

**External review of the Polish Accreditation Committee /  
Polska Komisja Akredytacyjna (PKA)**

**Report of the review panel**

**December 2013**

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## 1. Executive summary

This report presents findings of the external review of the Polish Accreditation Committee (*Polska Komisja Akredytacyjna*, PKA) undertaken in November 2013. The purpose of the review was to assess the extent of PKA's compliance with the criteria for membership of the European Association for Quality Assurance in Higher Education (ENQA), provide the Board of ENQA with information necessary to renew PKA's full membership of ENQA and enable the Agency to extend its registration in the European Quality Assurance Register in Higher Education (EQAR). This ENQA-coordinated review was a second external review of PKA, following a nationally coordinated review in 2008 which had provided the basis for granting PKA's full membership of ENQA and for its registration in EQAR in 2009.

Having considered the documentary and oral evidence collected during the review process, the Panel is satisfied that, in the performance of its functions, PKA is in compliance with the ENQA Membership Provisions. The Panel therefore recommends to the Board of ENQA that PKA should have its Full Membership of ENQA confirmed for a further period of five years.

The panel considers that PKA fully complies with ENQA membership criteria 1 / ESG 3.3 (Activities), 2 / ESG 3.2 (Official status), 3 / ESG 3.4 (Resources), 5 / ESG 3.6 (Independence), 6 / ESG 3.7 (External quality assurance criteria and processes), and 8 (Miscellaneous). Substantial compliance has been achieved with ENQA membership criteria 1 / ESG Part 2 / 3.1 (Activities / Use of external quality assurance procedures), 4 / ESG 3.5 (Mission statement) and 7 / ESG 3.8 (Accountability procedures).

PKA is an independent institution whose external quality assurance activities have a clear legal basis and are regularly undertaken, with a predefined and published length of the cycle, and which has adequate resources for its current and planned activities. As part of its activities, it has been an active ENQA member and plans to increase its involvement in initiatives pursuing ENQA's aims. The processes, procedures and criteria underlying PKA's activity are defined in official documents and published, and are overall in line with the ENQA standards, including the stages of the evaluation process and the involvement of students; where ex-ante assessment does not comprise all stages expected under the relevant ESG, the panel considers it fully justified. PKA has put in place a set of mechanisms and good practice arrangements which provide for the moderation of conclusions and ensure a consistent approach to evaluations. It has an appeals procedure which ensures maximum impartiality under current national legislation.

PKA's mission statement, though in line with the relevant ESG in other respects, does not make it clear that its processes have a double purpose of quality enhancement and accountability / compliance. While PKA held consultations with stakeholders before introducing a new process, there is no formal mechanism for consultations on, or impact assessment of, prospective changes. Overall, the Agency's processes are fit for purpose and do contribute to quality enhancement. However, the involvement of international experts is still very limited. Ambitious targets have now been set for the involvement of international experts, and it is desirable that the arrangements for the recruitment (not the selection) of academic experts and the training of international experts should be improved. Overall, PKA's evaluation criteria take into account the effectiveness of IQA systems, though those for programme evaluation do not cover QA policy and procedures (ESG 1.1), and not all HEI units are eligible for institutional evaluation which fully covers all of Part 1 ESG. While evaluation reports are in line with the relevant ESG in most respects, not all of them include clearly identifiable recommendations (an issue currently being addressed by PKA). The Agency draws up annual system-wide reports, which contain analytical parts, but – despite a 2008 review suggestion – it has not produced a publication on IQA which, in both the panels' and HEIs' opinion, would impact positively on HEIs' further development in the areas of internal quality assurance and quality enhancement. Finally, PKA has developed various arrangements which (are likely to) make it much more responsive and accountable than before, but an internal quality management system is not fully in place yet.

The panel has made a number of recommendations which would need to be implemented by PKA to achieve full compliance with all of the ESG (see ESG sections and section 5.1), and some suggestions which PKA may consider when reflecting on its further development (section 5.2). Annex 1 includes a comparative overview table of 2008 and 2013 review conclusions and recommendations.

## 2. Glossary

**CRASP / KRASP** – Conference of Rectors of Academic Schools in Poland (university-type HEIs) / Konferencja Rektorów Akademickich Szkół Polskich

**RCHEIP / KRZaSP** – Rectors Conference of Higher Education Institutions of Poland / Konferencja Rektorów Zawodowych Szkół Polskich

**EHEA** – European Higher Education Area

**ENQA** – European Association for Quality Assurance in Higher Education

**EQA** – External quality assurance

**EQAR** – European Quality Assurance Register

**ESG** – European Standards and Guidelines

**FLC expert** – formal and legal compliance expert (assessing compliance with national legislation)

**HE** – Higher education

**HEI** – Higher education institution

**IQA** – Internal quality assurance

**LoHE** – Law on Higher Education

**MoSHE** – Ministry of Science and Higher Education

**NRDS** – National Representation of Doctoral Students / Krajowa Reprezentacja Doktorantów

**PKA** – Polish Accreditation Committee / Polska Komisja Akredytacyjna

**PRACs** – Peer review accreditation commissions / środowiskowe komisje akredytacyjne

**QA** – quality assurance

**QF** – Quality Forum: conferences devoted to QA, regularly (co-)organised by PKA

**SAAs** – PKA's Sections for Academic Areas

**SER** – Self-evaluation Report

**SPRP / PSRP** – Students' Parliament of the Republic of Poland / Parlament Studentów Rzeczypospolitej Polskiej

### 3. Introduction

This report analyses the compliance of the Polish Accreditation Committee (*Polska Komisja Akredytacyjna, PKA*) with the criteria for Full Membership of the European Association for Quality Assurance in Higher Education (ENQA). It is based on an external review conducted in November 2013.

#### 3.1. Background of the review and outline of the review process

##### 3.1.1. Background of the review

ENQA's regulations require all full member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

In November 2004, the General Assembly of ENQA agreed that the third part of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) should be incorporated into the membership provisions of its regulations. Substantial compliance with the ESG thus became the principal criterion for full membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

The third part of the ESG covers cyclical external reviews of quality assurance and accreditation agencies. External reviews may be coordinated nationally or by ENQA and be of type A or B. Type A reviews are intended solely to assess the extent of the agency's compliance with ENQA's membership criteria / ESG, while type B reviews also cover other aspects of the agency's work or organisation.

PKA underwent its first external review in October 2008. It was a nationally coordinated type B review, initiated by the Agency to assess its compliance with the ESG and with the Code of Good Practice of the European Consortium for Accreditation in higher education (ECA) in the context of its prospective application for ENQA membership and its commitments as an ECA member. As a result of the review (for a summary of its main findings, see section 3.1.2 below and an overview table in Annex 1), PKA was granted Full Membership of ENQA and registered in the European Quality Assurance Register in Higher Education (EQAR) in 2009.

The 2013 review of PKA covered by this report was a type A review coordinated by ENQA. According to the Terms of Reference for the review, it aimed to "assess the degree of fulfilment of all ENQA membership criteria specified in the 'European Standards and Guidelines for Quality Assurance in European Higher Education Area'" and to "provide the Board of ENQA with the information necessary for confirming the membership of the Polish Accreditation Committee in that organisation and allow to renew the registration in the European Quality Assurance Register in Higher Education (EQAR)".

##### 3.1.2. Main findings of the 2008 review

The 2008 external review panel concluded that overall PKA was in substantial compliance with the ESG. It complied fully with ESG 3.2. (Official status), 3.3 (Activities), 3.4 (Resources), 3.6 (Independence) and 3.7 (EQA criteria and processes). The panel did, nevertheless, recommend or suggested that PKA be provided with additional funding to keep its best staff and develop its analytical activities and those related to the promotion of QA among HEIs, and that the Agency's arrangements for appeal against its decisions be refined so that they more obviously ensure objectivity and transparency.

PKA was found to be substantially compliant with ESG 3.1 (Use of EQA for HE) and 3.5 (Mission statement). While acknowledging various strengths of PKA with respect to these criteria, the panel recommended or suggested that the Agency place stronger emphasis on its role in quality enhancement, and thus on a better balance between its enhancement and accreditation roles, and on qualitative rather than quantitative orientation of its processes, and provide greater support to

HEIs in the development of their IQA systems. PKA would also need to consult the academic community about the aims and objectives of its processes, give more weight to (progress in the development of) HEIs' IQA systems in its evaluations, and publish more detailed information on results of individual evaluations. Further, the Agency's mission statement should refer explicitly to PKA as a national accreditation body and accreditation as an outcome of its evaluation processes.

The only criterion which the panel considered to be partially met by PKA was ESG 3.8 (Accountability procedures). While it was confirmed that PKA's procedures and criteria did, in general, provide a transparent basis for its EQA activities and that opportunities existed to provide and collect internal and external feedback, a fully-fledged internal quality assurance system had not yet been developed. Thus, the panel recommended that PKA establish internal and external feedback mechanisms and, additionally, define the frequency of its external reviews in an official document.

The progress made by PKA in areas covered by the 2008 review recommendations and suggestions is discussed under the individual ENQA membership criteria in Chapter 4.

### **3.1.3. Review process**

The 2013 external review of PKA was conducted in line with the process described in the Guidelines for external reviews of quality assurance agencies in the EHEA and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of PKA was appointed by ENQA and composed of the following members:

**Galina Motova**, Deputy Director of the National Centre for Public Accreditation (NCPA), Russian Federation, (Chairman),

**Angeline Aubert-Lotarski**, Faculty Quality Coordinator, University of Mons; QA expert for Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur (AEQES), Belgium,

**Jethro Newton**, Professor Emeritus, QA expert, University of Chester, United Kingdom; EUA nomination,

**Martynas Serys-Kubertavicius**, PhD student, Chemical and Biological Engineering, University of Sheffield, Member of the Quality Assurance Agency (QAA) Student Advisory Board, United Kingdom; ESU nomination,

**Ewa Kolanowska**, higher education consultant, Poland (Secretary).

PKA produced a self-evaluation report which provided a substantial portion of the evidence that the panel used to draw its conclusions. Additional written evidence, including statistics, evaluation reports, as well as answers to the panel's additional questions (further on referred to as the Addendum to the SER), was provided by the Agency at the panel's request. The panel conducted a site visit to validate fully the self-evaluation and clarify any points at issue. A draft final report, prepared by the panel on the basis of the SER, additional documents and findings from the site visit, was sent to PKA for comments on its factual accuracy. Subsequently, the final version of the report was produced and submitted to PKA and ENQA. The panel confirms that it was given access to all documents and people it wished to consult throughout the review. Although the President of the Students' Parliament of the Republic of Poland, who represents students in the PKA Presidium, was unable to meet the panel, evidence necessary to draw conclusions was collected from students involved in PKA's evaluations, including the Students' Coordinator appointed by the President of the SPRP.

During the review the panel paid special attention to the areas where the 2008 review report recommended that PKA should take action to ensure full compliance with the ESG and where it suggested that reflection and action could contribute to the Agency's further development.

#### **Self-evaluation Report**

The SER (including 30 Annexes) was received by the panel two months before the site visit. It was well-structured, informative and consistent. It was helpful for the panel to gain an understanding of PKA's operational framework, status, mission, main functions, procedures and criteria.

However, the SER did not contain any information about the self-evaluation conducted by PKA as part of the external review. This would have shown how the opportunity for internal discussion and analysis had been exploited by PKA, especially in the context of recent changes in the national legislative framework for higher education and the Agency itself. An insight into the self-evaluation would have also been useful because formal mechanisms for internal feedback and reflection were among weaker aspects identified during the previous external review. Relevant evidence was collected during the site visit (see section 4.8 / ESG 3.8).

Moreover, the SER would have been strengthened by a much stronger focus on analysis and reflection. Ideally, the introductory part would have provided an insight into how PKA's approach (not only the scope of its responsibilities) had evolved recently to reflect changes in law, and into how it saw its 'accountability / compliance-related' role in a new context where the focus of evaluations shifted from quantitative to qualitative aspects, as well as its 'quality enhancement' role in a context where greater responsibility for quality had been given to HEIs, many of which did not yet have fully-fledged internal quality systems in place. The main part of the report concerned with PKA's compliance with the ENQA membership criteria provided detailed descriptions, while its 'Analysis' (or other) sections lacked an analysis and assessment of the Agency's strengths and weaknesses with regard to each of the ESG. This would have shown if and how PKA had taken advantage of the self-evaluation as a self-analysis and self-reflection process, and how its findings had informed the Agency's plans for, or might be used in, its further development. It would have also provided useful background for the general SWOT analysis in the SER. This point was clarified during the site visit (see section 4.8 / ESG 3.8).

### **Site Visit**

The panel had a preparatory meeting on the day preceding the site visit to discuss in detail the lines of inquiry and divide tasks among themselves. The site visit took place on 26 and 27 November 2013. During the site visit the panel met with the following groups of PKA's members, staff of the PKA Bureau and external stakeholders (for the site visit agenda, see Annex 2):

- PKA Presidium, including the President, and Vice-Presidents (further on referred to as 'the Presidium / Management Team')
- Members of the PKA Sections for Academic Areas
- Management and staff of the PKA Bureau
- Representatives of the PKA Section for Ethics, the Section for Appeals and the Quality Team
- External experts involved in evaluations, including students, doctoral students and representatives of employers
- Vice-Ministers of Science and Higher Education, responsible for the quality of HE and HE funding
- Presidents of the two main Rectors' Conferences, CRASP and RCHEIP (bringing together university-type, and non-university and non-public HEIs respectively), as representatives of HEIs and members of the PKA Advisory Board, heads of HEIs, including (Vice-)Rectors, and a representative of peer review accreditation commissions operating under the CRASP umbrella (further on jointly referred to as 'Rectors')
- Representatives of evaluated HEIs (with both public and non-public HEIs as well as a full range of PKA's ratings, from 'outstanding' to 'negative', represented by the group).

The visit was well organised and all meetings were held as scheduled. The panel appreciated the willingness of all groups of stakeholders that it met to engage in discussions which enabled it to verify and collect additional evidence and clarify various points at issue.

Subsequently, the panel discussed in detail all evidence collected and PKA's level of compliance with each of the ESG and reached a consensus on all standards. At the end of the site visit, the panel met with the PKA Presidium and briefed them on the general findings and conclusions of the review.

## 3.2. Higher education and quality assurance in Poland

### 3.2.1. Higher education system

The Polish HE system operates on the basis of the Act of 27 July 2005, Law on Higher Education (LoHE), amended in 2011, and regulations resulting from the Act. LoHE applies to all HEIs except some of very few institutions administered by churches and denominational organisations. In recent years two proposals for a 2010-2020 strategy for the development of HE have been prepared (one commissioned by the Ministry of Science and Higher Education, and the other put forward by the Polish Rectors Foundation as representing the academic community). While a single official strategy has not been adopted, the 2011 amendments to LoHE introduced a number of changes based on the two proposals.

HEIs are divided into public and non-public institutions and university-type (referred to as 'academic') and non-university ('professional' or 'professionally oriented') institutions. The establishment of a non-public HEI and degree programmes in a new non-public HEI requires a permit granted by the Minister of Science and Higher Education after consultation with PKA (see PKA's functions in section 3.3). University-type HEIs are those where at least one organisational unit is authorised to award doctoral degrees (as fulfilling certain requirements laid down by law, including the quality of research activity and a specific number of academic staff holding a professorial title or a postdoctoral or equivalent degree). They provide first-, second- and/or long-cycle programmes as well as third-cycle programmes. Non-university HEIs may provide first- and second- and/or long-cycle programmes but are not authorised to award doctoral degrees.

Currently (2012/13), Poland has 453 HEIs, including 132 public and 305 non-public institutions, and 16 institutions administered by religious organisations. Most of public HEIs (73%) and a very small proportion of non-public HEIs (7%) are university-type institutions. Individual HEIs vary considerably in terms of their size, with up to five hundred students in smallest non-public institutions to over 30,000 and 50,000 in biggest public institutions. A total number of 1,676,900 students follow first-, second- and long-cycle programmes and 42,295 are enrolled on third-cycle programmes. Almost two-thirds (73%) of students are now registered in public HEIs and more than one-fourth (26%) in non-public HEIs.

Following the political changes in 1989 and the adoption of new legislation in 1990, the HE sector experienced substantial expansion for around 15 years. This may be illustrated by a significant growth of the non-public sector (7 HEIs in 1990/91), accompanied by a slight increase in the number of (non-university) public HEIs (105 in 1990/91), the total student population increasing steadily (from over 394,000 in 1990/91 to 1,953,800 in 2005/06 as the peak year) and net enrolment rates growing fourfold (from 9.8% in 1990/91 to 40.9% in 2009/10). Recent years have seen a marked decline in the total number of students, and a gradual decrease in the proportion of students in, as well as a slight decrease in the number of, non-public HEIs. The decrease in the number of students is due to the steady decline in the population aged 19-24 years. The decreasing proportion of students in the non-public sector may also be explained by an increasing number of places on tuition-free full-time programmes offered by public HEIs in the last decade. These changes have led to increasing competition for students among HEIs where financial factors, the attractiveness of programmes in terms of enhancing graduates' employability and the quality of education play a major role.

While the process of introducing a two-cycle degree structure as an alternative to long-cycle Master's programmes gained momentum when Poland signed the Bologna Declaration in 1999, it was only between 2005 and 2006 that national legislation was adopted whereby HEIs were required to establish two-cycle programmes. The following types of programmes are currently offered: first-cycle programmes (at least 180 ECTS; two types of Bachelor's degree awarded, *licencjat* or *inżynier*, depending on the field of study); second-cycle programmes (at least 90 ECTS; a Master's (*magister*) degree); long-cycle (Master's degree) programmes (300-360 ECTS); third-cycle programmes leading to a doctoral (*doktor*) degree (2-4 years; 45-60 ECTS for courses); and non-degree postgraduate



programmes (at least 60 ECTS). HEIs provide two-cycle programmes in most fields of study, only long-cycle programmes in 11 fields (e.g. law, some medical areas and psychology) and either two- or long-cycle programmes in 5 fields (some areas of fine arts and theology). They may choose between two orientations ('profiles') within first-, second- and long-cycle programmes: 'practical' which covers a module developing students' practical skills, and 'general academic' with a module which develops further their theoretical skills.

The 2011 amendments to LoHE and resulting regulations introduced a number of major changes, including, in particular, extended autonomy of HEIs' with regard to the development of curricula. Previously, national legislation laid down national standards for first-, second- and / or long-cycle programmes in each of the 118 officially recognised fields of study, defining so-called outline curricular contents, recently together with learning outcomes, as well as ECTS credit values and course loads for some curricular components and various other requirements. All HEIs awarded national diplomas. The new legislation has defined only eight broad academic areas together with domains of science / fine arts and scientific / artistic disciplines within each, established the National Qualifications Framework for Higher Education (NQF-HE) together with a description of generic learning outcomes for first- and second-cycle programmes in the eight academic areas, and model learning outcomes for five fields of study. The learning outcomes defined for the eight areas are so general that they may be suitable for various domains and fields.

In terms of the extent of curricular autonomy, a distinction is made between HEIs authorised to award postdoctoral degrees (*doktor habilitowany*) (as fulfilling certain requirements laid down in law, including the quality of research activity and a specific number of academic staff holding a professorial title or a postdoctoral or equivalent degree) and those which are not authorised to do so. The former are free to establish fields of study and provide programmes within academic areas and domains of science / fine arts corresponding to those where postdoctoral degrees are awarded. They define learning outcomes for each field and develop curricula on this basis. The latter may provide programmes in specific fields in accordance with the model learning outcomes defined in the legislation (for five fields) or with a description of learning outcomes adopted by the HEI for other fields, but this requires a decision taken by the Minister of Science and Higher Education after consultation with PKA. National standards are laid down only for seven fields covered by EU regulations (regulated professions) and initial teacher training. As another step in the process of delegating greater responsibility for the quality of education to HEIs, the new legislation has replaced national diplomas with university diplomas (with a specimen provided in a relevant Regulation).

