External review of the Polish State Accreditation Committee

Final report

TABLE OF CONTENTS

1.EXECUTIVE SUMMARY	4
2. Introduction	4
2.1. Purpose of the review	4
2.2. Review process	4
2.2.1. Management of the review process	
2.2.2. Main stages of the review	5
3. NATIONAL CONTEXT	6
3.1. Higher education system	6
3.2. Quality assurance	
4. STATE ACCREDITATION COMMITTEE	8
4.1. Status and main functions	8
4.2. Mission.	
4.3. Organisational arrangements and budget	9
5. REVIEW FINDINGS: COMPLIANCE WITH ENQA/ESG	
5.1. ESG 2.1 Use of internal quality assurance procedures	
5.2. ESG 2.2. Development of external quality assurance processes	
5.3. ESG 2.3 Criteria for decisions	
5.4. ESG 2.4 Processes fit for purpose	13
5.5. ESG 2.5 Reporting	
5.6. ESG 2.6. Follow-up procedures	
5.7. ESG 2.7. Periodic reviews	
5.8. ESG 2.8 System-wide analyses	
5.9. ESG 3.1 Use of external quality assurance procedures for higher education	
5.10. ESG 3.2 Official status	
5.11. ESG 3.3 Activities	
5.13. ESG 3.5 Mission statement	
5.14. ESG 3.6 Independence	
5.15. ESG 3.7 External quality assurance criteria and processes used by the agencies	
5.16. ESG 3.8 Accountability procedures	
6.REVIEW FINDINGS: COMPLIANCE WITH ECA CODE OF GOOD PRACTICE	
6.1. ECA 1: The accreditation organisation has an explicit mission statement	
6.2. ECA 2: The accreditation organisation is recognised as a national accreditation body by the	23
competent public authorities	25
6.3. ECA 3: The accreditation organisation must be sufficiently independent from government, from	20
higher education institutions as well as from business, industry and professional associations	26
6.4. ECA 4: The accreditation organisation must be rigorous, fair and consistent in decision-making.	
6.5. ECA 5: The accreditation organisation has adequate and credible resources, both human and	
financial	26
6.6. ECA 6: The accreditation organisation has its own internal quality assurance system that	
emphasises its quality improvement	26
6.7. ECA 7. The accreditation organisation has to be evaluated externally on a cyclical basis	26
6.8. ECA 8: The accreditation organisation can demonstrate public accountability, has public and	200
officially available policies, procedures, guidelines and criteria	
decisionsdecisions	
6.10. ECA 10: A method for appeal against the accreditation organisation's decisions is provided	
6.11. ECA 11: The accreditation organisation collaborates with other national, international and/or	21
professional accreditation organisations.	27
6.12. ECA 12: Accreditation procedures and methods must be defined by the accreditation organisation	
itself. 27	
6.13. ECA 13: Accreditation procedures must be undertaken at institutional and/or programme level of	on a
regular basis	
6.14. ECA 14: Accreditation procedures must include self-documentation/-evaluation by the higher	
education institution and external review (as a rule on site)	28

	6.15. ECA 15: The accreditation organisation must guarantee the independence and competence of t external panels or teams.	
	6.17. ECA 17: The accreditation standards must be made public and comply with European practice taking into account the development or agreed sets of quality standards	
7.	CONCLUSIONS AND RECOMMENDATIONS	. 28
	7.1. Summary of strengths and areas for improvement	
8.	Annexes	. 32
	Annex 1: List of abbreviations	. 32
	Annex 2: ToRs ("The model of the external review of the State Accreditation Committee")	. 33
	Annex 3: Members of the external review panel	. 33
	Annex 4: Agenda of the site visit	. 38

1. EXECUTIVE SUMMARY

This report analyses the compliance of the State Accreditation Committee (*Panstwowa Komisja Akredytacyjna, PKA*) in Poland with the ENQA European Standards and Guidelines for Quality Assurance in the European Higher Education Area (Parts 2 and 3) and the ECA Code of Good Practice. It is based on a review process initiated by PKA in the context of its prospective application for ENQA membership and its commitments as an ECA member, and managed by the Conference of Rectors of Academic Schools in Poland and the Bureau for Academic Recognition and International Exchange (Polish ENIC/NARIC). The review process included PKA's self-evaluation and a site visit undertaken by an external review panel between 5 and 8 October 2008.

The external review panel collected documentary and oral evidence which demonstrates that PKA is in substantial compliance with both the ENQA Standards and Guidelines and the ECA Code of Good Practice. PKA is officially recognised in the national legislation as a national body with external quality assurance responsibilities. It enjoys full operational independence and autonomy in decision-making within a framework provided by the national legislation and its own internal procedures. It has well-functioning external quality assurance processes which include the main stages recommended as good European practice and take into account internal quality assurance within the limits set by the current national context. External assessment is conducted by PKA on a regular basis in accordance with clear, transparent and publicly available procedures and criteria which ensure equal treatment of all institutions and consistency in decision-making. PKA makes efficient use of its currently available resources and, though facing a heavy workload related to its primary tasks, has undertaken analytical activities. It is already actively involved, and plans to increase further its participation, in European quality assurance activities.

The panel made a number of recommendations which PKA should consider as further improvements are planned with regard to ENQA and/or ECA standards, and also offered a number of suggestions which, though extend beyond the scope of the ENQA and ECA standards, might support further overall development of PKA in the coming years.

In concluding its work, the external review panel recommends, without reservation, to the ENQA Board that PKA should be awarded full membership for a period of five years.

2. Introduction

2.1. Purpose of the review

This review of the State Accreditation Committee (*Panstwowa Komisja Akredytacyjna, PKA*) in Poland was initiated and commissioned by PKA in cooperation with the Conference of Rectors of Academic Schools in Poland (CRASP) and the Bureau for Academic Recognition and International Exchange (Polish ENIC/NARIC). PKA initiated the review in the context of its prospective application for ENQA membership, its commitments as an ECA member, and its efforts to enhance further its credibility as an external quality assurance agency among Polish higher education institutions.

The main purpose of the review was to assess PKA's compliance with:

- ENQA's European Standards and Guidelines (Parts 2 and 3); and
- the ECA's Code of Good Practice.

Moreover, the review was undertaken as a process of reflection on the strengths and weaknesses of the PKA to help it build on the former and eliminate the latter and thus improve its capacity to achieve its mission and aims.

2.2. Review process

2.2.1. Management of the review process

The review process was carried out in accordance with ENQA's *Guidelines for national reviews of ENQA members agencies*. The terms of reference for the review (see: Annex 2) were drafted by PKA, approved by CRASP and endorsed by the ENQA Board as compatible with its procedures in the context of PKA's prospective application for ENQA membership.

The review process was managed by CRASP and the Bureau for Academic Recognition and International Exchange. Their main responsibilities included (for details, see: Annex 2):

- appointing members of an external review panel composed of two international experts, two
 national experts, a student member and a secretary (see: Annex 3);
- notifying the ECA that the review process has been initiated;
- forwarding PKA's Self-evaluation Report to the members of the external review panel;
- making arrangements for a site visit in consultation with the external review panel (for the agenda of the visit, see: Annex 4);
- sending the final version of the external review report to ENQA and the ECA.

2.2.2. Main stages of the review

The review was divided into three main stages:

- self-evaluation,
- a site visit, and
- an external review report.

Self-evaluation

PKA's self-evaluation began in the first quarter of 2008 and ended at the beginning of June 2008. To carry out its self-evaluation, the President of PKA appointed a team of six members chaired by PKA's Vice-President. A draft of the Self-evaluation Report (SER) was discussed by PKA members and approved by its Presidium. The SER covered all key issues as suggested in the ENQA Guidelines for national reviews, including: an outline of the Polish higher education system, the history of PKA and quality assurance arrangements in Poland; statistics concerning PKA's activities; PKA's methodology, appeals procedure and internal quality assurance procedures; and information on PKA's relations with its key stakeholders. Moreover, it contained PKA's self-assessment of its compliance with the ENQA and ECA standards, a brief analysis of PKA's strengths and weaknesses, and an outline of its plans for the future. Annexes to the report included: PKA's Statutes, mission statement and strategy; organisational chart; PKA bodies' powers; procedures for the appointment of experts, external quality assessment and reassessment, assessment of applications for the establishment of higher education institutions and degree programmes, and site visits; external quality assessment standards/criteria; quidelines on self-evaluation reports and reports on remedial measures to be prepared by higher education institutions; guidelines on external quality assessment and re-assessment to be prepared by PKA's experts; internal regulations; and the 2005 Law on Higher Education.

The SER enabled the external review panel to gain a good understanding of PKA's context and activities and identify issues for further clarification or more thorough analysis, and provided a sound basis for discussions held during the site visit.

Site visit

The site visit took place between 5 and 8 October 2008. The external review panel held meetings with all interested parties, including PKA's key stakeholders:

- PKA: Presidium; two of 11 Sections for Fields of Study; the working group for external quality assessment criteria and the internal quality assurance system; the team responsible for the SER; two former Presidents of PKA;
- the management and staff of the Bureau of PKA;
- experts, including student experts, working for PKA;
- the Minister of Science and Higher Education;
- representatives of Rectors' Conferences for university-type and non-university higher education institutions; and representatives of rectors of institutions where degree programmes were reviewed by PKA during the last two years;
- representatives of employers.

At the end of the visit, the panel gave a brief and general feedback on its major findings to the PKA Presidium, with a more detailed analysis, specific conclusions and recommendations to be included in the external review report.

The site visit was very well organised and provided an invaluable input to the external review. In addition to clarifying further PKA's procedures, the meetings held gave the panel a real insight into the context of PKA's activities, how PKA works in practice, and how its mission, role and activities are perceived by its main stakeholders.

External review report

A draft of the external review report was prepared by the panel on the basis of PKA's SER and the evidence collected during the site visit. The draft was sent to PKA to check for factual errors. The panel corrected the factual errors identified by PKA and sent the final version of the report to CRASP and the Bureau for Academic Recognition and International Exchange.

According to the terms of reference, PKA will make its comments on the final report, and CRASP/Bureau for Academic Recognition and International Exchange will send the report together with PKA's comments to the ECA. The ECA will take a decision on PKA's compliance with its Code of Good Practice. PKA will publish the report, its comments, the ECA's decision and PKA's action plan based on recommendations from the review.

3. NATIONAL CONTEXT

3.1. Higher education system

The years following the political changes in 1989 have been a period of rapid expansion and diversification of Polish higher education within an evolving legislative framework. Since the late 1990s these have been combined with changes encouraged by European developments in higher education.

The Higher Education Act (HEA) of 1990 granted autonomy to higher education institutions, allowed them to offer tuition-based programmes, thus stimulating the development of part-time programmes in public institutions, and provided a basis for the establishment of non-public institutions. In 1997 the Act on Higher Vocational Education Schools was adopted specifically for both public and non-public institutions which were authorised to provide only Bachelor's degree programmes. Currently, all public and non-public institutions, except few institutions administered by churches or denominational organisations, operate on the basis of the Law on Higher Education (LoHE) of 2005.

The total number of higher education institutions grew four-fold from 112, including 105 public and 7 non-public institutions, in the academic year 1990/91 to 448, including 130 public and 318 non-public institutions, in 2006/07. The total number of students increased almost five-fold from over 394,000 in 1990/91 to over 1.94 million in 2006/07, with the gross and net enrolment rates rising from 12.9% and 9.8% in 1990/91 to 49.9% and 38.8%, respectively, in 2006/07. Students enrolled in public and non-public institutions represent, respectively, 67% and 33% of the total student population. Institutions vary widely in terms of student enrolment, with student numbers ranging from several hundred in smallest public and non-public institutions to over 30,000 to 50,000 in biggest public institutions.

Public and non-public institutions are divided into university-type institutions, where at least one unit is authorised to award doctoral degrees, and non-university institutions which provide Bachelor's and/or Master's degree programmes but are not authorised to award doctoral degrees. Requirements for authorisations to award doctoral degrees are laid down by national legislation. Nearly 75% of all public institutions and only over 4% of all non-public institutions are university-type institutions. The great majority of non-university institutions are authorised to provide only Bachelor's degree programmes.

The degree structure has evolved during the last two decades. Institutions began to establish two-cycle programmes (Bachelor's degree programmes followed by Master's degree programmes) as an alternative to predominating long-cycle Master's degree programmes at their own discretion in the early 1990s. This has been accelerated further by the Bologna Process since 1999. The 2005 LoHE has established a legal basis for a three-cycle structure. In compliance with the 2006 Regulation of the Minister of Science and Higher Education on the names of fields of study, all institutions offering degree programmes in 101 of all 118 existing fields of study are required to establish a two-cycle structure; the remaining programmes being offered as either long-cycle or two-cycle programmes, or only as first-cycle programmes, depending on the field of study. The process of establishing two-cycle programmes is not yet completed as the new arrangements are applicable to programmes commencing in 2007/08.

All institutions award national degrees. Though they enjoy autonomy in all areas of their activity, a number of key aspects are regulated by national legislation. These include, in particular, requirements for the establishment of institutions, external units of institutions, and degree programmes; the names of fields of study for programmes; programme requirements (national standards); and minimum staff resources required to provide programmes. Arrangements in some of these areas have evolved in recent years to reflect the changing national context and European developments. LoHE has

introduced stricter requirements concerning minimum staff resources to solve the problem of multiple jobholding by academic teachers which had a negative impact on the quality of education. National standards for degree programmes have been recently redesigned to incorporate ECTS credits and learning outcomes. Further changes concerning fields of study and standards for degree programmes are expected after the adoption of the National Qualifications Framework (NQF) for Higher Education. A proposal for the NQF is currently being finalised by the NQF Task Force established in October 2006 by the Ministry of Science and Higher Education, and composed of Bologna Promoters and representatives of the State Accreditation Committee, the General Council for Higher Education and the Students' Parliament of the Republic of Poland.

