

# **FINAL REPORT**

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External review of the Accreditation Commission of the Czech Republic on compliance with membership criteria of the European Association for Quality Assurance in Higher Education (ENQA).

April 2010

This is the report of the review of Accreditation Commission of the Czech Republic (hereinafter "ACCR") undertaken in December 2009 for the purpose of determining whether the agency meets the criteria for Full membership of the European Association for Quality Assurance in Higher Education (ENQA). The membership provisions are listed in Annex to the report.

## **1. Overview**

### **1.1. Background of the review process**

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), covering the cyclical external review of quality assurance and accreditation agencies, 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.

### **1.2. Purpose and course of external review of the ACCR**

The external review of the ACCR was conducted in line with the requirement to test compliance with the ENQA membership criteria/ESG every five years. The chair of the ACCR initiated the process with a request for external evaluation of the ACCR, type A, to the Ministry of Education, Youth and Sports in November 2008.

The process of external evaluation started with appointment of review panel members (June 2009), preparation of Terms of reference (September 2009), continued with site visit (December 2009) and finalised with elaboration of the report and its submission to the ENQA Board (April 2010).

In accordance with the principle of subsidiarity, external review of the ACCR for ENQA membership purposes has been conducted on a national level, under the commission of the Ministry of Education, Youth and Sports of the Czech Republic (hereinafter "Ministry"). The coordinating body providing administrative and organizational support was the Agency of the Council for higher education institutions of the Czech Republic. The process of external evaluation of the ACCR was carried out independently from national authorities and followed the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area* and the Terms of reference agreed.

### **1.3. Methodology<sup>1</sup>**

The external review was carried out in line with the methodology described in the Terms of reference. The basis of information and evidence was provided by the Self-evaluation report of the ACCR (hereinafter "SER"). The review panel furthermore studied the documents annexed to the SER, including relevant legislation and national standards and procedures used. All the data were then validated through the interviews conducted

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<sup>1</sup> The methodology of the external review of the ACCR was designed as part of the project on harmonisation of the national quality assurance system with the ESG requirements.

It was the project of the ACCR and the Accreditation Commission of the Slovak Republic that aimed to design the system of internal quality assurance of the agencies and also the external evaluation systems, that were new to both commissions after the ESG had been approved in Bergen 2005 (SER, p. 24). Respective methodologies were elaborated (2006) and draft statute prepared (2008). The process of external evaluation of each agency then proceeded separately. In 2009 the Terms of reference were re-drafted by the review panel.

during the two-day site visit with chair, members, secretary and secretariat staff of the ACCR, representatives of the higher education institutions (hereinafter "HEIs"), students, employers and Ministry.

Final report was produced on the basis of the self-evaluation report, site-visit interviews and review panel's findings. The conclusions and recommendations<sup>2</sup> resulting from the external evaluation process were discussed by all members of the Evaluation Board and agreed upon by means of voting. While finalising the report, the review panel provided an opportunity for the ACCR to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review.

The panel also affirms that the integral element of the whole review was the endeavour for transparency, independency, high engagement of its members in the review process and care for professional and also courteous manner. The panel highly appreciates the openness and responsiveness of the ACCR and other professionals met during the site visit as well.

#### **1.4. Findings**

The review panel studied very carefully the evidence gathered through the review process and considered the opinion that the Accreditation Commission of the Czech Republic is substantially compliant with the ENQA membership criteria and the ESG.

#### **1.5. Members of the review panel**

The review panel for the external review of ACCR was composed of nine members, i.e. four internationally renowned experts in quality assurance, one representative of employers, one representative of HEIs, one expert from ENIC/NARIC network, one representative of students and one secretary. The members are as follows:

Marek Hodulík, student representative, chairman of Legislative committee of the Student chamber of the Council of HEIs and member of its presidium, chairman of Legislative committee of the Council of HEIs and member of its presidium, vice-president of the Academic senate of Palacky University (chairman of the review panel),

Christina Rozsnyai, internationally renowned specialist in quality assurance, programme officer for foreign affairs of the Hungarian accreditation committee, CEE Network secretary general (vice-chairman of the review panel),

Georges Mink, internationally renowned specialist in quality assurance, director of research at French National Centre for Scientific Research, member of Scientific committee of the French research and social science centre in Prague, member of the Academic committee of College of Europe (Bruges-Natolin), specialist in social and political systems of the central and eastern European countries,

Anja Tippner, internationally renowned specialist in quality assurance, Head of Department for Slavic Studies at Salzburg University, reviewer for tenure and promotion cases (Salzburg University, Graz University, Charles University in Prague), reviewer for Grant Commissions (Humboldt-Stiftung, DE; Czech Republic), coordinator of B.A./M.A. programmes in Slavic Studies and Comparative Literature,

Jan Bednář, internationally renowned specialist in quality assurance, vice-president of Council of Higher Education Institutions of the Czech Republic for educational activities and quality of universities, former vice-rector of Charles University in Prague for study affairs (till February 2010), teacher and scientist at the Charles University in Prague,

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<sup>2</sup> Review panel members agreed to make recommendations also for the cases when the agency fully complied with the ESG. It means, the recommendations were done with the aim to provide possibilities for improvement beyond the scope of the ESG.