In addition to those above, some general conditions for all HEIs to provide degree programmes are laid down in national legislation. For example, HEIs are required to define fields of study which are integrated with their mission and development strategy and assign them to (an) academic area(s) defined in the NQF-HE. The regulations also specify what a curriculum should define (e.g. a description of intended learning outcomes which takes into account the relevant outcomes chosen from among those which are defined in the legislation for (a) given academic area(s), ECTS credit values, methods used to verify the outcomes achieved, etc.). Further, it defines the minimum staff requirements (the minimum number of, and qualifications to be held by, academic staff included in 'the minimum staff resources') and staff to student ratios for fields of study within the eight academic areas and for foreign language studies. Moreover, HEIs are required to implement an IQA system, with some aspects to be taken into account defined by law (see section 3.2.2). HEIs' compliance with the conditions laid down by law is obligatorily assessed by PKA as part of its programme evaluations.

### **3.2.2. Quality assurance**

An external quality assurance system providing for mandatory quality evaluation and covering all HEIs has operated in Poland only since 2002 when PKA was established. However, the previous decade saw some initiatives in this field undertaken by both the national authorities and the

academic community. The General Council for Higher Education, an elective representative body of higher education, assessed applications for the establishment of new HEIs and programmes as an advisory body for the Minister of Education in this respect, and the Accreditation Committee for Higher Vocational Education, established by the government in 1997, conducted quality evaluations in non-university HEIs, then providing only first-cycle programmes. These responsibilities were subsequently taken over by PKA. Another institution created in that period (2001) on the basis of national legislation was the National Accreditation Council for Medical Education (currently, National Accreditation Council for Schools of Nursing and Midwifery, NACSN&M) responsible for the accreditation of programmes in the fields of nursing and midwifery. In parallel, from the 1990s, HEIs set up their own peer review accreditation commissions (PRACs), each for a specific type of HEIs or group of related fields of study (e.g. classical universities or technical universities, or economics, business and management studies).

Currently, PKA is the only statutory body which is responsible for external quality assurance in all HEIs operating on the basis of LoHE and which takes legally binding decisions. It conducts fee-free ex-post evaluations resulting in accreditation (or refusal of accreditation), but its evaluations extend beyond a 'yes/no' accreditation process as they lead to one of four quality ratings (see section 3.3). It also reviews and gives its opinions to the Minister of Science and Higher Education on applications for the establishment of HEIs and programmes (ex-ante evaluation). The NACSN&M assesses the compliance of HEIs' nursing and midwifery programmes with national standards. It submits to the Minister of Health proposals for granting or, in the case of non-compliance, withdrawing accreditation. Accreditation is required to provide programmes in the two fields and accreditation ('yes/no') decisions are taken by the Minister. Accreditation costs are covered by HEIs. PRACs do not operate on the basis of national legislation, though they are mentioned in LoHE in the context of the role of the Rectors' Conferences as the bodies which should support and monitor quality enhancement efforts – responsibilities which they can carry out through PRACs. PRACs work under the auspices of the Conference of Rectors of Academic Schools in Poland (CRASP), representing university-type HEIs. They conduct programme evaluations based on applications voluntarily submitted by HEIs, which cover costs of the evaluation process, and their accreditation decisions do not lead to legal consequences. Neither the NACSN&M nor PRACs are members of ENQA.

The 2011 amendments to LoHE and new ministerial regulations adopted on their basis have introduced a number of major changes in the area of QA. In external quality assurance, aside from changing PKA's name from the State Accreditation Committee into the Polish Accreditation Committee and confirming its independent status, the new legislation has extended its activities to cover ex-post institutional evaluation in addition to previously conducted ex-post programme evaluation (see section 3.3). As a result of the extended curricular autonomy of HEIs and the introduction of a new approach to curriculum design (see section 3.2.1), the main focus of PKA's external quality assurance has shifted from inputs, conditions and processes to learning outcomes and from quantitative aspects previously regulated by national legislation to qualitative aspects.

The recently adopted legislation has also provided major boost to the development of IQA systems in HEIs. Some HEIs began to develop and introduce IQA systems in the late 1990s on a voluntary and pilot basis. Pursuant to the legislation adopted between 2005 and 2007, including LoHE in particular, HEIs were required to ensure high quality of education and establish IQA systems, though with no timeframe set for their implementation or further guidelines, and to conduct student evaluation surveys, as well as teacher performance appraisal every four years. Progress in the implementation of IQA systems varied considerably among HEIs. Currently, HEIs are required to implement an IQA system and the responsibility for supervising the implementation and further development of IQA systems is explicitly entrusted to Rectors of HEIs. The quality of education should also be a factor taken into account when, for example, student enrolment levels are determined by HEIs. An IQA system, covering all stages and aspects of the education process, should take into account, in particular, all methods used to verify the achievement of learning outcomes, student course

evaluation and findings from the tracking of graduates' careers. Annual reviews of learning outcomes achieved should provide a basis for improving curricula. Teachers' performance is obligatorily assessed at least every two years or every four years in the case of staff holding a professorial title and employed in an HEI on the basis of appointment. One negative assessment may result, and two consecutive negative assessments obligatorily result, in the termination of the employment relationship with the teacher concerned. The functioning of IQA systems is now a major aspect assessed by PKA as part of its evaluations.

PKA's 2011 Annual Report showed that while HEIs had made substantial progress in implementing IQA systems in previous years, various common shortcomings still existed two years ago. For example, no aims and objectives were defined for the IQA system; the approach adopted was piecemeal rather than comprehensive (e.g. only student evaluation surveys and teacher performance appraisal or no links between various elements); though QA bodies were established and internal regulations adopted, the system was not actually operational; staff did not have required knowledge about, and / or motivation to implement, an IQA system. Further, evidence collected through an IQA system was rarely used for improvement or enhancement of the quality of education. In this context, PKA decided to provide greater support to HEIs in defining and implementing IQA systems.

Finally, the amended legislation has put in place a new mechanism which on the one hand encourages HEIs to improve quality and on the other hand shows the growing importance of PKA's external evaluations. Though the level of State-budget funding for the functioning of HEIs (awarded only to public HEIs) is not tied to outcomes of quality evaluations, so-called pro-quality subsidies are now granted by the Minister of Science and Higher Education to both public and non-public HEIs. This is additional funding awarded to HEIs' units which have been given an 'outstanding' quality rating by PKA (a maximum number of 25 units every three years, each receiving over 400,000 euro in three years) and, on a competitive basis, to HEIs' units which intend to implement or modify their programmes and develop IQA systems (e.g. 62 units selected in 2012, each receiving around 250,000 euro).

### **3.3. Polish Accreditation Committee**

PKA was established as the State Accreditation Committee on 1 January 2002 on the basis of the amended Higher Education Act of 1990 and currently operates on the basis of the 2005 Law on Higher Education (LoHE), amended in 2011, and resulting Regulations of the Minister of Science and Higher Education. It is the only statutory body responsible for external quality assurance in all HEIs which operate on the basis of LoHE. Its overall aim is defined in LoHE insofar as the law states that PKA is "an institution working independently for the enhancement of the quality of education". Its main functions include:

- conducting programme evaluations;
- conducting institutional evaluations; and
- giving opinions to the Minister of Science and Higher Education on (applications for):
  - the establishment of HEIs, including HEIs or branch campuses to be established by foreign HEIs;
  - the granting of authorisations to HEIs' units to provide first-, second- or long-cycle programmes (in cases where a given unit is not authorised to award postdoctoral degrees or the field of study concerned covers an academic area and domains of science / fine arts which do not correspond to those where the unit is authorised to award postdoctoral degrees; for the extent of HEIs' curricular autonomy, see section 3.2.1 above).

In other words, PKA conducts mandatory ex-post programme and institutional evaluations and gives opinions or acts in an advisory capacity to the Minister of Science and Higher Education as part of what may be called ex-ante programme and institutional evaluation / accreditation (though the term 'evaluation' or 'accreditation' is not used in law to refer to this process). Additionally, it gives opinions to the Minister on matters related to: the re-granting to HEIs' units of suspended authorisations to

provide first-, second- or long-cycle programmes; the compliance of first, second- and long-cycle programmes with the conditions for the provision of programmes laid down in national legislation; and the quality of education at HEIs' units applying for an authorisation to award doctoral and postdoctoral degrees.

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

Ex-post programme evaluations cover first-, second- and long-cycle programmes and are scheduled according to the field of study. Ex-post institutional evaluations, which include the evaluation of third-cycle and non-degree postgraduate programmes, do not actually cover institutions but only individual units of HEIs. To be eligible for an institutional evaluation, a HEI unit should offer third-cycle programmes or fulfil both of the following conditions: 1) was not given by PKA a negative rating as a result of a programme evaluation in the five years preceding an institutional evaluation; in case a conditional rating was given, its justification did not refer to the design and functioning of the IQA system; 2) programme evaluations have already been conducted in most fields of study in which the unit offers first-, second- and/or long-cycle programmes.

Both ex-post programme and institutional evaluations are conducted in accordance with a schedule adopted annually by PKA. Additionally, ad-hoc evaluations may be carried out by PKA at the request of an HEI or the Minister of Science and Higher Education (e.g. where audits conducted by the Ministry do not provide necessary evidence for the Minister to fulfil their statutory responsibilities); the latter represent a small proportion of PKA's all evaluations (e.g. 7.6% of all evaluations in 2012).

Going beyond 'yes/no' accreditation decisions, PKA gives four quality ratings as a result of its ex-post programme and institutional evaluations: outstanding, positive, conditional and negative. Although the term 'accreditation' is not used in law in this context, outstanding, positive and conditional ratings are considered 'yes' accreditation decisions. Moreover, where an outstanding or positive rating is awarded as a result of an institutional evaluation, the unit concerned is not subject to programme evaluations for the validity period of the rating (8 or 6 years, respectively). Where a negative rating is given by PKA to a programme, the Minister of Science and Higher Education is required by law either to suspend or to withdraw the HEI unit's authorisation to provide the programme, depending on the scope and type of shortcomings. In the former case, the Minister sets a deadline for the unit to fulfil the conditions for re-granting the authorisation; PKA's opinion is subsequently required by the Minister to re-grant the authorisation. The authorisation expires, on the basis of the Minister's decision, if the unit fails to eliminate the shortcomings identified and a negative opinion is given by PKA. In case the authorisation has been withdrawn or expired, the unit may apply for a new authorisation after a period of at least one year. The only consequence of a negative rating given as a result of an institutional evaluation is that PKA continues to conduct evaluations of all programmes offered by the unit.

In the case of ex-ante evaluation / accreditation of HEIs and programmes decisions are taken by the Minister of Science and Higher Education. The Minister is required by law to seek PKA's opinion on applications for the establishment of HEIs and programmes but is not obliged to take a decision consistent with the Agency's position. In practice, only in a few cases, where HEIs presented additional evidence after PKA had reviewed an application, did the Minister take a different decision, while consulting PKA on an ad hoc basis. PKA's opinions on applications may be 'positive' or 'negative'.

The recent legislative changes (see sections 3.2.1 and 3.2.2) have confirmed the independent status of PKA, and extended the scope of its activities by entrusting it the responsibility for institutional evaluation. Simultaneously, with much greater weight given to the quality of education in general and HEIs' own responsibility for quality in particular, and with their extended curricular autonomy,

the changes have shifted the focus of PKA's ex-post evaluations towards qualitative aspects and provided a good basis for strengthening its position in the academic community and for placing greater emphasis on internal quality assurance in its external quality assurance. The Agency introduced new procedures and criteria within a very short time, in some cases without 'a grace period' granted by law, and without suspending its core external quality assurance activities.

PKA's term of office is four years (current: 2012-2015). The Agency may include 70 to 90 members who may be only academic staff holding at least a doctoral degree and employed at an HEI as the place of primary employment, except that the President of the Students' Parliament of the Republic of Poland (SPRP, a national student organisation) is a PKA member by virtue of law. It now has 87 members, including 11 representatives of employers.

The PKA bodies are the President, the Secretary General, and the Presidium which includes the President, the Secretary General, the Chairs of eight Sections for Academic Areas (SAAs), the President of the SPRP and two representatives of employers. The PKA President is also supported by two Vice-Presidents elected by PKA members. The remit of the Sections for Academic Areas (Humanities & Theology; Economics; Social Sciences & Law; Mathematics, Physical & Chemical Sciences; Biological, Earth, Agricultural, Forestry & Veterinary Sciences; Medical, Pharmaceutical, Health & Physical Culture Sciences; Engineering & Technology; Film, Music, Visual Art & Theatre Sciences) covers the eight academic areas distinguished in national legislation. Two units recently set up within the PKA structure are the Section for Ethics and the Section for Appeals. Administrative and financial support for the Agency is provided by the PKA Bureau (23 staff members). In 2009 PKA established an Advisory Board which gives opinions on PKA's strategic objectives and development trends, activities and processes.

On average, PKA conducts 450 ex-post evaluations and gives 500 opinions to the Minister per year. Its activities are funded by the State budget (9.7 mln PLN, i.e. ca 2.4 mln euro, in 2013).

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

#### **4. Findings: PKA compliance with the criteria for ENQA membership**

##### **4.1. ENQA Criterion 1 / ESG 3.1. / ESG Part 2: External quality assurance processes**

###### **ESG 3.1. Use of external quality assurance procedures**

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

Compliance with each standard of Part 2 of the ESG is discussed separately in the following sections.

##### **4.1.1. ESG 2.1.: Use of internal quality assurance procedures**

###### **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.

**2008 review recommendations:** "PKA should set a timeframe for the adoption of a strict approach to internal quality assurance in its external assessment [...]. 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."

###### **Evidence**

As stated in the previous review report, at that time national legislation contained only general provisions concerning IQA at HEIs, and most HEIs were at an early stage in the process of establishing their IQA systems. PKA's evaluation criteria included some elements of Part 1 of the ESG, and the Agency followed a flexible approach, focusing on progress made by HEIs. A well-functioning IQA system was one of the conditions for awarding only one of PKA's four quality ratings ('outstanding').

The legislation currently in force includes more detailed provisions concerning IQA systems in HEIs (SER, Annexes 17 & 18). As part of its ex-post programme evaluations, PKA is required by law to assess the functioning of the IQA system with regard to the analysis of learning outcomes and how the system has contributed to the improvement of the curriculum. As part of its ex-post institutional evaluations, the Agency is obliged to assess the functioning of the IQA system, including its design and impact on the enhancement of the quality of education. A description of an IQA system is required in applications for the establishment of new (non-public) HEIs and programmes on which PKA gives its opinions to the Minister of Science and Higher Education as part of ex-ante evaluation. Within this general framework, PKA is free to adopt its own detailed criteria for evaluation.

As stated by PKA in the SER and during the visit, the Agency has developed and applies the same IQA-related criteria in its ex-post evaluation and assessment of applications as part of ex-ante evaluation. One of the eight programme evaluation criteria and two of the eight institutional evaluation criteria concern directly the IQA system, and several relevant aspects are also included in other criteria. According to PKA (SER, meeting with the Presidium), the criteria refer to all of Part 1 ESG in the case of institutional evaluation and to all ESG except 1.1 (Policy and procedures for QA) and 1.5 (Learning resources and student support) in the case of programme evaluation. As explained by representatives of evaluated HEIs during the site visit, HEIs are not required or expected to publish PKA quality ratings, results of other evaluation / accreditation processes or (excerpts from) evaluation reports as qualitative information (ESG 1.7), but some publish PKA ratings together with selected positive comments from the reports.

The ESG were the main point of reference for PKA's criteria at the development stage, though the former are not explicitly referred to in the latter. Representatives of PKA's Sections for Academic Areas and experts that the panel met were aware of the link between the ESG and PKA's criteria, but students- and doctoral students-experts did not recall any reference made to the ESG during their training. Neither was it fully evident to the panel that the link between the ESG and PKA's criteria for IQA was clear to all representatives of HEIs interviewed.

PKA has recently appointed a group of experts specialising in the assessment of IQA systems. They take part in all ex-post institutional evaluations but are not involved in ex-post programme evaluations. As explained by PKA during the visit, the role of an IQA expert is taken on by the chair of an ex-post programme evaluation panel.

The conditions for the award of all four quality ratings (outstanding, positive, conditional and negative) in ex-post evaluations explicitly take into account the extent to which the programme or HEI unit evaluated meets the main evaluation criterion covering the IQA system as well as other criteria related to Part 1 of the ESG. The relevant criteria should be fulfilled at an outstanding level, fully met or at least largely met for an outstanding, positive or conditional rating respectively. An HEI unit which has received an outstanding or positive rating as a result of an institutional evaluation is not subject to programme evaluations for the validity period of the rating (8 and 6 years, respectively). A 'positive' (as opposed to 'negative') opinion in ex-ante evaluation cannot be given where there are any major shortcomings in the IQA system. (SER, Annex 1, Addendum).

The panel did not find specific recommendations guiding (further) improvement of IQA systems in three ex-post evaluation reports to which it had access (see also section 4.1.5 / ESG 2.5). Representatives of evaluated HEIs confirmed during the visit that reports did not always contain such recommendations, but they emphasised that shortcomings showing indirectly the path to follow were identified in all reports, and recommendations or suggestions were made by panels and written

down by HEIs during site visits, and thus, overall, PKA's evaluations had accelerated the pace of IQA-related work at HEIs.

### **Analysis**

It is clear to the panel that, as part of its revision of the evaluation criteria prompted by amendments to legislation, PKA not only implemented the 2008 review recommendations but went much further in developing its approach to IQA. It actually introduced a strict approach to IQA in its external evaluation processes rather than only setting a timeframe for its adoption. The panel has analysed PKA's current methodology in detail and considers that, overall, it is clearly geared towards the effectiveness of IQA systems in both institutional and programme evaluations, and that this is adequately reflected in all ratings given by the Agency both in formal terms (the criteria for awarding each rating) and in practice (final decisions taken by the PKA Presidium, included and justified in its Resolutions and based on evaluation reports to which the panel had access). The panel was also impressed by a sound learning outcome-based approach to quality in the curriculum, efficiently introduced by PKA within a short period of time. The feedback collected from evaluated HEIs confirms that the methodology adopted is effective.

The criteria for institutional evaluation do indeed enable PKA to assess the effectiveness of processes covered by all of Part 1 ESG, even though the panel believes it would be a good idea to encourage all HEIs to publish PKA's ratings and (excerpts from and / or links to) evaluation reports (ESG 1.7) as a way of building quality culture, in particular because the Agency aims to support HEIs in this process. The panel also commends PKA for the appointment of IQA experts for institutional evaluations to make the assessment of IQA systems as thorough (and consistent) as possible. Overall, the panel is convinced that the institutional evaluation process is sufficiently robust to verify whether an IQA system ensures adequate quality and standard. Thus, PKA also has a sound basis for its approach of easing the burden of external evaluations for HEI units which have received an outstanding or positive rating as a result of an institutional evaluation and, consequently, are exempt from programme evaluations for the validity period of these ratings (for further comments, see sections 4.1.2 / ESG 3.2 and 4.1.7/ ESG 2.7).