3.2. Quality assurance

First initiatives in the area of external quality assurance emerged in the early 1990s in response to the rapid increase in higher education enrolments and the growing number of non-public institutions, combined with limited funding for higher education available from the State budget. In 1993 the General Council for Higher Education (GCHE) (an elected representative body of higher education whose responsibilities included, among other things, reviewing applications for the establishment of new institutions and programmes) developed a framework for quality assessment of education. In 1997 the government established the Accreditation Committee for Higher Vocational Education (ACHVE). In parallel, higher education institutions began to set up their own peer accreditation committees (PACs) for specific types of institutions or fields of study. Between 1993 and 2001, seven such committees were set up for classical, technical, medical, agricultural, pedagogical and physical education universities and arts education institutions, with two further committees covering economics, business and management studies. They now work under the auspices of the Conference of Rectors of Academic Schools in Poland. Finally, the government established the State Accreditation Committee (PKA) in 2001. PKA took over the responsibilities of the ACHVE and of the GCHE with regard to applications for new institutions and programmes, and was entrusted with the responsibility for external quality assurance in all higher education institutions in Poland.

PKA is the only statutory body for mandatory external quality assessment and accreditation whose decisions are legally binding. It is worth emphasising that PKA has ensured extensive and genuine involvement of student experts in its external assessment processes. The PACs conduct external quality assessment on the basis of applications submitted by higher education institutions on a voluntary basis, but their refusal to award a quality label has no legal implications. Thus, in terms of accountability of institutions or inspection and licensing functions, PKA has a clearly defined role in the national external quality assurance context as the sole institution authorised by the State to ensure compliance with national requirements and the comparability of national degrees awarded by institutions. However, both PKA and the PACs also see themselves as institutions which have a role in supporting quality improvement in higher education institutions and/or providing advisory functions visàvis higher education institutions. While this could potentially be an area of conflict, PKA and the PACs have established good working relations, have joint meetings and collaborate within the framework of the Quality Forum initiated by PKA.

Some higher education institutions, in particular those participating in EU programmes, began to develop internal quality assurance systems in the late 1990s, initially as pilot projects at faculty or institutional level. The 2005 LoHE specifies two obligatory elements of internal quality assurance systems: student evaluation questionnaires, and teacher performance appraisal to be carried out every four years (the latter already introduced in the 1990 HEA repealed by LoHE). In 2007 the Minister of Science and Higher Education adopted the Regulation on national standards for degree programmes whereby all institutions are required to ensure high quality of education and establish an internal quality assurance system. The Regulation does not set any timeframe for institutions to establish their internal quality assurance systems and does not contain any standards for such systems or guidelines for institutions. No extra State-budget funding is available to support institutions in the process of establishing internal quality assurance systems.

An explicit and organised quality culture is only now emerging in Polish higher education, and institutions vary considerably in terms of progress towards establishing internal quality assurance systems. Few institutions have fully-fledged systems in place, others are currently establishing such systems, and still others have yet to become fully aware of their primary responsibilities for quality assurance and the design of their systems. Moreover, as the higher education landscape is very

diverse, institutions face different challenges in this process. For example, institutions in big cities, most of which are extensively involved in European projects, have or are acquiring the necessary expertise, whether at faculty or institutional level, and with this various opportunities to attract extra funding. However, these are mainly institutions with long-established traditions, high prestige and a large number of faculties; this can prove a hindrance to change and a challenge in terms of co-ordinated management. While new institutions may be more open to change, many of them have little or no experience or expertise to draw on in quality assurance.

Institutions differ widely in terms of their status, academic traditions, quality standards and experience in quality management, and have different needs as regards internal and external quality assurance. Those which have established or are establishing quality assurance systems, and have programmes accredited by PKA and in many cases the PACs as well, tend to expect to see more flexible arrangements in external quality assurance, with an emphasis on quality improvement. Others, with less experience in the development of internal procedures, may benefit from more formal external quality assurance procedures to ensure, in the first instance, any minimum quality standards with external incentives and support to develop and design an internal quality assurance system that can encourage a quality culture.

4. STATE ACCREDITATION COMMITTEE

4.1. Status and main functions

The State Accreditation Committee (PKA) was established on 1 January 2002 on the basis of the amended Higher Education Act of 12 September 1990 and currently operates on the basis of the Law on Higher Education (LoHE) of 27 July 2005. It has two major responsibilities as laid down in LoHE:

- to assess the quality of education in individual fields of study; and
- to give opinions on applications for the establishment of new higher education institutions, the extension of permits for the establishment of non-public institutions, and for the authorisation for higher education institutions to establish new degree programmes.

Pursuant to LoHE, existing programmes of outstanding quality as confirmed by PKA's external assessment may be awarded extra funding by the minister responsible for higher education. Where a negative quality assessment is given by PKA, the minister is required by LoHE to suspend or withdraw the programme concerned. PKA's opinions on applications for the establishment of new institutions or programmes are submitted to the minister who takes a decision.

During its first two terms of office (2002-2004 and 2005-2007), PKA gradually shifted focus from the review of applications to quality assessment. In particular, a sharp decline in the number of applications in 2006 as compared to 2002-2005 enabled PKA to increase substantially the number of degree programmes assessed. In total, PKA gave 2,078 opinions on applications and 980 quality ratings in the first term as compared to 1,307 opinions on applications and 1,341 quality ratings in the second term. During the two terms of office, PKA assessed the quality of programmes at 351 (78.3%) of all 448 currently existing institutions, including 118 of all 130 public institutions and 233 of all 318 non-public institutions. The remaining institutions have been established recently and the programme of quality assessments will commence as their students start to graduate.

4.2. Mission

PKA works for quality improvement in higher education. Its primary objective is to support Polish higher education institutions in the development of educational standards by conducting obligatory quality assessment of degree programmes and by giving opinions on applications for the establishment of institutions and degree programmes. Moreover, PKA aims to serve as a platform for cooperation and dialogue between all stakeholders working to ensure high quality of higher education, and to contribute towards the Bologna Process and the European Higher Education Area through cooperation with other accreditation bodies and their international umbrella organisations.

PKA acts in the public interest, as an institution financed solely by public funds. It works for the academic community, student applicants and employers, and cooperates with State authorities and public administration bodies to achieve its aims.

PKA is guided in its work by the principles of professionalism, objectivity in assessment, openness and transparency of procedures, sound justification for its resolutions and respect for academic traditions.

4.3. Organisational arrangements and budget

PKA has 80 members, including academics with recognised research and teaching achievements and experience in the areas covered by PKA's responsibilities, and the President of the Students' Parliament of the Republic of Poland. It works at plenary sessions and through its bodies. At plenary sessions, PKA adopts or amends its Statutes, elects Vice-Presidents, presents annual reports and gives opinions on matters referred to it by the minister responsible for higher education. PKA bodies include the President of the Committee, the Secretary and the Presidium.

The powers of the President include, among other things, managing PKA and representing it in external relations; making decisions which are not reserved for other PKA bodies; convening and chairing plenary sessions and Presidium sessions; signing resolutions adopted by PKA and agreements concluded with national and international organisations; drawing up and updating the list of PKA experts; drawing up a list of fields of study falling within the remit of each Section for Fields of Study (see: below); determining fees for experts; and establishing working groups.

The Secretary ensures the efficient functioning of PKA and the performance of its tasks; organises current activities of PKA and signs related correspondence; resolves disputes between the sections related to their remit; appoints expert panels for quality assessment; and appoints reviewers from among members of PKA or experts.

The Presidium is composed of the President, the Secretary, the Chairmen of the Sections for Fields of Study, and the President of the Students' Parliament of the Republic of Poland. Its powers include, among other things, adopting resolutions concerning quality ratings for assessed degree programmes and applications reviewed by PKA (see: section 4.1); defining general criteria for quality assessment; drawing up guidelines for self-evaluation and evaluation reports related to quality assessment; laying down procedures for site visits; identifying a list of fields of study and programmes to be assessed in a given year; and defining, at the request of the President, how and to what extent PKA will take into account peer quality assessment.

PKA includes 11 sections for the following groups of fields of study: 1) humanities; 2) natural sciences; 3) mathematics, physics and chemistry; 4) agricultural, forestry and veterinary sciences; 5) medical sciences; 6) physical education; 7) engineering and technology; 8) economics; 9) social sciences and law; 10) fine arts; and 11) military sciences. Each section is composed of at least five members of PKA representing a given group of fields of study, including at least three members holding a professorial title or a postdoctoral degree in the relevant areas or disciplines of science.

PKA is supported by nearly 800 academic experts, 60 student experts, and 47 formal and legal compliance experts who assess compliance with requirements laid down by national legislation and examine documents during site visits at institutions under review. Moreover, nearly 40 international experts have participated in site visits to date.

Administrative support and financial services for PKA are provided by the Bureau of the State Accreditation Committee, with its Director appointed by the President of PKA. Established as a unit within the Ministry of Education and Science in 2002, PKA Bureau has operated as a unit independent of the Ministry and financed from the State Budget since 1 January 2006. Its main responsibilities include: organising and taking minutes of PKA's plenary sessions, meetings of the Presidium and the Sections for Fields of Study, and participating in meetings of the Sections; making organisational arrangements for site visits and quality assessments; keeping records of measures taken to implement PKA's decisions; making organisational arrangements for PKA's international activities; liaising with the ministry responsible for higher education and other sector ministries; handling matters related to the appointment of PKA experts and organising their work; compiling statistics, and producing promotion and information materials on PKA's activities. Currently, the Bureau has 26 staff members, including the Director and two Deputy Directors, the Chief Accountant, secretaries for each of the 11 Sections for Fields of Study, staff responsible for international relations, ICT, public procurement, analysis and reporting, and other administrative staff.

PKA's budget for 2008 is PLN 7,290,000 (ca. EUR 2,195,783), which represents ca. 0.068% of the total expenditure on higher education. The budget is used to cover: costs of quality assessments, including fees for experts (no costs are incurred by higher education institutions; the cost of full quality assessment in one institution: ca PLN 15,000 or ca EUR 4,518; reassessment of programmes given a conditional rating by PKA: ca PLN 3,000 or ca EUR 904); costs of reviewing applications, including fees

for experts (no costs incurred by applicants); expenses related to international activities of PKA; fixed fees paid to the President, the Vice-President and the Secretary, and fees paid to PKA's members for attending PKA sessions; and operational expenses of the Bureau of PKA.

5. REVIEW FINDINGS: COMPLIANCE WITH ENQA/ESG

This chapter describes the main findings of the external review panel based on PKA's SER and the site visit. Each section includes a summary of the evidence collected for a given standard, an analysis of the evidence, a conclusion concerning PKA's compliance and, where applicable, recommendations from the external review panel. The panel also offers some suggestions that PKA may wish to consider regarding possible improvements.

5.1. ESG 2.1 Use of internal quality assurance procedures

Standard: External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Description: Higher education institutions have only recently been obliged to establish internal quality assurance systems by the 2007 Regulation of the Minister of Science and Higher Education on national standards for programmes. The Regulation does not set any timeframe or guidelines for institutions to establish their internal quality assurance systems.

PKA has taken internal quality assurance into account in its external assessment since 2002. Its criteria concerning internal quality assurance have been rearranged recently to reflect ENQA's ESG published in 2005. Self-evaluation reports to be submitted by institutions contain a section where they outline their internal quality assessment systems, including all seven elements listed in ESG Part 1 (quality assurance policy and procedures; periodic reviews of programmes; student assessment; quality assurance of teaching staff; student support; information systems; and public information) (SER, Annex 12). All seven ESG standards are also included in reports to be prepared by PKA external assessment panels (SER, Annex 13). A well-functioning internal quality assurance system is one of the criteria for an outstanding rating PKA (one of four quality ratings given to programmes by PKA: outstanding, positive, conditional and negative) (SER, Chapter III, Section 3.1).

As explained by the PKA Presidium during the site visit, this is a transition period in internal quality assurance for Polish higher education as many institutions have yet to establish fully-fledged systems, in particular after the adoption of the 2007 Regulation. Thus PKA's external assessment currently focuses on progress made by institutions towards establishing such systems rather than on whether a comprehensive system is already in place and/or how coherent or effective it is. Some elements are analysed in more detail; these include all elements in a sequence from the mission statement to learning outcomes; mechanisms in place to monitor how the student assessment system works in practice; student course evaluation; teacher performance appraisal; and teaching and learning facilities. At the final stage of each quality assessment process, the evidence collected is discussed by the PKA Presidium in a broader institutional context on the basis of findings from the assessment of programmes in other fields of study in the same institution. The PKA Presidium believes that a stricter approach to internal quality assurance during this transition phase would stifle rather than encourage institutions' efforts to take responsibility for quality assurance.

Analysis: In a context where the national legislation does not provide any specific framework for internal quality assurance, the panel is glad to note that PKA has adopted a pro-active and supportive approach by including ENQA Part 1 standards in its external quality assessment. As confirmed by PKA during the site visit, this has already encouraged reflection and desirable developments in institutions.

The flexible approach to internal quality assurance and the focus on progress towards the establishment of internal systems rather than the effectiveness of fully-fledged systems is fully justified, considering the early stage of development of internal quality assurance in Polish higher education. The panel agrees that this is a period when PKA should promote internal quality assurance standards and support institutions in the development of their systems rather than strictly enforcing standards which many institutions would be unable to meet. However, there is no timeframe set yet by PKA to move from a flexible approach to a strict approach, while a target date or period for the move would give, where necessary, an extra incentive to institutions to introduce their (fully-fledged) internal quality assurance systems. Moreover, although PKA takes into account internal quality assurance

when giving all four quality ratings (outstanding, positive, conditional and negative), this aspect is highlighted only in the criteria for an outstanding rating. The criteria for the positive, conditional and negative ratings focus on compliance with legal requirements for programmes and academic staff.

