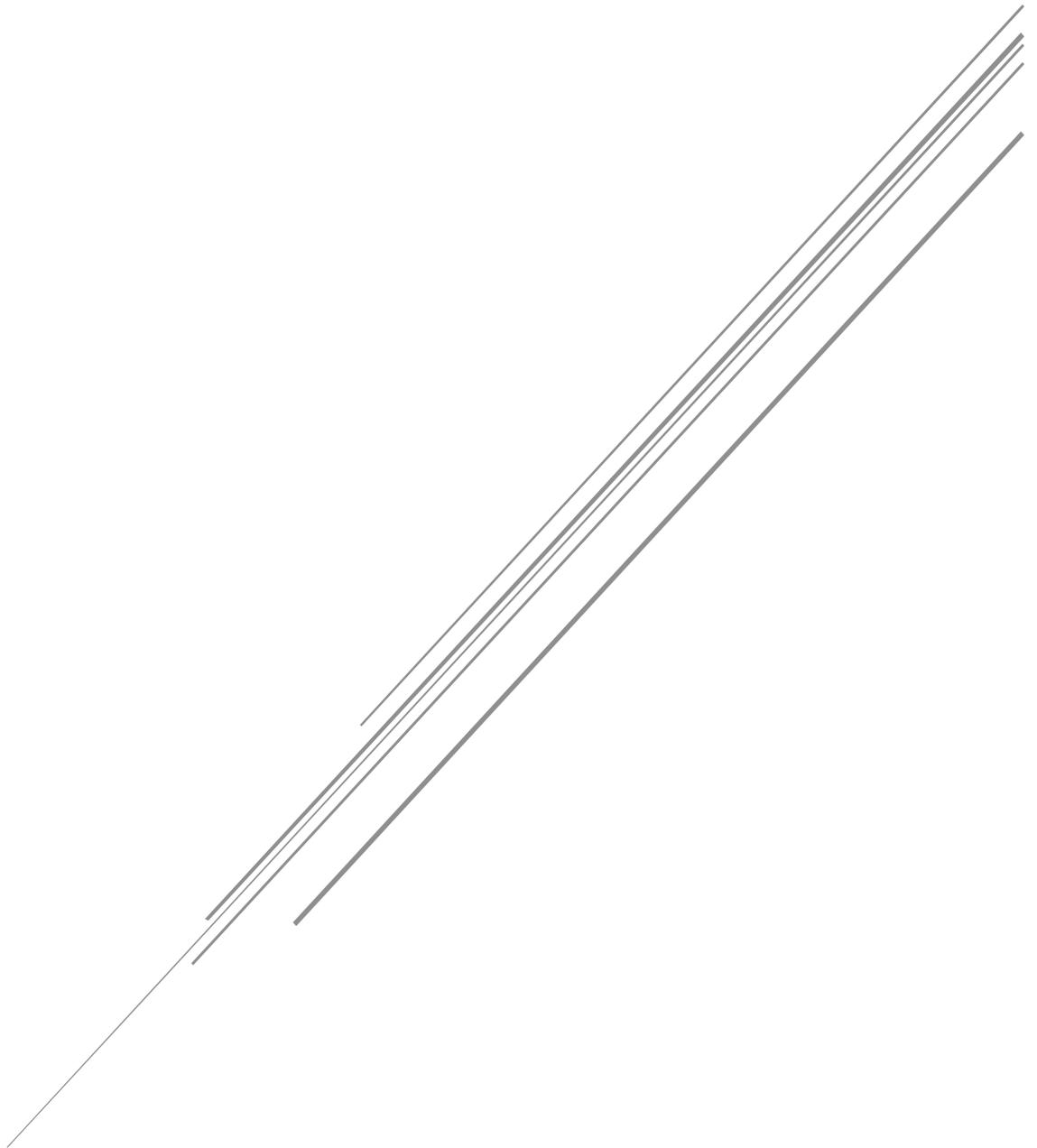




POLISH ACCREDITATION COMMITTEE  
(PKA)

FOLLOW-UP REPORT  
FEBRUARY 2016



## Foreword

In 2013/14, the Polish Accreditation Committee (PKA) underwent an external review for the purpose of renewal its full membership in the European Association for Quality Assurance in Higher Education (ENQA) and to check compliance with the Association's membership criteria and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). In December 2013 the external review panel developed a review report and as a result in March 2014 the ENQA Board took the final decision **“on the basis of its scrutiny of the final review report (...) that PKA met the necessary requirements for reconfirmation of ENQA Membership.”** However, PKA was asked to take into consideration the panel's recommendations, and more particularly address the issue of appeals procedure (Membership criterion 8ii) and involvement of employers in programme evaluation panels (ESG 2.4).