The panel has found that most ESG, including some elements of ESG 1.5, are covered by PKA's programme evaluation criteria. However, ESG 1.1 is not translated into, or not specifically referred to in, any (sub-)criteria. Thus, while in practice some aspects of this ESG may be taken into account by evaluation panels, the criteria as they are now defined do not provide explicitly a basis for thorough and comprehensive assessment of QA policy and procedures (ESG 1.1). In line with the ESG, these are considered by the panel to be a key element as they provide a necessary framework for IQA down to the programme level. On the one hand, this is, to some extent, understandable because the QA policy and procedures as such are thoroughly assessed at the level of HEI unit as part of institutional evaluation. Besides, there is a strong focus in programme evaluation on programme-specific mechanisms for ensuring the quality of curricula. Nevertheless, the relevant programme evaluation criteria should explicitly require that PKA assess whether a given programme has in place a comprehensive set of QA procedures which cover all aspects of quality. They should also be defined so as to ensure that PKA assesses whether and how the QA policy and procedures at the HEI unit level are reflected in detailed procedures and approaches and how the former are implemented, reviewed and revised at the programme level.

These ESG 1.1 aspects also appear to be particularly relevant in the specific Polish QA context for two reasons. Firstly, as stated in PKA's 2011 Annual Report (see section 3.2.2), many HEIs still have a piecemeal approach to their IQA systems. Thus, assessing both QA procedures in place at the programme level, and their link with the QA policy and procedures at the unit level, would support Heads of HEI units in developing fully fledged and integrated IQA systems, in line with PKA's overall aim of quality enhancement. Since, ideally, IQA arrangements at the unit level would be part of an institutional IQA system, this would also help Rectors in carrying their new responsibility for the development of IQA systems. Secondly, not all HEI units fulfil PKA's eligibility conditions for institutional

evaluation (provision of doctoral programmes or most programmes evaluated by PKA, with no negative rating given in the last five years - see section 3.3). This means that QA procedures at the programme level, and the way in which the HEI unit's QA policy and procedures are implemented at the programme level, are not subject to evaluation in units which undergo only programme evaluation (even if, in the panel's opinion, this is partly balanced by the strong focus on the quality of curricula, as mentioned above). Any revision of the IQA-related criteria for programme evaluation to cover ESG 1.1 should take into account that consistency needs to be ensured within a given cycle of evaluations.

Thus, overall, the panel considers that some revision of the criteria for programme evaluation would be necessary for PKA to be fully compliant with ESG 2.1. It is aware that this conclusion does not reflect far-reaching changes introduced by the Agency since the previous review when the conclusion was the same. However, like PKA in its external assessment of IQA systems in HEIs, the panel has taken a strict approach to assessing the Agency's compliance with ESG 2.1, considering that, unlike in 2008, this is justified by the new national context where legislation gives much more weight to IQA and where HEIs have made progress in establishing and developing their IQA systems in recent years.

The panel would like to make an additional point which extends beyond the scope of ESG 2.1. and, consequently, is not taken into account in its conclusion under this ESG. Although agencies do not need to refer explicitly to ESG Part 1 in their EQA criteria, it would be advisable to promote the former more widely so that Polish HEIs are fully aware that PKA's expectations of their IQA systems is part of a broader European approach to quality assurance which aims to increase transparency and foster trust among institutions across the EHEA.

**Panel conclusion:** Substantially compliant

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

#### **4.1.2.ESG 2.2: Development of external quality assurance procedures**

##### **ESG 2.2. Development of external quality assurance procedures**

**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.

**2008 review 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."*

##### **Evidence**

The previous external review showed that HEIs were fully familiar with PKA's processes and procedures. However, while they perceived its processes primarily as designed to ensure minimum quality standards and emphasised the role of peer review accreditation commissions (for PRACs, see section 3.2.) in quality improvement, PKA saw itself as an institution supporting quality improvement. Although its procedures and criteria drew on available experience, no consultations had been held with HEIs at the development stage.

Following 2011 amendments to LoHE, the overall aim of PKA's external quality assurance processes is predefined by legislation insofar as it states explicitly that PKA is an institution working for quality enhancement. This is reflected in PKA's mission statement. While a general framework for its activities is set by law, the Agency develops its own evaluation procedures and criteria. (SER, Annexes 3, 7, 17 & 18) All PKA's processes and procedures are described in various official documents, including its Statutes, and published on its website (in both Polish and English).



The recently amended legislation provided a basis for the introduction of institutional evaluation and a revision of PKA's evaluation criteria. As explained by PKA in the SER and during the visit, new criteria were first developed by PKA together with its external experts, including representatives of academic staff, students and employers, and its Advisory Board. Subsequently, PKA held consultations with the Minister of Science and Higher Education and the Rectors' Conferences. The new evaluation framework was also presented at various events attended by HEIs and employers, including Quality Forum conferences regularly (co-)organised by PKA as a platform for cooperation with external stakeholders.

As there was no transitional grace period for the implementation of the new regulations, PKA could not test its procedure for institutional evaluation on a pilot basis. However, it conducted a satisfaction / feedback survey on the new procedure among a small number of HEI units which had been the first group undergoing institutional evaluation, held a meeting with Rectors to discuss its findings and made some changes in its approach accordingly (SER). In its Addendum to the SER, PKA did not consider a survey on the new programme evaluation criteria necessary as the changes introduced had been "evolutionary" and no "alarming signals" had been received from HEIs through an on-going survey conducted since 2009 among all HEI units which had undergone ex-post evaluations (see also section 4.8 / ESG 3.8).

In their discussions with the panel during the site visit, both Rectors and representatives of evaluated HEIs pointed to a change in PKA's processes which had focused on compliance with minimum standards in the past and which now were designed to, and did actually contribute to, quality enhancement. The Rectors also confirmed that they had been consulted about the new evaluation framework and had suggested some modifications which were taken on board by PKA. While it was clear from the SER and discussions during the visit that the consultations on the new evaluation framework did not directly involve PRACs (operating under the umbrella of one of the Rectors' Conferences, CRASP), this was not raised as an issue by the Rectors. As explained by the PKA Presidium / Management Team during the visit, PKA did consider the 2008 review recommendation, but cooperation with PRACs is "a tricky issue" as PKA and PRACs are in a way competitors, and PKA is not aware of examples of cooperation between competing QA agencies in Europe.

As explained in the SER and mentioned in section 4.1.1, PKA has introduced an arrangement where the HEI unit which has received an outstanding or positive rating as a result of an institutional evaluation is exempt from programme evaluations for the validity period of the rating (8 or 6 years, respectively). During discussions with the panel, both Rectors and representatives of evaluated HEIs emphasised benefits from PKA's evaluations in terms of quality improvement, in particular in the case of second or third evaluations when HEIs are already fully familiar with all aspects of the process, and especially in the case of institutional evaluations which are not so detailed, have a broader focus and enable better assessment of quality. They stated, however, that it would be advisable to simplify the procedures so that the same or very similar aspects are not covered by both programme and institutional evaluations, and to shift the focus of evaluations so that they rely more on site visits than on documents.

### **Analysis**

The panel confirms that PKA's processes, procedures and criteria are published and easily available to all stakeholders.

The evidence collected clearly shows that stakeholders, in particular HEIs, were consulted and contributed to PKA's new procedures and criteria, and that an 'impact assessment' was carried out for the new process of institutional evaluation despite the pressure of time, both developments showing considerable progress as compared to the situation in 2008. Moreover, although no survey was undertaken for programme evaluation, both programme and institutional evaluation processes are now perceived by HEIs as contributing to quality improvement and enhancement, in line with

their (and PKA's) overall aim predefined by law – another welcome change as compared to the differences in perception five years ago.

It is, likewise, clear to the panel that benefits from PKA's evaluations in terms of quality improvement outweigh the related burden as perceived by HEIs. As mentioned in section 4.1.1 / ESG 2.1, the panel also considers that the approach where HEI units with an outstanding or positive institutional evaluation rating are exempt from programme evaluations for the validity period of the rating does indeed limit the evaluation-related burden to what is necessary in units where the IQA system is robust enough to ensure a required standard of quality and further quality improvement (for further comments, see section 4.1.7 / ESG 2.7).

On the other hand, though this is understandable in view of the pressure of time, the pilot survey limited to institutional evaluation did not allow PKA to make a comparative assessment of institutional and programme evaluations. Such a comparative assessment could have pointed to possible modifications like those (e.g. eliminating unnecessary overlaps) suggested by HEIs during the meeting with the panel, and it could have still improved the cost-benefit ratio of PKA evaluations (see also a related recommendation concerning additional feedback that could be usefully collected from HEIs in section 4.8 / ESG 3.8).

PKA has several informal ways of engaging with its stakeholders, including discussions with the Advisory Board which, however, do not meet the need for external stakeholder consultation due to its limited membership (even if six members represent academic and employers' umbrella organisations) or with stakeholders at various meetings and events which cannot, however, be considered formal consultations or a formal mechanism. The survey on institutional evaluation was conducted on an ad-hoc basis. There is no official document or officially adopted arrangement providing for (obligatory) consultations with HEIs and other stakeholders, identifying stakeholders to be consulted and defining methods to do so. Thus, PKA does not yet have in place a formal (i.e. officially adopted and thus binding) mechanism for consultations with its stakeholders on, and for impact assessment of, prospective changes in its processes, procedures or criteria. Such mechanism would be particularly useful given the frequently changing legal framework in Poland and would also help PKA to gain recognition for its processes among HEIs where it is still sought. Further, the panel considers that a survey on evaluations conducted in the past could not be a substitute for an impact assessment of prospective changes, unless these are indeed insignificant.

With regard to the role of PRACs in this context, the panel understands PKA's argument, though it also believes that the Agency's good working relations with CRASP will enable the two bodies, both acting on their own initiative, to find a way of consulting PRACs (cooperating under the latter's umbrella) on prospective changes that does not put PKA's 'competitive advantage' at risk.

**Panel conclusion:** Substantially compliant

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

#### 4.1.3.ESG 2.3: Criteria for decisions

##### 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.

**2008 review 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".

## Evidence

PKA takes formal decisions upon completion of both ex-post evaluation processes and the process of assessing applications as part of ex-ante institutional and programme evaluation, though its decisions are legally binding only in the former case, and in the latter case they are presented as 'opinions' to the Minister of Science and Higher Education who takes the final decision (SER). Evaluation procedures and criteria, criteria for decisions and decision-making procedures have been adopted by PKA in its Statutes (SER, Annex 1) and other official documents and are all published on its website.

As stated in the SER and confirmed by both PKA and its experts, including students and doctoral students, during the site visit, all PKA members and experts (academic experts, students/doctoral students-experts, experts representing employers, FLC experts assessing compliance with national legislation and IQA experts) are obligatorily trained in evaluation procedures and criteria. There are no special training arrangements for international experts. The initial training for (doctoral) students and FLC experts covers additional aspects specific to their needs and / or tasks (e.g. soft skills or national legislation respectively), and both groups take a test / exam assessing their knowledge and skills. Recently appointed IQA experts have been trained specifically to assess IQA systems at HEIs as part of institutional evaluations. In addition to initial training, training sessions are regularly organised for both PKA members and each category of experts, and experts meet regularly to share experience on a less formal basis. Additionally, ex-post evaluation panel chairs are obliged to brief panel members and check if they are familiar with the procedure. PKA does not yet have in place a formal mechanism for identifying experts' training needs (see also section 4.1.4 / ESG 2.4). However, it has launched a programme 'Supporting the development of competences of PKA experts' (Addendum to the SER; meetings with PKA and its experts during the visit), including a pilot survey on needs among students, and experts may and actually do make suggestions to the PKA Bureau. Experts confirmed during the visit that the training provided was adequate for their needs and tasks, and the pilot survey was much appreciated by students and doctoral students.

PKA has adopted and published procedures and templates with guidelines for self-evaluation reports to be produced by HEIs, guidelines for conducting site visits, templates with guidelines for site visit reports as part of ex-post evaluation and those for the assessment of applications / opinions as part of ex-ante evaluation (SER, Annexes 14-16, 20, 23 & 24). As stated in the SER and during the visit by both PKA and experts, templates are obligatorily used in evaluation / assessment processes. As part of ex-post evaluations, documents provided by HEIs are discussed by evaluation panels at a meeting preceding each site visit. Final versions of site visit reports are prepared by chairs of evaluation panels (on the basis of partial reports from panel members) who are present or former PKA members. Further, as part of good practice arrangements in place rather than a formal mechanism, the PKA Secretary General reviews a site visit report before it is sent to the HEI for comments in order to check its compliance with formal requirements and consistency with other reports, and to ensure that judgements made are supported by adequate evidence.

During the discussion with the panel, all representatives of evaluated HEIs agreed that comparability and consistency in evaluations were ensured by evaluation panels adhering to the same procedure and criteria, taking the same approach to evaluation and pursuing various points to gather comparable evidence. It was also important to the HEIs that public and non-public HEIs were treated in the same way by evaluation panels and, thus, that PKA applied the same 'standard' to both sectors.

Decisions are taken by PKA in a process including three main stages (SER, meetings with PKA during the visit). The evaluation panel or (a) reviewer(s) involved in ex-post and ex-ante evaluation, respectively, agree their position on each evaluation criterion and propose a quality rating / general opinion. Their proposal and key evidence collected is subsequently analysed by the relevant PKA SAA which takes a vote on the recommended rating / opinion and presents its proposal to the PKA Presidium. The Presidium makes a final decision by voting.

## Analysis

The panel has analysed PKA's criteria and confirms that all are clear and explicit, as well as published and easily accessible. It is confident that the set of mechanisms or arrangements which the Agency has put in place jointly ensure consistency in both applying the criteria and making decisions. The obligatory training for experts and their regular meetings to exchange experience, combined with the use of templates and guidelines, and the approach to writing and (double-)checking evaluation reports are effective mechanisms for ensuring consistency in the application of criteria and the moderation of evaluation reports. Although there is no special training for international experts, who are likely to be less familiar with the Polish HE and QA context and PKA's procedures, the panel considers that this has no impact on consistency in evaluations as other evaluation panel members, in particular chairs, are well placed to act as 'moderators' (but see also this element analysed in more general terms in section 4.1.4 / ESG 2.4). It is also clear to the panel that the three-stage decision-making procedure, with decisions taken collectively rather than individually at each stage, enables PKA to moderate conclusions and eliminate possible inconsistencies in the final phase of the evaluation process. The fact that all PKA SAAs are represented in the Presidium, which takes final decisions, ensures further that decisions are consistent across academic areas / fields of study. The panel had access to PKA's four resolutions including quality ratings and their justification and three evaluation reports and confirms that they are both internally and comparatively consistent.

The 2008 recommendation is no longer valid due to the recent amendments to legislation. In any case, PKA's criteria for awarding quality ratings are now fully transparent and an outstanding rating can be given to any programme.

**Panel conclusion:** Fully compliant

### 4.1.4.ESG 2.4.: Processes fit for purpose

#### 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.

**2008 review suggestions:** *PKA should / is encouraged to: 1) "...to align more clearly the roles and responsibilities for accreditations (opinions and decisions) and quality assurance / quality enhancement"; 2) "... 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) "... consider increasing the involvement of international experts ..."; 4) "... jointly review [with PRACs] the current predominance of PKA's quantitative orientation within its procedures and criteria and introduce more qualitative aspects"; 5) "... 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."*

#### Evidence

PKA conducts ex-post programme and institutional evaluations and assesses applications for the establishment of programmes and HEIs. The primary objective of both ex-post evaluation and ex-ante assessment processes is to support HEIs in enhancing quality. In formal and more practical terms, PKA assesses applications to give its opinion to the Minister of Science and Higher Education who takes a final decision as part of ex-ante evaluation. (SER, Annexes 1 & 7). The panel's meeting with Vice-Ministers of Science and Higher Education made it clear that both bodies cooperated closely on a daily basis and no problems were mentioned. It was also clearly stated that the Ministry's responsibility was to ensure HEIs' compliance with law, while quality was the responsibility of PKA.

The procedure for giving opinions on applications as part of ex-ante evaluation includes a review of documentation submitted by the applicant and an optional site visit, undertaken when documents

submitted are not sufficient for a thorough assessment. (A) reviewer(s) appointed by PKA prepare(s) a report / opinion; it provides a basis for PKA's final opinion which is subsequently forwarded to the Minister of Science and Higher Education (and other ministers, where applicable) and the applicant. Applications for the establishment of HEIs or programmes are assessed by the PKA SAAs and / or (an) external expert(s). (SER, Annex 1) Over the years, PKA noted improvements in re-submitted applications in terms of their compliance with its quality standards and requirements laid down in national legislation (SER). Nevertheless, according to its Annual Report, in 2012 PKA gave a negative opinion on nearly 50% of applications for the establishment of programmes, a positive opinion with recommendations on approx. 19% of applications, and a positive one on 35%.

The procedure for ex-post programme and institutional evaluations includes the following stages: a self-evaluation report produced by the HEI; a site visit; a draft report of the evaluation panel sent to the HEI for feedback; the final report and the quality rating awarded published on the PKA website (though not all reports were published at the time of the review as the programme and institutional evaluation databases were being merged into one). Additionally, each quality rating given and its justification are published in the Public Information Bulletin. A follow-up procedure is applied in cases where PKA has given a conditional rating or a positive rating with remedial measures to be taken within a given timeframe (for more details, see section 4.1.6 / ESG 2.6). Next and follow-up evaluations take into account shortcomings and recommendations from previous ones (SER, Annexes 1, 20, 23 & 24).

HEIs' self-evaluation reports are structured so as to provide evidence related to all evaluation criteria. A procedure for site visits includes meetings (SER, Annexes 15 & 16) with the HEI's authorities, academic staff, students and external stakeholders, class inspections, examination of additional documents (e.g. a mission statement and strategy, students' final theses) and an inspection of teaching and learning facilities. Representatives of HEIs stated during the visit that evaluation panels gathered more than adequate evidence to justify their conclusions. However, as mentioned before, both representatives of HEIs and Rectors admitted during the visit that while shortcomings were clearly identified in all evaluation reports, recommendations were not always included, though they were made during site visits and, in any case, shortcomings were sufficient for HEIs to find their way ahead. Very few or no recommendations on IQA were found by the panel in three evaluation reports provided by PKA. During the site visit, the PKA Presidium / Management Team explained that they did not want to impose on evaluated HEIs approaches or arrangements which they or their experts considered desirable, but they were revising report templates to put a greater emphasis on recommendations or suggestions. (More details in section 4.1.5 / ESG 2.5.)

Each ex-post evaluation panel is composed of 2 to 5 members (programme evaluation) or 3 to 8 members (institutional evaluation). A programme evaluation panel includes (an) academic expert(s), a student-expert and a formal and legal compliance (FLC) expert assessing compliance with national legislation requirements. An institutional evaluation panel additionally includes an IQA expert and experts representing doctoral students and employers.

The work of students- and doctoral students-experts is coordinated and evaluated by Coordinators appointed by the SPRP and the NRDS respectively. During the site visit, both groups clearly stated that they now felt to be full members of panels and their opinion was taken into account, though they would like to be more involved in the final stages of the evaluation process when the final report is sent to the HEI and a quality rating given. Where professors on some panels had not respected the principle of equal treatment in the past, PKA had provided all necessary support to solve the problem to the student's satisfaction. Several factors were mentioned by both groups as contributing to a gradual change in the approach to them: their improved competence, their position strengthened by recent amendments to legislation, and the decision of the Minister of Science and Higher Education to raise the fee for students so that it is now equal for all panel members. To representatives of the PKA SAAs and experts interviewed, students' involvement is crucial, they are

well prepared for their tasks, show a sense of responsibility and provide a refreshing input, which enables „learning both ways”.

The performance of evaluation panels is assessed through internal arrangements, and by evaluated HEIs through a survey after each evaluation process, with findings published at the end of each quarter and year (see section 4.8 / ESG 3.8). Data in PKA’s 2012 Annual Report shows that the work of evaluation panels is highly rated by HEIs (e.g. the overall rating of 4.7 on a scale of 1 to 5). This was confirmed during the visit by representatives of evaluated HEIs who all agreed that, except for some isolated cases, panels were well prepared and did a good or very good job. They, as well as the Rectors interviewed, also emphasised that the quality of experts had improved considerably over the years.