Václav Cejpek, Czech rectors conference representative, former vice-chairman of the Czech rectors' conference (till January 2010), vice-rector for study, pedagogical and artistic affairs of the Janáček Academy of Music and Performing Arts in Brno,

Jiří Marek, representative of employers' association, Executive Director of The Union of Employers' Associations Czech Republic,

Štěpánka Skuhrová, expert nominated by ENIC/NARIC of the Czech Republic, head of National academic information centre (ENIC/NARIC),

Lenka Pospíšilová, expert in higher education, Ministry of Education, Youth and Sports, Czech Republic (secretary to the review panel).

## **2. Introduction**

### **2.1. Legislative development**

Higher education in the Czech Republic has experienced a significant development and growth after the fall of the communist regime in 1989<sup>3</sup>.

The basis for the new development of higher education was established by the act on higher education in 1990 (Act No. 172/1990). It reduced to a minimum the influence and control of the state over higher education, confirmed academic freedom and academic rights, and constituted institutional self-government. It further included matters regarding study and academic degrees, introduced the bachelor's degree, established a basis for student participation in higher education governance and brought research back to HEIs. The Accreditation commission was established as a government advisory body for higher education quality assurance.

Further changes arising from the economic transformation, overall changes in society and new demands on harmonisation of higher education within Europe led to the need for new legislative arrangements, therefore, new Higher education act<sup>4</sup> (hereinafter "Act") was agreed in 1998 (Act No. 111/1998). This Act, with several amendments, is a valid legislation for higher education and quality assurance at present as well. The most important issue it tackles is the transformation of state HEIs into public institutions (i.e. all property of the state used by HEIs was transferred to the ownership of public HEIs), thus continuing the trend towards greater autonomy of public HEIs (further supported by amendments towards greater financial autonomy of HEIs). Based on this Act, private HEIs were allowed to be established, principles of the Lisbon Recognition Convention were incorporated in Czech legislation or the Diploma Supplement was introduced.

The Act also defines the Accreditation commission as an independent expert body caring for quality assurance in higher education, mainly through two core activities: evaluations of activities that HEIs perform (improvement oriented approach) and issuing standpoints to applications for accreditations (fulfilment of minimum standards), and other issues. As a consequence to changes that the Higher education act brought (1998), the duties of ACCR has grown, mainly with respect to caring for quality of higher education provision of private HEIs. In 2001, the amendment to the Act brought also the obligation of re-accreditation of all Master's study programmes by the end of 2003 (so that the maximum of long Master study programmes was structured into bachelor and follow-up Master study programmes). Hence, the ACCR played a key role in the realisation of the Bologna commitments, mainly the implementation of three-cycle structure, ECTS system or application of ESG.

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<sup>3</sup> Source: Higher education in the Czech Republic 2008, <http://www.msmt.cz/vzdelavani/publikace-k-vysokemu-skolstvi-v-cr-2008>

<sup>4</sup> Act No 111/1998 Coll. (amended and consolidated) on higher education institutions and on amendments and supplements to some other acts (The higher education act).

Further discussions on the reform of tertiary education, including the quality assurance of higher education arrangements, have surged on various levels during the last years due to both national factors and international development (e.g. White paper on tertiary education, January 2009; Long-term plan of the Ministry for 2011-2015<sup>5</sup>; national projects on quality assurance methodology or National qualifications framework). It is expected that new tertiary education legislation will be negotiated after the parliamentary elections in May 2010. Quality assurance is one of the important topics of this legislation, including the incorporation of tertiary professional schools into the sector of tertiary education.

It should be noted here, that due to different legislative developments, the tertiary professional schools (ISCED 5B) oriented on vocational education are not part of the higher education system in the Czech Republic. These institutions, or their study programmes, are not evaluated by the ACCR. For the purpose of quality assurance of vocational education there is other specialized accreditation commission. The review panel would like to point out that the evaluation of the accreditation commission for tertiary professional schools has not been included in this report based on the fact that according to the Czech legislation, tertiary professional schools do not belong to higher education sector.