Pursuant to the ENQA Board decision PKA submitted Action Plan and accompanying clarifications on the issue of appeals procedure and involvement of employers in programme evaluations. It should be noted that Action Plan was produced on the basis of review panel's recommendations as well as its suggestions and was adopted by the Presidium of PKA in March 2014.

The purpose of this follow-up is to proof the agency's continuous awareness of its own quality and quality work<sup>1</sup>. Therefore PKA follow-up report presents the current status of remedial measures that have been taken by PKA since its last external review. The additional recommendations given by ENQA Board were treated in the PKA follow-up report separately.

The following structure of the follow-up report was adopted:

1. Appeals procedures (Membership criterion 8 ii)
2. Involvement of employers into programme evaluation panel (ESG 2.4)
3. Action plan
4. Appendixes
  - 4.1. Statute of the Polish Accreditation Committee
  - 4.2. Mission Statement of the Polish Accreditation Committee
  - 4.3. EIQAS project general description
  - 4.4. PKA QM system (2013; 2015)
  - 4.5. Dobre praktyki w zarządzaniu jakością kształcenia, red. Ł. Sułkowski, PKA 2015 /eng. Good practices in quality management of education, Ł. Sułkowski, PKA 2015/

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<sup>1</sup> Guidelines for ENQA Agency Reviews, October 2015

## 1. Appeals procedures (Membership criterion 8ii)

In the final decision the ENQA Board noted that

*“PKA had 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”* and that *“discussions were held between PKA and the Ministry at the time of the visit”* (p.40). Even though the legal framework does not allow PKA to improve its appeals procedure, **the Board is of the opinion that a more adequate appeals procedure needs to be implemented.**

The appeals procedure was in the centre of PKA’s interest for the last years. As it was stated in PKA response from March 2014 that several proposals were submitted to the Ministry of Science and Higher Education and to the amendment to the Act of the 27<sup>th</sup> July 2005 Law on Higher Education (LoHE) relating to the establishment of the independent body as an appealing section in its structure.

The PKA’s efforts were finally satisfied with the amendment to LoHE in 2014<sup>2</sup> where the following clauses were added to the Articles 50 and 52:

### Article 50.

1. The Committee shall exercise its functions through plenary sessions and through its bodies.
2. The bodies of the Committee shall be:
  - 1) the Chairperson;
  - 2) the Secretary;
  - 3) the Presidium.
3. The composition of the Presidium shall be:
  - 1) the Chairperson of the Committee;
  - 2) the Secretary;

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<sup>2</sup> The amendment to the Law on Higher Education, 2014 only completed the regulatory framework that had been gradually modified in 2011 by introducing further changes in the legal environment of HEIs. Consistently introduced regulations adjust and harmonize HE system with the solutions being implemented in the European Higher Education Area. The introduced regulations focus mainly on the encouraging adults to embark on HE studies, improving the quality of HE with the respect for HE autonomy and adjusting process of HEIs to the results of population decline. Besides adopted amendment constitute the response to the recent changes in labour market needs and to the necessity of strengthening the cooperation between HEIs and social and economic environment by introducing more innovative approach to teaching and learning. The recently introduced amendment also requires HEIs to distinguish two educational profiles in the study programmes offered: academic and practical. Another new option is the ability to validate learning outcomes attained outside of the HEI by students with the relevant professional experience, which can then be recognized and validated towards the requirements of the study programme. According to the Minister in charge of HE the amendment to the Law on Higher Education introduced a number of changes that will open HEIs to new trends and challenges that await us in the future.

With regard to the PKA’s activity the amendment to the LoHE clarifies the activity of appeals section within its structure by introducing independent Appeals Body. The membership in the Appeals Body cannot be combined with the membership in the other Section. Besides new executive acts imposed further responsibilities on the PKA that in effect were reflected in its evaluation criteria (see Appendix 1 Statute of the Polish Accreditation Committee).