All relevant groups (the PKA SAAs, experts, including students and doctoral students, Rectors and evaluated HEIs) interviewed during the visit agreed that evaluation findings provided good guidance for further quality improvement, and observed changes in terms of quality improvement that had occurred as a result of PKA’s evaluation processes, though the pace of change varied depending on HEIs themselves. For the SAAs and experts, it was also important that site visits were beneficial for both sides, with PKA learning about good practice examples that could be promoted elsewhere. According to students, a more demanding approach on PKA’s side would, however, make its processes even more effective in terms of quality improvement. For Rectors, who are now responsible for IQA, evaluation findings are “an excellent tool” for initiating or introducing quality-related changes. Both the Rectors and representatives of evaluated HEIs also emphasised that the focus of PKA’s processes had shifted from compliance with formal requirements laid down in law (though it is still covered) to IQA systems and quality improvement.

Selection procedures and criteria for appointing experts are laid down in PKA’s official document (SER, Annex 19) and published on its website. The criteria are defined separately for each category of experts, reflecting their specific roles, but all require prerequisite knowledge and / or prior experience in areas covered by evaluation. Candidates are proposed by relevant PKA units or external bodies, including the PKA SAAs, Secretary General and Bureau, national organisations of students and doctoral students (SPRP and NRDS) and employers’ organisations. As explained by the SAAs and experts during the visit, there are no formalised methods for recruiting academic experts and the SAAs often rely on their informal and personal links, though seeking those with recognised expertise. In addition to the recruitment via the SPRP and the NRDS, students and doctoral students are reached through advertisements and letters to student organisations; priority is given to those who are involved in student activities as this shows their expertise and commitment. International experts are sought through QA agencies abroad and PKA members’ personal links; as so far PKA has sought mainly Polish-speaking experts, the former method has not proved very effective. Pre-selected students, doctoral students and FLC experts take a test / exam assessing their knowledge and skills. Recently, a number of experts have been selected from the pool to specialise in the assessment of IQA systems. As explained in the Addendum to the SER and during the visit, the list of experts (currently, almost 1,000) is revised at the beginning of PKA’s term of office and updated in line with programme evaluation cycles. PKA also emphasised during the visit the importance of experience gained by its experts over a number of years.

All experts receive obligatory initial as well as periodic training and meet regularly to share experience. Further, evaluation panel chairs are required to brief experts on, and check their familiarity with, the procedure. There are no special arrangements for the training of international experts. While PKA has not yet put in place a mechanism for identifying experts’ training needs on a regular basis (only a pilot survey conducted among students and doctoral students), the panel found during the visit that experts considered the training provided adequate and that they could put forward suggestions to the PKA Bureau. (See also section 4.1.3 / ESG 2.3).

Currently, according to statistics provided to the panel, PKA has a pool of 35 international experts (as compared to ca. 40 according to the previous external review report), mainly those speaking Polish, who were involved in ca. 1% of all ex-post evaluations conducted in each of the last three years (SER, Addendum). Their limited involvement was identified as a weakness and a threat in the SWOT analysis in the SER. As explained in the SER and confirmed by PKA during the visit, the extent of (potential) involvement of international experts is limited by the insufficient level of internationalisation of Polish HEIs, their low interest, a small number of programmes delivered in English and HEIs' reluctance to translate documents into foreign languages. A very small number of HEIs interested in evaluations conducted in English was also considered a threat in the SWOT analysis. At the same time, as stated in the Addendum to the SER and during discussions with the PKA Presidium / Management Team, PKA had set for itself a target of involving international experts in all institutional evaluations and in 30% of all evaluations by 2015. The panel was also informed during the visit that international experts were involved in all institutional evaluations currently undertaken, unless an expert was unavailable and a replacement could not be found. The Presidium / Management Team also explained that their view that HEIs were not interested in evaluations involving international experts was based on what they had learned during site visits rather than on a systematic review of the current situation. In the context of international experts, it was also mentioned that PKA was considering the possibility of exchanging experts with QA agencies in other countries.

The PKA SAAs and experts, including students and doctoral students, all agreed during the visit that more international experts would need to be involved and that this would have a great added value in terms of looking at HEIs from a different perspective and learning. Students and doctoral students saw no problem with speaking English. However, while they were happy about cooperation within evaluation panels where international experts had been involved, they also considered that not all those involved had been sufficiently well trained or prepared with regard to PKA's procedures.

Both the Rectors and representatives of evaluated HEIs that the panel met were enthusiastic about the idea of involving international experts in PKA's evaluations and thus giving them an international dimension; both believed that combining Polish and international perspectives would enhance the effectiveness of evaluations. The 'logistics' related to the involvement of international experts, including the translation of documents where extra funds are necessary, was considered "a slight burden" by both groups. It was thus suggested that they could be involved in a certain proportion of evaluations or in the evaluation of selected aspects (for which only some documents would need to be translated). The representatives of evaluated HEIs also emphasised that international experts would need (to be adequately trained) to understand the national / local context.

All PKA members, Bureau staff and external experts sign a declaration where they undertake to respect the Agency's Code of Ethics, including its general ethical principles and the principle of no conflict of interest (with cases of potential conflict of interest listed in the document). A breach of the Code may lead to a disciplinary penalty. Experts for individual ex-post evaluation and application review processes are appointed through a two-stage procedure (candidates proposed by the PKA SAAs and approved by its Secretary General) where the principle of no conflict of interest is taken into account; the above-mentioned Coordinators are also involved in the appointment of students and doctoral students. (SER, Annex 9; meetings with PKA and experts, including students, during the visit)

## **Analysis**

Overall, the evidence collected shows that PKA's ex-ante assessment and ex-post evaluation processes are fit for purpose and do indeed contribute to quality enhancement, and that most of the 2008 review suggestions have been taken on board by PKA. In the context of these suggestions, the panel notes that the arrangement where PKA and the Minister of Science and Higher Education share in a way the responsibility for ex-ante evaluation is still in place, but the evidence demonstrates that

there is a clear distinction between a 'formal compliance' and decision-making role of the Ministry and a 'quality-oriented' and advisory role of PKA. A shift towards a qualitative orientation is clearly reflected in the new evaluation criteria which the panel analysed in detail, and the feedback from HEIs confirms, likewise, that PKA's processes are now evidently fit for the purpose of quality improvement. The panel also notes that PKA has introduced an on-going survey to collect feedback from evaluated HEIs which helps to assess the usefulness of its processes in terms of improvement (see section 4.8 / ESG 3.8).

With regard to the elements considered particularly noteworthy under ESG 2.4, strengths evidently outweigh weaknesses. The panel has analysed the criteria and procedures for the selection of experts and considers that they are sufficiently stringent or rigorous to select all categories of experts with relevant expertise. Combined with the training provided, this ensures, overall, that experts are competent to perform their tasks, and this is confirmed by the views of the evaluated HEIs interviewed during the visit. A mechanism is also in place to prevent a conflict of interest. However, it would be advisable to put in a place (as currently considered by PKA) a mechanism to identify experts' training needs on a regular basis. The current informal arrangement relies solely on individual experts' initiative and does not allow identifying needs of a representative sample of nearly 1,000 experts, including less active ones who would not necessarily make suggestions to the PKA Bureau. Further, the method of recruiting academic experts, with the PKA SAAs proposing candidates and the recruitment process largely based on informal links, does not ensure open or equal access to the pool of experts and, thus, is not fully transparent. This is not balanced by a transparent selection method where submitted applications are considered collectively within the PKA SAAs as they are directly involved in the recruitment process. This could be improved, for example, by posting advertisements in popular academic journals or other media. While the panel understands PKA's interest in retaining experienced experts as long as possible, newcomers are likely to bring in a refreshing perspective and further enhance the transparency of PKA's activities. To this end, it would be a good idea to define a minimum proportion of new experts to be recruited for each new cycle of evaluations or PKA's term of office. Moreover, considering that international experts are not as familiar with the national HE and QA context, it would be advisable to provide additional training and / or materials to them, even if any possible gaps in their expertise can be 'filled in' by other evaluation panel members.

The panel commends PKA for ensuring active involvement of students and doctoral students in all programme and / or institutional evaluations, and for creating both conditions and a climate where they feel comfortable, their contributions are highly valued and they can develop their skills. Like some interviewees, the panel was impressed by their sense of mission and responsibility for encouraging and supporting quality enhancement in Polish HEIs.

PKA's ex-post evaluations include all key stages promoted by ESG 2.4, from self-evaluation to follow-up. The panel is confident that the ex-post evaluation procedure ensures that ample evidence is gathered to justify conclusions, and this was also confirmed by the feedback from HEIs during the visit. The composition of evaluation panels enables them to assess in depth all aspects covered by the criteria. Although the process of assessing applications (ex-ante evaluation) does not always include all relevant 'model' stages, the panel considers it sufficiently fit for purpose. For a programme or HEI which is not yet established, documentation submitted is sufficient to assess compliance with key criteria (in particular, those related to learning outcomes or a concept of the IQA system), and a site visit is undertaken where it is necessary to verify the accuracy of written evidence. In practical terms, the reliance on desk assessment is also justified by PKA's workload. It is common (good) practice that reviews / opinions on applications are made available only to the applicant and, where required, clearly identified other parties rather than published, and the panel would not see any added value of publishing PKA's opinions in terms of quality improvement in the HE sector as non-applicant HEIs can learn from shortcomings identified in ex-post evaluations reports.



While it has the potential to impact positively on IQA in Polish HEIs, it is disappointing to note that the suggestion made in 2008 regarding the involvement of international experts has not been addressed to any significant extent in terms of the level of increase in the numbers involved. The panel notes, nevertheless, that international experts now take part in all institutional evaluations and that PKA has set ambitious targets for their involvement to be reached within two years. It is not in a position to judge whether these targets are fully achievable. However, considering difficulties with recruiting Polish-speaking experts on the one hand and HEIs' strong support for involving experts not necessarily speaking Polish, expressed during the panel's visit, on the other hand, the panel believes that the targets may be more realistic if PKA seeks and involves English-speaking experts as well, especially that there are now over 400 programmes delivered in English in Poland (CRASP database: <http://www.studyinpoland.pl/en/>). Even if initially introduced on a pilot basis, this approach would encourage further internationalisation of Polish HEIs. As an additional point extending beyond strictly interpreted ESG 2.4, given the discrepancy between PKA's perception of HEIs' interest in evaluations involving international experts and their interest expressed during the panel's visit, it may be a good idea to hold some consultations with HEIs to arrive at a common understanding of the current situation, including the main obstacles, and workable arrangements for the involvement of international experts (see also section 4.8 / section 3.8).

As mentioned above, it is clear to the panel that PKA's processes, and in particular site visits, do indeed contribute to institutional improvement and enhancement. It also appreciates PKA's sensitivity to the issue of university autonomy where recommendations are (to be) made. However, it also considers that the Agency should provide guidelines on how quality can be enhanced and IQA systems developed and improved, while now such guidelines can hardly be found in individual evaluation reports (see also sections 4.1.1 / ESG 2.1 and 4.1.5 / ESG 2.5). Where recommendations would be perceived as too 'strong' by HEIs, suggestions could be included in reports instead (as now considered by PKA itself), and a clear distinction made in report templates between the former as referring to what must be done to fulfil requirements and the latter as advice or good practice examples.

The 2008 Suggestion no. 5 is considered in section 4.1.5 / ESG 2.5.

The panel understands that the 2008 review conclusion ('fully compliant') under this ESG was justified by the specificity and constraints of the national context (an early stage in the process of building quality culture and internationalisation, and strict, detailed and largely quantitative requirements in law) and, thus, also that weaknesses were addressed through suggestions rather than recommendations. It has taken into account all positive and significant developments that have taken place since then, in particular in terms of making PKA's processes fit for the purpose of quality improvement. However, it considers that, in particular, PKA should have made much more intensive efforts to increase the involvement of international experts during five years, and that the current national context, conducive to further development of QA in Poland in terms of both national legislation and HEIs' evolving approach, allows and even obliges PKA to make improvements in other areas identified above.

**Panel conclusion:** Substantially compliant

**Panel recommendations:** PKA should review and revise its arrangements for the recruitment and training of experts so that academic experts are recruited through a fully transparent procedure, a mechanism is put in place to assess training needs of all categories of experts on a regular basis, and the training or briefing of international experts ensures that all of them are well prepared for their tasks in terms of familiarity with the national context and PKA's procedures. To increase transparency, PKA may consider adopting a rule that a certain minimum proportion of new experts are recruited after the end of each evaluation cycle or PKA's term of office.

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

For a recommendation on recommendations and suggestions to be included in evaluation reports, see section 4.1.5 / ESG 2.5.

#### 4.1.5.ESG 2.5.: Reporting

##### 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.

**2008 review recommendation:** *“PKA should explore ways to publish more detailed and specific information on individual programmes, while respecting the national legislation.”*

##### Evidence

At the time of the previous external review PKA published only quality ratings awarded and evaluation reports were available to the public only on request. As explained by PKA, this approach was justified by the fact that reports contained sensitive data. Discussions with Rectors of HEIs during the site visit also indicated that there was no strong demand in Polish higher education for more detailed reports.

Currently, pursuant to the recently amended LoHE, PKA is required to publish its resolutions, which include ex-post evaluation ratings together with a justification, on its website and in the Public Information Bulletin, and it may publish reports of evaluation panels on its website. These provisions are also reflected in PKA’s Statutes. PKA publishes both quality ratings (including ‘negative’ ones) and individual ex-post evaluation reports (though not all reports were available on the website at the time of the review as the programme and institutional evaluation databases were being merged into one). Following the 2008 review, report templates were modified so that sensitive data are now included in a separate section made available only to the HEI concerned. Opinions on applications, given to the Minister of Science and Higher Education as part of ex-ante evaluation, are forwarded to the Minister (and other ministers, where appropriate) and applicants. (SER, Annexes 1, 3, 23 & 24; PKA website)

Ex-post programme and institutional evaluation / site visit reports are both based on templates structured according to eight evaluation criteria (SER, Annexes 14 & 15). They include a part outlining the background of the site visit, detailed comments under each criterion, a final conclusion on the level of compliance (a five-grade scale) together with a summary of conclusions for each criterion, and a summary table presenting the level of compliance with all criteria. A programme evaluation report template also includes a section for final comments on development and quality enhancement prospects, areas where an IQA system is effective and those where measures should be taken, including recommendations. An institutional evaluation report template ends with final comments on strengths and weaknesses within the context of the IQA system and other aspects, and contains an annex summarising shortcomings in the IQA system and related recommendations. As draft reports are sent to HEIs for feedback, evaluation panels may be requested to clarify any statements which are not easily readable. As mentioned in section 4.1.4, changes in report templates were being discussed at the time of the panel’s visit to include a summary of recommendations and suggestions at the end and make a distinction between recommendations (what must be done to meet requirements) and suggestions (advice).

Reviews / opinions on applications are also based on templates structured according to the evaluation criteria. They include detailed comments and conclusions concerning each evaluation criterion, a final conclusion and a proposed justification for PKA’s resolution. (SER, Annex 20)

Growing demand in society, in particular among prospective students and their parents, for reliable information on the quality of education was identified as an opportunity in the SWOT analysis in the SER. Intended readers of ex-post evaluation reports are Ministers supervising HEIs, university

authorities, students and doctoral students, prospective students and their families (SER, Addendum). As explained by PKA during the visit, visits on its website are considered to show that evaluation reports are used by various groups, including students and journalists; reports are also promoted at Quality Forum conferences, regularly (co-)organised by PKA, and PKA plans to have meetings with prospective students in 2014. According to students- and doctoral students-experts interviewed by the panel, it would be desirable to publish reports within a shorter time after evaluations, prospective students do not read evaluation reports, wider promotion of reports among them is necessary, and promotion through social media would be a better strategy.

PKA collects feedback from each evaluated HEI through an online survey where HEIs can comment on, among other things, the usefulness of evaluations in terms of identifying problems and improving quality. Comments and suggestions can also be made by both HEIs and any other interested parties via a recently established 'Quality window' on the PKA website. As viewed by both the Rectors and representatives of evaluated HEIs that the panel met, evaluation reports are clear, detailed, contain a lot of substance, make HEIs aware of both strengths and weaknesses, and are very useful for their needs in terms of both improving quality at their own institutions and making comparisons among HEIs (see also section 4.1.4 / ESG 2.4). While site visits are particularly useful in this respect, and thus perhaps more useful than reports, both groups emphasised, as mentioned before, that though recommendations were not included in all reports, clearly identified shortcomings showed them what should be done. Some of the participants did not expect detailed guidelines as each HEI should find its own way forward. Moreover, advice (rather than official recommendations) is given during site visits and suggestions can be written down by HEIs.

### **Analysis**

With evaluation reports now published, PKA has implemented fully the 2008 recommendation and ESG 2.5 in this respect. It is also worth noting a cultural change in Polish HEIs which were not particularly interested in detailed reports five years ago and now appreciate their usefulness; this may have been at least partly encouraged by the publication of reports by PKA in recent years. As mentioned in section 4.1.4 / ESG 2.4, the panel would not see any added value of publishing PKA's reviews / opinions on applications.

The panel had access to three reports (without annexes) and confirms that they are clear, include background information on the evaluation process, a description and analysis of ample evidence collected, and identify strengths and weaknesses. As mentioned before, it found, however, very few or single and general or no recommendations, in particular specifically referring to the IQA system, in the main text or at the end of the reports. The panel is aware that reports as they are now may meet the needs of (some) HEIs in terms of guiding quality improvement. However, it agrees with PKA that templates need to be revised so that they include easily locatable recommendations and suggestions, with a clear distinction between the two, as recommendations and suggestions should be documented and available not only to the HEIs concerned, if made during a site visit, but also to the general public. (See also section 4.1.4 / ESG 2.4.)

Although this extends beyond strictly interpreted ESG 2.5 and, thus, is not taken into account in the conclusion below, the panel agrees with PKA's students- and doctoral students-experts that what is done currently could not be considered sufficient to promote evaluation reports, especially among prospective students. As the demand in society for information on the quality of education is growing, PKA may consider how it can exploit fully this opportunity by reviewing its PR policy and making wider use of mass media to target the general public and, as suggested by students, in particular social media to reach prospective students (see also a suggestion in section 5.2). In this way, the Agency would also implement the 2008 suggestion about increasing its public profile (see section 4.1.4 / ESG 2.4).

**Panel conclusion:** Substantially compliant

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

#### 4.1.6.ESG 2.6.: Follow-up procedures

##### 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.

**2008 review recommendation:** *“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 HEIs where internal quality assurance systems are at an early stage of development. These reports should focus on (development of) internal quality assurance systems.”*

##### Evidence

PKA gives four quality ratings as a result of ex-post evaluations: outstanding, positive, conditional and negative. Follow-up procedures are defined in its official documents for a conditional rating and a ‘sub-type’ of positive rating. In the case of a conditional rating, recommendations from the evaluation report should be implemented within one year and the HEI concerned is required to submit a report on remedial measures taken and other relevant changes. A follow-up evaluation, including a site visit where justified by the nature of shortcomings, is undertaken to assess the extent to which recommendations have been implemented and the effectiveness of measures taken by the HEI. In the case of a positive rating, the HEI concerned may be obliged to take specific remedial measures and submit a report on their implementation within a timeframe set by PKA. Such positive ratings are given only in special cases where minor shortcomings do not significantly affect the quality of education and which require action to be taken over a longer period of time. If remedial measures taken by the HEI do not meet PKA’s expectations, it undertakes a programme or institutional evaluation earlier than it would normally be scheduled. (SER, Annex 1)

As stated in the SER and confirmed during the site visit (SAAs and experts), where PKA has given an outstanding rating or a positive rating with no recommendations to be implemented by a specific deadline, recommendations made in evaluation reports and action taken on their basis are taken into account in the next cycle of evaluations. Relevant sections are included in evaluation report templates but, as explained in sections 4.1.4 and 4.1.5, while shortcomings are clearly identified, not all reports actually contain specific recommendations. The representatives of evaluated HEIs assured the panel that shortcomings identified / recommendations made as a result of a previous evaluation are followed up during the next evaluation, and that changes resulting from previous evaluations are indeed made and visible. This was confirmed by the PKA SAAs and experts.

