



PKA's Follow-up 2020

## Table of Content

<b><i>PKA's Follow-up 2020.....</i></b>	<b>1</b>
<b><i>Foreword.....</i></b>	<b>3</b>
<b><i>Explanatory note .....</i></b>	<b>3</b>
<b>National policy context.....</b>	<b>3</b>
New tasks of PKA .....	6
<b>Internal context .....</b>	<b>6</b>
Criteria for reviewing requests for granting permission to provide a degree programme .....	6
New criteria for ex-post programme assessments.....	7
<b><i>Follow – up 2020 report.....</i></b>	<b>9</b>

## Foreword

In 2018, the Polish Accreditation Committee (PKA) underwent an external review, coordinated by the European Association for Quality Assurance in Higher Education (ENQA). This was the third external review of PKA as a quality assurance agency by the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The panel concluded that PKA is in compliance with the ESG 2015. ENQA panel found PKA fully compliant with four standards, and substantially compliant with seven standards and partially compliant with three standards as below:

Table no 1 PKA's ESG compliance - ENQA review results

ESG 2015		
Fully compliant	Substantially compliant	Partially compliant
3.1 Activities, policy and progress for quality assurance 3.2 Official status 3.3 Independence 3.7 Cyclical external review of agency	3.4 Thematic analysis 3.5 Resources 3.6 Internal quality assurance and professional conduct 2.2 Designing methodologies fit for purpose 2.3 Implementing processes 2.5 Criteria for outcomes 2.7 Complaints and appeals	2.1 Consideration of internal quality assurance 2.4 Peer review experts 2.6 Reporting

The purpose of this document is to provide ENQA with more detailed scheme of follow-up activities since 2018 as well as to summarize some changes that took place in Polish quality assurance system.

## Explanatory note

### National policy context

Polish higher education landscape has been significantly changed since 2018. This was caused by the introduction of a new Law on Higher Education and Science. It needs to be noted, that unlike previous amendments to the legal system, this is completely new set of rules and regulations. Their main aim is to facilitate greater European and global competitiveness of Polish higher education institutions. Enhancement of quality of education and scientific outcomes are the overarching principle of the new Law (called Law 2.0). Therefore, the new legal framework introduces greater institutional autonomy in its organisational aspect. Higher education institutions received greater flexibility in reshaping their own internal structures, processes and policies.

The changes in the most important legal act in Polish higher education has its impact also on the Polish Accreditation Committee (PKA). PKA has been granted new tasks, which would strengthen its systematic impact on quality in Polish higher education. Moreover, introduction of a new type of external quality assurance procedure has been initiated. Such significant changes required adjusting of the PKA Statute and quality assurance procedures. Following the recommendations formulated by the ENQA review panel, PKA has, among other issues, modified its approach to the opinion-giving procedure.

Besides the Polish Accreditation Committee has been assigned with new tasks aimed to enhance higher education in Poland through new types of activities. These are analytical tasks, training activities and dissemination of good practices. The new Law 2.0 promotes the development of this strand of PKA's activities by making it a legal obligation of PKA. To meet the new requirements, in January 2019, the Bureau of the Polish Accreditation Committee established a new internal unit responsible for analysis, research, training and public communication.

The entry into force of the new Law on Higher Education and Science also resulted in the amendment of PKA's Statutes.

Table no 1 PKA's task – matrix of changes

<b>Law on Higher Education in force until 1 October 2018</b>	<b>Law on Higher Education and Science in force since 1 October 2018</b>
	<p><b>In accordance with Article 258(1) of the Law on Higher Education and Science, the Committee's tasks include:</b></p> <ul style="list-style-type: none"> <li>1) expressing opinions on the entry of a non-public higher education institutions in the register;</li> </ul>
<p><b>In accordance with Article 49(1) of the Law on Higher Education, the Committee submits to the minister competent for higher education:</b></p> <ul style="list-style-type: none"> <li>1) opinions on the establishment of higher education institutions and granting them or their basic organizational units authorizations to provide degree programs in specific fields of study, at specific levels and with specific degree profiles;</li> <li>2) results of program evaluation, including the evaluation of initial teacher training programs, as well as compliance with the requirements for the provision of degree programs;</li> <li>3) opinions on re-granting of suspended authorizations to provide degree programs in specific fields of study at specific levels and with specific degree profiles;</li> <li>4) opinions on the establishment of a higher education institution or a branch campus by a foreign higher education institution.</li> </ul>	<ul style="list-style-type: none"> <li>2) expressing opinions on meeting the conditions for conducting studies in a specific field, level and profile, and the relationship of studies with the higher education institution's strategy;</li> </ul>
<p><b>Article 48a of the Law on Higher Education stipulates the scope of program evaluation, in accordance with which PKA evaluates the quality of education provided as part of</b></p>	<ul style="list-style-type: none"> <li>3) conducting a program assessment;</li> </ul>