## **2.2. Higher education landscape**

The higher education sector in the Czech Republic comprised in 2008 of 73 higher education institutions. There were approximately 374 thousand of students studying at HEIs, at all levels of study programmes (Bachelor's, Master's and Doctoral), out of them 85.3% studied at the public HEIs<sup>6</sup>, 13.5% at the private HEIs and 1.2% studied at the state HEIs<sup>7</sup>. The number of students enrolled in higher education has been constantly growing last years – compared to the year 2007, the total number of students increased of 6.9%. In that same year, 71 153 students graduated and most of them found occupations. It is a general trend that unemployment of higher education graduates keeps at the lowest level compared to all other graduates, reaching the rate of 2.3% in 2008. The higher education was provided by 18 200 higher education teachers. At Czech HEIs there were 2 237 accredited study programmes in 2008; 38% bachelor study programmes, 12% long master study programmes, 28% follow-up master study programmes, 22% doctoral study programmes.

## **2.3. Quality assurance system in the Czech Republic**

HEIs differ in their legal status (26 public, 2 state and 45 private HEIs<sup>8</sup>), its specific mission, in number of students, in internal functioning or funding system but study programmes of all of them are subject to accreditation awarded by the Ministry, based on the previous expert standpoint of the ACCR. The ACCR is the only body that is entitled to care for the quality of higher education in the country. Any HEI, if it wants to provide higher education programmes, admit any applicants, hold classes, carry out examinations or award academic degrees<sup>9</sup> (recognised by the Ministry); must get the accreditation. The accreditation is awarded for maximum ten years.

The ACCR focuses on two levels of assuring the quality of higher education in the Czech Republic. Firstly, it is the process of assessment of applications for accreditation of study programmes, then it is also applications for authorisation to carry out the habilitation

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<sup>5</sup> Long-term plan for educational, scientific, research, development, artistic and other creative activities of higher education institutions for 2011-2015, available at web site of the Ministry <http://www.msmt.cz/vzdelavani/dlouhodoby-zamer-vzdelavaci-a-vedecke-vyzkumne-vyvojove-a>

<sup>6</sup> Výroční zpráva o činnosti vysokých škol za rok 2008, <http://www.msmt.cz/vzdelavani/vyrocnizprava-o-cinnosti-vysokych-skol-za-rok-2008>

<sup>7</sup> Own counting based on data from a publication *Higher education in the Czech Republic 2008*

<sup>8</sup> SER, p. 7

<sup>9</sup> Act, section 78, par. 2

procedure and the procedure for the appointment of professors; the establishment, merger, amalgamation, splitting or dissolution of a faculty of a public higher education institution; the granting of state permission to a legal entity wishing to operate as a private higher education institution. The applications are evaluated according to the standards defined by the ACCR and in compliance with the Act and Decree<sup>10</sup>, thus guaranteeing a minimum level of higher education quality. The negative standpoint of the ACCR must be respected by the Ministry; the positive standpoint of the ACCR may be changed by the Ministry into the negative one only on the basis of arguments not connected to the content of the programme, and specifically defined by the Act (section 79).

Secondly, the ACCR is concerned in its work to carry out evaluation of activities that HEIs perform, to evaluate its quality and give recommendations for improvement. Apart of these two objectives, the ACCR also reviews other issues affecting the system of higher education, when asked to do so by the Minister, and expresses its standpoint on these issues.

The ACCR is an active member of the ENQA and has been working on implementation of the ENQA membership provisions/ESG since 2005.

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<sup>10</sup> Decree of the Ministry of Education, Youth and Sports of 10<sup>th</sup> February 1999 on the content of applications for the accreditation of study programmes

### 3. Findings

#### Compliance of the ACCR with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

##### 3.1. Part 2 of the ESG

##### 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.

**Guidelines:** The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

##### Evidence

An important notion in the Czech system of higher education is the autonomy of HEIs. In the context of internal quality assurance processes of HEIs the autonomy allows HEIs to design their own system of internal quality assurance and oblige them to carry out the internal evaluations regularly and annually report the results to public.

Based on the Act, the Ministry recommends the form and structure of the annual report on activities of HEIs and the annual report on its financial management (Act, section 21). Part of the annual report on activities of HEIs is a self-evaluation report written according to the structure pre-defined by the Ministry. One of the obligatory points is to describe the process of quality assurance and criteria used as such and also in comparison with the ESG, Part 1<sup>11</sup>. The responsibility for internal systems of quality assurance lies with each HEI and the role of the ACCR is to check the effectiveness through institutional evaluation.