A follow-up procedure is not applicable to negative ratings. A programme which has been given a negative rating is suspended or abolished (and the HEI should re-apply for an authorisation to provide it) (see section 3.3). An HEI which has received a negative rating in an institutional evaluation is subject to programme evaluations as part of a regular evaluation cycle.

ESG 2.6 is not considered applicable to PKA’s opinions on applications for the establishment of HEIs or programmes given as part of ex-ante evaluation.

As explained by PKA during the site visit, given its workload, a follow-up procedure for programmes and HEIs with positive (except the above-mentioned sub-type) and outstanding ratings is not considered, but between evaluations the Agency provides additional support for HEIs in the development of their IQA systems at regular Quality Forum conferences which serve the purpose of exchanging good practice and at other events attended by HEIs. In this context, representatives of

evaluated HEIs would appreciate a publication presenting good practice in IQA (see section 4.1.8 / ESG 2.8).

### **Analysis**

PKA has implemented the 2008 recommendation by introducing a follow-up procedure for a sub-type of positive rating. The panel confirms that follow-up processes for programmes and HEI units which have received a conditional rating or a sub-type of positive rating are based on predetermined and consistently applied procedures. The evidence collected also shows that these procedures ensure that plans are adopted and action is taken by HEIs to make changes and improvements in line with findings from a completed evaluation, even if remedial measures are based on shortcomings identified rather than recommendations made in evaluation reports.

Ideally, similar follow-up action would also be taken in the case of outstanding and ‘fully’ positive ratings. However, it is important to the panel that PKA’s evaluation procedures and criteria (even if the latter do not cover IQA policies and procedures in the case of programme evaluation as this is, to some extent, balanced by the sound approach to quality in the curriculum – see section 4.1.1) are sufficiently robust to ensure that where a positive rating is given, required quality standards are met and the IQA system is sufficiently strong, and that shortcomings / recommendations from previous evaluations are taken into account in the next cycle. Besides, in purely practical terms, considering the Agency’s workload (450 evaluations per year on average), it would be unrealistic to expect that it could introduce a follow-up procedure for all programmes and HEI units with outstanding and positive ratings.

**Panel conclusion:** Fully compliant

### **4.1.7.ESG 2.7.: Periodic reviews**

#### **ESG 2.7. Periodic reviews**

**Standard:** External quality assurances 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.

### **Evidence**

As laid down in its Statutes (SER, Annex 1), PKA undertakes ex-post programme and institutional evaluations on a regular basis, with the length of the cycle determined in both cases by the quality rating given as a result of a previous evaluation. Programmes and HEI units which have received an outstanding or positive rating are re-evaluated after 8 or 6 years respectively. Units which have received either of the two ratings as a result of an institutional evaluation are exempt from programme evaluations for the validity period of the rating. In the case of a conditional rating given to a programme or unit, PKA applies a follow-up procedure (see section 4.1.6 / ESG 2.6). Where a negative rating is given to a programme, the Minister of Science and Higher Education is required by law to suspend or withdraw the authorisation of the HEI unit to provide the programme concerned; if the authorisation is re-granted, the programme is subject to evaluation according to a regular schedule. In the case of a negative rating given in an institutional evaluation, all programmes of the unit concerned are subject to programme evaluation according to a regular schedule and depending on their previous ratings.

The length of the cycles and evaluation procedures are published on the PKA website. Evaluation schedules are adopted by the PKA Presidium for each academic year and published in advance on the Agency’s website. Programme evaluation schedules are arranged according to fields of study (e.g. Administration, Management, etc. in 2013/14). Annual programme evaluation schedules take into account evaluation cycles, fields of study which have not been assessed yet and new programmes where students have already graduated. Institutional evaluations are undertaken only in HEI units which offer third-cycle programme or comply with the following preconditions laid down by law: 1)

no negative rating has been given to a programme in the last five years; where a conditional rating was given, its justification did not refer to the IQA system; 2) programme evaluations have already been conducted in most fields of study. Thus annual institutional evaluation schedules are based on programme evaluation cycles: where a HEI unit which complies with the above preconditions would be scheduled for a programme evaluation, an institutional evaluation is conducted instead. (SER, discussions with PKA during the site visit)

Subsequent programme and institutional evaluations take into account findings from previous ones. Evaluation panels assess the effectiveness of changes introduced and of remedial or other measures taken by HEIs to rectify shortcomings or implement recommendations made previously. Reports on subsequent evaluations provide summary information about the previous evaluation (incl. areas where remedial measures were required, identified shortcomings and recommendations) and comments on progress made under each relevant evaluation criterion. This was confirmed by representatives of evaluated HEIs during the site visit (some having undergone more than 10 evaluations).

In their discussions with the panel during the visit, Rectors and representatives of evaluated HEIs all agreed that benefits from PKA's evaluations in terms of quality enhancement outweighed the related burden for HEIs, in particular where subsequent evaluations were conducted, as HEIs were then fully familiar with the process, and in the case of institutional evaluations as being less detailed and enabling better assessment of quality. They suggested, however, some modifications which could streamline further PKA's processes (see section 4.1.2 / ESG 2.2).

### **Analysis**

It is clear to the panel that PKA undertakes its programme and institutional evaluations on a regular basis. The evaluation cycles and procedures are clearly defined in an official document and are indeed published on the PKA website. Report templates and reports to which the panel had access and the feedback from evaluated HEIs confirm that findings from previous evaluations are given due consideration in subsequent evaluations.

The feedback from HEIs also shows that PKA's processes are not perceived as placing unnecessary demands on evaluated institutions, even if some improvements could still be made in this respect. As mentioned in sections 4.1.1 / ESG 2.1 and 4.1.2 / ESG 2.2, the panel considers that the lighter procedure for HEI units with an outstanding or positive institutional evaluation rating ensures a good cost-benefit ratio for HEIs, while PKA can indeed be confident that IQA systems at the units concerned are sufficiently robust to serve the purpose of quality enhancement in line with the overall aim of the Agency's processes. Although not all HEIs may undergo institutional evaluation, the panel's view is that the eligibility criteria define a reasonable quality threshold: (1) to be authorised to provide doctoral programmes, HEI units should fulfil certain statutory conditions concerning, among other things, the quality of research activity, and PKA's opinion on the quality of their education is taken into account (see also sections 3.2.1 and 3.3); (2) units which are not authorised to provide doctoral programmes need to demonstrate through programme evaluation ratings that their IQA systems are effective enough to ensure a required standard of quality and further quality improvement.

**Panel conclusion:** Fully compliant

### **4.1.8.ESG 2.8.: System-wide analyses**

#### **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.

**2008 review 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."

## **Evidence**

As at the time of the previous review, PKA produces, on its own initiative, annual reports and summary reports covering each term of office. Annual reports include statistical data on ex-post evaluations and applications assessed as part of ex-ante evaluation, and content-related analyses by academic area or cluster of fields of study or topic (e.g. IQA). Analytical parts present general observations and give a more detailed insight into shortcomings or problems identified, changes and development trends, and the impact of PKA's activities on quality improvement. Reports produced at the end of the term of office provide a broader overview, including trends observed over several years. Intended readers of Annual Reports include Ministers, Polish Parliament committees, Rectors' Conferences, the General Council for Higher Education and Science, university authorities, academic staff, students and doctoral students, and PKA members and experts. Reports are published on PKA's website and distributed to various stakeholders, including the national authorities and the above mentioned academic bodies. (SER, Addendum to the SER & 2009 Annual Report in English provided to the panel)

As explained in the SER and confirmed during the visit, PKA also (co-)organises Quality Forum conferences as a platform for discussion and exchange of good practice, and its members publish articles in national journals and present findings from sector-wide analyses at various meetings attended by HEIs and in the Polish Parliament. Additionally, the Agency plans to publish in 2014 separate and more detailed reports specifically devoted to programme and institutional evaluations. Though this was suggested by the 2008 review panel, PKA has not produced and does not plan to produce any publication specifically focusing on internal quality assurance. The PKA Presidium / Management Team explained during the visit that some HEIs would not like to see their 'secrets' published and that best practice examples could be found in evaluations reports on programmes or HEI units which had received an outstanding rating. The PKA SAAs and experts added that Annual Reports include good practice examples.

Data collected for Annual Reports is used by PKA itself for self-reflection and improvement in general terms. Reports are quoted in newspapers and journals and used by doctoral students and post-docs. (SER, Addendum; meeting with PKA during the visit) The panel's discussions about the use of Annual Reports with external stakeholders, including the Vice-Ministers, Rectors and evaluated HEIs, tended to drift away from Annual Reports and the participants emphasised, in particular, benefits from Quality Forum conferences in terms of learning about main trends in Polish QA. According to the students- and doctoral students-experts interviewed, more events like QF conferences should be organised. The Rectors considered Annual Reports "useful summary documents" but were more explicit about how individual evaluation reports were used, and the representatives of evaluated HEIs made it clear that a publication presenting examples of good practice in IQA would be very useful.

## **Analysis**

Evidently, PKA makes a considerable effort to compile and analyse a great wealth of information gathered through its ex-ante assessments and ex-post evaluations, and it is also worth noting that its reports presenting system-wide analyses are published as often as each year (and at the end of each term). Based on the 2009 Annual Report, the panel confirms that these publications are not limited to statistics and descriptions, but do indeed contain more in-depth analyses and show main trends across the HE sector. It is also a good arrangement that hard copies are made available directly to all intended readers. Moreover, though a research and development function is not included within its activities, the Agency will produce two other sector-wide publications next year. In terms of expertise sharing and learning, it is also quite important that the production of Annual Reports is a joint effort as both PKA members and Bureau staff are involved in analysing data and drafting various chapters.

On the other hand, PKA has not produced any publication specifically devoted to (good practice in) IQA. Like the 2008 review panel, this panel considers that such a publication would be an important

improvement tool, both for PKA and for HEIs seeking to further develop their IQA systems, especially in view of, as noted by PKA itself in one of its recent Annual Reports (see section 3.2.2), a piecemeal approach to IQA in many HEIs. Moreover, the feedback from HEIs during the visit clearly shows that a publication on IQA would be very welcome; it was clear to the panel that even those of the HEIs' representatives interviewed that did not expect PKA to give them recommendations in individual reports would still appreciate such a publication. Even considering PKA's argument that HEIs would object to disclosing their 'secrets' (though good practice examples are published on HEIs' websites across Europe), the panel believes that PKA could produce a separate system-wide publication providing a more detailed insight into current approaches to IQA at Polish HEIs, together with guidelines on how they could be improved or a Code of Good Practice. The argument that HEIs may find good practice examples in individual evaluation reports is not very convincing to the panel as, obviously, only a publication at system level could bring together various tested and proven arrangements introduced in individual HEIs, since some good practice examples can also be found within IQA systems that are not yet fully established. Overall, while the panel can see that the 2008 review conclusion ('fully compliant') under this ESG was justified by the evidence suggesting that policy-makers' and HEIs' needs were satisfied at that time, it believes that now PKA could and should do more to respond to the current needs of HEIs with regard to sector-wide analyses.

Although this extends beyond strictly interpreted ESG 2.8 and, thus, is not taken into account in the panel's conclusion, the evidence collected does not make it clear how useful Annual Reports actually are and how they are used by their intended readers. Thus, PKA may consider seeking feedback from intended readers of Annual Reports on what scope or format of system-wide publications would be most relevant and useful to them. (For a suggestion, see section 5.2)

**Panel conclusion:** Substantially compliant

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

### **ENQA Criterion 1 / ESG 3.1: Summary of findings**

PKA's compliance with each of the ESG Part 2 standards is discussed in sections 4.1.1-4.1.8 above. PKA was found to be fully compliant with ESG 2.3, 2.6 and 2.7 and substantially compliant with ESG 2.1, 2.2, 2.4, 2.5 and 2.8. The panel has come to the conclusion that, overall, the Agency complies substantially with ESG 3.1.

In brief, by the ESG: Overall, external evaluation processes give due consideration to the effectiveness of IQA systems, but institutional evaluation is more comprehensive and thorough than programme evaluation which does not cover ESG 1.1. (QA policies and procedures), and not all HEIs are eligible for the former (2.1). PKA consulted its stakeholders about its new proposed procedures and criteria on an ad-hoc basis, but there is no formal mechanism for consultations on, and impact assessment of, prospective changes (2.2). The evaluation criteria are clear and published, and there is a set of arrangements in place which ensure consistency in applying the criteria and making decisions (2.3). Overall, evaluation processes are fit for the purpose of quality improvement and take into account the ESG-relevant elements, except that the recruitment arrangements for academic experts are not fully transparent, the involvement of international experts is still limited and there are no special training arrangements for them, though they are not as familiar with the national context and PKA's procedures as Polish experts (2.4). Reports are clear, useful for HEIs and published, but not all of them include recommendations (2.5). Follow-up processes are based on predetermined and consistently applied procedures which ensure that action is taken in line with findings from a completed evaluation (2.6). Evaluations are conducted on a regular basis, cycles are clearly defined and published, and the methodology provides for a lighter procedure where the IQA system is sufficiently strong (2.7). While system-wide publications are regularly produced and contain analyses



in addition to statistics and description, there is no publication on IQA, while it would have a positive impact on currently fragmented IQA systems and there appears to be demand for such a publication among Polish HEIs (2.8).

**Panel conclusion:** Substantially compliant

**Panel recommendations:** See detailed recommendations in sections 4.1.1 to 4.1.8.

## 4.2. ENQA Criterion 1 / ESG 3.3.: Activities

### ESG 3.3. Activities

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

#### Evidence

PKA's main functions are defined in LoHE and include conducting ex-post programme and institutional evaluations, and giving opinions to the Minister of Science and Higher Education on matters related to the establishment of HEIs and the granting of authorisations to HEIs to provide first-, second- and long-cycle programmes, the latter involving the assessment of applications for the establishment of HEIs and programmes (SER, Annex 3). These main functions are also explicitly referred to in PKA's Statutes, as well as in its mission statement as a means of pursuing its primary objective of supporting quality enhancement (SER, Annexes 1 & 7).

As explained in the SER, ex-post evaluations are carried out on a regular basis, with the length of the cycle depending on a previous quality rating given by PKA, and evaluation schedules are established annually (for details see section 4.1.7). This was also confirmed by the panel's discussions with various groups during the site visit. The statistics provided by PKA show that between its establishment in 2002 and 2012 PKA conducted 4 945 ex-post evaluations, i.e. on average 450 per year; 285 evaluations were completed in 2013 before the external review. The assessment of applications as part of ex-ante evaluation is conducted on an on-going basis. A total number of 5 514 applications, i.e. 501 per year on average, were assessed by PKA between 2002 and 2012, and 281 before the external review in 2013. Detailed statistics on conducted ex-post evaluations and applications reviews / opinions given are published by PKA in its annual reports and reports produced at the end of each term of office.

#### Analysis

All evidence collected by the panel before and during the site visit confirms that external quality assurance activities are part of PKA's core functions and that it undertakes them on a regular basis.

Although this extends beyond the ESG and, thus, is not taken into account in the conclusion below, the panel did not find statistics in various breakdowns on the PKA website, while it believes that they are a useful source of information for, and thus should ideally be easily accessible to, PKA's external stakeholders and other interested parties.

**Panel conclusion:** Fully compliant

### 4.3. ENQA Criterion 2 / ESG 3.2: Official status

#### 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.

#### Evidence

PKA was established on 1 January 2002 on the basis of the 1990 Higher Education Act amended in 2001 and currently operates on the basis of the 2005 Law on Higher Education amended in 2011. LoHE (SER, Annex 3) also defines the scope of PKA's external quality assurance responsibilities, including programme and institutional evaluations and opinions to be given to the Minister of Science and Higher Education on matters related to the establishment of HEIs and authorisations for HEIs to provide first-, second- and long-cycle programmes. The term 'accreditation' is used in LoHE in PKA's official name (Polish Accreditation Agency), but not with regard to PKA's functions. However, its official status as an accreditation agency is confirmed by LoHE provisions whereby the Minister is required to take specific action (e.g. to suspend or abolish programmes as a result of a negative rating given PKA after a programme evaluation, or to seek PKA's opinion when re-granting to HEIs authorisations to provide suspended programmes). As an institution financed from the State-budget, PKA is subject to regular audits conducted by the Supreme Audit Office to check its compliance with national legislation (SER).

#### Analysis

It is evident to the panel that PKA operates on a clear legal basis, which defines its external quality assurance responsibilities, and is recognised by the relevant statutory bodies, and that there are external mechanisms in place to verify its compliance with the requirements of national law.

**Panel conclusion:** Fully compliant

### 4.4. ENQA Criterion 3 / ESG 3.4: Resources

#### 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 manner, with appropriate provision for the development of their processes and procedures and staff.

**2008 review 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. [...] 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)."

#### Evidence

PKA is financed from the State-budget allocation for higher education managed by the Minister of Science and Higher Education, except for few ad-hoc projects financed from other sources. Its funding is governed by public finance law and allocated annually on the basis of a financial plan drawn up by the PKA Bureau, an independent State-budget unit which provides administrative and financial services to PKA. No fees are charged by PKA for external evaluation. Its budget in 2013 is 9.7 mln PLN (ca 2.4 mln euro) (as compared, for example, to 7.2 mln PLN, i.e. ca 2.2 mln euro, in 2008). Despite the financial crisis and austerity measures introduced in the State-budget sector, PKA's budget has not been cut in recent years. (SER)

As stated in the SER, the human and financial resources available have allowed PKA to carry out efficiently the “work related with ... [its] ... objectives and tasks ...”. On the other hand, “insufficient human and financial resources of Bureau of PKA hindering administrative services of the Committee” [i.e. PKA], “legal and financial limitations hindering performance of the PKA strategic tasks / aims” and “uncertainty in the PKA level of financial resources due [to] the economic crisis and possible decrease in the state funds for higher education” were identified as a weakness or threat in the SWOT analysis in the SER. As further explained in the SER, in view of PKA’s increasing international activity (plans to hire more international experts and organise international events) and the need to develop analytical and training activities and support the development of IQA at HEIs, there is a need to increase the Agency’s budget and seek funding for some of its activities (e.g. research and development projects) outside the public sector. While PKA intends to seek such extra funding, weaknesses in the SWOT analysis included limited opportunities for applying for EU grants and participating in international projects due to the fact that PKA is not a legal person.

As the panel was informed by the PKA Presidium / Management Team and / or the PKA Bureau during the visit, the Agency is provided with adequate funding for its activities and, actually, it has some reserve funds this year as institutional evaluations are conducted instead of programme evaluations where HEI units are eligible; the reserve will be used for development, and in particular for the training of experts, this and next year. The 2014 budget will be sufficient to cover the costs of additional system-wide reports (see section 4.1.8 / ESG 2.8). Limited, and no increase in, funding for Bureau staff is an issue. Hiring international experts is not a resource problem if these are Polish-speaking experts, but more funds would be needed for translation if other international experts were involved. While the participants acknowledged that PKA’s legal status imposed some constraints, the Agency had already been involved in several ECA and INQAAHE projects, and external, mainly EU, grants would be sought and were expected to be the main source of funding for development projects by 2020. Further, the panel was assured that funding was also sufficient for planned international activities and PKA had no plans to apply to the Ministry for increased funding as the 2014 budget was already fixed.