<p><b>individual fields of study with taking into consideration:</b></p> <ol style="list-style-type: none"> <li>1) concept of education; learning outcomes; study programs;</li> <li>2) standards of education and training;</li> <li>3) qualifications of academic teachers and other persons teaching classes to students;</li> <li>4) cooperation with representatives of social and economic stakeholders in the education process;</li> <li>5) effectiveness of internal education quality assurance system;</li> <li>6) functioning of the procedures for the validation of learning outcomes;</li> <li>7) internationalization of the education process;</li> <li>8) accreditation and certificates of domestic and international institutions;</li> <li>9) infrastructure used to achieve learning outcomes;</li> <li>10) support provided to students in the learning process.</li> </ol> <p>In accordance with the law, the minister competent for higher education determines by way of a regulation general criteria for program evaluation, whereas the Committee has retained the right to develop detailed evaluation criteria and modes of conducting program evaluation and methods for appointing experts.</p>	
	4) conducting a comprehensive assessment;
	5) conducting analytical and training activities as well as disseminating good practices in the field of the quality of education;
<p><b>Article 49a of the Law on Higher Education:</b> The Commission cooperates with national and international institutions and organizations operating in the area of higher education, in particular with those whose subject of activity is the assessment of the quality of education and accreditation.</p>	6) cooperation with national and international institutions and organizations operating in higher education sector;
	7) giving opinions on other matters presented by the minister.

## New tasks of PKA

Polish Accreditation Committee has been assigned with new tasks, which aim to stimulate the quality enhancement in Polish higher education through new type of activities. These are:

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

The new tasks correspond with one of the recommendations formulated by the external review panel regarding ESG Standard 3.4. According to the panel, PKA should *"strengthen their initiatives to develop a more structured approach towards thematic analysis leading to analysis meeting the requirements of the polish HE system, independently from international projects as well as adding additional resources."*. The new Law 2.0 facilitates development of this strand of PKA activities by acknowledging it as a legal PKA obligation.

Following those new circumstances, in January 2019 Bureau of the Polish Accreditation Committee has introduced a new internal unit for analysis, research, training and public communication. Currently it is composed of 3 FTE.

## Internal context

Introduction of the new Law on higher education, resulted also in important internal changes in the PKA activities. First of all, Plenary session of the Polish Accreditation Committee on 13 December 2018 approved the new Statutes. It introduced significant changes regarding the criteria for programme assessments and introduction of the separate criteria for the opinion-giving procedure.

### Criteria for reviewing applications for granting permission to provide a degree programme

Following the recommendations of the external review panel, PKA has introduced the separate criteria for reviewing applications for granting permission to provide a degree programme. They follow ESG standards and are composed of the following criteria:

1. Structure of the study programme: concept of education, learning objectives and outcomes
2. Implementation of the study programme: programme contents, timetable for the implementation of the study programme, forms and organisation of classes, methods of education, student placements, organisation of the teaching and learning process
3. Admission to studies, verification of learning outcomes achievement by students, giving credit for individual semesters and years and awarding diplomas
4. Competence, experience, qualifications and the number of staff providing education. Staff development and in-service training
5. Education infrastructure and resources used in the implementation of the study programme and their improvement

6. Cooperation with social and economic stakeholders on the development, implementation and improvement of the study programme and its impact on the development of the degree programme
7. Conditions for and methods of improving the internationalisation of education provided as part of the degree programme
8. Supporting learning, social, academic or professional development of students and their entry on the labour market. Development and improvement of such support
9. Public access to information about the study programme, conditions for its implementation and achieved results
10. Quality assurance policy, designing, approving, monitoring, reviewing and improving the study programme

Furthermore, up to 5 quality education standards have been formulated for each of the 10 criteria.

Finally, a new procedural change has been introduced regarding the reviewers' panel composition. According to the Article 7 point 3. 12) of the new PKA Statutes, a student experts' section for reviewing applications will be appointed by the President of PKA from among student experts of the Committee. Article 10 point 2. 5) indicates that the Secretary of the PKA appoints the review panel and one of the reviewers must be a member of student experts' section for reviewing applications.