Even though the formation of the system of internal quality assurance procedures is obligatory for each higher education institution, no unified approach exists. The newly published Long-term Plan of the Ministry for 2011-2015 includes within its priorities also the harmonisation of internal evaluation systems. Some other activities in this field are supposed to promote the work even more, however, the review panel could not check their validity as at the time of external evaluation of the ACCR the documents had not yet been published (as part of a national project on quality financed from the structural funds).

At the level of the ACCR, there are two main orientations of the ACCR while performing its duties. Firstly, it is the evaluation of applications for accreditation of study programmes<sup>12</sup> and secondly, it is the evaluation of institutions (Act, section 84, Statute<sup>13</sup>

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<sup>11</sup> Framework scheme recommended by the Ministry: Annual report on activities of higher education institution for 2008 (Doporučená rámcová osnova: Výroční zpráva o činnosti veřejné vysoké školy za rok 2008), available at [http://www.msmt.cz/uploads/soubory/vysoke\\_skoly/Doporucena\\_ramcova\\_osnova\\_Vyrocní\\_zprav\\_y\\_o\\_cinnosti\\_VVS\\_za\\_rok\\_2008.doc](http://www.msmt.cz/uploads/soubory/vysoke_skoly/Doporucena_ramcova_osnova_Vyrocní_zprav_y_o_cinnosti_VVS_za_rok_2008.doc), 12 January 2010

<sup>12</sup> Apart of the evaluation of applications for accreditation of study programmes, the ACCR issues also other standpoints but they represent a minority compared to the study programmes. It is the standpoint on requests for authorisation to carry out habilitation procedure and the procedure for the appointment of professors; the establishment, merger, amalgamation, splitting or dissolution of

Article 1, SER<sup>14</sup> p.12). The first one specifies the minimum standard to be fulfilled in order to receive accreditation of study programmes and the second one is targeted on the gradual improvement of higher education through evaluation of activities that HEIs perform<sup>15</sup>.

Even though the procedure of accreditation takes into account also the conditions for the evaluation and quality assurance of the study programme (Statute, Section 9 b), the **effectiveness of internal quality assurance processes** is evaluated in its complexity by the ACCR through institutional evaluation. For each evaluation the questionnaire is prepared by the chair of the ad-hoc working group and sent to the evaluated institution, requesting necessary documents and asking for self-evaluation report according to the defined scheme. Depending on the focus of evaluation (e.g. institutional, evaluation directed at one problematic issue across various HEIs in the country, i.e. doctoral studies, pedagogical faculties, etc.), the questionnaires vary from case to case. The common feature with them is, among other issues, a request to a HEI to evaluate its own system of internal quality assurance (using defined criteria and a SWOT analysis). As each HEI has its own internal quality assurance system, the ACCR uses institutional evaluations to assess effectiveness of each one of them, makes recommendations and gradually tries to harmonise the overall system of internal quality assurance.

This tool, institutional evaluation, is planned to focus on specific problems or individual institutions with the aim to check to what extent the specific institution fulfils its obligations, in this case, to what extent the internal quality assurance system is implemented in the HEI and how effective it is.

Yet, the number of institutional evaluations that take place per year is limited by time capacities of the members of the ACCR (based on the information from the site visit and the web sites, approximately ten evaluations per year). The majority of the work load of the ACCR (approx. 60-70%) is oriented on the assessment of applications for the accreditation of study programmes. It is the duty based in the Act that cannot be omitted, and further, the accreditation could be granted for maximum ten years. This is certainly beneficial for the quality of study programmes but limits time possibilities of the ACCR to evaluate institutions. According to the information gained during the site visit, the cycle within which all HEIs should be evaluated is 5 – 6 years. It is usually an evaluation of a specific activity within the institution (that includes in its majority the assessment of the internal quality assurance system); complex evaluation of the whole institution has been done, until 2008, just at small HEIs without faculties. In 2008 the complex evaluation has been carried out also at a large institution divided into number of faculties<sup>16</sup>.

The current institutional evaluation is an important tool for gradual improvement and serves to control the effectiveness of the internal quality assurance of HEIs. It is very individualised to the HEI evaluated and stipulates also a follow-up. Nevertheless, a cyclical, harmonised and comparable system of internal quality assurance processes at HEIs has not yet been installed. The situation is also affected by current legislature that puts emphasis on accreditation (SER, p. 31).