During the discussion with the panel, the Vice-Minister responsible for finance emphasised, first of all, that PKA’s budget had not been trimmed despite the economic crisis and cuts were unlikely in the future, and though the Ministry allocated the budget, PKA could use it according to its own plan (e.g. to hire international experts). While discussions were being held at the time of the visit about whether PKA’s budget should be separate or remain part of the HE budget, the option chosen would not per se have any impact on the level of the Agency’s funding. However, if PKA submitted a sound plan for expansion and development, including the development of its international activities (e.g. international experts), it could be awarded additional funding provided that such funding is available.

Currently, PKA has 87 members, 23 staff members work in the PKA Bureau and the Agency is supported by nearly 1,000 external experts. PKA members, who are academic staff employed at HEIs (except for the President of the SPRP who is a member by virtue of law), do not work at PKA on the basis of an employment contract but receive fees for specific tasks performed. The PKA Bureau’s staff are employed on the basis of employment contracts and paid in accordance with regulations for the State-budget sector. Bureau staff provide support at all stages of evaluation processes. The majority (80%) of staff have also been trained to be PKA’s FLC experts and thus are directly involved in evaluation processes (SER; meeting with the Bureau during the visit)

The Director of the PKA Bureau is responsible for a human resources policy. Annual plans are adopted, but training is also organised on an ad-hoc basis, depending on the needs, and meetings are held regularly to share experience and discuss any problems (SER; meeting with the PKA Bureau). As explained during the visit, since the office is small, there is no formal mechanism for training needs assessment; Bureau staff’s needs are identified through on-going observation and consultations with staff (one person collects information and passes it on to the Bureau management), and changes in legislation are also taken into account. For example, language and management training has been

recently provided at the request of Bureau staff. The Bureau is also responsible for organising initial and periodic training for PKA members and experts (for comments, see sections 4.1.3 / ESG 2.3 and 4.1.4 / ESG 2.4). The Agency is currently involved in a project under which several additional training sessions were organised and study visits were undertaken.

PKA rents office space of 900 square meters, including meeting and conference rooms for its regular activities; external facilities are rented for bigger-scale events. It has developed IT tools, data protection software and a system of databases to support its activities and has access to a national database on Polish higher education. (SER; tour of the facilities during the site visit)

### **Analysis**

It is clear that PKA has a stable source of funding. The question of whether the available financial and human resources were indeed adequate was discussed at some length and in detail with both the PKA Bureau and the PKA Presidium / Management Team as first general statements during the visit were not fully consistent with those in the SER. Considering all the evidence collected, the panel has come to the conclusion that PKA has and can realistically expect to have adequate funding for its core and development activities, including training, analytical and international activities, as they are currently planned. Further, it has resolved the issue of the limited funding for Bureau staff salaries by involving staff as FLC experts in evaluations; this enables the Bureau to keep its best staff and, at the same time, provides additional staff development opportunities. While the arrangement may put extra strain on staff, core activities are carried out efficiently according to PKA, and the panel found no evidence to the contrary during its discussions with HEIs. This arrangement also shows to the panel that the human resources available are sufficient for the PKA Bureau to carry out its activities. As more ambitious development plans would require extra funding, PKA intends to seek EU funding much more actively than until now, and judging from its current involvement in some international projects, its legal status is not a major obstacle in this respect. Since PKA has set for itself quite ambitious targets concerning the involvement of international experts (see section 4.1.4 / ESG 2.4) and extra funding would be necessary for non-Polish speaking experts, the panel would like to draw PKA's attention to the fact that the Ministry is, in principle, willing to consider the Agency's sound development plan if funding is available.

The PKA Bureau staff that the panel met during the visit were evidently competent and committed, and judging from no complaints from HEIs as well as from the organisational aspects of the visit, certainly able to provide efficient administrative support to PKA. Even if there is no formal mechanism for assessing trainings needs of Bureau staff, the evidence collected shows that they have good development opportunities.

The panel confirms that PKA's office provides good working conditions for PKA members, Bureau staff and external experts, and it is equipped with all necessary facilities.

**Panel conclusion:** Fully compliant

## **4.5. ENQA Criterion 4 / ESG 3.5: Mission statement**

### **ESG 3.5. Mission Statement**

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

**2008 review 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."*

### **Evidence**

The overall aim of PKA is defined in LoHE, which refers to the Agency as an institution working for quality enhancement, and is reflected in PKA's mission statement. Revised in 2012, the statement now defines PKA's primary goal as supporting HEIs in the process of enhancing the quality of education and developing best educational standards, and its mandatory programme and institutional evaluations and opinions given on HEIs' applications for an authorisation to provide programmes as the means of pursuing its mission. It also explains basic principles and values underlying PKA's activities. Finally, it affirms PKA's commitment to engage in cooperation and dialogue with its external stakeholders, including the academic community, prospective students, employers and national authorities, and in cooperation with accreditation agencies and international organisations in the European Higher Education Area. (SER, Annexes 1 & 3) The mission statement is published on PKA's website.

PKA's Strategy 2012-2015 (SER, Annex 6), published on its website, defines five general and a number of operational objectives together with tasks, implementation timeframes and expected results for each objective. The five general objectives are related to: (1) conducting quality evaluations; (2) supporting HEIs in the development of quality culture; (3) improving dialogue on the development of internal quality assurance; (4) strengthening PKA's role as an autonomous institution working for quality enhancement and promoting quality; (5) further internationalisation of PKA's activities. In addition to those already undertaken on a regular or ad-hoc basis, the Strategy includes a number of new tasks, planned under several objectives for 2013-2015, which specifically reflect PKA's primary goal of supporting HEIs in their quality enhancement efforts (e.g. reports, a guide, seminars). An Action Plan was also adopted in 2009 to implement 2008 external review recommendations.

During the panel's visit, the PKA Presidium explained that the mission statement did not refer to 'accreditation' because the Agency's activities focused on quality enhancement and, thus, on its advisory role vis-à-vis HEIs and building quality culture. A reference to accreditation might also be misinterpreted by HEIs as linking PKA with business activities (ISO standards, etc.). All other stakeholders interviewed by the panel, including the Vice-Ministers, Rectors, representatives of evaluated HEIs, the PKA SAAs and experts, agreed that PKA's external evaluations as well as other activities (QF conferences) were geared towards, and did indeed support, quality improvement and enhancement. Representatives of non-public HEIs added that, from their perspective, ensuring minimum quality standards was also an important function of the Agency. In their more detailed comments, the representatives of evaluated HEIs explained that while the balance had shifted quite radically towards quality enhancement and, thus, evaluation panels were now perceived to a large extent as peers or advisers, they did also assess compliance with quality standards and legislation and, thus, performed the function of inspectors.

### **Analysis**

The panel confirms that PKA's primary goal is clearly defined and explicitly stated in its published mission statement, and that external quality assurance activities are clearly identified as the Agency's core activity, with its ex-post evaluations being mandatory for HEIs. While the statement does not place PKA's activities in a historical or cultural context, it does define PKA's stakeholders and the principles underlying its relations with HEIs, as well as with other stakeholders. The Agency's three-year strategy, which the panel analysed in detail, shows clearly how the Agency's overall goal is translated into operational objectives and how these will be achieved through planned activities. The evidence collected also demonstrates that PKA's activities actually contribute to quality enhancement in Polish higher education.

Except in PKA's name (Polish Accreditation Committee), national legislation does not use the term 'accreditation', and thus it is evident to the panel that an explicit reference to accreditation in the mission statement would not fit into the legal framework (regardless of any possible business connotations). However, the evidence collected, including national legislation (SER, Annexes 1, 3 & 18), PKA's evaluation criteria (SER, Annex 1) and the feedback from evaluated HEIs, also clearly shows

that – in addition to supporting quality enhancement – PKA is required to, and does, assess compliance (with both quality standards and law) as part of its evaluation processes, and that its quality ratings lead to legal consequences for HEIs. These aspects are not reflected in the mission statement. Consequently, aside from the reference to the mandatory nature of ex-post evaluations, the statement presents PKA as an institution with an advisory function rather than one which has a dual, advisory and supervisory, role (quality enhancement and accountability / compliance). The panel agrees that PKA’s evident focus on quality enhancement should be highlighted in its mission statement but considers that the statement should reflect its actual dual role, including a reference to legal consequences of its processes. This will also identify more clearly the Agency’s position in the Polish QA system. By revising its mission statement along these lines, PKA would also implement the 2008 review suggestion.

**Panel conclusion:** Substantially compliant

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

#### 4.6. ENQA Criterion 5 / ESG 3.6: Independence

##### 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.

##### Evidence

The recently amended LoHE, which provides the legal basis for PKA, states explicitly that it is “an institution working independently for the enhancement of the quality of education”. The new provision is included in PKA’s Statutes. Pursuant to LoHE, PKA members (except the President of the Students’ Parliament of the Republic of Poland (SPRP) who is a PKA member by virtue of law) are appointed by the Minister of Science and Higher Education from among candidates proposed by the General Council for Science and Higher Education (an elective representative body of HE), the Rectors’ Conferences representing university-type and non-university HEIs (CRASP and RCHEIP), the SPRP, HEIs’ Senates and national academic associations and employers’ organisations. PKA members may be dismissed by the Minister only at the request of the PKA Presidium. The Director of the PKA Bureau is appointed and dismissed by the PKA President, and staff are employed by the Director. (SER, Annexes 1 and 3)

National legislation sets a general framework for PKA’s activities, defining its functions and governing bodies, and aspects to be taken into account in PKA’s ex-post evaluations as they are regulated by law (see sections 3.2.2 and 4.1.1). However, in accordance with LoHE, PKA’s organisational and operational arrangements, powers of its governing bodies, evaluation criteria and procedures as well as the method for appointing external experts are laid down in the Statutes adopted by PKA at a plenary session. Other detailed procedures or arrangements are laid down in official documents adopted by the PKA Presidium (composed of the President, the Secretary General, Chairs of the eight Sections for Academic Areas, the President of the SRRP and two representatives of employers’ organisations). (SER, Annexes 1, 3 & 18)

PKA’s annual ex-post evaluation schedules are adopted by its Presidium; ad-hoc evaluations may be additionally undertaken at the request of the Minister or an HEI. External experts are put forward by PKA itself (the SAAs, the Secretary General, employers’ representatives in the Presidium, the President of the SPRP, the Director of the PKA Bureau), national student and doctoral student organisations (SPRP and NRDS) and employers’ organisations. Applications are considered internally by teams or coordinators, and experts are appointed by the PKA President. Evaluation panels are

appointed by the PKA Secretary General in consultation with the Chair of the SAA concerned and, in the case of students- and doctoral students-experts, with the Students' and Doctoral Students' Coordinators. Further, as provided for in PKA's Code of Ethics, both PKA members and experts sign a declaration where they undertake to respect the principles of independence, impartiality and no-conflict-of-interest, with penalties up to dismissal envisaged for a breach of the Code. (SER, Annexes 1; meetings with the SAAs and experts, including students, during the site visit)

PKA conducts ex-post evaluations and reviews applications as part of ex-ante evaluation, in the former cases giving quality ratings and in the latter case giving only its opinions to the Minister of Science and Higher Education. In both cases it takes formal decisions, though they lead to legal consequences only in the case of ex-post programme evaluation where, pursuant to LoHE, the Minister of Science and Higher Education is required to suspend or withdraw the authorisation of the HEI unit concerned to provide a programme which has received a negative rating from PKA. Programmes given one of the other three ratings are considered accredited, though this is not explicitly stated in law. In the case of ex-ante evaluation, while adopting a formal resolution which can be appealed against, PKA performs only an advisory role, and decisions are taken by the Minister who is not obliged to follow PKA's opinion. However, in practice (s)he normally does so or otherwise (e.g. if additional documentation is submitted after PKA's review process) consults the Agency on an ad-hoc basis. (SER, Annexes 1 & 3)

At the end of both ex-post evaluation and application review processes, PKA takes decisions in accordance with a two-stage procedure laid down in its Statutes. The relevant SAA proposes a quality rating (ex-post evaluation) or opinion (application assessment) together with its justification after an analysis of collected evidence, and a final decision is made by the PKA Presidium. At both stages decisions are taken collectively by voting.

PKA stated in the SER, its Addendum and during the site visit that it considered itself to be fully independent, and that there had been no cases where it had to (re)assert its independence. PKA's SAAs and experts, including students, assured the panel that they felt independent and worked under no pressure. They also confirmed that several formal and good practice arrangements were in place to ensure independence and impartiality: the Code of Ethics / a no-conflict-of-interest declaration signed; panels appointed by the PKA Secretary General in accordance with the Code; very rarely the same composition of the panel; and the collective decision making procedure. Explaining that it had nothing to do with 'the system', but with individuals, students referred to isolated cases of professors trying to influence their opinions in the past where PKA had solved the problem to students' satisfaction.

In her discussion with the panel, the Vice-Minister responsible for quality of HE made it clear that PKA was fully independent of the Ministry and the Ministry did not interfere with PKA's activities or its budget (the Agency is financed from the State-budget allocation managed by the Minister; see section 4.4 / ESG 3.4). Although some legal provisions concerning PKA would need to be amended in view of a recent decision of the Constitutional Tribunal which had implications for PKA's appeals body (see section 4.7), the Vice-Minister was committed to preserving its independence and ensuring that it complied with the ESG in this respect. It was also stated explicitly that PKA could refuse to carry out an evaluation at the request of the Minister (e.g. due to its heavy workload) without any consequences, and that this had actually occurred in the current academic year. The Rectors interviewed were aware that the appointment of PKA members by the Minister might suggest PKA's limited autonomy, but this was not the case and was actually viewed as a good arrangement. They also emphasised that PKA was fully independent not only of the Minister but also of HEIs, with both public and non-public HEIs feeling represented.

## **Analysis**

It is clear to the panel that PKA's operational independence is guaranteed by national legislation, and the feedback collected during the site visit shows that the Agency makes full use of the relevant legal provisions in practice as no stakeholder has any doubt about its independence.

While the Minister appoints PKA members selecting them from among a pool of candidates, they are put forward by all external stakeholders except the Minister, and the procedure for the dismissal of PKA members (at the request of the Presidium where decisions are taken collectively and key stakeholders except the Minister are represented) does not enable the Minister to influence PKA during its term of office. Overall, all stakeholders are involved in the appointment procedure, but it works as a 'checks and balances' system which limits the influence of the Minister on the one hand and of other stakeholders on the other hand.

It is also evident to the panel that PKA adopts autonomously its evaluation procedures and criteria and appoints its external experts, and the arrangements where these processes involve either all PKA members (procedures and criteria) or different groups or individuals (appointment of experts) do not provide room for promoting possible particular interests. There is also a formal mechanism in place (the Code of Ethics / a signed declaration) to ensure experts' independence, and the isolated cases referred to by students show that PKA does intervene to protect their independence. The two-stage decision-making procedure combined with collective decision making prevents any third party from influencing quality ratings that PKA gives as a result of its ex-post evaluations and opinions given as part of ex-ante evaluation. In this context the panel also notes that it is actually the Minister who is required by law to act in line with PKA's decision where a negative rating is given to a programme in ex-post evaluation. The appointment and dismissal procedures combined with those for decision-making also rule out the possibility of the Minister exerting influence on PKA through the budget allocated to the Agency (for PKA's budget see section 4.4 / ESG 3.4).

**Panel conclusion:** Fully compliant

#### **4.7. ENQA Criterion 6 / ESG 3.7: External quality assurance criteria and processes used by the agencies**

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

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

- a self-assessment 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.

**2008 review 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."

##### **Evidence**

PKA's processes, procedures and criteria for both ex-post evaluation and review of applications as part of ex-ante evaluation are laid down in the Agency's official documents (SER, Annexes 1, 15, 16, 23 & 24) and published on its website. Templates, including more detailed guidelines, for self-evaluation and evaluation / assessment reports are also available on PKA's website. Annual ex-post evaluation schedules are published in advance, and individual HEIs are notified six weeks before the deadline for the submission of a self-evaluation report.

As mentioned in section 4.1.4, the procedure for ex-post evaluations includes:

- a self-evaluation by the HEI concerned,



- an external evaluation, including a site visit, conducted by an evaluation panel composed of academic experts, a student-expert and a FLC expert in the case of programme evaluation and, additionally, of experts representing doctoral students and employers, one of each, and an IQA expert in the case of institutional evaluation;
- the publication of a quality rating given and an evaluation report on the PKA website (and, additionally, of a rating together with its justification in the Public Information Bulletin);
- a follow-up procedure where a conditional rating has been given, focusing on previously identified shortcomings and related recommendations, as well as where a positive rating has been awarded but the HEI concerned is obliged to take specific remedial measures within a given timeframe. In other cases subsequent evaluations take into account recommendations from the previous evaluation.

The procedure for reviewing applications as part of ex-ante evaluation includes desk-based assessment and, optionally, a site visit when documents submitted do not enable thorough assessment. PKA's opinions on applications are forwarded to the Minister of Science and Higher Education (and other ministers, where appropriate) and applicants. As mentioned in section 4.1.4 / ESG 2.4, the distribution of PKA's opinions on applications for the establishment of programmes in 2012 was as follows: a negative opinion on nearly 50% of applications, a positive opinion with recommendations on approx. 19% of applications, and a positive one on 35%.

Both PKA members and external experts attend obligatory initial and periodic training (see sections 4.1.3 / ESG 2.3 and 4.1.4 / ESG 2.4). Evaluation panels' reports (ex-post evaluation) or reviewers' opinions (ex-ante evaluation) are further reviewed by the relevant PKA SAAs as well as checked for consistency and adequate evidence to support conclusions by the PKA Secretary. Decisions are taken collectively in accordance with a two-stage procedure where the relevant PKA SAA arrives at an agreed quality rating (ex-post evaluation) or opinion (ex-ante evaluation) and presents it to the PKA Presidium (where all SAAs are represented) where the final decision is made (see also section 4.1.3).

At the time of the 2008 review, appeal requests were considered by the same individuals (a relevant PKA SAA and the PKA Presidium) who had proposed and taken the decision challenged by the appeal. In line with the review suggestion, at the stage of drafting recent amendments to LoHE, PKA submitted to the Ministry a proposal to establish an appeals body composed of key HE stakeholders, but it was not included in the amended law (SER, meetings with PKA during the site visit). Thus, PKA revised its appeals procedure while respecting the LoHE provisions. Currently, pursuant to LoHE (SER, Annex 3), a party dissatisfied with PKA's decision may submit a request for reconsideration to PKA. The procedure, laid down in the Agency's Statutes (SER, Annex 1), is the same for ex-post evaluation and review of applications, though only the former leads to legal consequences (see also sections 3.3 and 4.6 / ESG 3.6). An appeal is considered in parallel by the SAA concerned and the recently established Section for Appeals composed of PKA members; their opinions are presented to the PKA Presidium which takes a final decision. Between 2010 and 2012, the proportion of PKA's all ex-post evaluation decisions challenged by HEIs ranged from 6 to 8%, depending on the year, and the success rate for appeals varied from 47 to 67%; the figures for opinions on applications are 18 to 37% and 51 to 64% respectively.

As explained to the panel during the site visit, a recent ruling of the Polish Constitutional Tribunal no. 84/6/A/2013 (file SK 61/12) questions the legitimacy of the current LoHE provisions concerning PKA's appeals procedure which, in brief, does not ensure full impartiality. As PKA's decisions may not be questioned in court, this is particularly important in cases where PKA gives a negative rating to a programme and the Minister is required by law to suspend or abolish the programme. Since LoHE should be amended within 18 months of the date of the ruling, PKA has proposed two options to the Ministry: an external appeals body, and a body within PKA composed of individuals who are not involved in PKA's evaluations at all. Discussions were held between PKA and the Ministry at the time of the visit.