- 3) the Chairpersons of the review panels referred to in section 4.1 below;
  - 4) the President of the Student Parliament of Republic of Poland;
  - 5) two representatives of employers' organizations;
- 4. The composition of the Committee shall be:**
- 1) Sections dedicated to the specific areas of study defined by legislation pursuant to Article 9, section 2, subsection. 2;**
  - 2) Appeals Body.**
5. Each Section, referred to in section 4.1, shall be composed of at least four members of the Committee representing areas of study, including at least three holding the title of profesor or degree of doktor habilitowany in relevant disciplines, as well as minimum one representative of employer's organization.
  - 6. Appeals Body, referred to in section 4.2, shall be composed of Committee members representing at least one representative of each area of study. Membership in Appeals Body cannot be combined with membership in the Section, referred to in section 4.1.**

#### **Article 52.**

1. The Presidium shall adopt resolutions on the matters referred to in Article 49, sections 1 and 4 on the basis of a report submitted by the Sections referred to in Article 50, section 4.
2. Any party not satisfied with a resolution of the Presidium on the matters referred to in Article 49, sections 1 and 4, may request the reconsideration of the matter. Such a request shall be submitted to the Committee within thirty days of the date of receipt of the relevant resolution. **The Presidium shall adopt the resolution within two months of its receipt.**
- 3. The matter, referred to in section 2, is reconsidered by Appeals Body.**
- 4. In the process of reconsideration of the matter referred to in section 2, cannot participate experts who already took part in its reconsideration in the first instance.**
- 5. The Chairperson of Appeals Body shall take part in an advisory capacity in the meetings of Presidium where the resolutions on the matters for reconsideration are adopted.**

Pursuant to the recent amendment to the LoHE PKA adopted changes to its Statutes on 23<sup>rd</sup> of February, 2015 (see Appendix 1). Then the members of Appeals Body were officially appointed and by the end of the last year the Body reconsidered 245 matters submitted by HEIs.

## 2. Involvement of employers in programme evaluation panels (ESG 2.4).

In the final decision the ENQA Board recommended

integrating employers as experts also in the panels of programme evaluation, so that all stakeholders are represented, as employability is important issue to address.

PKA pays special attention to the subject of employability and since 2011 representatives of employers' organizations have been involved in PKA's quality assurance processes through their presence in PKA's decision-making bodies (Presidium and Sections) as well as through their personal engagement in the institutional and then programme evaluation panels.

Employers involvement in quality assurance was treated as an evolutionary process and in a way its realization was prompted by the legal framework of HE system. Amendment to the Law on Higher Education, 2014 strengthened the role and importance of cooperation between HEIs and social and economic environment and at the same time opened up for PKA new possibilities to tighten cooperation with employers through their participation in programme evaluation panels. Nowadays all higher education institutions are obliged to distinguish two educational profiles in the study programmes offered: academic and practical whereas in the latter it is expected that the cooperation among HEIs and business will be substantial and clearly defined in the concept and delivery of education.

Taking into account the recommendation of ENQA Board and following legislation in the last year PKA significantly increased its efforts moving towards the employers involvement in programme evaluation panels. As it was declared by PKA in its response to ENQA Board after coming into force amendment to the LoHE, 2014 employers were engaged in all programme evaluation procedures that were carried out on practical profile. Besides it should be stressed that even more systematic approach was adopted to the cooperation with employers organizations and PKA developed the short-term strategy in this area. Consequently PKA's President appointed the coordinator responsible for the cooperation with employers organization who is also in charge of the processes of experts' selection, trainings and smooth incorporation of experts into evaluation panels. He also monitors and evaluates on on-going basis the development of experts' competences as well as identifies further needs for improvement.

To sum up at the moment the employers fully participate in all institutional and programme evaluation procedure conducted on the practical profile. PKA has just accomplished dedicated trainings for the selected group of experts that could

be also engaged in the programme procedure on academic profile as soon as possible.

### 3. Action Plan

Action Plan was adopted by PKA's Presidium in March 2014 on the basis of recommendations and suggestions made by external review panels pursuant to the ESG 2005. The last column shows the current status of remedial measures that have been taken by the Polish Accreditation Committee until the end of February, 2016. From PKA perspectives all recommendations were addressed and their realization is constantly being monitored by PKA's QM system in order to prove satisfactory.