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a faculty of a public HEI; the granting of state permission to a legal entity wishing to operate as a private higher education institution; specification of the type of higher education institution.

<sup>13</sup> Statute of the Accreditation Commission, approved by the Government Decree, No. 744 dated 28<sup>th</sup> July 2004, accessible through the web site of the ACCR on <http://www.msmt.cz/areas-of-work/legislative-norms-and-associate>.

<sup>14</sup> SER, i.e. Self-evaluation report of the ACCR, July 2009, available at <http://www.msmt.cz/areas-of-work/sebehodnotici-zprava-akreditacni-komise>

<sup>15</sup> Evaluation of activities that HEIs perform and evaluation of quality of accredited activities (as stated by the Act, section 84), is also called institutional evaluation in this report.

<sup>16</sup> Jan Evangelista Purkyně University in Ústí nad Labem, the evaluation report of the ACCR is available at [http://www.msmt.cz/uploads/soubory/akak/hodnoceni\\_vs/hodnoceni\\_ujep\\_2008.doc](http://www.msmt.cz/uploads/soubory/akak/hodnoceni_vs/hodnoceni_ujep_2008.doc)

Even though there is a strong tendency to shift the activities of the ACCR from programme accreditation to institutional accreditation, current legislature does not allow a full and complex transformation. Thus, regular and structured evaluations of the effectiveness of internal quality assurance systems depend considerably either on an amendment to Act No 111/1998 on higher education institutions or new legislative regulation.

### **Analysis**

The review panel has taken into consideration all the above mentioned information, mainly the procedure of annual reporting of HEIs on their internal quality assurance systems, work of the ACCR within the institutional evaluation to harmonise internal systems of quality assurance while respecting the autonomy of HEIs and also the criteria for accreditation, and came to the conclusion that processes described in Part 1 are sufficiently evaluated in the course of external procedures. Nevertheless, the review panel would recommend further work on harmonisation of the system of internal quality assurance and its overall implementation at all HEIs in order to reach “full compliance” with ESG 2.1.

**Conclusion:** substantial compliance

### **ESG 2.2 Development of external quality assurance processes**

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

**Guidelines:** In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

### **Evidence**

With respect to the two main aims of the ACCR, i.e. expressing its standpoints to requests for the accreditation of study programmes (and accreditation of habilitation procedures and procedures for the appointment of professors) and institutional evaluation, there are two specific processes applied.

In the first case mentioned, the standpoint of the ACCR to **applications for the accreditation of study programmes** is based on the **criteria** defined in the Act, the Decree<sup>17</sup> and mainly the Standards<sup>18</sup> (the Act being the most general and following documents going to more details respectively). All three documents in draft form had been consulted with the relevant expert public. The one document that is easiest to amend and pertains to more detailed information (Standards) has been formulated based

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<sup>17</sup> Decree of the Ministry of Education, Youth and Sports of 10<sup>th</sup> February 1999 on the content of applications for the accreditation of study programmes, <http://www.msmt.cz/areas-of-work/42-decree-issued-by-ministry-of-education-youth-and-sports-on-contents-of-application-for-study-programme-accreditation-1>

<sup>18</sup> Accreditation Commission standards for assessing applications for the granting, extension and renewal of accreditation for study programmes and fields of study, approved by the ACCR at meeting No. 4/2003, amended in 2005, 2006 and 2009.

on in-depth discussions among the members of the ACCR, the experience of their working groups and feedback from stakeholders. All the documents are publicly available through the web site of the ACCR. For easy understanding of the applicants and also for the consistency of assessments, the ACCR prepared and published the Guide form for assessment of applications for the accreditation of study programmes<sup>19</sup>.

The fact is that Standards define the framework of the necessary criteria that are further developed on the level of field specifications within the working groups. The development of criteria is a continuous process, differing in each working group (SER, p. 43). At the time of the external evaluation of the ACCR, the development of criteria on the level of working groups differed mainly in the issue of participation of stakeholders (students, employers, other experts from the field, etc.). No formalised cooperation with stakeholders was observed to be used; it depended on the chair of a working group how she or he handled the discussions. Some of the working groups organised broader discussions, some of the working groups followed internationally recognised standards, some of them discussed the development of criteria within the working group itself. Criteria for field specifications are also published on the web pages of the ACCR<sup>20</sup>.

A similar situation applies for the **criteria** for assessing applications for the accreditation of **habilitation procedures and procedures for the appointment of professors**. It is defined in the Act (on a general level) and more detailed information is published in Standards of the ACCR for assessing applications for fields of habilitation procedures and procedures for the appointment of professors<sup>21</sup>.