The Rectors meeting with the panel (aware of the Tribunal's ruling) did not have any specific reservations regarding the way that PKA handles appeals but would prefer a different path or another institution for appeals. The representatives of evaluated HEIs interviewed confirmed that they had always received from PKA information on how to appeal against its decisions; in their opinion, externality ensured in appeals by external academics, not a court, would be a good arrangement and would also provide "more comfort" to PKA. Commenting on the two options proposed by PKA, the Vice-Minister responsible for quality of HE stated that the Ministry was committed to ensuring PKA's independence in any final arrangement.

## Analysis

The panel confirms that PKA's processes, procedures and criteria are predefined and published on the Agency's website. Ex-post evaluation processes include all stages referred to in this ESG, from a self-assessment to the publication of an evaluation report and a formal outcome (quality rating), as well as a follow-up procedure where appropriate (for more detailed comments, see section 4.1.6 / ESG 2.6), and involve students. Recommendations in evaluation reports are an aspect to be (and currently being) improved (see section 4.1.5 / ESG 2.5). While the ex-ante assessment process includes a site visit only in some cases, the panel considers that this is sufficient to ensure thoroughness in the assessment of applications; it is also confirmed by the large proportion of PKA's negative opinions and positive opinions with recommendations in 2012. Although opinions on applications are not published, the panel would not see any real added value of publishing them in terms of supporting quality improvement or increasing the transparency of PKA's processes (see also section 4.1.4 / ESG 2.4). For all processes, the arrangements in place ensure consistency in evaluation itself and, subsequently, in decision-making (for details, see section 4.1.3 / ESG 2.3).

With regard to PKA's appeals procedure, it is clear that PKA made an effort to amend LoHE in line with the 2008 review recommendation and since it was unsuccessful, the previous procedure could be and was improved only within the constraints of the existing legal provisions. Even though a large proportion of appeals are considered favourably, the panel is aware that the current procedure does not ensure full impartiality and transparency, and this is indeed particularly important in cases where PKA gives a negative rating to programmes. However, it is also evident that the present 'constitution of the Agency' would not allow further improvement.

Though future arrangements extend beyond the scope of this ESG and review, the panel is glad to note that PKA has already proposed to the Ministry two alternative appeals procedures. In this context, PKA might consider involving international experts who would certainly guarantee impartiality. This would also contribute to further internationalisation of PKA and, given HEIs' support for the idea of involving international experts in evaluation as expressed during the panel's visit, could be well received by the academic community as well. (See a suggestion in section 5.2).

**Panel conclusion:** Fully compliant

### 4.8. ENQA Criterion 7 / ESG 3.8: Accountability procedures

#### ESG 3.8: Accountability procedures

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

**2008 review recommendations:** "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."

#### Evidence

Since the 2008 review PKA has adopted a formalised internal quality management system on the basis of a Regulation of the PKA President, who is responsible for the supervision of the system, and has appointed a Quality Management System Coordinator ('QMS Plenipotentiary') responsible for gathering and processing all data, maintaining the system and reporting on its effectiveness. Although not referred to as a QA policy or strategy, the Regulation defines the objectives and scope of the system, which covers all PKA's (including its Bureau's) activities and objectives, lays down operational arrangements and assigns specific responsibilities to the PKA bodies and individuals concerned. This framework document is published on the PKA website. The Agency has also established a QM Portal on its website which includes findings from surveys among evaluated HEIs, information about progress made by PKA in the implementation of its quality-related tasks and plans

for the coming months, as well as a 'quality window / mailbox' for sending messages to PKA. (SER, Annex 13; meetings with PKA, including the QMS Coordinator during the visit).

While there are no annual activity plans, PKA has adopted a 2012-2015 Strategy (SER, Annex 6) which is based on its mission statement, and which defines its general and operational objectives together with specific tasks and timeframes for their implementation for each operational objective. Performance, including the operation of the QM system itself, is reviewed on an annual basis at PKA's plenary meeting, and annual activity reports are published on PKA's website, distributed to the main stakeholders (see section 4.1.8 / ESG 2.8) and presented at various events. (SER; meetings with PKA during the visit)

External experts are subcontracted for both ex-post evaluations and the assessment of applications as part of ex-ante evaluation. They are selected in accordance with predefined criteria, including prerequisite knowledge or experience, and attend obligatory initial and periodic training as well as regular meetings to share experience. PKA is yet to put in place a formal mechanism for identifying their training needs on a regular basis (see section 4.1.4 / ESG 2.4). Ex-post evaluation panels, appointed while taking into account the principle of no conflict of interest, are chaired by present or former PKA members who also draw up final versions of reports, based on partial reports from panel members. (SER, Annex 19; meetings with PKA and experts during the site visit)

Each PKA member and external expert signs a declaration where they undertake to respect the principles of PKA's Code of Ethics, including the principle that they should not engage in activities which may give rise to doubt as to their impartiality, with potential conflict-of-interest cases specified in the Code. Sanctions may be imposed for breach of the Code. (SER, Annex 9; meetings with PKA and experts) Breaches of the Code are very rare; such cases are considered by the PKA Section for Ethics; in PKA's history one expert has been removed from the pool, and one has received a reprimand in three other cases considered (SER, Addendum; meetings with PKA and experts) The Rectors and representatives of evaluated HEIs emphasised during the panel's visit that equal treatment of the public and non-public sectors was ensured, despite the predominance of PKA members coming from public HEIs. While there had been some problems in several cases in the past, experts were now considered impartial by both groups interviewed, even if some experts unintentionally tended to look at evaluated HEIs from the perspective of 'best' approaches in their own institutions (which could be, as suggested, addressed through training).

As part of monitoring arrangements for evaluation / assessment processes, the PKA Bureau checks if deadlines are met and reports to the PKA Secretary General who intervenes where problems arise and, in any case, presents findings to the Presidium. Ex-post evaluation reports and opinions on applications are reviewed by the relevant PKA SAAs and then further checked by the Secretary General for consistency and completeness. Evaluation reports are also sent to the HEIs concerned for feedback. The performance of evaluation panel members is assessed by panel chairs, the Secretary General who analyses each report, indirectly by the Presidium which analyses draft resolutions and, in the case of (doctoral) students-experts, also by the Students' and Doctoral Students' Coordinators (who coordinate their work and act as liaison persons between them and PKA). Externally, the performance of panels is assessed by evaluated HEIs through a survey (see below). As the SAAs play a key role in all evaluation / assessment processes, data on their performance is collected each quarter and discussed within the Presidium; since all SAAs are represented in the Presidium, regular discussions also serve the purpose of ensuring a consistent approach to evaluation / assessment and sharing best practice across the academic areas. The Presidium meets regularly to review the implementation of PKA's Strategy. (SER, Addendum, Annexes 1, 11, 23, 24; meetings with PKA and experts)

Since, as explained during the visit, the PKA Bureau is small (23 staff members), there is no formal staff appraisal procedure, but there is an incentive system, with bonuses awarded periodically

depending on performance assessed by the Bureau management. (SER, Addendum; meeting with the PKA Bureau) For training arrangements, see section 4.4 / ESG 3.4.

As explained in the SER and its Addendum and confirmed during the visit, a number of mechanisms have been developed to collect internal feedback, including in particular: 1) feedback surveys among PKA members and experts covering their needs and expectations, and strengths and weaknesses of PKA's activities; 2) regular meetings between PKA members, PKA Bureau staff and / or experts and the PKA and PKA Bureau management teams; 3) internal audits to check performance against a plan; and 4) on-going and annual reviews of the QM system itself. A draft QM Handbook has also been prepared. However, mechanisms (1), (3) and (4) are still at the consultation or piloting stage (an example given by students- and doctoral students-experts during the visit: conclusions from a pilot evaluation survey among them yet to be endorsed and a decision on any (annual) follow-up action to be taken). As explained by the PKA SAAs and experts, they can also make any comments or suggestions directly to the PKA Bureau and, additionally, (doctoral) students to their Coordinators; though doctoral students are not represented in the PKA Presidium, their representative is invited to discuss any suggested changes with the Presidium. PKA does not have a whistleblowing policy but, as the panel was informed during the visit, considers it a good idea. As examples of how PKA used or responded to internal feedback, PKA mentioned improved functionality of its database, training sessions organised at the request of Bureau staff, and requesting those who had not been satisfied with the electronic voting system to suggest necessary changes.

PKA collects external feedback from evaluated HEIs through an on-going survey introduced in 2009. HEIs fill in an online questionnaire after the completion of each evaluation process, and findings are published by PKA in its QM Portal on a quarterly and annual basis. Additionally, a one-off survey was conducted among the first group of HEI units that had undergone institutional evaluation; the procedure and criteria were modified in line with findings and follow-up discussions (see section 4.1.2 / ESG 2.2). Those interested may also give their feedback through the quality window on PKA's website. During discussions with the panel, both Rectors and representatives of evaluated HEIs made it clear that they were satisfied with their feedback opportunities and PKA's responses to feedback, and that no aspect of PKA's evaluation processes was missing in the online questionnaire. PKA should, however, do more to distribute information about amended legislation and clarify how to interpret new provisions. It was still too early to assess the usefulness of the newly established quality window.

PKA has an Advisory Board established in 2009 to give opinions on the Agency's strategic objectives and development trends, activities, standards and procedures (SER, Annexes 10 & 30). It is currently composed of former PKA Presidents, Presidents of the Rectors' Conferences (CRASP and RCHEIP), Presidents of two national employers' organisations, and international QA experts. As the panel was informed by PKA during the visit, the Board has met once or twice a year until now to discuss PKA's processes (e.g. proposed amendments to LoHE) and help PKA to push forward some points with the Ministry. PKA intends to increase the frequency of meetings and the number of international experts on the Board. The Presidents of CRASP and RCHEIP, whom the panel met, appreciated opportunities for regular contact and close cooperation with PKA through the Board.

Responding to external feedback collected until now, PKA has revised institutional evaluation criteria, self-evaluation report guidelines and evaluation report templates, and introduced a rule whereby HEIs are requested to make documents available only before a site visit (and not also during a visit as earlier). No other changes have been suggested. Feedback has also been used to develop a consistent approach to interpreting evaluation criteria across the SAAs. Responding to an evaluated HEI's critical feedback on the expertise of panel members, PKA investigated the matter and found the comments unjustified. In more general terms, external feedback has helped PKA to become more self-critical. (SER, Addendum; meetings with PKA during the visit)

As PKA informed the panel during the visit, the self-evaluation as part of the external review (not referred to in the SER) was coordinated by a small task force chaired by one of the Vice-Presidents, and the SWOT analysis was made by the PKA management. The self-evaluation process involved reflection on the 2008 review findings, changes introduced and data collected since then, and the ENQA membership criteria. Preliminary conclusions were consulted with the PKA SAAs and Bureau, and the SER was approved by the Presidium. As the panel clarified during the visit, experts, including students and doctoral students, had not contributed to the SER. While some lessons learned were mentioned, the Presidium / Management Team admitted that the self-evaluation had been carried out under the pressure of time and PKA would have benefitted from more self-reflection and another year to conduct the self-evaluation in a professional way.

PKA's Statutes (SER, Annex 1) have been amended and now state explicitly that the Agency is subject to external review at least every five years. Such reviews should be undertaken in accordance with operational arrangements for accreditation agencies in the European Higher Education Area.

### **Analysis**

Overall, it is evident to the panel that PKA has made great progress since the 2008 review when more formalised mechanisms for collecting internal feedback were not even contemplated and no mechanism was in place to collect external feedback, and thus PKA was considered 'partially compliant' with ESG 3.8. Now PKA has a policy for assuring the quality of its own activities as well as a portal dedicated to internal quality management, and the panel confirms that the former is published on the Agency's website and the latter is both fully operational and easily accessible. A great advantage of the QM system is that it is based on an integrated and comprehensive approach, covering the Agency as a whole (including all its activities and organisational units). An analysis of PKA's three-year strategy shows that it is clearly geared towards fulfilling the Agency's mission of quality enhancement in Polish HE (see also section 4.5 / ESG 3.5). It also includes both objectives and tasks (together with implementation timeframes) which focus on support for HEIs in enhancing quality and those linked with improving the quality of PKA's own activities (e.g. further training to increase the level of professionalism of evaluation panels, extended activities to improve the dialogue with HEIs, etc.).

The panel is also confident that the set of formal mechanisms and good practice arrangements in place (qualifying criteria, training, regular meetings, review of reports, and the external feedback survey) ensures that the performance of external experts hired by PKA meets required standards. The evidence collected shows that a no-conflict-of-interest declaration, introduced in recent years and obligatorily signed by both PKA members and experts, does work in practice as the representatives of HEIs referred only to some breaches of the impartiality principle in the past. PKA's formal and informal mechanisms for collecting internal feedback will jointly enable it to canvas all internal stakeholders (including experts) for their views on all key aspects of the Agency's activities and their own work. The examples of the use made of internal feedback quoted above show that PKA is responsive to feedback where it is sought and given. HEIs are satisfied with the online survey on individual evaluations and PKA's responsiveness is confirmed by the changes made in its processes.

The panel also confirms that a mandatory external review is now provided for in PKA's official document. Although the relevant provision does not refer explicitly to a report on the Agency's compliance with the ENQA membership criteria, it is clear that a review should be undertaken in line with the requirements of ENQA as the ESG have been approved by the Bologna Process signatory countries for the EHEA.

On the other hand, the QM system is not fully in place yet and, in particular, all formal mechanisms for collecting internal feedback still need either to be introduced or to be used on a regular basis. Thus it is too early to assess the effectiveness of the system. It would be particularly important to take early action to collect feedback from PKA members and experts as, especially given the total number of experts (nearly 1,000), their feedback can hardly be gathered in a reliable way through

various informal discussions (though there are indeed plenty of opportunities for internal reflection and informal feedback in various groups).

The usefulness of the surveys among HEIs on completed evaluations is unquestionable. However, they enable PKA to collect feedback from HEIs only on individual evaluations and either on programme or on institutional evaluation. Other ways of collecting feedback cannot be considered a formal, i.e. officially adopted and thus binding, mechanism (e.g. the quality window which, in addition, is not specifically designed to collect feedback on the overall methodology) or could not provide representative feedback (e.g. the quality window; discussions with the Advisory Board unless its members representing the Rectors' Conferences first gather formally feedback from a representative sample of HEIs). Thus, there is no formal mechanism for collecting HEIs' comments and suggestions on PKA's overall ex-post evaluation methodology, i.e. institutional and programme evaluation processes considered as a whole (e.g. possible and unnecessary overlaps between the two processes), while it was clear to the panel during the visit that both Rectors and representatives of evaluated HEIs could come up with some suggestions (see section 4.1.2 / ESG 2.2). A survey on the overall methodology among a sample of experienced HEIs would be particularly useful several years after the introduction of institutional evaluation as a new process and the revision of the criteria in the recent years (especially that PKA did not make an impact assessment covering both institutional and programme evaluation when the new criteria were introduced – see section 4.1.2). Ideally, it would be subsequently conducted every few years.

Further, it was clear to the panel, as it was to PKA itself, that the Advisory Board could contribute much more substantially to the development of the Agency, the achievement of its objectives and the improvement of its processes, and that periodic assessment of its effectiveness would be desirable. Thus the panel is glad to note PKA's plans to exploit the Board's potential more extensively. Now the Board (which includes the Presidents of the Rectors' Conferences) could also be consulted on workable arrangements for the involvement of international, non-Polish speaking, experts in PKA's evaluations (see section 4.1.4 / ESG 2.4). More information about the activities of the Board should also be available on the PKA website.

Finally, the self-evaluation process would have benefitted, as PKA admitted, from more self-reflection and self-analysis. It would have also benefitted greatly from direct involvement of representatives of all PKA Sections and of a representative number of experts, including students, in the self-evaluation task force. The composition of the task force could not be considered representative or sufficient to encourage self-reflection and self-analysis across the Agency, even if some internal consultations had been held; this seems to be reflected in the SER (see section 3.1.3). The panel believes that formal internal feedback mechanisms which are not yet in place would have helped PKA to conduct a more thorough self-evaluation.

**Panel conclusion:** Substantially compliant

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

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

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

For a general suggestion for further development, see section 5.2.

#### 4.9. ENQA Criterion 8: Miscellaneous

##### **ENQA Criterion 8: Miscellaneous**

- I. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements and decisions are reached in consistent manner, even if the judgements are formed by different groups;
- II. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.
- III. The agency is willing to contribute actively to the aims of ENQA.

##### **(I) Consistency of judgments**

PKA has in place mechanisms which ensure that its members, PKA Bureau staff as well as its experts respect the principles underlying its activities, as defined in the Agency's mission and the Code of Ethics, and meet its quality standards in line with the objectives of its internal QM system. Likewise, there are effective mechanisms and good practice arrangements for ensuring consistency in decisions. For detailed comments, see sections 4.1.3 / ESG 2.3, 4.7 / ESG 3.7 and 4.8 / ESG 3.8.

##### **(II) Appeals system**

PKA takes formal decisions, and its decisions involve legal consequences in the case of ex-post programme evaluation. While its appeals procedure could still be improved, the current legal framework does not allow PKA to do so. For details, see section 4.7 / ESG 3.7.

##### **(III) Contribution to the aims of ENQA**

PKA has been a full member of ENQA since 2009. Its members and PKA Bureau staff attend meetings, seminars and training sessions organised by ENQA. As part of the objective concerning further internationalisation in its Strategy 2012-2015 (SER, Annex 6), the Agency plans to send more people, including experts, to attend ENQA training sessions (2012-2014) and organise an ENQA conference or seminar (2014). As explained during the visit, the latter would, however, depend on the availability of funding. Three priorities for international activities contributing to quality enhancement and development of quality assurance were highlighted during the visit: (1) more extensive involvement in projects carried out by accreditation agencies (now one ECA project); (2) evaluations of Polish non-public HEIs which provide education abroad (e.g. in the United Kingdom and Belgium) to be used as an opportunity for extending cooperation with QA agencies abroad (expertise sharing, exchange of experts, and recruitment of international experts through foreign agencies); and (3) a greater number of signed bilateral agreements on the mutual recognition of accreditation decisions as one of the outcomes of more extensive international cooperation. It is clear to the panel that PKA is committed to pursuing, and plans to increase its contribution to, the aims of ENQA

**Panel conclusion:** Fully compliant

## **5. Conclusion and development**

### **5.1. Overall findings and recommendations**

Since the previous external review in 2008 PKA has grown into a more mature institution and one which is much more responsive than before. It has taken the lead in helping to create a climate in which the quality of education is a paramount concern, and has gradually gained recognition for its contribution to quality enhancement in Polish higher education. Recently, its external quality assurance responsibilities have been extended, and PKA has not suspended its core activities despite a short time for developing new or adjusting its on-going processes to amended legislation. It has also made sound progress in terms of embedding the standards set for quality assurance agencies in the EHEA into its operational framework and activities. At the same time, as PKA has acknowledged, there



continues to be scope for further progress, both in terms of organisational learning in Polish HEIs and within PKA itself. Where the panel's conclusions under some ESG do not show progress, this is because national legislation has been amended and no longer imposes constraints or limitations on PKA and / or the panel considers that more could and should have been done to implement the well justified recommendations or suggestions from the previous review, in particular in the overall national context which is now both more demanding and more conducive to further development of external and internal quality assurance.

In the light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, the Polish Accreditation Committee is in compliance with the ENQA Membership Provisions. The panel therefore recommends to the Board of ENQA that PKA should have its Full Membership of ENQA confirmed for a further period of five years.

The criteria where full compliance has been achieved are: **ENQA membership criteria 1 / Activities / ESG 3.3** (Activities), **2 / ESG 3.2** (Official status), **3 / ESG 3.4** (Resources), **5 / ESG 3.6** (Independence), **6 / ESG 3.7** (External quality assurance criteria and processes), and **8 / Miscellaneous**.