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	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</p>	Substantially compliant	<p>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.</p>	<p>The inclusion of explicit references to policies and procedures of quality assurance(ESG 1.1) in PKA sub-criteria for programme evaluation.</p>	<p>Following the amendment to the Law on Higher Education (LoHE) PKA adopted new Statute with evaluation criteria on the 23<sup>rd</sup> of February 2015. The changes in the programme evaluation criteria were made accordingly and the explicit references to QA policies and procedures were included - see Appendix 1-3 Statute of the Polish Accreditation Committee</p>

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
		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.				
<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.	The introduction of formal mechanism for consultations with PKA external stakeholders to the internal quality management system.	PKA introduced to its QM system internal procedure on designing regulations where the direct mechanism for consultations with external stakeholder were included – see Appendix 4' QM system 2015, procedure V.2.  The last wide consultancy process took place in 2014/2015 and its outcomes were brought by PKA on board while developing new evaluation criteria, templates of the reports etc.
<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	Fully compliant			

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
		listed in the national legislation.				
<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> <p>PKA and PRACs might jointly review the current predominance of PKA's quantitative orientation within its</p>	Substantially compliant	<p>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,</p>	<p>1. The revision of the recruitment procedure.</p> <p>2. The introduction to the internal quality management system the procedure for assessing training needs and expectations of all categories of experts.</p>	<p>1. According to the amendment to the experts' recruitment procedure queries for experts from academic staff and requirements are publicly announced and sent directly to Deans of Faculties. PKA needs with regards to new experts are verified and refilled on on-going basis, however, at the beginning of each terms of office the pool of experts is reviewed once again. As on the 1<sup>st</sup> of January 2016 PKA has commenced its new terms of office and at the moment the pool of PKA's experts is being verified.</p> <p>2. With regard to different groups of experts it has been developed the range of tools (e.g. questionnaires, evaluation interviews, self-assessment of competences etc.) enabling to conduct the process of research and assessment of training needs and expectations. The training programme is always tailored to different experts' groups expectations and needs and finally delivered by qualified trainers. Since the quality policy of PKA aims at the continuous development of experts/staff competences the above-mentioned procedure is in constant use.</p>

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
		<p>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 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> <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>	<p>3. The increase of international experts participation in PKA quality assurance processes.</p> <p>4. The appointment of Task Force responsible for internationalization of PKA external quality assurance processes including the increase of non-Polish speaking experts in its procedures.</p>	<p>3. According to the resolution adopted by PKA's Presidium all institutional evaluations and at least 30% of all programme procedures should be attended by foreign experts. Since March 2014 PKA has been organizing cyclical trainings for international experts and has been expanding its list of experts on a regular basis.</p> <p>4. The internationalization of PKA external quality assurance processes is in the core of its interest. The Task Force responsible for the delivery of this process has been appointed and is responsible for the delivery of the process. Besides since 2014 PKA has been coordinating the EIQAS project that is also directed at the capacity building of partners' agencies with special regard to experts training and future exchange among QA agencies. Two trainings for international experts (students, QA experts) were already organized in Ljubljana and Lisbon -- for further information see Appendix 3 EIQAS project general description or project website : <a href="http://www.eiqas.com">www.eiqas.com</a></p>
<b>ENQA Criterion 1a ESG Part 2 /</b>	Substantially compliant	PKA should explore ways to publish more detailed and specific information on	Substantially compliant	Pursuing its thoughts as part of the work already initiated,	The revision of evaluation reports so that they include and make a clear distinction between	Following the amendment to the LoHE, 2014 and PKA's Statute the changes of reports' templates were made accordingly. There is a clear distinction

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
<b>ESG 2.5: Reporting</b>		individual programmes, while respecting the national legislation.		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.	recommendations and suggestions on quality improvement and enhancement.	between recommendations and suggestions on quality improvement and enhancement. In order to ensure adequate quality of site visit reports sent to HEI authorities, PKA has implemented a procedure for internal control of this type of documents; each report drawn by a chair of an evaluation panel must be approved by the Secretary General. The consistency of the document is analysed (also the compliance with the recommendations presented by PKA during previous evaluations is analysed) and the consistency of the scope of the evaluation with the requirements included in the templates posted online is verified.
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.6: Follow-up procedures</b>	Fully compliant	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.	Fully compliant			
<b>ENQA Criterion 1a ESG Part 2 /</b>	Fully compliant		Fully compliant			