Decision: Substantially compliant

Recommendation: PKA should set a timeframe for the adoption of a strict approach to internal quality assurance in its external assessment, taking into account the varying progress made by institutions on the one hand and the need for institutions to double their efforts to establish internal quality assurance systems on the other hand. Criteria for quality ratings should be revised so that all highlight the importance of progress made by institutions towards the establishment of internal quality assurance systems, and ultimately the effectiveness of such systems. In doing this PKA may wish to reflect on whether and how a more systematic approach to the assessment of internal quality assurance systems could be developed to ensure consistency in assessment and quality ratings given to programmes according to revised criteria. These components might be combined through a series of workshops organised by PKA, and targeted particularly at the less experienced institutions. The aim would be to promote examples of best practice in internal quality assurance in Polish institutions.

5.2. ESG 2.2. Development of external quality assurance processes

Standard: The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions), and should be published with a description of the procedures to be used.

Description: The overall aim of PKA's processes is defined in its mission statement (SER, Annex 17) which has been adopted by the PKA Presidium and is published on PKA's website; its processes are aimed at supporting quality improvement in higher education. To develop its procedures, PKA took into account the experience gained by the General Council for Higher Education and the PACs (for PACs, see: Section 3.2) in pilot quality assurance initiatives in the 1990s and the experience of PKA experts (an interview with two former Presidents of PKA during the site visit; SER, Chapter V, Section 5.1, ENQA 2.2).

All rectors of higher education institutions interviewed during the site visit were fully familiar with the aims and objectives set by PKA for its processes. However, according to them, PKA's processes should and do serve the primary and initial purpose of ensuring minimum quality standards. Contributions to quality improvement were viewed by the rectors as coming from not just PKA, as a secondary part of its mission, but also from the PACs. PKA is fully aware of the difference in perception (SER, Chapter VI), recognises the contexts of different stages of development and needs within institutions, and intends to improve communication with institutions and collect feedback on its procedures (SER, Chapter VII).

All procedures are published on PKA's website. Moreover, PKA President and Secretary attend meetings of the Rectors' Conferences and other meetings with representatives of higher education institutions which help to clarify the aims of PKA's processes and its procedures. Furthermore, PKA publishes various reports and information materials which outline the framework of its activities, and distributes them among the main stakeholders.

Analysis: Both the mission statement, which defines the overall aim of PKA's processes, and its procedures are easily available on its website.

The aim itself as defined by PKA in its mission statement is very general and there is no reference to accreditation (see also: Section 5.13) yet, whereas PKA is both by name and action an accreditation body (see also: Section 5.10). Higher education institutions were not involved in determining the aims and objectives of PKA's processes. There is currently a difference between the presented aim and objectives (quality improvement), the (widely agreed) crucial actual role of PKA (providing a 'bottom line' for quality) and the relative roles of PKA and the PACs. PKA and the PACs are highly regarded by the academic community and have already established good working relations, but there is evidently a need to arrive at a clear consensus among all main stakeholders on the aims and objectives of PKA's processes. It should, however, be emphasised that, as confirmed by the interviews held by the panel, PKA's processes as such are nonetheless widely accepted among institutions, as fulfilling a valuable role.

Decision: Substantially compliant

Recommendation: PKA should hold consultations with higher education institutions and the peer accreditation committees to arrive at a clear consensus over the primary and secondary aims and objectives of its processes.

5.3. ESG 2.3 Criteria for decisions

Standard: Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Description: PKA has defined criteria for external quality assessment (SER, Annex 7) and decisions taken (i.e. quality ratings given) as a result of assessment (SER, Chapter III, Section 3.1; Annex 1) in its Statutes and/or relevant resolutions adopted by the PKA Presidium. It has also adopted guidelines for self-evaluation and external assessment (SER, Annexes 12 and 13). Criteria and guidelines are published on PKA's website.

As described in the SER and confirmed by PKA during the site visit, arrangements adopted to ensure consistency in applying criteria and decision making are as follows:

- all PKA members and experts receive training which covers national legislation, internal PKA regulations, and procedures and criteria adopted by PKA;
- external assessment is based on guidelines for PKA members and experts involved;
- a PKA member is the chair of each expert panel undertaking an external assessment site visit and drafts a report based on contributions from experts;
- reports on individual programmes are double-checked by PKA Secretary and the Director of PKA Bureau for their consistency with PKA procedures and criteria;
- a two-stage procedure is applied to arrive at a final decision: all evidence collected is discussed by the relevant Section for Fields of Study; the Section adopts a proposed decision by voting; the proposal is presented by the Chair of the Section to the PKA Presidium which reaches a final decision by voting.

Moreover, numerous internal discussions have been held during regular meetings of the Sections to arrive at consistent interpretation of PKA's criteria. Furthermore, the majority of PKA members and experts have already gained considerable experience by working for PKA for several years.

The key areas covered by the criteria for assessment have remained the same over the years. However, the criteria concerning learning outcomes and internal quality assurance have been slightly modified in recent years to reflect changes in the national legislation, suggestions from higher education institutions and/or best European practice. Information about any changes in criteria is published on PKA's website, and PKA's applies new or refined criteria only after a lapse of one year.

In order to give a quality rating to a programme, PKA takes a positive rating as a point of reference for the other three ratings (outstanding, conditional and negative). An outstanding rating may be given when all or the majority of programmes in a given field of study have been assessed (SER, Chapter III, Section 3.1; Annex 1, PKA's Statutes, Article 18).

Analysis: Criteria are easily available on PKA's website. Decisions are clearly based on recorded evidence. The arrangements adopted ensure necessary consistency across institutions and fields of study and allow PKA to moderate conclusions, where necessary.

Some doubts may arise as to the consistency of assessment criteria used over the years because PKA has recently refined its criteria concerning learning outcomes and internal quality assurance, and a flexible approach to internal quality assurance has been adopted on a temporary basis (see: Section 5.1). However, the panel is aware that such inconsistencies are unavoidable in the rapidly evolving national and European contexts for higher education.

As mentioned in Section 5.1, PKA should revise its criteria for quality ratings given to programmes to highlight the importance of internal quality assurance systems in all ratings. As it is already into its second cycle of assessment, a proper balance should be sought between the need to revise the criteria and the need to ensure consistency.

Related to the criteria for quality ratings, but extending beyond the scope of the ESG standard discussed here, the panel notes that the overwhelming majority of programmes are provided by institutions in the fields of study defined in the national legislation. However, if relevant national requirements are fulfilled, an institution may also offer a programme in a field of study which is not

listed in the national legislation (LoHE, Article 11(3)). Since, according to PKA's decision-making procedures, an outstanding rating may be given only when all or the majority of programmes in a given field have been reviewed, there is currently no explicit basis in PKA's procedures for giving an outstanding rating to a programme offered in a "non-listed" field of study. While PKA has already given an outstanding rating to programmes in "non-listed" fields, taking programmes in related fields as a reference point, the lack of explicit reference to the procedure for programmes in "non-listed" fields might usefully be remedied.

Decision: Fully compliant

Suggestion: PKA should consider how it may refine its decision-making procedures in order to provide an explicit basis for giving an outstanding rating to programmes in fields of study which are not listed in the national legislation.

5.4. ESG 2.4 Processes fit for purpose

Standard: All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Description: PKA has adopted a slightly different procedure for giving opinions on applications for the establishment of new institutions and programmes, and assessing the quality of existing programmes.

PKA normally gives its opinion (recommendation) (SER, Annex 16) on new institutions or programmes on the basis of an application reviewed by PKA members from the relevant Section(s) for Fields of Study and/or PKA experts. A site visit is undertaken only where there are reasons to question the validity of information provided in the application. A decision granting or refusing to grant an authorisation to establish an institution or programme is taken by the minister responsible for higher education. In two or three cases the minister did not act upon PKA's recommendation. In these cases, the minister's decisions were based on reasons unrelated to quality (for example, no demand for another programme in the field of study of study in a given region or the fact that formal shortcomings were removed between the period of the review by PKA and the decision taken by the minister). As the panel was informed during the site visit, the PKA Presidium would prefer to see an arrangement where the minister's decisions are based on PKA's recommendations. The Minister of Science and Higher Education interviewed by the panel stated that she wished to hand over to PKA full responsibility for the establishment of new institutions and programmes.

The quality assessment process for existing programmes (SER, Annex 8) includes: self-evaluation by the institution concerned; a site visit undertaken by an expert panel; a report sent to the institution; a published quality rating (outstanding, positive, conditional or negative) given to the programme concerned (reports for individual programmes are available to the public on request, but are not published as they contain personal data covered by the legislation on data protection); and a follow-up procedure for programmes which have been given a conditional rating (reassessment after one year).

Programmes with a negative rating are suspended or withdrawn by the minister responsible for higher education by virtue of law (2005 LoHE, Article 11(6)). An outstanding rating can be used as a basis by the minister to increase State-budget funding for a given programme (LoHE, Article 95 (3)). The Minister of Science and Higher Education stated during the interview that there should be a clear link between the quality rating given by PKA to programmes and the level of funding awarded from the State Budget.

Expert panels undertaking external quality assessment visits are normally composed of academic experts, student experts and formal and legal compliance experts. Student members are not invited only when the panel has a smaller number of members appointed to assess specific aspects (for example, research achievements of a faculty), and when student experts were satisfied with the arrangements adopted in a given faculty during previous site visits undertaken to assess a programme in another field of study.

A procedure for the selection and training of three types of experts, including academic experts, student experts, and legal and formal compliance experts, is laid down in the relevant resolution of the PKA Presidium (SER, Annex 11). Candidates should meet specific preliminary requirements and receive training. Student and formal and legal compliance experts also take a test assessing their knowledge and skills before appointment.

PKA is supported by almost 800 academic experts, 60 student experts, and 47 formal and legal compliance experts. Moreover, 40 international experts have so far participated in site visits. Most of them have a good command of the Polish language. Limited involvement of international experts is identified by PKA as one of its weaknesses (SER, Chapter VI). PKA intends to increase substantially the number of international experts participating in external quality assessment (SER, Chapter VII).

Both PKA members and experts gave the external review panel a number of examples confirming that PKA's processes did actually contribute to quality improvement in institutions. However, as explained by PKA during the site visit, no published evidence is available because PKA has only recently completed its first assessment cycle of programmes where students have already graduated. Thus evidence of quality improvement for the majority of programmes can only be collected in the coming years.

According to the rectors interviewed, the cost-benefit analysis for the first assessment cycle in their institutions was favourable, but they would expect more flexible arrangements in the second cycle. They pointed to the heavy focus on compliance with formal and legal compliance in PKA's external assessment processes. However, they also acknowledge that PKA was well-placed to have a comparative overview of arrangements adopted across institutions, was doing a good job in terms of ensuring minimum quality standards, and its expert panels had offered in some cases valuable recommendations and advice.

Analysis: There is no explicit distinction in LoHE or PKA's procedures between accreditation and external assessment. Opinions (recommendations) are made on proposals for new institutions or programmes, whilst existing programmes are given a 'rating' (outstanding, positive or conditional ratings are implicitly regarded as accredited, whereas those with a negative rating are not accredited and thus suspended or withdrawn by the minister responsible for higher education by virtue of law). Thus PKA's processes can serve both for ('yes/no') accreditation and (as an incentive for) quality improvement.

LoHE makes only a general distinction between a positive and negative assessment to be given by PKA, but at the same time refers to high-quality programmes for which extra funding may be awarded from the State budget. The introduction of three positive ratings (outstanding, positive and conditional) by PKA is considered by the panel to have strengthened the quality improvement orientation of the assessment process and thus make it more fit for purpose.

The external assessment process tends to focus on quantitative rather than qualitative aspects because a fairly large proportion of the criteria refer to compliance with legal requirements. Internal quality assurance does not yet play a major role in the process and only has an impact through the award of an outstanding rating (see: Section 5.1). To a large extent, the current focus on quantitative aspects is justified by the fact that programmes are subject to strict and detailed national requirements and PKA as an accreditation body is responsible for ensuring compliance with these minimum requirements. As confirmed by the Minister of Science and Higher Education, the national legislation is likely to establish more flexible arrangements after the adoption of the NQF for Higher Education.

Even with the heavy focus on legal requirements, the quality assessment process allows PKA to collect ample evidence to support its conclusions and make recommendations to both ensure compliance with minimum quality standards, for the purpose of accreditation, and support quality improvement.

The quality assessment process allows PKA to take into account different perspectives of all stakeholders within institutions, as well as different perspectives of panel members visiting institutions. The procedure for the appointment of experts enables PKA to select those who have necessary competence and skills to perform their tasks. However, as the SER points out, international experts have been involved in quality assessment on a very limited basis. The panel is aware that their more extensive involvement would place a heavy strain on PKA's resources and require extra language support for those who do not have a good command of Polish. Nevertheless, in addition to offering a desirable European perspective on programmes under assessment, they could provide advice on internal quality assurance which would be invaluable in the context of the early stage of development of internal quality assurance in Polish higher education. This would clearly enhance the fitness of PKA's processes for the purpose of quality improvement and strengthen further the value of PKA's work.

The fact that PKA publishes only quality ratings rather than full reports on individual programmes is justified on the basis of legal constraints. The panel considers however that more detailed public information on the quality of individual programmes would prove a strong incentive for institutions to establish internal quality assurance and improve quality, thus making PKA's processes more fit for purpose. Reporting is discussed in more detail in Section 5.5.