What concerns the **procedures** of the ACCR while **assessing the applications for accreditation**, these are directed by the Act (section 79, 82, 85) and Statute (Article 12: Commission's rules of procedure). The review panel has not learned from any person interviewed during the site visit that the procedures would not be known, would not be transparent or that the purpose would not be clear enough. Some of the chairs of working groups during the site visit even mentioned that from time to time they visit HEIs that provide study programmes from the relevant field in order to learn about the institution and discuss the criteria used.

Second crucial activity of the ACCR, the **institutional evaluation of HEIs**, is the process described by the Statute. Statute is a document prepared by the ACCR, discussed with the representative bodies of HEIs and approved by the government. It is published at web pages of the ACCR.

The evaluation of institutions, or faculties or some accredited activities performed by HEIs, are based on a questionnaire prepared by the ACCR individually for each case. The questionnaire depends on what is being evaluated, there is no standardised questionnaire that would be publicly known and agreed by the general public (there is just a model of the questionnaire publically available<sup>22</sup>).

The main issues that are checked by the ACCR come from the aims and objectives defined by the Act, which means that the ACCR evaluates what HEIs are obliged to fulfil by law, *i.e. educational, research, scientific, innovation, artistic and other creative activities in accordance with the type and orientation of the institution* (Act, section 1), *sufficient and appropriate staff, financial, material, technical and information support*

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<sup>19</sup> The form mentioned in the Internal evaluation report of the ACCR from 2009, available in Czech language on <http://www.msmt.cz/vzdelavani/prirucka-pro-posuzovatele-2> , 12 January 2010

<sup>20</sup> <http://www.msmt.cz/vzdelavani/specificke-pozadavky-pro-skupiny-oboru>

<sup>21</sup> Standards were approved by the ACCR in 2003. They are available on the web site of the ACCR at <http://www.msmt.cz/vzdelavani/doporucene-standardy-pro-habilitacni-a-profesorske-rizeni> or in English at <http://www.msmt.cz/areas-of-work/recommended-standards-of-the-accreditation-commission-for> , 12 January 2010

<sup>22</sup> Questionnaire for evaluation of non-university type of higher education institution, available in Czech on [http://aplikace.msmt.cz/AK/Dotaznik\\_NVS-2005.doc](http://aplikace.msmt.cz/AK/Dotaznik_NVS-2005.doc)

(Act, section 79). The concrete questionnaire depends on the specific institution and may omit or add the criteria above mentioned. The purpose is not institutional accreditation but to assess its different features and to recommend improvements.

The procedure of the institutional evaluation is defined by the Statute and is publicly available. The questionnaire is prepared by the ACCR and sent to the evaluated HEI, requesting strategic documents elaborated by the HEI (long-term plan for 5 years and its actualised version for the current year, annual report from the previous year, self-evaluation report of the institution). An integral part of the process of institutional evaluation is the site visit by an ad-hoc working group to the HEIs and discussion with staff and students. Members of the ad-hoc working group of ACCR are experts nominated by ACCR from its members, external stakeholders and students. Cooperation with students in institutional evaluation has proved to be valuable and it is recommendable to broaden this cooperation to other activities of the ACCR as well (participation in working groups, possibly in the plenum).

What concerns the **administrative procedure** of applying for study programme accreditation, the applications are sent in three paper copies and one electronic version. Once the ACCR receives the application, the paper version is kept at the secretariat and the electronic version is shared through the ftp protocol among the members of the ACCR. Thus a database of applications and review reports is available to all the ACCR members. In the database other reports, documents or institutional reviews are kept. Further simplification will come with a new web site of the ACCR that will include electronic applications for accreditation. The review panel, however, cannot verify such application because the web site has just been launched at the beginning of April (<http://www.akreditacnikomise.cz/>) and the system of electronic application is planned to be finalised after the submission of this review report.

### **Analysis**

Concerning the development of external quality assurance processes (ESG 2.2), the review panel confirms that aims and objectives of these processes are determined before the process is developed; they are publicly available for both major processes: accreditation procedures and institutional evaluation. It is important to mention (based on the interviews during the site visit) that there has been very significant cooperation of relevant stakeholders regarding both legislative and other documents that define the processes, such as Act, Decree or Statute.

Yet, the review panel recommends to make the process of criteria development (on the level of field specifications within the working groups) less dependent on chairs of permanent working groups while accepting general rules of procedure valid for all working groups; to make the working groups more inclusive to external stakeholders (students and employers) and to maintain discussions on criteria development with the professional public. Proposed criteria for field specifications are (and should continue to be) subject to ACCR approval.