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
<b>ESG 2.7: Periodic reviews</b>						
<b>ENQA Criterion 1a ESG Part 2 / ESG 2.8: System-wide analysis</b>	Fully compliant	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.	Substantially compliant	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.	PKA will develop the Code/Guide of Good Practices of IQA for Polish HEIs.	Since 2014 PKA has been coordinating EIQAS project that is funded from Erasmus Plus KA2. The final outcome of the project is development of the Guide to IQA (publication specifically devoted to IQA with the examples of good practices) - for further information see Appendix 3 EIQAS project general description and project website: <a href="http://www.eiqas.com">www.eiqas.com</a> . Besides last year PKA published its first booklet on good practices in quality management of education that was widely distributed among HEIs. The publication is also available on PKA website <a href="http://www.pka.edu.pl">www.pka.edu.pl</a> as well as is attached to this follow-up report - see Appendix 5.
<b>ENQA Criterion 1a: ESG 3.1: Use of EQA procedures</b>	Substantially compliant	N/A	Substantially compliant	See detailed recommendations above.		
<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			

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
<b>ENQA Criterion 3: ESG 3.4: Resources</b>	Fully compliant	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 taken into account in the budget for HE in the coming year(s).	Fully compliant			
<b>ENQA Criterion 4: ESG 3.5: Mission statement</b>	Substantially compliant	If legally allowable, the mission statement should be revised to make specific reference to PKA as the national accreditation body and to accreditation as an outcome of PKA's external quality assessment.  In any review of the mission statement PKA may consider how this could be defined more precisely, and, in	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	PKA will take into account recommendation referring to its mission while facing its future revision.	The PKA mission was revised immediately after coming into force the amendment to the LoHE, 2014. The recent revision was consulted with PKA's Advisory Council in order to reflect the double purpose of quality assurance processes carried out by PKA – see for further information Appendix 2 Mission Statement of the Polish Accreditation Committee or PKA website <a href="http://www.pka.edu.pl/en/mission-statement/">http://www.pka.edu.pl/en/mission-statement/</a>

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
		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.		consequences for HEIs.		
<b>ENQA Criterion 5: ESG 3.6: Independence</b>	Fully compliant		Fully compliant			
<b>ENQA Criterion 6: ESG 3.7: EQA</b>	Fully compliant	PKA should consider how it can establish	Fully compliant			

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
<b>criteria and processes used by the agencies</b>		an appeals body which more obviously ensures objectivity and transparency in considering appeals against decisions of the PKA Presidium.				
<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</p>	<ol style="list-style-type: none"> <li>1. Full implementation of internal quality management system enabling assessment of its effectiveness</li> <li>2. Enhancement of currently used by PKA the formal mechanism for collection of feedback from HEIs.</li> <li>3. Expanding the activity and efficiency of PKA Advisory Board in the terms of its consultative function performed.</li> </ol>	<ol style="list-style-type: none"> <li>1. The QM system was implemented in April 2013 and then slightly modernized in 2015 after a short-term experience. All processes and procedures aimed at identifying the areas that need correction or improvement are constantly being monitored. The effectiveness of the systems was assessed as satisfactory with regard to identified processes and their performance.</li> <li>2. The mechanism for collection of feedback from experienced HEIs is constantly used by Conferences of Rectors and other HE bodies while addressing the most pressing issues for quality assurance in HE.</li> <li>3. The Advisory Body is engaged in consultation process both on the strategic and operational level. Some of its members cooperate with PKA on on-going basis and are directly involved in Committee's routine activities as well as in international projects (e.g. EIQTAS) that from PKA</li> </ol>

ENQA Criterion / ESG	2008 review		2013 review		Targeted measures	The current status of measures February 2016
	Level of compliance	Recommendations and suggestions	Level of compliance	Recommendations		
				<p>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>		<p>perspective brings added-value to all parties engaged.</p>
<b>ENQA Criterion 8: Miscellaneous</b>	N/A	N/A	Fully compliant			