Decision: Fully compliant

Suggestions:

The panel offers the following, hopefully constructive, observations:

- 1) During various discussion meetings, and particularly during a very helpful and constructive meeting with the Minister of Science and Higher Education, it became apparent that discussions between PKA and the ministry might help to align more clearly the roles and responsibilities for accreditations (opinions and decisions) and quality assurance / quality enhancement.
- 2) PKA should pursue its initial thoughts about a framework for systematic collection, analysis and use of evidence to verify whether its processes are fit for the purpose of quality improvement.
- 3) PKA should consider increasing the involvement of international experts to enhance general fitness for purpose and, more specifically, to support the development of internal quality assurance in Polish higher education.
- 4) As the work of PKA and the PACs contributes to the development of quality assurance systems within institutions, they might jointly review the current predominance of PKA's quantitative orientation within its procedures and criteria and introduce more qualitative aspects. This could, of course, only be done within (changes to) the legal framework. In such a manner a second cycle of quality assessments could continue to provide a high benefit to cost ratio.
- 5) PKA may consider ways of increasing its 'public profile', thus providing a wider and more general audience with information about the quality and standards of Polish higher education.

5.5. ESG 2.5 Reporting

Standard: Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Description: PKA publishes only the quality rating (outstanding, positive, conditional or negative) given as a result of external assessment. Ratings are published on PKA's website. External assessment reports are sent to the institution concerned and are available to the public on request. Reports contain brief information on the site visit procedure, evidence collected for each assessment criterion, conclusions at the end of each section, and a summary of conclusions, including strengths and weaknesses, and recommendations. None of the Rectors interviewed by the external review panel during the site visit stated any objections as to the clarity or readability of reports, or to the fact that reports on individual programmes are not published.

As explained by PKA in the SER (Chapter 5, Section 5.1, ENQA 2.5) and during the site visit, reports on individual programmes are not published because they contain personal data of academic staff and other sensitive information (for example, feedback on individual staff members collected during meetings with students) which are covered by the legislation on data protection. Even if personal data were removed, it would be easy to identify the individuals concerned.

PKA publishes annual activity reports which include a detailed analysis of its quality assessments and detailed overview reports on quality assessment of all programmes in individual fields of study. Volume I containing 37 overview reports was published in 2007 and Volume II will soon be published.

Analysis: The structure of reports is clear and any reader can easily find conclusions and recommendations. The external review panel had access to one report translated into English and can confirm that it was written in a clear and readily accessible style.

Quality ratings give only a very general idea of the quality of a given programme. Annual and overview reports provide a detailed insight, but may be particularly useful for a fairly limited circle of readers interested to learn about general trends across institutions or in specific fields of study. Although

reports on individual programmes are available on request, this arrangement does not ensure an easy access for all potentially interested parties.

Discussions with the rectors indicated that there is no strong demand in Polish higher education for more detailed reports about the quality of individual programmes. Moreover, public access to such information is still a sensitive issue even for institutions where programmes have been given an outstanding or positive rating. Prospective students, employers and the general public rely on rankings of institutions published by several national journals as a source of information about the quality of programmes offered. Considering this broader context and the legal constraints referred to by PKA, the panel understands why full reports on individual programmes have not been published yet. However, the panel considers that it may be advisable to publish an abridged version of each report which outlines strengths and weaknesses of individual programmes and contains no personal data. This would not only ensure that PKA fully complies with the relevant European standard, but also increase the accountability of institutions, encourage them, where necessary, to establish internal quality assurance systems and improve quality, and thus also strengthen PKA's role as an institution working for quality improvement.

Decision: Substantially compliant

Recommendation: PKA should explore ways to publish more detailed and specific information on individual programmes, while respecting the national legislation.

5.6. ESG 2.6. Follow-up procedures

Standard: Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Description: PKA gives four quality ratings (outstanding, positive, including positive with a full or shorter validity period, conditional and negative) (SER, Chapter III, Section 3.2.). Programmes given an outstanding, positive or conditional rating are accredited for a specified number of years (for review cycles, see: Section 5.7). Programmes with a negative rating are suspended or withdrawn by the minister responsible for higher education by virtue of law (2005 LoHE, Article 11 (6)). Subsequently they may be re-established in accordance with the regular procedure for the establishment of new programmes laid down by LoHE; a re-established programme is assessed as a new programme in accordance with annual assessment plans adopted by PKA. A follow-up procedure (SER, Annex 9) has been adopted for programmes with a conditional rating.

The procedure includes the following main stages:

- a report on remedial measures taken by the institution concerned on the basis of recommendations given by PKA, including any necessary supporting documents;
- review of the report and, where necessary, a site visit by an expert panel;
- a report on the effectiveness of remedial measures prepared by the expert panel;
- the relevant Section(s) for Fields of Study propose(s) a quality rating on the basis of the evidence collected and presents it to the PKA Presidium;
- a quality rating given by PKA in the form of a resolution of the PKA Presidium is published on PKA's website; the resolution together with its justification is sent to the institution concerned, the minister responsible for higher education and, where applicable, another minister supervising the institution.

Analysis: This approach is justified because outstanding ratings are given to highest-quality programmes, programmes given a positive rating with a shorter validity period are re-assessed after two or three years (see: Section 5.7), and those with a negative rating are suspended or withdrawn. However, the majority of programmes have so far been given a positive rating (with a full validity period) and are re-assessed only after six years. As fully-fledged internal quality assurance systems are not yet in place in many institutions, this may raise doubts as to whether the institution concerned takes any action upon recommendations given as a result of external assessment. Thus a "soft" follow-up procedure (for example, a brief report submitted after three years) might be advisable, particularly where institutions which are only in the process of establishing internal quality assurance systems.

Decision: Fully compliant

Suggestion: PKA may wish to consider introducing a follow-up procedure for programmes with a positive rating; this might be particularly useful for programmes offered by institutions where internal quality assurance systems are at an early stage of development. These reports should focus on (development of) internal quality assurance systems.

5.7. ESG 2.7. Periodic reviews

Standard: External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Description: Assessment of existing programmes is undertaken on a cyclical basis according the relevant provisions of PKA's Statutes. Frequency varies depending on the quality rating given to the programme concerned:

- outstanding rating: every 8 years (unless there are reasons justifying assessment at an earlier date);
- positive rating: every 6 years (unless there are reasons justifying assessment at an earlier date);
 positive rating with a shorter validity period: reassessment conducted after 2 or 3 years,
 depending on the shortcomings identified and recommendations given;
- conditional rating: reassessment conducted after 1 year;
- negative rating: the programme concerned is suspended or withdrawn by virtue of law (LoHE, Article 11(6)); it may be re-established in accordance with the regular procedure for the establishment of new programmes laid down by LoHE; a re-established programme is assessed as a new programme in accordance with annual assessment plans adopted by PKA.

The length of the cycles and review procedures are clearly defined and published on PKA website.

Analysis: Compliance is evident.

Decision: Fully compliant

5.8. ESG 2.8 System-wide analyses

Standard: Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Description: PKA publishes annual activity reports and periodic activity reports (covering, for example, two years or one term of office) and overview reports for specific fields of study (SER, Chapter V, Section 5.1). Activity reports include general findings and statistical data in a breakdown by types of institutions and fields of study. Overview reports are produced after a full cycle of assessment in all faculties offering programmes in a given field of study has been completed (Volume I and II, covering 37 and 17 fields of study, respectively, already published; Volume III to be published soon). They contain detailed information and analysis of strengths and weaknesses of programmes in a given field, as well as prospects for future developments. Reports are published on PKA's website, and hard copies were also provided to the panel.

Moreover, as stated in the SER and confirmed during the site visit, PKA intends to produce reports on programmes' compliance with formal and legal requirements laid down by the national legislation. These would be prepared by formal and legal compliance experts who are members of external assessment panels undertaking site visits to institutions. Furthermore, PKA plans to produce reports which will give an overview of quality assurance arrangements in specific fields of study.

Identifying its weaknesses in the SER (Chapter VI), PKA points to the fact that the heavy workload related to its primary routine tasks does not leave sufficient time and resources for analysis and research.

Analysis: Reports which are already published by PKA are a comprehensive source of information and are easily available for any interested readers. System-wide analyses are particularly relevant to policy makers and university authorities (rectors and faculty deans). Their needs in this respect seem to be fully satisfied as neither the Minister of Science and Higher Education nor the rectors of institutions interviewed stated otherwise. There does not seem to be any demand for system-wide analyses among the general public. This may be related to the fact that accountability of higher education institutions and the quality of programmes are a new issue in Poland. In this context, the panel understands that the publications available satisfy the current demand among PKA's main

stakeholders. However, quality culture is only now emerging in Polish higher education and some institutions may need incentives and/or guidance to establish their internal quality assurance systems. Thus the panel is pleased to note that PKA intends to publish overview reports on quality assurance arrangements in a breakdown by field of study. As internal quality assurance systems established by faculties, which offer programmes in one or several fields of study, should be an integral part of institutional quality assurance systems, it would also be advisable to publish examples of best practice at institutional level. Such publications would not only contribute to building quality culture in Polish higher education, but also strengthen the position of PKA as an institution supporting quality improvement in higher education.

Decision: Fully compliant

Suggestion: PKA might wish to consider the value and practicality of publishing reports on internal quality assurance in individual fields of study and publications promoting best practice in internal quality assurance at institutional level.

5.9. ESG 3.1 Use of external quality assurance procedures for higher education

Standard: The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Description and analysis: The panel found evidence that PKA has well-functioning external quality assurance processes that address the use of internal quality assurance procedures within HE institutions. The extent to which PKA can fully address all aspects is limited both by the fact that internal HE quality assurance systems are still in development (and at different stages in different institutions) and that PKA works with a rather tightly defined legal framework.

Decision: Substantially compliant

5.10. ESG 3.2 Official status

Standard: Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Description: PKA was established on 1 January 2002 on the basis of the Higher Education Act of 12 September 1990, as amended on 20 July 2001 (Article 38 (1)). Currently, it operates on the basis of the Act of 25 July 2005, The Law on Higher Education (LoHE)((Articles 48 to 53). LoHE defines two main responsibilities of PKA: giving opinions on applications for the establishment of new institutions and programmes, and assessing the quality of existing programmes. It also specifies legal implications of PKA's decisions.

PKA is subject to audits conducted by the Supreme Chamber of Control (the last audit in 2004).

Analysis: It is evident that PKA has an official status and an established legal basis for its external quality assurance responsibilities.

However, the panel would like to make some comments concerning the legal framework for PKA which may be relevant if any amendments to the 2005 LoHE are proposed in the future. The name of PKA (State Accreditation Committee), as given in LoHE (Article 48), indicates that PKA is an accreditation body. However, its responsibilities as specified by LoHE (Article 49) include only giving opinions on applications for the establishment of new institutions or programmed and assessing the quality of existing programmes. Except in PKA's name, there is no explicit reference in LoHE to accreditation as such and hence no reference to the accreditation process or a specific body responsible for accreditation.

LoHE does not refer to accreditation, but positive quality assessment (subdivided by the PKA into an outstanding, positive or conditional rating) of existing programmes is implicitly considered to result in accreditation. LoHE does however specify the implications of a negative rating given to a programme by the PKA as a result of quality assessment; programmes with a negative rating are automatically regarded as non-accredited and are suspended or withdrawn by the minister responsible for higher education by virtue of law.

Decisions on quality ratings for programmes are taken by the PKA, whereas legal proceedings for programmes given a negative rating by the PKA (suspension or withdrawal of the programme concerned) are taken by the minister responsible for higher education. As the minister is explicitly required by LoHE to suspend or withdraw programmes with a negative rating given by the PKA, the PKA is *de facto* the decision-making body. Thus, as decisions are in fact taken by the PKA, the minister's responsibility for legal proceedings leads to some ambiguity about the overall responsibility for the process.

None of the ambiguities discussed here has any impact on how PKA works in practice or on the validity of its decisions.

Decision: Fully compliant

5.11. ESG 3.3 Activities

Standard: Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Description: PKA assesses the quality of existing programmes according to the cycles set for programmes which have been given an outstanding rating, a positive rating with a full or shorter validity period, or a conditional rating (see: Section 5.7). Planned tasks are outlined in a medium-term strategy (currently covering 2007-2011) and annual plans which identify programmes to be assessed in a given academic year. Activity reports include detailed information about the programmes which have already been assessed. PKA has completed its first assessment cycle and is now in its second assessment cycle. The first assessment cycle covered programmes in 78.3% of all currently existing institutions; the remaining institutions have been established recently and their students have not graduated yet.

Analysis: The panel found evidence (SER, printed activity reports, website) confirming that external assurance activities are undertaken by PKA on a regular basis.

Decision: Fully compliant5.12. ESG 3.4 Resources

Standard: Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Description: PKA is fully financed on an annual basis from the State budget via the Minister of Finance and the Minister of Science and Higher Education. Its annual budget is PLN 7,290,000 (ca EUR 2,195,783) in 2008. The budget covers the following types of costs: all costs, including fees for experts, related to the review of applications for the establishment of new institutions and programmes (no costs incurred by applicants) and the quality assessment of existing programmes (no costs incurred by institutions); fees paid to PKA members; and operational expenses of the Bureau of PKA. The cost for a full process of quality assessment in one institution is PLN 15,00 (ca EUR 4,518). (SER, Chapter II, Section 2.4, and Chapter V, Section 5.1, ENQA 3.4). The legislation does not allow PKA to have a contingency fund within its budget, but the Bureau of PKA can apply to the minister for extra funding to cover emergency expenses.

PKA has 80 members and the Bureau of PKA, which provides financial services and administrative support to PKA, has 26 staff members. The number of jobs in the Bureau of PKA is limited by the Minister of Finance. PKA is assisted by almost 800 academic experts, 60 student experts and 47 formal and legal compliance experts. PKA members and staff of the Bureau of PKA participate in training organised internally as well as by international organisations and networks.

The panel was informed during interviews that PKA/Bureau salaries, particularly for the more junior professional staff, are low and far from desirable. The main factors motivating them to work for PKA are the high reputation of PKA, opportunities for training and upgrading skills, good atmosphere in the office and the satisfaction from results of their work. PKA experts interviewed acknowledged likewise that they received modest fees and were motivated mainly by the content of their work.

According to the SER (Chapter V, Section 5.1, ENQA 3.4), human and financial resources are currently sufficient for PKA to organise and run its activities as planned and to achieve its aims.