**Conclusion:** substantial compliance

### **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.

**Guidelines:** Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

### **Evidence**

The ACCR issues standpoints, which means that it expresses formal viewpoints that must be respected by the decision making body, i.e. Ministry, within the defined rules of the Act (section 79, par. 5). The ACCR standpoints pertain to the five following topics defined by the Act (section 84, par. 2):

1. requests for accreditation of degree programmes,
2. requests for authorisation to carry out habilitation procedures and the procedures for the appointment of professors,
3. establishment, merger, amalgamation, splitting or dissolution of a faculty of a public HEI,
4. granting of state permission to a legal entity wishing to operate as a private higher education institution,
5. specification of the type of higher education institution.

The issues above are assessed according to the explicit and published **criteria** that can be found on the web pages of the ACCR. The criteria are as follows.

1. Standards for assessing requests/applications for accreditation of degree programmes: general information is stated in the Act 111/1998 Coll. (section 79), more detailed information is defined by the Decree No 42/1999, the Standards and the criteria for field specifications, all published on the web site of the ACCR<sup>23</sup>.
2. Standards of the ACCR for assessing applications for fields of habilitation procedures and procedures for the appointment of professors are defined by the Act 111/1998 Coll. (section 82) and Standards of the ACCR for assessing applications for fields of habilitation procedures and procedures for the appointment of professors, both published on the web site of the ACCR.
3. Based on the Act (section 23, par. 3) the ACCR should express standpoints on the issues mentioned above in point 3, but these standpoints are not binding, rather they are more recommendations that may or may not be followed by the applicant institutions. The criteria used are the Standards, Decree No 42/1999, the Act (section 79) and then the concept is evaluated within the context of the whole HEI and strategic documents presented. According to the interviews during the site visit, criteria are applied consistently.
4. State permission is granted to the legal entity by the Ministry based on several criteria defined by the Act (section 39). The ministerial decision cannot diverge from the ACCR standpoint on the proposed degree programmes. Criteria applied for the assessment of applications for the accreditation of degree programmes are equal to point 1.
5. The type of a HEI is determined by the type of accredited degree programmes it provides (Bachelor's, Master's, Doctoral) as defined by the Act (section 2). The same legislative document (Act, section 2, par 4, 5) defines that the HEI can be of university type (providing all three degree programmes) or non-university type (providing just Bachelor's and may also offer Master's degree programmes without being divided into faculties). The ACCR gives its standpoint on the study programmes provided by HEIs. Study programmes are assessed according to the criteria already mentioned above, no other criteria are applied.

During the site visit, no interviewed person communicated to the review panel that the criteria were not explicit enough or difficult to find on the web pages of the ACCR. Yet, the issue that is very topical for the ACCR is the **consistency** in application of the criteria. There are Standards that define general rules for all the study programmes and fields of study. Then, on the level of working groups, field specifications are done

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<sup>23</sup> The field specifications of Standards is available in Czech language on <http://www.msmt.cz/vzdelavani/specificke-pozadavky-pro-skupiny-oboru> , 12 December 2010

according to the study fields. Thus, it may happen that two requests for accreditation of study programmes are assessed slightly differently across the different fields, but consistently within their own fields. A similar situation may occur with the strictness of different reviewers (mentioned by the higher education representatives during the site visit<sup>24</sup>).

For this reason the ACCR has repeatedly emphasised in their internal evaluation reports the importance of communication between members of the working groups and the plenum of the ACCR, with the aim to apply the standards consistently (SER, p. 32, 36). The ACCR has included all the chairs of working groups in the discussions about the criteria assessing the applications, strives to maintain consistent argumentation of negative standpoints to the applicants and requires systematically to file all minutes from meetings of working groups and the plenum of the ACCR, together with archiving at the secretariat the documentation and recorded evidence (and also putting it to the ftp protocol). The ACCR also organised an expert seminar for members of all working groups (2008) aimed at harmonizing their awareness of the interpretation of the ACCR criteria and exchanging experience of assessments of applications for accreditation between members of the various work groups (SER, p. 36). As mentioned already before (ESG 2.2), the consistency of the evaluation is also supported by the Guide form for assessment of applications for the accreditation of study programmes that contains clear explanation of criteria - serving to both, the reviewers and the applicants.

The process of maintaining consistency in criteria application is a difficult task and needs to be systematically supported. It cannot be guaranteed in 100% of the cases but according to the evidence gathered and conversations made during the site visit (with HEIs and other stakeholders), the review panel qualifies the ACCR's procedures related to the accreditation processes and criteria as effective and consistent, respectively.