Substantial compliance has been achieved with the following criteria:

- **ENQA membership criterion 1 / Activities / ESG Part 2 / ESG 3.1** (Use of external quality assurance procedures), including:
  - **ESG 2.1 (Use of internal quality assurance procedures): substantial compliance**  
PKA should strengthen the assessment of quality assurance policies and procedures (ESG 1.1) as part of its programme evaluation by including explicit references to both elements in the relevant (sub-) criteria.
  - **ESG 2.2 (Development of external quality assurance processes): substantial compliance**  
PKA should put in place a formal mechanism for consultations with its external stakeholders on, and impact assessment of, prospective changes in its processes, procedures and / or criteria which identifies stakeholders to be obligatorily targeted and methods to do so.
  - **ESG 2.3 (Criteria for decisions): full compliance**
  - **ESG 2.4 (Processes fit for purpose): substantial compliance**  
PKA should review and revise its arrangements for the recruitment and training of experts so that academic experts are recruited through a fully transparent procedure, a mechanism is put in place to assess training needs of all categories of experts on a regular basis, and the training or briefing of international experts ensures that all of them are well prepared for their tasks in terms of familiarity with the national context and PKA's procedures. To increase transparency, PKA may consider adopting a rule that a certain minimum proportion of new experts are recruited after the end of each evaluation cycle or PKA's term of office.  
PKA should make early progress in securing the targeted increase of international experts, including non-Polish speaking, in its external quality assurance processes.
  - **ESG 2.5 (Reporting): substantial compliance**  
Pursuing its thoughts as part of the work already initiated, PKA should revise its evaluation report templates so that they include recommendations and suggestions on quality improvement and enhancement, in particular IQA systems, and a clear distinction is made between recommendations and suggestions.
  - **ESG 2.6 (Follow-up procedures): full compliance**
  - **ESG 2.7 (Periodic reviews): full compliance**
  - **ESG 2.8 (System-wide analyses): substantial compliance**  
In addition to publications already planned, PKA should produce a more fine-grained publication specifically devoted to internal quality assurance systems at Polish HEIs,

preferably with a Code of Good Practice or guidelines on how current approaches could be improved.

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

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

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

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

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

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

PKA is encouraged to take appropriate action, so far as it is empowered to do so, to achieve full compliance with these criteria.

## **5.2. Suggestions for further development**

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

- (1) The panel has reflected on the various arrangements currently in place which contribute to PKA's focus on enhancement in both its external quality assurance processes and its internal quality management (e.g. the work of the various Sections and the pool of experts, and of the Quality Management Coordinator as well as other individuals with direct responsibility for internal quality management). While noting their valuable contributions, the panel formed the view that a more formalised focal point might help to reinforce current arrangements. For example, PKA may wish to consider benefits from forming an Operations Enhancement Group (OEG), which draws together representatives from all of the PKA Sections, the PKA Bureau, the Quality Management Coordinator and the pool of experts, including students and doctoral students, and which provides a focal point for identifying and disseminating enhancement opportunities, both within PKA and across HEIs themselves. An OEG may also provide inspiration for, and valuable input to, the work of the Quality Management Coordinator.

As PKA is likely to conduct soon an ex-post impact assessment of its evaluation processes, the OEG could take on a key role in the development of a methodology for such an assessment. In this context, PKA as a whole and the OEG in particular may benefit from the experience of some accreditation agencies which are making good progress in this area and which share their experience within the framework of international QA and HE networks and organisations.

- (2) It is clear to the panel that Polish HEIs are intimately familiar with PKA's activities and that it has gained recognition for its work in the higher education sector in the recent years. Less attention has been given to raising awareness of the Agency's activities and their outcomes among the general public, including in particular prospective students, while PKA aims in its 2012-2015 Strategy to improve the methods of informing about its activities. Thus, PKA might benefit from developing (further) a PR / communication policy, which identifies main target groups together with methods for reaching them, and a mid-term action plan for raising its profile. As suggested by PKA's students- and doctoral students-experts, social media may be an effective tool in

targeting prospective students. Further, as part of a communication or, more precisely, publications policy, PKA may find it worthwhile to consult intended readers of its Annual Reports on how they could be made even more relevant to their needs. (See also sections 4.1.5 / ESG 2.5 and 4.1.8 / ESG 2.8). The appointment of a PR officer to support the President of PKA (responsible for external relations) at the operational level could be worth considering as well.

- (3) During its discussion with the Vice-Ministers of Science and Higher Education, the panel noted that the Ministry would be willing, in principle, to consider favourably PKA's request for top-up funding, for example for the involvement of international experts, provided that funds are available in the budget and that the Agency's plan to use extra funding is indeed good and sound (see also sections 4.1.4 / ESG 2.4 and 4.4 / ESG 3.4). Thus, the panel would encourage PKA to draw up such a plan which identifies clearly and justifies its internationalisation priorities, in line with its 2012-2015 Strategy, and outlines benefits in terms of quality enhancement in Polish higher education, so that it can be submitted to the Ministry when funds are available. Considering the enthusiastic approach of the representatives of Polish HEIs that the panel met to the involvement of international experts, support for the plan might also be sought in the academic community.
- (4) As PKA is currently discussing with the Ministry of Science and Higher Education possible amendments to LoHE to revise its appeals procedure, it may wish to consider the involvement of international experts in a new internal or external body, in particular for appeals against ex-post evaluations decisions. This could be a way of ensuring greater impartiality in the appeals procedure and would also contribute to further internationalisation of the Agency's activities. Since appeals are lodged against a small proportion of ex-ante evaluations decisions, costs involved might be quite limited (see also sections 4.7 / ESG 3.7 and 4.9).

With regard to appeals procedure options now considered, the panel is glad to note (see also section 4.6 / ESG 3.6) the Vice-Ministers' commitment to preserving PKA's independence so that the Agency continues to meet ENQA's relevant criterion. In this context, once some more detailed arrangements are developed, it may be a good idea for PKA to seek advice from the ENQA Board on their compliance with ESG 3.6 before they are formally included in proposed LoHE amendments.

- (5) Finally, the panel strongly supports PKA's idea to exchange experts with quality assurance agencies in other countries of the EHEA as this would, obviously, develop further experts' skills, bring different perspectives into, and thus enhance the European dimension of evaluation processes, and have a positive impact on the quality of education in HEIs (see sections 4.1.4 / ESG 2.4 and 4.9 / 8 (Misc.)).

## 6. Annexes

### Annex 1: 2008 and 2013 external reviews: a comparative overview of findings

ENQA Criterion / ESG	2008 review		2013 review	
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.1: Use of IQA procedures</b>	Substantially compliant	<p>PKA should set a timeframe for the adoption of a strict approach to IQA in its external assessment, taking into account the varying progress made by HEIs on the one hand and the need for HEIs to double their efforts to establish IQA systems on the other hand.</p> <p>PKA's criteria for quality ratings should be revised so that all highlight the importance of progress made by HEIs towards the establishment of IQA systems, and ultimately the effectiveness of such systems; PKA may reflect on whether and how a more systematic approach to the assessment of IQA systems could be developed to ensure consistency in assessment and quality ratings given to programmes according to revised criteria.</p>	Substantially compliant	PKA should strengthen the assessment of quality assurance policies and procedures (ESG 1.1) as part of its programme evaluation by including explicit references to both elements in the relevant (sub-)criteria.
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.2: Development of EQA processes</b>	Substantially compliant	PKA should hold consultations with HEIs and PRACs to arrive at a clear consensus over the primary and secondary aims and objectives of its processes.	Substantially compliant	PKA should put in place a formal mechanism for consultations with its external stakeholders on, and impact assessment of, prospective changes in its processes, procedures and / or criteria which identifies stakeholders to be obligatorily targeted and methods to do so.
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.3: Criteria for decisions</b>	Fully compliant	PKA should consider how it may refine its decision-making procedures to provide an explicit basis for giving an outstanding rating to programmes in fields of study not listed in the national legislation.	Fully compliant	
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.4: Processes fit for purpose</b>	Fully compliant	<p>Discussions between PKA and MOSHE may help to align more clearly the roles and responsibilities for accreditations (opinions and decisions) and quality assurance / enhancement.</p> <p>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.</p> <p>PKA should consider increasing the involvement of international experts to enhance general fitness for purpose and to support the development of IQA in Polish HE.</p>	Substantially compliant	PKA should review and revise its arrangements for the recruitment and training of experts so that academic experts are recruited through a fully transparent procedure, a mechanism is put in place to assess training needs of all categories of experts on a regular basis, and the training or briefing of international experts ensures that all of them are well prepared for their tasks in terms of familiarity with the national context and PKA's procedures. To increase transparency, PKA may consider adopting a rule that a certain minimum proportion of new experts are recruited after the end of each evaluation cycle or PKA's term of office.

		<p>PKA and PRACs might jointly review the current predominance of PKA's quantitative orientation within its procedures and criteria and introduce more qualitative aspects (within (changes to) the legal framework); then a second cycle of quality assessments could continue to provide a high benefit to cost ratio.</p> <p>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 HE.</p>		<p>PKA should make early progress in securing the targeted increase of international experts, including non-Polish speaking, in its external quality assurance processes.</p>
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.5: Reporting</b>	Substantially compliant	<p>PKA should explore ways to publish more detailed and specific information on individual programmes, while respecting the national legislation.</p>	Substantially compliant	<p>Pursuing its thoughts as part of the work already initiated, PKA should revise its evaluation report templates so that they include recommendations and suggestions on quality improvement and enhancement, in particular IQA systems, and a clear distinction is made between recommendations and suggestions.</p>
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.6: Follow-up procedures</b>	Fully compliant	<p>PKA may consider introducing a follow-up procedure for programmes with a positive rating; this might be particularly useful for programmes offered by HEIs where IQA systems are at an early stage of development. These reports should focus on (development of) IQA systems.</p>	Fully compliant	
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.7: Periodic reviews</b>	Fully compliant		Fully compliant	
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.8: System-wide analysis</b>	Fully compliant	<p>PKA may consider the value and practicality of publishing reports on IQA in individual fields of study and publications promoting best practice in IQA at institutional level.</p>	Substantially compliant	<p>In addition to publications already planned, PKA should produce a more fine-grained publication specifically devoted to internal quality assurance systems at Polish HEIs, preferably with a Code of Good Practice or guidelines on how current approaches could be improved.</p>
<b>ENQA Criterion 1a: ESG 3.1: Use of EQA procedures</b>	Substantially compliant	N/A	Substantially compliant	<p>See detailed recommendations above.</p>
<b>ENQA Criterion 1b: ESG 3.3: Activities</b>	Fully compliant		Fully compliant	
<b>ENQA Criterion 2: ESG 3.2: Official status</b>	Fully compliant		Fully compliant	
<b>ENQA Criterion 3: ESG 3.4: Resources</b>	Fully compliant	<p>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 QA among Polish HEIs, and within a broader European ('Bologna') perspective. It should hold discussions with MoSHE to ensure that its development priorities are</p>	Fully compliant	

		taken into account in the budget for HE in the coming year(s).		
<b>ENQA Criterion 4: ESG 3.5: Mission statement</b>	Substantially compliant	<p>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.</p> <p>In any review of the mission statement PKA may 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 HEIs 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 HE (through its accreditations), and (ii) contributing to the improvement (enhancement) of HE (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 QA agency.</p>	Substantially compliant	PKA should revise its mission statement so that it clarifies that its external quality assurance processes have a double purpose of quality enhancement and accountability / compliance, and that its ex-post evaluation decisions lead to legal consequences for HEIs.
<b>ENQA Criterion 5: ESG 3.6: Independence</b>	Fully compliant		Fully compliant	
<b>ENQA Criterion 6: ESG 3.7: EQA criteria and processes used by the agencies</b>	Fully compliant	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.	Fully compliant	
<b>ENQA Criterion 7: ESG 3.8: Accountability procedures</b>	Partially compliant	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.	Substantially compliant	<p>In line with its plans and preliminary arrangements, PKA should implement fully its internal quality management system and assess regularly its fitness for purpose and effectiveness.</p> <p>PKA should introduce a formal mechanism for the periodic collection of feedback from a sample of experienced HEIs on its overall evaluation methodology (i.e. institutional and programme evaluation processes considered jointly as making up a whole), in addition to feedback now collected on individual evaluations.</p> <p>Pursing its initial thoughts, PKA should make arrangements for maximising and exploiting more extensively the potential of its Advisory Board in terms of its input on the work and operations of the Agency, and for reviewing its effectiveness. Information about the activities of the Board should be easily available on the PKA website.</p>
<b>ENQA Criterion 8: Miscellaneous</b>	N/A	N/A	Fully compliant	

## Annex 2: Site visit agenda

### Site visit agenda, 25-27 November 2013

25.11.2013		
16:00 – 18.45	Private meeting of the review panel	Review panel only
19.15	<i>Dinner</i>	Review panel only
26.11.2013		
08:30 - 09:45	Meeting with the PKA Presidium and Vice-Presidents (Management Team)	<p><u>Management Team:</u>  <i>Prof. M. Rocki, President of PKA</i>  <i>Prof. D. Strahl, Vice-President of PKA</i>  <i>Prof. M. W. Socha, Vice-President of PKA</i>  <i>Prof. J. Rogowski, Secretary General of PKA</i></p> <p><u>Presidium representatives:</u>  <i>Prof. M. Chudy, Chair of the Section for Technical and Engineering Sciences</i>  <i>Prof. K. Szewior, Chair of the Section for Social Sciences</i>  <i>Prof. Ł. Sułkowski, representative of the Employers' Organisation</i></p>
09:45 - 10:45	Meeting with the Presidents of the Rectors' Conferences (KRASP and KRZaSP) / representatives of HEIs in the PKA Advisory Board, Rectors and Heads of HEIs, and a representative of peer review accreditation commissions	<p><i>Prof. W. Banyś, President of the Conference of Rectors of Academic Schools in Poland (CRASP), member of the PKA Advisory Board, Rector of Silesian University in Katowice (public HEI)</i></p> <p><i>Prof. W. Tłokiński, President of the Rectors Conference of Higher Education Institutions of Poland (RCHEIP), member of the PKA Advisory Board, Rector of the Ateneum University in Gdańsk (non-public HEI)</i></p> <p><i>P. Zygardłowski, President of the Board and Arkadiusz Doczyk Director for Education of WSB Schools of Banking in Gdynia, Gdańsk, Bydgoszcz, Toruń, Szczecin, Poznań, Łódź, Wrocław, Opole, Chorzów (non-public HEIs which co-organised the 2009 Quality Forum conference and will organise the next QF conference)</i></p> <p><i>Dr. Cz. Dyrzcz, Rector-Commander of the Naval Academy in Gdynia (public HEI which organised the 2012 Quality Forum conference),</i></p> <p><i>Prof. D. Bąkowski-Kois, Vice-Rector of the Academy of Music in Cracow (public HEI)</i></p> <p><i>Prof. L. Pączek, President of the Accreditation Committee of Medical Universities in Poland (a peer review accreditation commission)</i></p>
10:45 - 11:00	<i>Coffee break with internal review panel discussion</i>	Review panel only
11:00 - 12:30	Meeting with representatives of evaluated higher education institutions	<p><u>Programme evaluations:</u>  <i>Dr M. Madej, Rector of the University of Ecology and Management in Warsaw (non-public HEI) (a wide range of PKA quality ratings received)</i>  <i>Dr S. Gudkova, IQAS Coordinator at the Koźmiński University in Warsaw (non-public HEI) (outstanding quality ratings)</i>  <i>Prof. Przyborski, Vice-Rector of the University of</i></p>

		<p><i>Warmia and Mazury in Olsztyn (public HEI) (a wide range of quality ratings received)</i></p> <p><u><i>Institutional evaluations:</i></u>  <i>Prof.J. Ostaszewski, Dean of the Faculty of Management and Communication Policy of the Jagiellonian University in Cracow (public HEI) (outstanding rating)</i>  <i>Prof. H. Stryczewska, Dean of the Faculty of Electrical Engineering and Computer Science, Technical University in Lublin (public HEI) (conditional rating)</i>  <i>Prof. M. Ligarski, IQAS Coordinator, Silesian Technical University in Gliwice (public HEI) (positive rating)</i></p>
12:30 - 13:30	<i>Internal review panel discussion with lunch</i>	Review panel only
13:30 - 15:00	Meeting with members of the PKA Sections for Academic Areas and external experts	<p><u><i>Members of Sections for Academic Areas:</i></u>  <i>Prof. T. Skubis (Technical and Engineering Sciences)</i>  <i>Prof. B. Muchacka (Social Sciences)</i>  <i>Prof. T. Bąk (Social Sciences)</i>  <i>Prof. Ł. Sułkowski (Employers' Organization)</i></p> <p><u><i>Experts:</i></u>  <i>Prof. J. Żyśko (Physical Education)</i>  <i>Prof. M. Osińska (Economic Sciences)</i>  <i>M. Markowski (IQAS)</i></p>
15:00 - 15:30	<i>Coffee break with internal review panel discussion</i>	Review panel only
15:30 - 16:30	Meeting with students- and doctoral students-experts	<p><u><i>Students:</i></u>  <i>D. Kolenda (Students' Coordinator),</i>  <i>E. Profaska, P. Kulczycki</i></p> <p><u><i>Doktoral students:</i></u>  <i>A.Mrozowska (Doctoral Students' Coordinator),</i>  <i>R. Kiljańczyk, K. Kurowska</i></p>
16:30 - 16:45	<i>Walk to the Ministry of Science and Higher Education</i>	
16:45 - 17:30	Meeting with Vice-Ministers of Science and Higher Education	<i>Dr D. Lipińska-Nałęcz and Prof. M. Ratajczak, Vice-Ministers of Science and Higher Education responsible for cooperation with PKA and HE funding</i>
17:45 - 19:00	<i>Review panel meeting to summarize outcomes of day one</i>	Review panel only
19:30	<i>Dinner</i>	Review panel only
<b>27.11.2013</b>		
08.45-09:00	Quick tour of PKA facilities	Acquaintance with physical infrastructure
09.00-09:45	Meeting with PKA Bureau management and staff	<p><u><i>Management Team:</i></u>  <i>B. Wojciechowska, Director</i>  <i>B. Bryzek, Deputy Director</i>  <i>J. Janas, Chief Accountant</i></p>



		<p><u>Staff:</u>  <i>H. Chrobak, Secretary of Section for Economics,  J. Koziel, Secretary of Section for Medical and Physical Education Sciences, representative of employers  W. Marszelewska, Coordinator of administrative support to the Sections  E. Lasota-Bałżek, Secretary of the Section for Sciences  K. Martyniak, International Relations Officer and Institutional Assessment Coordinator</i></p>
09:45-10:45	Section for Ethics, Section for Appeals and Internal Quality Management Team (incl. 'Quality Management System Plenipotentiary')	<p><i>Prof. S. Wrzosek, Chair of the Section for Ethics,  Prof. T. Kufel, member of the Section for Appeals  Prof. D. Strahl, Chair of the Section of IQA Experts,  I. Kwiatkowska Sujka, QMS Coordinator,  W. Wrona, Administrator of the Quality Management System Panel and Data Security</i></p>
10:45 – 11:00	<i>Coffee break with internal review panel discussion</i>	Review panel only
11:00 – 11:30	Meeting with two members of the PKA Management Team to clarify outstanding issues	<i>Prof. D. Strahl and Prof. M. W. Socha, Vice-Presidents</i>
11:30 - 15:00	<i>Final discussion of the review panel to agree outcomes and to discuss main lines of the report with lunch</i>	Review panel only
15:00 - 15:15	Final meeting with the PKA Management Team	<p><i>Prof. M. Rocki, President of PKA  Prof. D. Strahl, Vice-President of PKA  Prof. M. W. Socha, Vice-President of PKA  Prof. J. Rogowski, Secretary General of PKA</i></p>
15:30	<i>Departure</i>	