However, PKA may need to increase its budget and attract extra funding to cover some costs (e.g. research projects) in view of its increasing international activity, and its plans to increase analytical activities, intensify activities to support the development of internal quality assurance systems in institutions and provide additional training for the staff. The Minister of Science and Higher Education interviewed during the site visit was aware that quality assurance cannot be undertaken on a minimal budget and that it was increasingly important that PKA should be able to both retain the best staff and work more extensively in European initiatives in quality assurance.

Analysis: The workload related to PKA's basic tasks (giving opinions on applications and quality assessment) is heavy (for example, 1,307 applications and 1,341 programmes reviewed between 2005 and 2007; SER, Chapter II, Section 2.9) as compared to the human resources available. The fact that PKA considers the resources available to be sufficient for its current tasks clearly demonstrates that it organises and performs its work in an efficient and effective manner. A mid-term financial perspective would certainly be desirable, but a mid-term financing agreement could hardly be made between PKA and the Minister of Science and Higher Education as new priorities emerge in the context of reforms planned by the government. Moreover, as confirmed by the interviews during the site visit, the annual financing system does not pose a major problem to PKA.

The panel agrees entirely with PKA that it should extend its activities beyond the basic routine tasks and encourages it to do so by some of the recommendations or suggestions given in the previous sections. In particular, PKA should undertake more extensive activities to promote internal quality assurance, systematically collect, analyse and use evidence about the effectiveness of its external quality assurance processes, and increase the participation of international experts in external assessment. Moreover, it should publish more detailed reports on individual programmes which have already been reviewed. All these tasks require additional human and financial resources, but are crucial to enhancing the fitness of PKA's processes for purpose, supporting quality improvement in Polish higher education, strengthening PKA's credibility among Polish higher education institutions, and meeting European expectations.

Decision: Fully compliant

Recommendation: PKA should be provided with additional funding to enable it to retain the very best staff, extend its analytical activities and undertake more extensive activities to promote quality assurance among Polish higher education institutions, and within a broader European ('Bologna') perspective. It is recommended that PKA should hold discussions with the Minister of Science and Higher Education to ensure that its development priorities are taken into account in the budget for higher education in the coming year(s).

5.13. ESG 3.5 Mission statement

Standard: Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Description: The mission statement (SER, Annex 17) is published on PKA's website.

The mission statement is as follows:

"The State Accreditation Committee is an independent institution working within the higher education system in Poland for the improvement in the quality of education. The primary objective of the Committee is to support Polish public and non-public higher education institutions in the development of educational standards matching the best models adopted in the European and global academic space. These activities aim to ensure that graduates of Polish higher education institutions rank high on the national and international labour market, and to enhance the competitiveness of Polish higher education institutions as European institutions.

The State Accreditation Committee carries out its mission by conducting obligatory assessments of the quality of education and giving opinions on applications for the authorisation to provide degree programmes submitted by higher education institutions. The overriding value guiding the work of the Committee is the objectivity of such assessments and opinions. The Committee takes care to ensure that its assessments leave – within the limits of the legislation in force – ample space for autonomous initiatives promoting innovativeness in the teaching process and high quality education culture.

As an institution financed exclusively by public funds and always concerned about public good, the State Accreditation Committee is guided by a sense of responsibility for decisions taken, building its credibility through

its professionalism in the activities undertaken, its adherence to the principle of openness and transparency of its procedures (applied), precision in statements justifying the resolutions adopted and respect for academic traditions.

The State Accreditation Committee is a platform for co-operation and dialogue between all parties interested to work to ensure high quality of education in higher education. The Committee undertakes initiatives for co-operation in this area, also in the international arena. The Committee co-operates actively with other accreditation commissions and international organisations bringing them together in the implementation of the Bologna Process and the development/creation of the European Higher Education Area.

Acting on the belief that quality and effectiveness of education contribute substantially to the socio-economic development of the country, the State Accreditation Committee considers that it is its duty to work for the academic community, student applicants and employers, and co-operates in this area with State and public administration bodies."

Specific goals and tasks are described in PKA's medium-term strategy (2007-2011) which is published on its website.

Analysis: The mission statement, which is consistent with the legal framework set for PKA by the 2005 LoHE, makes clear that external quality assurance is PKA's main activity. It defines the overall aim of its activities and its stakeholders, and identifies processes leading to the achievement of its aim and the principles underlying its work. The mission statement is easily available to PKA's stakeholders. It was used as a basis to develop PKA's medium-term strategy which is also easily available on its website.

However, the mission statement does not identify PKA as the national accreditation body for existing programmes and makes no reference to accreditation, whereas PKA has clearly defined decision-making powers in this area. This is partly justified by the fact that LoHE makes no explicit reference to accreditation (see: Section 5.10).

PKA's opinions on applications concerning new institutions or programmes are not related to quality improvement per se, although do provide a secure base line upon which quality improvement can be established.

The panel notes that higher education institutions regard PKA as primarily concerned with accreditation and assessment, though also recognising that quality improvement can come from these. However, the emphasis on improvement and lack of mention of the primary accreditation within the mission statement might usefully be remedied.

Decision: Substantially compliant

Recommendation: If legally allowable, the mission statement should be revised to make specific reference to PKA as the national accreditation body and to accreditation as an outcome of PKA's external quality assessment.

In any review of the mission statement PKA might wish to consider how this could be defined more precisely, and in particular clarify the dual roles of giving opinions on applications for the establishment of new institutions and programmes on the one hand, and conducting assessments of existing programmes which are increasingly geared to quality improvement on the other hand. It will be essential for PKA to retain its dual roles of: i) providing public reassurance about minimum standards in Polish higher education (through its accreditations), and also ii) contributing to the improvement (enhancement) of higher education (by working with and through Poland's HE sector), if PKA is to fulfil its full potential and retain its goal of being a leading European quality assurance agency.

5.14. ESG 3.6 Independence

Standard: Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Description: PKA members are appointed by the minister responsible for higher education from among candidates proposed by proposed by the General Council for Higher Education (an elected representative body of higher education), two rectors' conferences for university-type and non-university higher education institutions, the Students' Parliament of the Republic of Poland, senates of higher education institutions, as well as national academic associations and employers' organisations. The President of the Students' Parliament of the Republic of Poland is a member of PKA and its Presidium by virtue of law. A PKA member may be dismissed only at the request of the PKA Presidium. (LoHE, Article 48). The panel was informed by PKA that the fact that the minister is involved in the appointment of its members does not limit in any way their perceived independence as they are proposed by institutions other than the ministry.

The Director of PKA is appointed and, if necessary, dismissed by the President of PKA. Other staff members of the Bureau are recruited by the Director (LoHE, Article 53). Experts are appointed by the President of PKA in accordance with a procedure laid down in the relevant resolution of the PKA Presidium (LoHE, Article 53; SER, Annex 11). Expert panels to assess specific programmes are appointed by the Secretary of PKA from among experts appointed by the President. Experts stated during the site visit that they felt entirely independent and bound only by their obligations vis-à-vis PKA. For the rectors interviewed during the site visit, PKA is entirely independent of the ministry.

LoHE (Article 53) gives PKA full responsibility for its organisational arrangements and operational procedures, the precise powers of its bodies, the procedure for conducting assessment and the procedure for the appointment of experts. These are laid down in its Statutes adopted by the PKA Presidium (SER, Annex 1). Activity plans, including the programmes to be assessed in a given year, are adopted by the PKA Presidium. In justified cases, the minister responsible for higher education may request PKA to assess the quality of a programme in a specific institution (LoHE, Article 49 (3)).

PKA has two main responsibilities as laid down in LoHE (Article 49): giving opinions on applications for the establishment of new institutions and programmes, and assessing the quality of existing programmes. As regards the former, applications are submitted to the minister responsible for higher education who forwards them to PKA for review; PKA gives its opinion, and a decision to grant or refuse an authorisation to establish a new institution or programme is taken by the minister. As the panel was informed by PKA during the site visit, in two or three cases the minister's decision was different than recommended by PKA.

As regards its latter responsibility, PKA assesses a programme, takes a decision on the quality rating for the programme concerned, and notifies its decision to the minister responsible for higher education. Where a negative rating is given by PKA, the minister is required to suspend or withdraw a programme by virtue of law (LoHE, Article 11 (6)). This is an arrangement where PKA takes an accreditation decision, whereas the minister is responsible for taking legal proceedings to suspend or withdraw a programme on the basis of PKA's decision. The panel was given a copy of a 2003 ruling of the Supreme Administrative Court concerning a dispute over a negative rating given by PKA; it states that PKA is the sole body authorised to assess programmes, PKA's decisions in this respect are binding upon the minister, and the minister is not authorised to overrule them. The Minister of Science and Higher Education told the panel that she wished to hand over full responsibility for accreditation to PKA.

Within PKA, decisions (opinions on applications or quality ratings) are taken in accordance with a two-stage procedure. The relevant Section(s) for Fields of Study propose(s) an opinion/a quality rating on the basis of the evidence collected, and a final decision is taken by the PKA Presidium. At both levels, decisions are taken by voting.

Analysis: There is some room for the minister to influence the appointment of PKA members. However, the minister's powers are clearly limited in this respect as he/she is only responsible for the final selection from among candidates pre-selected by all possible stakeholders. Moreover, as PKA members may be dismissed only at the request of the PKA Presidium, the minister has no way of exerting influence during their term of office. Arrangements for the appointment of experts and the recruitment of staff for the Bureau of PKA guarantee full independence.

LoHE does not refer explicitly to independence of PKA. However, it guarantees full autonomy of PKA in terms of organisational arrangements and operational procedures. The relevant article of LoHE and the court ruling referred to above confirm beyond doubt that the minister has no way of overruling any

decision of PKA concerning existing programmes. As regards the establishment of new institutions or programmes, PKA has an advisory role in this process. However, even though the minister is free not to act upon a recommendation given by PKA, this does not affect its decisions or its autonomy in decision-making. The two-stage internal voting procedure adopted by PKA to arrive at decisions ensures that even if there was any interference from a third party at some stage, it is highly unlikely that it could effectively influence a final decision taken by PKA.

The panel is of the view that PKA has full operational independence, and safeguards for that independence, within the legal framework in which it operates.

Decision: Fully compliant

5.15. ESG 3.7 External quality assurance criteria and processes used by the agencies

Standard: The processes, criteria and procedures used by the agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-evaluation or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site-visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Description: All processes, criteria and procedures used by PKA are defined in the relevant resolutions of the PKA Presidium (SER, Annexes) and published on its website.

As mentioned in Section 5.4, PKA has a slightly different procedure for giving opinions on applications for the establishment of new institutions and programmes, and assessing the quality of existing programmes. The opinion-giving procedure includes the following main stages:

- the application is assessed by PKA members from the relevant Section(s) for Fields of Study and/or PKA experts on the basis of the documentation submitted by the applicant and, where necessary, a site visit; site visits are undertaken only where there are reasons to question the validity of information provided in the application;
- the relevant Section(s) for Fields of Study propose(s) an opinion on the basis of the evidence collected and presents it to the PKA Presidium;
- an opinion in the form of a resolution of the PKA Presidium is sent to the applicant, the minister responsible for higher education and, where applicable, another minister supervising the institution concerned.

The quality assessment procedure for existing programmes includes the following main stages:

- the institution concerned carries out self-evaluation and sends its self-evaluation report to PKA;
- the self-evaluation report is analysed by an expert panel composed of (a) PKA member(s) and experts;
- a site visit is undertaken by the expert panel; a panel is normally composed of academic experts, student experts and formal and legal compliance experts (for details, see: Section 5.4);
- a report from the expert panel is sent to the institution concerned for comments;
- the relevant Section(s) for Fields of Study propose(s) a quality rating (outstanding, positive, conditional or negative) on the basis of the evidence collected and presents it to the PKA Presidium;
- a quality rating given by PKA in the form of a resolution of the PKA Presidium is published on PKA's website; the resolution together with its justification is sent to the institution concerned, the minister responsible for higher education and, where applicable, another minister supervising the institution.

Mechanisms in place to ensure consistency in decision-making are described in Section 5.3.

A follow-up procedure is laid down for programmes which have been given a conditional rating ("reassessment procedure"). This procedure is described in Section 5.6.

All institutions are informed about their right to appeal against PKA's decisions in the resolution giving a quality rating for the programme assessed. The appeals procedure includes a review of the request for reconsideration during a joint meeting of PKA Section for Fields of Study concerned and the Presidium, and a resolution adopted by the PKA Presidium. The resolution is sent to the applicant, the

minister responsible for higher education and, where applicable, another minister supervising the institution concerned.

Analysis: Compliance with the standards concerning pre-defined and publicly available processes, criteria and procedures is evident. Both the opinion-giving procedure and the quality assessment procedure ensure that there is a sound basis for conclusions and decisions and that they are reached in a consistent manner. Although site visits are not as a rule undertaken as part of the opinion-giving procedure, the panel considers that this arrangement is fully justified in the case of applications for new institutions or programmes.

The assessment procedure includes all stages as recommended by ENQA, except the publication of a report. While this is partly justified by the legal constraints, the panel considers that the publication of reports would provide further encouragement to institutions to establish their internal quality assurance systems and improve quality. This is discussed in more detail in Section 5.5.

A follow-up procedure is only operational for programmes with a conditional rating; this is, in principle, a justified approach, though it may be advisable to establish a soft follow-up procedure for programmes with a positive rating offered by institutions where current internal quality assurance mechanisms do not ensure that PKA's recommendations are actually translated into action. This is discussed in Section 5.6.