Moreover, since the October 2018 the reviews/opinions in the opinion-giving process are being published.

#### New criteria for ex-post programme assessments

New PKA Statutes also introduced new set of criteria and organizational changes regarding the programme evaluation procedure. The updated assessment framework covers all the ESG standards and is composed of 10 following criteria:

1. Structure of the study programme: concept of education, learning objectives and outcomes
2. Implementation of the study programme: programme contents, timetable for the implementation of the study programme, forms and organisation of classes, methods of education, student placements, organisation of the teaching and learning process
3. Admission to studies, verification of learning outcomes achievement by students, giving credit for individual semesters and years and awarding diplomas
4. Competence, experience, qualifications and the number of staff providing education. Staff development and in-service training
5. Education infrastructure and resources used in the implementation of the study programme and their improvement
6. Cooperation with social and economic stakeholders on the development, implementation and improvement of the study programme and its impact on the development of the degree programme
7. Conditions for and methods of improving the internationalisation of education provided as part of the degree programme
8. Supporting learning, social, academic or professional development of students and their entry on the labour market. Development and improvement of such support
9. Public access to information about the study programme, conditions for its implementation and achieved results
10. Quality assurance policy, designing, approving, monitoring, reviewing and improving the study programme

Furthermore, the new Statutes introduces the new position of the panel secretary, whose main task will be to support the methodological accuracy and efficiency of the renewed programme assessment procedure.

# FOLLOW – UP REPORT 2020

ESG	Panel recommendations	Measures already taken
<b>ESG 3.4 – Substantially compliant</b>	PKA should strengthen their initiatives to develop a more structured approach towards thematic analysis leading to analysis meeting the requirements of the polish HE system, independently from international projects as well as adding additional resources. Mobilizing resources from within the Bureau should be considered.	<b>PKA believes that recent changes in the Law on HE reflected PKA long-term experience in thematic analysis and address the ENQA recommendation directly.</b> It should be highlighted that analytical and training activities have now been included in the specific tasks of the PKA on the ground of the Act of 20 July 2018 Law on Higher Education and Science. Therefore, the analytical activity has found formal confirmation in legal acts and <b>has been reflected in the structural solutions of PKA's Bureau. A special unit for analyses has been formed since the beginning of 2019 and Bureau's resources were dedicated to the activity.</b> It should be emphasized that long-term PKA procedures in the area of formalizing PKA analytical activity have now been confirmed in generally applicable regulations. Both in the previous and current PKA's strategy, this area of activity has been effectively addressed, which is confirmed by numerous publications that appear in the Commission's output as a result of its on-going analysis of activities as well as targeted and systematic project activities.
<b>ESG 3.5 – Substantially compliant</b>	PKA should take action to improve the situation of staff in its Bureau. Valuing – in terms of remuneration as well as job profiles – and capitalizing on its acquired expertise, should decrease staff turnover and increase PKA's capacity to invest time and knowledge in thematic analysis and internal enhancement.	According to the Law on Higher Education and Science Bureau of the Polish Accreditation Committee is a state-owned independent budgetary unit that provides administrative and financial services to the Committee. At the beginning of 2019 new Managing Director of the Bureau after successful run in the open contest, was appointed by the President of PKA. <b>Following the changes the new structure of the Bureau was introduced that explore and capitalize human potential in New Public Management manner. All persons already hired in the office received job proposals and decided to prolong their contracts stepping into new responsibilities. Intensive plan of systematic trainings and further skills development have been successfully implemented.</b> Besides, in 2019 Bureau received significant increase of HR budget that improved in a short time staff renumeration policy.
<b>ESG 3.6 – Substantially compliant</b>	The comprehensiveness of the IQA, should be developed in the areas of management procedures (decision-making process; definition	PKA's management team and the PKA's Presidium are responsible for monitoring the implementation of the strategy. Monitoring process is held cyclical basis and collected results usually are reflected in the PKA's term of office reports, which are published on the PKA website. In

	<p>and implementation of the strategic plan, etc.), role of the President of panel in programme evaluation and internal feedback.</p>	<p>addition, the responsibility for the implementation of strategic tasks has been distributed in the Strategy, and the accountability of their implementation is of a current nature within the scope of business subordination. The new PKA Strategy was adopted at the end of 2017 and the results of its monitoring will only be presented in the next annual report. The Appeals Body referred to in the example is monitored on an ongoing basis, see the annual report <a href="http://www.pka.edu.pl">www.pka.edu.pl</a>.</p>
	<p>PKA should update its internal Quality Assurance for the procedure for programme evaluation in a way that there is a checks and balance system for the strong role of the PKA member serving as president of the review panel.</p>	<p>The responsibility of the Chairman was a bit released recently by introducing by the end of 2018 Secretary position in the panel who is responsible for drafting the report and coordinating the entire programme evaluation procedure since its beginning to the end. <i>According to the article 18 of the PKA's Statute the assessment process is conducted by an assessment panel composed of Committee members, experts and a person acting as the assessment panel's secretary.</i> Besides according to the same article <i>a member of the Committee or, in duly justified cases, an expert – academic teachers, can perform the function of the chair of an assessment panel.</i> So the chairman role is not only limited to the member or former member of PKA.</p>
ESG 2.1 – Partially compliant	<p>The opinion giving procedure should be fully aligned with the requirements of Part 1 of the ESG.</p>	<p>Following ENQA review panel recommendation PKA on the basis of the recent changes in the Law on HE Act of 20 July 2018, PKA developed new criteria for the opinion giving process that are aligned with requirements of Part 1 of the ESG. The new criteria together with the Statute were published on the website <a href="http://www.pka.edu.pl">www.pka.edu.pl</a>.</p>
ESG 2.2 – Substantially compliant	<p>The opinion giving process should be further developed in consultation with stakeholders, to increase its fitness for purpose.</p>	<p><b>Stakeholders are involved in the design and continuous improvement of the opinion giving process. Both regulations (HE act and following executive acts) and the PKA Statute, criteria as well as templates of documents are subject to a wide consultation system and all stakeholders can submit comments to the process being designed or improved at this stage, for which PKA has documented evidence.</b> The consultations serve not only to give opinions on internal acts adopted by the PKA, but also to a broader reflection on the quality assurance system and the current activity in the higher education system. Stakeholders are involved in the process of shaping and improving external quality assurance system, both at the stage of drafting legal regulations (stakeholder consultation process) and drafting of PKA's internal regulations (procedure for giving opinions on internal regulations). Drafting legal regulations refers to the level of legislator (Ministry), therefore the consultation process is run according to the procedure of adapting legislative acts (e.g. Law on HE) and always requires public consultation with all stakeholders involved included PKA. In this way,</p>

		<p>a bilateral relationship emerges, resulting from the initiative of the state administration. At the level of PKA consultation process refers to internal regulations and is run according to the procedure for giving opinions on internal regulations adapted in the PKA's management system under the name of "Procedure for preparing the Committee' internal regulations". Details on the consultation process are provided in SAR, p. 59 besides evidences of holding such a process on regular basis can be easily found on PKA website <a href="http://www.pka.edu.pl/2019/01/25/otwartha-konsultacje-projektu-wzorow-dokumentacji-wykorzystywanej-przez-pka/">http://www.pka.edu.pl/2019/01/25/otwartha-konsultacje-projektu-wzorow-dokumentacji-wykorzystywanej-przez-pka/</a>. <a href="https://www.pka.edu.pl/2018/11/13/otwartha-konsultacje-projektu-szczegolowych-kryteriow-oceny-programowej-oraz-opiniowania-wnioskow-o-pozwolenie-na-utworzenie-studiow/">https://www.pka.edu.pl/2018/11/13/otwartha-konsultacje-projektu-szczegolowych-kryteriow-oceny-programowej-oraz-opiniowania-wnioskow-o-pozwolenie-na-utworzenie-studiow/</a> <a href="https://www.pka.edu.pl/2018/11/29/otwartha-konsultacje-projektu-statutu-polskiej-komisji-akredytacyjnej/">https://www.pka.edu.pl/2018/11/29/otwartha-konsultacje-projektu-statutu-polskiej-komisji-akredytacyjnej/</a></p>
ESG 2.3 – Substantially compliant	PKA should increase the transparency of the process in the opinion giving procedure, particularly regarding the availability of documents for the applying institution.	The new Law on Higher Education and Science was signed in July 2018 by the President of the Republic of Poland and the process of preparing executive acts was initiated. This opened the possibility of submitting by PKA to the MoHE proposals of new legal solutions to the opinion giving process in order to adapt it to the recommendations of the ENQA review panel and achieve full alignment with Part I ESG in the context of the criteria used by PKA (ESG 2.1) as well as ensuring publication resolutions and reports in the opinion giving process (ESG 2.6). Since October 2018 also PKA's resolutions and reports in the opinion giving process are published on PKA's website on a regular basis. They are also on cyclical basis uploaded to DEQAR database.
ESG 2.4 – Partially compliant	PKA should develop a practice reassuring the equal involvement of stakeholders across the different procedures making sure all experts are	<p>PKA is profoundly convinced that the adopted procedures, referring to the program evaluation, guarantee that all experts, including employers' representatives, are equal in the assessment process. Students and representatives of employers are also active participants in the opinion giving process through participation in the PKA's statutory bodies responsible for this process and the process itself.</p> <p>The opinion giving procedure is initiated and implemented by the PKA's Section, which <b>always includes representatives of employers</b>. Besides <b>the President of the Students Parliament of the Republic of Poland is a member of the PKA's Presidium by virtue of law</b>. Both in the procedure of opinion giving on applications and evaluations, all members of the Section as well as the Presidium are obliged to read the source documentation, which is made available via the PKA's repository or the internal disc, and express their opinion on the matter during the meetings. <b>It is also worth</b></p>