Requests for appeal are reviewed by the same persons (i.e. the relevant Section(s) and the PKA Presidium) who have proposed and taken the decision challenged by the appeal. This might not allow for full objectivity and transparency, although the panel has no evidence that this is not the case. Though in principle appeals may be lodged to a court of justice, a 2007 ruling of the Supreme Administrative Court (SER, Chapter V, Section 5.1, ENQA 3.6) states that PKA's decisions are not subject to litigation because PKA is not a public administrative body and thus its decisions do not constitute public administration acts. Thus there is no effective way of appealing against PKA's decisions. However, the panel understands that PKA could not establish to date a formal appeals body because such body is not provided for by LoHE which sets an overall framework for PKA's activities.

In this regard PKA meets the criterion of having an appeals procedure for significant areas of its operations, but there may be some perceived weaknesses in that procedure that PKA might wish to address. This would probably require amendments to LoHE.

Decision: Fully compliant

Recommendation: PKA should consider how it can establish an appeals body which more obviously ensures objectivity and transparency in considering appeals against decisions of the PKA Presidium.

5.16. ESG 3.8 Accountability procedures

Standard: Agencies should have in place procedures for their own accountability.

Description: General principles (professionalism, transparency, objectivity) underlying PKA's activities are published in its mission statement available on its website. PKA's work is carried out in accordance with procedures, guidelines and criteria for quality assessment, which are published on its website (SER, Annexes 7, 8, 9, 10, 11 and 16), and internal operational procedures (Organisational regulations of the Bureau of PKA, SER, Annex 4; Procedure for circulation of documents concerning quality assessment and opinions on applications, SER, Annex 5; Guidelines for circulation of documents for the Bureau of PKA, SER, Annex 6). The procedure for the appointment of expert panels includes a no-conflict-of-interest clause (SER, Annex 11).

Internal meetings are held to assess and improve the quality of work. Such meetings usually take place when doubts arise as to the interpretation of criteria for the assessment of programmes. To ensure consistency in public communication, only the President or persons appointed by him are authorised to provide information on PKA's activities. Activity reports are available on its website and sent to the Parliamentary Committee for Education, Science and Youth. The President and the Secretary of PKA attend meetings of the Rectors' Conferences and the General Council for Higher Education (a representative body of higher education). PKA initiated the Quality Forum where it organises annual conferences for its stakeholders. It has adopted a resolution which encourages the Presidium to extend cooperation with the PACs. (SER, Chapters III and V).

According to the employers interviewed during the site visit, employers' organisations and large institutions are familiar with PKA's activities, whereas individual SMEs show no interest in quality ratings given by PKA, which do not play any role in staff recruitment. In general, employers are guided in staff recruitment by the reputation of higher education institutions and rankings published by national journals.

Limited involvement of employers and insufficient public communication, in particular with the PACs, are identified as weaknesses in the SER (Chapter VI). In the first quarter of 2009, PKA will organise a Quality Forum conference devoted to the role of employers in quality improvement. It also intends to develop questionnaires to collect feedback on its procedures and performance from both PKA members and its main stakeholders. Moreover, PKA would like to establish a supervisory board to be composed of international academics, employers' representatives and opinion-forming organisations (SER, Chapter VII).

The external review covered by this report is the first one initiated by PKA in accordance with its medium-term strategy (2007-2011).

Analysis: PKA's internal quality assurance system is still at an early stage of development. The procedures, guidelines and criteria adopted by PKA provide a transparent basis for its external quality assurance processes and decisions, except that appeals are considered internally (see: Section 5.15), and efficient organisation of work within PKA. PKA collects internal feedback and encourages internal reflection, but as yet there is no formal mechanism to do so; the approach adopted seems to be more reactive than proactive as various issues are discussed when problems or doubts arise.

Whilst there is an on-going exchange between PKA members and experts, as both jointly participate in site visits, there is no formal mechanism for systematic collection, analysis and use of their feedback. Likewise, while PKA organises and participates in various events involving its stakeholders, these are not devoted specifically to reviewing its processes, procedures, criteria or assessing its performance; thus there is no formal mechanism for systematic collection, analysis and use of external feedback.

The panel learnt that these matters are currently under discussion within PKA and was pleased to note that it intends to conduct surveys among its members and stakeholders, has already developed a draft questionnaire for higher education institutions and would like to establish an international supervisory board.

The frequency of mandatory external reviews is not defined in any official documents.

Decision: Partly compliant

Recommendation: PKA should establish mechanisms for more organised internal feedback and reflection, and a mechanism to gather and analyse external feedback, thus strengthening its accountability to its stakeholders. The frequency of mandatory external reviews should be defined in PKA's official document.

6. REVIEW FINDINGS: COMPLIANCE WITH ECA CODE OF GOOD PRACTICE

In assessing PKA's compliance with the ECA Code of Good Practice, the panel will refer to the relevant sections of Chapter 5 to avoid repetitions.

6.1. ECA 1: The accreditation organisation has an explicit mission statement.

For a description and analysis, see: Section 5.13.

Decision: Substantially compliant

Recommendation: If legally allowable, the mission statement should be revised to make specific reference to PKA as the national accreditation body and to accreditation as an outcome of PKA's external quality assessment.

6.2. ECA 2: The accreditation organisation is recognised as a national accreditation body by the competent public authorities.

See: Section 5.10.

Decision: Fully compliant.

6.3. ECA 3: The accreditation organisation must be sufficiently independent from government, from higher education institutions as well as from business, industry and professional associations.

See: Section 5.14.

Decision: Fully compliant

6.4. ECA 4: The accreditation organisation must be rigorous, fair and consistent in decision-making.

See: Sections 5.3 and 5.4. **Decision:** Fully compliant

6.5. ECA 5: The accreditation organisation has adequate and credible resources, both human and financial.

See: Section 5.12.

Decision: Fully compliant

Recommendation: PKA should be provided with additional funding to enable it to retain the very best staff, extend its analytical activities and undertake more extensive activities to promote quality assurance among Polish higher education institutions, and within a broader European ('Bologna') perspective.

6.6. ECA 6: The accreditation organisation has its own internal quality assurance system that emphasises its quality improvement.

See: Section 5.16.

Decision: Partly compliant

Recommendation: PKA should establish mechanisms for more organised internal feedback and reflection, and a mechanism to gather and analyse external feedback, thus strengthening its accountability to its stakeholders.

6.7. ECA 7. The accreditation organisation has to be evaluated externally on a cyclical basis.

The review covered by this report is the first external review of PKA. It was initiated in accordance with PKA medium-term strategy 2007-2011. The strategy refers to cyclical reviews, but their frequency is not defined in official documents.

Decision: Substantially compliant

Recommendation: The frequency of mandatory external reviews should be defined in PKA's official document.

6.8. ECA 8: The accreditation organisation can demonstrate public accountability, has public and officially available policies, procedures, guidelines and criteria.

PKA's up-to-date strategy, procedures, guidelines and criteria are published on its website. Outcomes of PKA's external assessment (quality ratings given to programmes) are published on its website on an going-basis. PKA also publishes annual activity reports and overview reports for individual fields of study where programmes have been assessed. For details, see Sections 5.1, 5.2, 5.3, 5.5 and 5.8.

Decision: Fully compliant

6.9. ECA 9: The accreditation organisation informs the public in an appropriate way about accreditation decisions.

See: Section 5.5.

Decision: Substantially compliant

Recommendation: PKA should explore ways to publish more detailed and specific information on individual programmes, while respecting the national legislation.

6.10. ECA 10: A method for appeal against the accreditation organisation's decisions is provided.

See: Section 5.15.

Decision: Substantially compliant

Recommendation: PKA should consider how it can establish an appeals body which more obviously ensures objectivity and transparency in considering appeals against decisions of the PKA Presidium.

6.11. ECA 11: The accreditation organisation collaborates with other national, international and/or professional accreditation organisations.

Description: PKA collaborates with the national authorities, including the Ministry of Science and Higher Education and the Parliamentary Committee for Education, Science and Youth (PCESY), and several organisations active in higher education, including the General Council for Higher Education (GCHE, a representative body of higher education), Rectors' Conferences and the Polish Rectors Foundation. Representatives of PKA attend sessions of the PCESY concerning the financing of higher education, new legislation, development of higher education, the Bologna Process, etc. PKA gives its opinions on draft legislation to the minister responsible for higher education and holds frequent meetings with the minister to discuss current and strategic issues. The minister or his/her deputy attend plenary sessions of PKA (SER, Chapter III, Section 3.7). The President of PKA has attended several plenary sessions of the GCHE and participated in many meetings of the Rectors' Conferences. The Secretary of PKA is a member of the Working Group developing a proposal for the NQF for Higher Education. PKA organises annual Quality Forum conferences for its main stakeholders. It has recently adopted a resolution concerning more extensive collaboration with peer accreditation committees established by the academic community between 1993 and 2001.

Active involvement in international activities is one of the objectives set by PKA in its medium-term strategy for 2007-2011. PKA is a member of three international networks of accreditation and quality assurance agencies, CEEN, ECA and INQAAHE, and intends to submit an application for ENQA membership. It actively participates in various activities undertaken by the networks (for example, ECA Working Groups 2, 3 and 4; TEAM project; CEEN and INQAAHE conferences). To date, PKA has signed a cooperation agreement with the Spanish National Agency for Quality Assurance and Accreditation (ANECA), and agreements on mutual recognition of accreditation decisions with the Dutch-Flemish Accreditation Organisation (NVAO) and the Austrian Accreditation Council (ÖAR) (with their entry into force of the latter pending on the results of this external review). It also signed a letter of intent with the Swiss Accreditation and Qualifications Agency (OAQ). As part of its bilateral cooperation, PKA has organised or participated in numerous meetings devoted to exchange of information and experience with the above-mentioned agencies and the German Accreditation Council, the Malaysian Accreditation Committee and the Mongolian National Council for Education Accreditation.

Analysis: Compliance with the standard is evident.

However, as PKA acknowledges in its SER (Chapter VI) and the panel found during the site visit, higher education institutions still perceive PKA as an institution which should and does actually aim to ensure minimum quality standards rather than supporting quality improvement. Since quality improvement is the primary aim in PKA's mission, this suggests that PKA should extend its collaboration with higher education institutions and, in particular, peer accreditation committees, to enhance mutual understanding. These issues are also referred to in Sections 5.2, 5.4, 5.13 and 5.16.

Decision: Fully compliant

6.12. ECA 12: Accreditation procedures and methods must be defined by the accreditation organisation itself.

Procedures and methods have been defined autonomously and independently by PKA itself. See also: Section 5.14.

Decision: Fully compliant.

6.13. ECA 13: Accreditation procedures must be undertaken at institutional and/or programme level on a regular basis.

See: Section 5.7.

Decision: Fully compliant.

6.14. ECA 14: Accreditation procedures must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site)

See: Section 5.15.

Decision: Fully compliant.

6.15. ECA 15: The accreditation organisation must guarantee the independence and competence of the external panels or teams.

See: Sections 5.4 for competence and 5.14 for independence.

Decision: Fully compliant.

6.16. ECA 16: The accreditation procedures must be geared at enhancement of quality.

Internal quality assurance is taken into account in PKA's external assessment. Although PKA has temporarily adopted a flexible approach to internal quality assurance, this is fully justified in view of the early stage of development of internal quality assurance systems in Polish institutions. A well-functioning internal quality assurance system is included as a criterion for only one of four quality ratings given by PKA; criteria for the other three ratings focus on compliance with legal requirements. For details see: Section 5.1.

In accordance with its mission statement and as confirmed by the rectors of institutions interviewed by the panel, PKA external assessment processes respect autonomy, identity and integrity of institutions.

Decision: Substantially compliant

Recommendation: Criteria for quality ratings should be revised so that all reflect progress made by institutions towards the establishment of internal quality assurance systems, and ultimately the effectiveness of such systems.

6.17. ECA 17: The accreditation standards must be made public and comply with European practice taking into account the development or agreed sets of quality standards.

PKA's standards and criteria are based on ENQA and ECA standards and are published on its website. As demonstrated in the previous sections, PKA is already substantially compliant with ENQA and ECA standards. Its major weakness in this respect is that it has yet to involve extensively all important stakeholders in the process of determining the aims and objectives of its quality assessment processes. See: section 5.2.

Decision: Substantially compliant

Recommendation: PKA should hold consultations with higher education institutions and the peer accreditation committees to arrive at a clear consensus over the primary and secondary aims and objectives of its processes.

7. CONCLUSIONS AND RECOMMENDATIONS

PKA has travelled a long journey over a relatively short span of seven years in evolving national and European contexts for higher education. It has done huge work to arrive at a stage in its development where strengths outnumber weaker points, is well aware of the areas where improvements would be desirable and has already undertaken some initiatives to translate its conclusions into action.

7.1. Summary of strengths and areas for improvement

Strengths

 PKA has an official status and a legal basis for its external quality assurance responsibilities established by the national legislation. The national legislation also specifies legal implications of PKA's decisions.

- 2. PKA has full operational independence within the national legal framework for its operations and internal procedures in place to ensure autonomy in decision-making.
- 3. PKA has adopted clear and transparent procedures for external assessment. These are published together with guidelines for both higher education institutions and PKA members and experts involved in external quality assessment.
- 4. Criteria and guidelines combined with internal double-checking mechanisms and decision-making procedures ensure equal treatment of all higher education institutions and consistency in decision-making.
- 5. PKA's procedures include the main stages considered to be good European practice, while respecting the national legislation.
- 6. External assessment of programmes is carried out on a regular basis.
- 7. To support its activities, PKA has created a large pool of competent and independent experts and has ensured genuine rather than merely token involvement of student experts.
- 8. PKA has attracted and kept professional, competent and committed staff who ensure that the work is carried out efficiently.
- 9. Despite the heavy workload related to its primary tasks, PKA has already undertaken system-wide analyses and has published its findings in various reports.
- 10. PKA's efforts have already encouraged positive changes in higher education institutions and, as a result, it is perceived by institutions as an agency which plays a crucial role in ensuring that all Polish higher education institutions meet certain quality standards.
- 11. International links established by PKA enable it to both contribute to developments in European quality assurance and learn from its partners to support its own development.