	<p>involved in the relevant key steps of each procedure.</p>	<p><b>noting that the opinion of the students' self-government at the applying HEI concerning the study program is obligatory element of each application and is used in the opinion giving procedure by PKA. Thus, representatives of students as well as employers have a significant impact on the opinions regarding the applications.</b> Besides in 2018 PKA reconfirmed students' status in the opinion giving process as an equal participants involved in the procedure by providing requirement in the PKA's Statute. Article 10 point 2. 5) indicates that the Secretary of the PKA appoints the review panel and one of the reviewers must be a member of student experts' section for reviewing applications.</p> <p>The opinion giving process has been conducted in PKA since 2002 in a systematic manner, regulated by procedures, subjected to continuous improvement, based on uniform documentation templates, in close cooperation with the Minister as well as with the involvement of different categories of stakeholders (mentioned above). Besides so far none of the national supervisory bodies and external control institutions hasn't raised any concerns to its conduct.</p> <p>In the case of programme evaluation PKA elaborated the rules for the division of duties between the members of the evaluation panels, which are binding for all chairmen of the panels. At the same time, the PKA has evidence from each evaluation procedure, i.e. reports of evaluation panel prepared by experts on the assessment procedure, which confirm arrangements between all panel members with regard to final assessments under each criterion as well as the most important issues that should be highlighted in the site visit report.</p>
	<p>External experts, particularly students should be used in the opinion giving process.</p>	<p>Although in the course of PKA's current activities, students had the opportunity to express an additional opinion in the opinion giving process through the participation of their representative in the PKA's Presidium, PKA's President acknowledging the recommendations of the ENQA review panel, immediately decided to set up a team of student experts to issue their judgements in opinion giving procedure, whose activities will ensure more systematic participation of students in the process of reviewing applications. The task of this team includes presentation opinions on applications regarding the awarding to HEI or its basic organizational unit the right to run study programme in a specific field, level and profile. On the other hand, PKA believes that employers at the current stage, as mentioned above, are involved respectively in the work of PKA's Sections and the Presidium.</p>

<b>ESG 2.5 – Substantially compliant</b>	The opinion giving procedure should be made more transparent and decision-making process should become more consistent in order to improve the procedure and decrease number of appeals.	Since the October 2018 the results of opinion giving process are published on PKA website. The procedure, decision making process and criteria have been published on PKA website. The composition of PKA Sections and lists of experts are also public information. The appeal procedure is described in the Statute that has been also always published on PKA website together with detailed procedure <a href="http://www.pka.edu.pl">www.pka.edu.pl</a> . Besides the membership of Appeals Body is also transparent and published on website <a href="https://www.pka.edu.pl/en/about-pka/organisational-structure/">https://www.pka.edu.pl/en/about-pka/organisational-structure/</a> . Concerning the decision making process and its consistency it should be underlined that PKA's Section, Presidium and Appeals Body follow the same criteria.
	The criteria to grant respective ratings for the different standards in the programme evaluation procedures should be further developed and clarified.	Recent changes in the Law on Higher Education and Science enabled further development of program evaluation criteria. PKA decided to formulate standards for each of the evaluation criteria and introduced detailed quality indicators to strengthen the consistency of criteria applying between the panels of experts. Criteria development was consulted with the stakeholders.
<b>ESG 2.6 – Partially compliant</b>	Expert reports and resolutions of the opinion giving process should be published.	Since October 2018 PKA's resolutions and reports in the opinion giving process have been published on PKA's website. <a href="https://www.pka.edu.pl/en/database-of-opinions/">https://www.pka.edu.pl/en/database-of-opinions/</a> <a href="https://www.pka.edu.pl/ocena/baza-opinii-w-sprawie-spelnienia-warunkow-prowadzenia-studiow-na-okreslonym-kierunku-poziomie-i-profilu-oraz-zwiazku-studiow-ze-strategia-uczelnii/">https://www.pka.edu.pl/ocena/baza-opinii-w-sprawie-spelnienia-warunkow-prowadzenia-studiow-na-okreslonym-kierunku-poziomie-i-profilu-oraz-zwiazku-studiow-ze-strategia-uczelnii/</a>  Besides the resolutions and reports in the opinion giving process are also on cyclical basis uploaded to DEQAR database.
	When drafting the assessment reports for the programme evaluation procedures by the chair of the panel, PKA should setup a mechanism reassuring appropriate involvement of all experts.	PKA set up a mechanism reassuring the appropriated involvement of experts by setting the rules for the division of duties between the members of the evaluation panel (SAR, p. 64), which are binding for all chairmen of the evaluation panels. At the same time, the PKA has evidence from each evaluation procedure, i.e. reports of evaluation panels prepared by experts on assessment procedure, which confirm the arrangements between members of the whole panels with regard to final assessments under each criterion, as well as the most important issues that should be addressed in the site visit report. Besides so far, PKA hasn't received any complaints from group of experts or individuals that they are not treated equally during the procedure or some problems

	<p>might have occurred. Besides the President of Students' Parliament who is the member of PKA's Presidium never raised the issue as a problematic.</p> <p>However, at the end of 2018 PKA decided to introduce the Secretary function in the panel who is responsible for drafting the report and coordinating the entire programme evaluation procedure since its beginning to the end. The Secretary, while preparing the draft report, is obliged by the procedure to consult all steps with panel's members and after the final acceptance of all panel members report is forwarded to the appropriate PKA's Section.</p> <p><i>Article 18 of the PKA's Statute states that the assessment process is conducted by an assessment panel composed of Committee members, experts and a person acting as the assessment panel's secretary.</i></p>
<b>ESG 2.7 – Substantially compliant</b>	<p>The implementation of the appeals procedure should be improved to avoid creative use of this system and decrease the number of appeals.</p> <p>PKA strongly disagree with the statement that PKA's criteria are creatively used in the appeal procedure. Taking into account that issues are further proceeded by the Ministry and have legal consequences (e.g. suspension of rights etc.) resolutions taken by PKA were never doubted in further procedure by Ministry or national court in a sense of criteria inconsistency or their creative use. PKA has been investigated several times by National Chamber of Auditors and results of control which were also published and discussed in the Polish Parliament never showed any creative use of PKA criteria.</p> <p>So far consistency use of PKA criteria have been safeguarded by detailed guidelines for members and experts. <i>Since the beginning of 2019 the additional quality checklist have been introduced to each standard that PKA experts and bodies are required to follow.</i></p> <p>However, following the ENQA review panel recommendation, at the beginning of 2020 the President of PKA appointed the Team responsible for maintaining the case- law database of the Polish Accreditation Committee. The task of the Team is to develop positions on the interpretation of legal provisions (generally applicable and internal), which constitute the basis for the work of PKA, and in particular regulate the conduct of program evaluations and opinion-giving process. These positions, after consultations and adoption by the Presidium of the PKA, are intended to harmonize the views of the members and experts of the PKA on the issues of understanding the law in cases causing large divergences in interpretation. All positions are also published on PKA website <a href="https://www.pka.edu.pl/baza-orzecznictwa-pka/">https://www.pka.edu.pl/baza-orzecznictwa-pka/</a></p>

	<p>PKA should implement a more systematic analysis of received feedback, recommendations, complaints and data from appeals procedures to facilitate IQA and improvements of procedures.</p>	<p>The Appeals Body activity is monitored on an ongoing and regular basis, see the annual report published on PKA's website <a href="http://www.pka.edu.pl/">http://www.pka.edu.pl/</a>. In a sense of enhancing PKA's works the Chairman of the Appeals Body is responsible for providing regular feedback (quarterly and annual basis) for the observation of the procedure.</p> <p>As we informed ENQA review panel the high level of appeals results mainly from the dynamic changes of the Law on HE or its regulation and rather enhance-oriented approach of PKA than the other faults of the procedure.</p>
--	---	---