Areas for improvement

Areas where action should be taken to ensure full compliance with ENQA and ECA standards

- 1. PKA has a published mission statement which defines its overall aim of quality improvement and notes its main stakeholders, and also identifies the processes leading to the achievement of the stated aim, as well as the principles underlying its work. However, as PKA has a clearly defined responsibility for accreditation of existing programmes, the statement should additionally make explicit reference to its title role as the national accreditation body and to accreditation as an outcome of its external quality assessments.
- 2. PKA is still perceived by higher education institutions and the peer accreditation committees (PACs) as an institution working primarily to ensure minimum quality standards (as an accreditation body) rather than supporting quality improvement in line with its aim as defined in its mission statement. As institutions are among PKA's main stakeholders and the PACs should be among its main partners in efforts to improve quality in higher education, PKA should hold consultations with the former and the latter to arrive at a clear consensus over the primary and secondary aims and objectives for its processes.
- 3. While internal quality assurance is already taken into account by PKA in its external assessment, PKA has adopted a flexible approach to this aspect for a transition period when institutions are establishing internal quality assurance systems, and the importance of this aspect is highlighted only for one of four ratings given by PKA to programmes as a result of assessment. In order to provide, where necessary, an extra incentive for institutions to establish such systems, PKA should set a timeframe for the adoption of a strict approach to this aspect in its external assessment. To strengthen the quality improvement orientation of its processes, PKA should revise the criteria for its quality ratings so that all ratings emphasise the importance of progress made by institutions towards the establishment of internal quality assurance systems, and ultimately the effectiveness of such systems. In doing this PKA may wish to reflect on whether and how a more systematic approach to the assessment of internal quality assurance systems could be developed, to ensure consistency in assessment and ratings given to programmes according to revised criteria. As internal quality assurance is at an early stage of development in Polish higher education, these components might be combined through a series of workshops organised by

PKA to promote examples of best practice adopted by Polish institutions, and targeted particularly at the less experienced institutions.

- There are two aspects to PKA's external quality assessment and operational procedures which might be regarded as shortcomings, although both result to a large extent from legal constraints within which it works. Firstly, PKA publishes only quality ratings given to individual programmes; full reports are not published because they contain details covered by the national legislation on data protection, but are sent to the institution concerned and the competent minister(s). However, reports outlining strengths and weaknesses of individual programmes would clearly increase the accountability of institutions, and encourage them to establish internal quality assurance systems and improve quality. Moreover, this would strengthen PKA's role as an institution working for quality improvement in higher education. Thus PKA should explore ways to publish more detailed and specific information on individual programmes, whilst also in compliance with the national legislation. Secondly, there is no apparent independent way of appealing against PKA's decisions; requests for appeal are considered by the same PKA members and body (PKA Presidium) which proposed and took the decision being challenged by the appeal. Furthermore, PKA's decisions are not subject to litigation in a court of justice. While a formal appeals body could not be established to date, because PKA's bodies are pre-defined in the national legislation, PKA should consider how it might establish an appeals body which can more obviously ensure independent objectivity and transparency when considering appeals against decisions of the PKA Presidium.
- 5. While PKA is now adequately resourced to perform its primary tasks, it should be provided with additional funding to enable it to retain the very best staff, extend its analytical activities, and undertake more extensive activities to promote quality assurance among Polish higher education institutions, and within a broader European ('Bologna') perspective. It is recommended that PKA should hold discussions with the Minister of Science and Higher Education to ensure that its development priorities are taken into account in the budget for higher education in the coming year(s).
- 6. PKA is only at an early stage in the development of practices concerned with accountability for its own procedures, and it is aware that further work in this area is required. While PKA's work is carried out in accordance with procedures and internal discussions are held frequently, it has yet to develop a fully-fledged internal quality assurance system. To provide a good basis for systematic and continuous improvement, PKA should establish mechanisms for more organised internal reflection and feedback. Moreover, although PKA has already established good working relations with higher education institutions and their representative bodies, it should establish a mechanism to gather and analyse external feedback to strengthen its accountability to its stakeholders. Furthermore, to provide a formal basis for its future external reviews, PKA should define the frequency of such reviews in an official document.

Areas where reflection and action may contribute to further development

- Currently, PKA has an advisory role in initial accreditation and a decision-making role in accreditation of existing programmes, even though legal proceedings for existing programmes which have received a negative rating from PKA are taken by the minister responsible for higher education. The Minister of Science and Higher Education acknowledged in a discussion with the panel that she would welcome discussions about transfer of further responsibilities to PKA. Such discussions could provide a good basis for more clearly aligned roles and responsibilities for accreditation and quality enhancement.
- When reflecting on its mission statement, PKA might wish to consider how this could be defined more precisely, in particular to clarify the dual decision-making and advisory roles: giving opinions on applications for the establishment of new institutions and programmes, which serves primarily the purpose of ensuring compliance with certain minimum standards, and conducting assessments of existing programmes which are increasingly geared to quality improvement. It will be essential for PKA to retain its dual roles of: i) providing public reassurance about minimum standards in Polish higher education (through its accreditations), and also ii) contributing to the improvement (enhancement) of higher education (by working with and through Poland's HE sector), if PKA is to fulfil its full potential and retain its goal of being a leading European quality assurance agency.

- As higher education is currently subject to detailed national requirements for programmes and their academic staff, PKA's processes necessarily focus on quantitative aspects. However, within the current legal framework (or changes thereto expected after the adoption of the NQF for Higher Education), it may consider reviewing the current orientation of its processes to introduce more qualitative aspects. This could be done jointly with the peer accreditation committees as both PKA and the PACs work for quality improvement in higher education. In this way a second cycle of quality assessments conducted by PKA could continue to provide a high benefit to cost ratio.
- A large proportion of higher education institutions have yet to establish fully-fledged internal quality assurance systems and PKA is particularly well-placed to offer guidance and extra incentive in this respect. Thus it may wish to consider the value and practicality of producing publications which give an overview of internal quality assurance in individual fields of study and/or promote best practice in internal quality assurance at institutional level. Moreover, in addition to the existing follow-up procedure for programmes with a conditional rating, PKA may consider introducing such a procedure for programmes with a positive rating offered by institutions where internal quality assurance systems are at an early stage of development.
- PKA's decision-making procedures do not refer explicitly to an outstanding rating which may be given to programmes in fields of study other than those listed in the national legislation, while these can be offered by higher education institutions fulfilling certain national requirements. While PKA has already given an outstanding rating to such programmes, taking programmes in related fields of study as a reference point, it should consider refining its decision-making procedures to provide an explicit basis for giving an outstanding rating to programmes in "non-listed" fields of study.
- PKA should consider increasing the involvement of international experts as a way of enhancing the general fitness of its processes for purpose, and for supporting further the development of internal quality assurance in Polish higher education.
- As PKA is now in its second cycle of external quality assessment, it is encouraged to pursue its
 initial thoughts to establish a framework for systematic collection, analysis and use of evidence to
 verify whether its processes are fit for the purpose of quality improvement.
- National rankings are still regarded as the main source of information on the quality of programmes, and quality ratings given by PKA are not yet widely recognised as "a quality label". Thus PKA may wish to consider ways of increasing its public profile and publishing information on the quality of Polish higher education for a wider audience.

7.2. Final statement: Compliance with ENQA and ECA standards

In the light of the documentary and oral evidence collected, the external review panel is satisfied that, in the performance of its functions, PKA is sufficiently in compliance with the ENQA Standards and Guidelines for Quality Assurance in the European Higher Education Area for the panel to recommend, without reservation, to the ENQA Board that PKA should be awarded full membership for a period of five years.

The documentary and oral evidence collected also demonstrates that PKA is in substantial extent to which PKA meets the expectations set out in the ECA Code of Good Practice. The panel commends its findings and conclusions to ECA, hoping that they will be useful for its decision on PKA's compliance with the Code of Good Practice.

8. ANNEXES

Annex 1: List of abbreviations

ACHVE: Accreditation Committee for Higher Vocational Education

CRASP: Conference of Rectors of Academic Schools in Poland

ECA: European Consortium for Accreditation

ENQA: European Association for Quality Assurance in Higher Education

ESG: European Standards and Guidelines (ENQA)

HEA: Higher Education Act (1990), repealed by LoHE

LoHE: Law on Higher Education (2005) **NQF**: National Qualifications Framework

PACs: Peer accreditation committees

PKA: State Accreditation Committee (Panstwowa Komisja Akredytacyjna)

SER: Self-evaluation Report

Annex 2: ToRs ("The model of the external review of the State Accreditation Committee")

The model of the external review of the Polish State Accreditation Committee (PKA) activities

According to European Standards and Guidelines for Quality Assurance in the European Higher Education Area accepted by the conference of Ministers in Bergen operations undertaken by quality assurance agencies should be subjected to cyclical external reviews. In line with above-mentioned obligations the Polish State Accreditation Committee initiates external review for evaluation of compliance of its activity with European standards defined in following documents:

- 1) European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA) and
- 2) Code of Good Practice (ECA).

The scheme of external evaluation process of the Polish State Accreditation Committee consists of following elements:

- 1. identification of evaluation criteria,
- 2. identification of an institution responsible for assignment and appointing a panel of experts,
- 3. identification of an institution responsible for organizational issues.
- 4. assignment and appointing members of the external panel of experts,
- 5. self-evaluation of the Polish State Accreditation Committee, including preparation of the self-evaluation report,
- 6. site visit conducted by the external panel of experts,
- 7. preparation of the final evaluation report by the external experts' panel,
- 8. submitting of the final evaluation report to concerned entities,
- 9. identification of expenses,
- 10. identification of a time-table and responsibility for individual stages of process.

1. Evaluation Criteria

The external panel of experts evaluates activity of the Polish State Accreditation Committee taking into consideration:

- 1. European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA):
 - a) with reference to part 3: European standards and guidelines for external quality assurance agencies,
 - b) with reference to part 2: European standards and guidelines for the external quality assurance of higher education.
- 2. Code of Good Practice (ECA).

2. External panel of experts

The Conference of Rectors of Academic Schools in Poland (KRASP) is responsible for appointing members of the external panel of experts. The panel should consist of at least six foreign and local experts:

- 1) two experts with international experience in quality assurance, one of whom shall act as Chair,
- 2) one national expert acting as Secretary of panel,
- 3) two representatives of higher education institutions (national experts),
- 4) one representative of students (foreign expert).

Candidatures of experts can be also suggested by the Polish State Accreditation Committee. Approval of panel should be based on a declaration of independence, guaranteeing credibility and reliability of the review. The Polish State Accreditation Committee can express comments on final composition of the external panel of experts.

The Chair of the review panel shall be responsible for coordination of the review process. However, the Secretary is responsible for the preparation of the report draft on behalf of the experts' panel and mediates in contacts with interested entities.

The review panel will collect information during following stages:

- 1) studying self-evaluation report prepared by the Polish State Accreditation Committee,
- 2) a visit on site,
 - a. meetings with a team responsible for the self-evaluation report,
 - b. meetings with management of the Polish State Accreditation Committee, including its President, Vice-President and Secretary General,
 - c. meetings with the Presidium of the Committee,
 - d. meetings with representatives of the Students' Parliament of the Republic of Poland,
 - e. meetings with management and employees of the Bureau of the Polish State Accreditation Committee, as a unit providing administrative and financial support for the Polish State Accreditation Committee.
 - f. meetings with at least two rectors and/or deans of higher education institutions assessed by the Polish State Accreditation Committee in the period of last two years.
 - g. meetings with representatives of other institutions acting in higher education system.

3. Self-evaluation report

The Polish State Accreditation Committee prepares a self-evaluation report which covers:

- 1) a brief outline of the national higher education system,
- 2) history of PKA and its role in the national system of quality of higher education,
- 3) description of methodology of PKA activity in scope of the evaluation of the quality of education (standards, criteria, procedures, decision process, appeal procedure),
- 4) description of the activity of the Committee in scope of the opinion giving on programmes fields of studies, units in another locations,
- 5) characteristic of the internal system of quality assurance,
- 6) analysis of conformity of the PKA activity with standards of ENQA and ECA,
- 7) analysis of weaknesses and strengths of PKA,
- 8) additional information and enclosures.

4. Site visit

A site visit takes 2-3 days, depending on the panel members' knowledge about PKA and system dependences. The detailed program of meetings shall be conveyed not later than 6 weeks before the inspection through Secretary who remains in contact with unit organizing course of the site – visit. The panel members can meet and discuss essential issues on the day preceding the site - visit.

The Polish State Accreditation Committee provides in its headquarter conference rooms for meetings on site. Rooms will be equipped with 2-3 computers with internet access and multimedia projector.

External experts' panel will consider presentation of the main conclusions at the end of the site - visit. The representatives of the interested institutions, especially including management of the Polish State Accreditation Committee can participate in the final meeting.

5. Evaluation Report

The panel of experts prepares an evaluation report within time defined in point 7.

The evaluation report should cover the following areas of interest:

- general evaluation of compliance of PKA activities with European standards defined by following documents:
 - a. European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA) and
 - b. Code of Good Practice (ECA),

- 2) information about the panel members,
- 3) description of the main stages of the external review,
- 4) information concerning:
 - a. reasons for conducting the external review,
 - b. position of PKA competences in the quality assurance structure,
 - c. main tasks of PKA,
 - d. involvement of PKA in realization of the European standards of QA,
- 5) summary of the collected evidences,
- 6) analysis of the level of fulfilment of each criteria described in:
 - a. European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA) and
 - b. Code of Good Practice (ECA),
- 7) a conclusion of implementation by PKA: completely / sufficiently / partially or non –compliant with ENQA and ECA European standards,
- 8) recommendations,
- 9) the details of the timescale over which the external review was conducted.

The Secretary of the external review panel prepares the draft evaluation report based on the findings of the panel. The panel members comment on the draft of the evaluation report which is subsequently sent to the Polish State Accreditation Committee with request for factual correction. The final version of the report is conveyed to the Conference of Rectors of Academic Schools in Poland and to the Polish State Accreditation Committee. The Committee formulates opinion on information included in the report and apprises of follow – up measures to given recommendations.

6. Expenses

Expenses related to the external review procedure are covered by the Polish State Accreditation Committee. The expenses covers preparation of the self-evaluation report and conducting of the site visit e.g. travel and accommodation costs, as well as the fees of external panel members.

7. Time-table and responsibility for realization of individual stages of process of the external review

Activity	Final deadline	Responsibility
Assignment of the panel preparing a self- evaluation report	25 February 2008	PKA
Appointment of the external experts' panel - notifying the panel members	April/May 2008	KRASP/BUWiWM
Notification to ECA of the beginning of the external review procedure	Immediately after assignment of the external panel of experts and confirmation of procedure	PKA/KRASP/BUWiWM
Preparation of the self-evaluation report consisting of description of the internal system of quality assurance	to 15 April 2008	self-evaluation panel of PKA
Approval of the self-evaluation report content by the Presidium of PKA	15 May 2008	PKA
Translation of the self-evaluation report	15 May 2008	BPKA
Distribution of the self-evaluation report to external panel members	Till the end of August 2008	PKA/BUWiWM
Preparation of site – visit (logistics)	First half of September 2008	BPKA/BUWiWM in consultation with external panel of experts
Site-visit including possibility of the additional day for briefing on the higher education system in Poland	5-8 October 2008 (2-3 days)	external panel of experts, PKA
External panel of experts prepares draft report	Within 6 weeks after completing the site – visit, however, not later than 19 November 2008	external panel of experts
PKA receives draft report for factual	Within 1 week after receiving	external panel of experts

correction and sends report back to	the report from the evaluation	
external panel of experts	panel	
External panel of experts prepares final	Within 2 weeks after receiving	external panel of experts,
version of report and sends it to	comments from the PKA,	KRASP/BUWiWM, PKA
KRASP/BUWiWM	however not later than 10	·
	December 2008	
PKA expresses its opinion on information	Within 1 week after receiving of	PKA
included in the report of external panel	report from the evaluation	
	panel, however not later than 17	
	December 2008	
KRASP/BUWiWM sends to ECA/ENQA	December 2008	KRASP/BUWiWM
the evaluation report including comments		
of PKA		
ECA takes a decision on PKA compliance	likely December 2008	ECA
with standards	-	
PKA publishes paper and electronic	December 2008	PKA
version of the evaluation report, its	2 000	
comments, decision of ECA and		
information on activities which will be		
taken by PKA on the basis of given		
recommendations		
recommendations		

In order to guarantee the independence of the external review procedure the Bureau for Academic Recognition and International Exchange (BUWiWM) will be in charge of all organizational duties. BUWiWM performs a role of Secretariat responsible for passing on information and documents among entities involved in procedure of external review, i.e. among KRASP – evaluation panel – ECA – PKA – BPKA.

The main duties of BUWiWM are as follows:

- 1. notification about the beginning of external review procedure of PKA,
- 2. correspondence regarding appointing members of evaluation panel,
- 3. arrangement of the final date of inspection in second half of September 2008 and passing on logistical arrangements to BPKA (time and course of site visit, information about accommodation, arrivals, etc.),
- 4. passing on the self-evaluation report to members of the evaluation panel,
- 5. passing on the final version of report to KRASP,
- 6. passing on report with PKA comments to ECA.

Annex 3: Members of the external review panel

Nicholas Harris, Chair, international quality assurance expert: Until October 2008 Nick Harris was Director for Development and Enhancement at the (UK) Quality Assurance Agency for Higher Education (QAA), where he was responsible for the establishment and maintenance of the criteria that act as the reference points for academic standards and quality in the UK. He has been involved in a wide range of international QA reviews and projects, including the development of the Framework for Qualifications of the European Higher Education Area (and the Dublin Descriptors). Prior to joining QAA he was Professor of Biological Sciences at the University of Durham (UK), with an extensive array of international research collaborations in developmental crop biology. Nck Harris is currently a UK Bologna Expert and involved in various international consultancy and teaching activities.

Oddvar Haugland, Member, international quality assurance expert: Associate Professor in Economics; Chief Executive Officer of the Norwegian Agency for Quality Assurance in Education, Oslo, Norway.

Edward Jezierski, Member, national quality assurance expert: Professor in Automatics and Robotics; Vice-Rector of the Technical University of Lodz for Academic Affairs, 2002-2008; external expert in institutional and programme evaluation, Phare Multi-Country Programme in Higher Education ZZ - 95.20, Quality Assurance in Higher Education, 1997/98; member of the Accreditation Committee of Polish Technical Universities, 2001-2006; member of the Accreditation Committee at the Conference of Rectors of Academic Schools in Poland since 2005; external expert in the Institutional Evaluation Programme of the European University Association since 2003.

Marek Wąsowicz, Member, national quality assurance expert: Professor of Law; Vice-Rector of Warsaw University for Student Matters, 1998-2005; Vice-President of the University Accreditation Commission (UAC) (a peer accreditation committee for classical universities) in Poland, 2006-2007; President of the UAC elected for the term of office 2008-2012; member of the Steering Committee of the CEE Network (Central and East European Network of Quality Assurance Agencies) since 2006.

Viorel Proteasa, Member, international student expert: BSc in Physics; student of management; former President of the National Union of Students in Romania (ANOSR); member of the Executive Committee of the European Students' Union (ESU), formerly ESIB, 2007-2008.

Ewa Kolanowska, Secretary: MA in English Studies; translator; higher education consultant; author of national contributions for the Eurydice Network's publications (e.g. Eurybase – "Tertiary Education"; "Focus on the Structure of Higher Education in Europe, 2006/07") and reports on the Erasmus Programme for the National Agency for the Lifelong Learning Programme in Poland (e.g. "Impact of the Erasmus/Socrates Programme on the internationalisation of Polish higher education institutions", "10 Years of the Erasmus Programme in Poland, 1998-2008").

Annex 4: Agenda of the site visit

Day	Time	Type of meeting	Meeting participants Panel of experts and:
Sunday, 5 October		Arrival and accommodation Holiday Inn Hotel, ul. Złota 48/54 Warsaw	
	18.30	Meeting of the panel; presentation of the Polish higher education system, Holiday Inn Hotel	Hanna Reczulska, Deputy Director, BUWiWM
	20.30	Dinner at Holiday Inn Hotel	Hanna Reczulska, Deputy Director, BUWiWM
Monday, 6 October	9.30	Clarification of the aims and background of review Conference room no. 1	President, dr hab. Marek Rocki Secretary General, dr hab. Mieczysław W. Socha Vice-President, prof. dr hab. Anna Zielińska- Głębocka Vice-President, prof. dr hab. Danuta Strahl Director Barbara Wojciechowska Deputy Director – Barbara Bryzek Deputy Director Izabela Kwiatkowska-Sujka
	10.00	Meeting with the PKA team responsible for self-evaluation report – discussion on the self-evaluation process Conference room no. 1	prof. dr hab. Danuta Strahl dr hab. Mieczysław W. Socha dr hab. Marek Lisiński Director Barbara Wojciechowska Deputy Director Izabela Kwiatkowska-Sujka
	11.00	Meeting with PKA Presidium – discussion on PKA's mission, strategy, tasks and procedures Conference room no. 3	PKA Presidium: dr hab. Marek Rocki dr hab. Mieczysław W. Socha prof. dr hab. Andrzej Staniszewski prof. dr hab. Andrzej Stefan Górniak prof. dr hab. Zenon Łukaszewski prof. dr hab. Tadeusz Laudański prof. dr hab. Sławomir Drozdowski prof. dr hab. inż. Krzysztof Kędzior prof. dr hab. Danuta Strahl dr hab. Tadeusz Bodio prof. dr hab. Czesław Flanek Leszek Cieśla BPKA: Director Barbara Wojciechowska Deputy Director Barbara Bryzek Agnieszka Socha -Woźniak
	12.00	Internal meeting of the panel Conference room no. 1	
	12.30	Lunch at the invitation of PKA Restaurant <i>Smaki Warszawy</i> , Żurawia 47/49	
	14.00	Short presentation of the PKAs's internal quality assurance system Meeting with the PKA working group responsible for assessment criteria and PKA internal quality assurance system – discussion on assessment criteria and their improvement, and PKA internal quality assurance system Conference room no. 1	Dr hab. Marek Lisiński prof. dr hab. Danuta Strahl prof. Andrzej Banachowicz dr hab. inż. Adam Marciniec ks. dr hab. Jerzy Kułaczkowski dr hab. Mieczysław W. Socha prof. dr hab. Tadeusz Laudański BPKA Karolina Ciaś
	15.40	Walk to the Ministry of Science and Higher Education	
	16.00	Meeting with the Minister of Science and Higher Education	Minister of Science and Higher Education Prof. dr hab. Barbara Kudrycka
	17.30	Internal meeting of the panel Conference room no. 1	
Tuesday, 7 October	9.00	Meeting with former PKA Presidents – discussion on PKA's experience and PKA evaluation in HE system. Conference room no. 2	dr hab. Andrzej Jamiołkowski dr hab. Zbigniew Marciniak
	10.00	Meeting with the Bureau's management Conference room no. 1	Director Barbara Wojciechowska Deputy Director Barbara Bryzek Deputy Director Izabela Kwiatkowska-Sujka Chief Accountant Jolanta Janas
	10.30	Meeting with the Bureau's staff	Hanna Chrobak-Marszał Łukasz Wiater Wojciech Wrona Maciej Markowski Jakub Kozieł

			Grzegorz Laskowski Monika Stachowiak
	11.00	Meeting with employers' representatives Conference room no. 2	prof. dr hab. Janusz Pala - PKA prof. dr hab. Andrzej Królikowski – PKA prof. dr hab. Józef Rogowski - PKA prof. dr hab. Eugeniusz Gatnar – National Bank of Poland Krzysztof Ostrowski – Business Centre Club Cristiano Pinzauti – Polish Confederation of Private Employers Lewiatan Małgorzata Rusewicz– Polish Confederation of Private Employers Lewiatan Adam Ambroziik – Confederation of Polish Employers
	12.00	Lunch at the invitation of PKA Restaurant, Ale Gloria, Pl. Trzech Krzyży 3	
	14.30	Meeting with representatives of Conference of Rectors of Academic Schools in Poland and the Conference of Rectors of Non-University Higher Education Institutions in Poland— discussion about PKA in HEI perspective Conference room no. 1	prof. dr hab. Katarzyna Chałasińska-Macukow prof. dr hab. Waldemar Tłokiński
	15.30	Meeting with Rectors of HEIs assessed by PKA during the last two years—discussion on PKA in assessed HEI perspective, applied procedure, criteria, awarded assessments etc. Conference room no. 3	Representatives of: prof. dr hab. Adam Budnikowski - Warsaw School of Economics dr hab. Stanisław Zajas - Military Academy of National Defence in Warsaw, prof. dr hab. Stanisław Lorenz - Adam Mickiewicz University in Poznań, prof. dr hab. Wanda Romaniuk -Silesian Medical University in Katowice, prof. dr hab. Janusz Rachoń - Gdańsk University of Technology, prof. dr hab. Jan Strelau - Warsaw School of Social Psychology, prof. dr hab. Andrzej K. Koźmiński -Leon Koźmiński Academy of Business, dr Aleksander Kowalski - School of Economics and Computer Sciences in Kraków prof. dr hab. Brunon Hołyst - School of Management in Warsaw
	17.00	Meeting with representatives of Students' Parliament of the Republic of Poland participating in PKA expert panels – discussion on PKA cooperation with students. Conference room no. 2	Dariusz Kołoda – Warsaw University of Technology, Joanna Boruta – Gdańsk University of Technology, Aleksandra Giszczak– Marie Skłodowska-Curie University in Lublin, Przemysław Kotecki – Gdańsk University of Technology, Marcin Koper – Adam Mickiewicz University in Poznań, Łukasz Sawicki – Kazimierz Wielki University in Bydgoszcz Maciej Markowski BPKA
	17.45	Meeting with PKA's experts	prof. dr hab. Jan Želazo prof. dr hab. Jerzy Rogowski prof. Rafał Strent prof. dr hab. Ryszard Cieśla prof. Henryk Kuźniak
	18.00	Internal meeting of the panel	-
Wednesday, 8 October	9.00	Conference room no. 1 Participation in the meeting of PKA Section for Fields of Study in Fine Arts. Conference room no. 3	Chair, prof. Joachim Pichura prof. Andrzej Banachowicz prof. Andrzej Godek prof. Stanisław Górka dr hab. Paulina Komorowska- Birger prof. Adam Romaniuk
	9.45/10.00	Participation in the meeting of PKA Section for Fields of Study in Military Sciences. Conference room no. 2	Chair, prof. dr hab. Czesław Flanek dr hab. Janusz Karpowicz dr hab. inż. Włodzimierz Miszalski dr hab. Stanisław Sirko dr inż. Andrzej Urban

1	1.00-11.30	Last questions to the Presidium Conference room no. 1	prof. dr hab. Danuta Strahl, prof. Jaochaim Pichura, prof. dr hab. Tadeusz Laudański, prof. dr hab. Krzysztof Kędzior, Leszek Cieśla
		Internal meeting of the panel Conference room no. 1	
1:	3.00	General feedback to the PKA Presidium and lunch at the invitation of PKA, Restaurant <i>Absynt</i> , ul. Wspólna 35	dr hab. Marek Rocki dr hab. Mieczysław W. Socha prof. dr hab. Anna Zielińska-Głębocka prof. dr hab. Danuta Strahl Barbara Wojciechowska Barbara Bryzek Izabela Kwiatkowska-Sujka
1	4.00-14.30	Internal meeting of the panel Conference room no. 1	
A	Afternoon	Departure	