What concerns the **institutional evaluation**, as mentioned before, it is a process complementing the accreditation of study programmes with the aim to support gradual improvement. Criteria used are not fixed, they are more individualised and focused on the evaluation of activities of HEIs that are defined by the Act (section 84: "evaluating the activities of HEIs and the quality of accredited activities and publishing results of such evaluations"). Usually, the evaluation concentrates on the following aspects: ability of HEI to reflect critically on its own development and react adequately (includes SWOT analysis), quality of accredited activities, creative and research activities on HEI, students and study conditions, human resources, information resources or internal quality assurance system. Some other issues may be touched as well depending on the focus of the evaluation (as one of the objectives is also to check specific issues of each institution, e.g. while evaluating private higher education institutions more attention is paid to financial and management issues<sup>25</sup>).

The outcome of such evaluations is a structured final report addressing in its final part the recommendations (based on the evaluation done). The recommendations have a formal character and should be followed and fulfilled by the evaluated institutions within the defined time and with concrete outcomes (under the penalty specified by the Act, section 85: limitation of accreditation, temporary termination of accreditation, revocation of accreditation). These are decisions based on the evaluation of institutions using in all the cases the strategic documents of HEIs, their self-evaluation reports (based on individualised questionnaires); an integral part is also a site visit in the evaluated institution (more in ESG 3.7) and discussion with representatives of the evaluated

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<sup>24</sup> "There is one thing: different approaches (strictness of the approach) are different on the level of working groups."

<sup>25</sup> The management and financial system of public HEIs is defined by the Act, private HEIs are free to choose their own management system and do not get financial support from the state budget (apart of some minor exception).

institution about the draft report at the meeting of the ACCR. The information about the institutional evaluation is available on the websites of ACCR (including the model of one of the questionnaires<sup>26</sup>).

With regard to the possibility of moderating conclusions, there are two ways the ACCR applies. Firstly, it is the communication with representatives of evaluated institutions, a personal visit of the ad-hoc working group directly at the premises of the institution and also the discussion at the plenum of ACCR on the draft report with representatives of the evaluated HEI. If any misunderstandings or factual incorrectness are found, the conclusions drafted by the ACCR may be modified in the final report. Moreover, the institution may react on the report through a position paper which is then published on the web site of the ACCR together with the report.

Secondly, a formal system of appeal is established in compliance with the Act (section 79, par. 8)<sup>27</sup> and in compliance with the Rules and administrative procedures of the Czech Republic (Act No 500/2004). More information on the system of appeal is discussed under ESG 3.7.

### **Analysis**

The review panel confirms that both criteria and results of the quality assurance activities (evaluation reports and standpoints) are explicitly published on the web pages of the ACCR. Conclusions are based on evidence that is archived at the ACCR secretariat. The consistency in criteria application is guaranteed by the ACCR as every conclusion is subject to approval of the ACCR plenum, which means that criteria specification and also their application is looked after by the plenum. Moreover, the endeavour for consistency is present in ACCR documents (priorities mentioned in the annual reports) and was also observed by the review panel members who participated at an ACCR meeting.

Beyond the scope of ESG 2.3, the review panel would like to recommend better use of website potential so that the orientation for the general and professional public is easier.

**Conclusion:** full compliance

### **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.

**Guidelines:** Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;

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<sup>26</sup> Questionnaire for evaluation of non-university type of higher education institution, available in Czech on [http://aplikace.msmt.cz/AK/Dotaznik\\_NVS-2005.doc](http://aplikace.msmt.cz/AK/Dotaznik_NVS-2005.doc) , 12 December 2010

<sup>27</sup> "If the Ministry learns that the facts included in the negative standpoint of the ACCR with respect to a particular degree programme are not in accordance with the real state of affairs or the Act, it can ask the ACCR to renew the procedure for issuing its standpoint and to correct any deficiencies in the reasons it has given."

- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

## Evidence

Aims and objectives of the ACCR are defined in publicly available documents (Act, section 84; Statute, article 1, point 1, 2). Processes of implementation of the aims and objectives are different for the two main tasks of the ACCR, accreditation and evaluation. The process of accreditation is defined by the Act (section 79 – 82, 84 - 86), by the Decree and the Standards and is based on the notion that each application for accreditation<sup>28</sup> must meet the minimum standard level of quality in order to be accredited. The process of evaluation of activities that HEIs perform, described by the Act (section 84) and the Statute (both also described in SER, p. 18 – 20), is complementing the concept of the minimum quality level with in-depth evaluation of the institutions and the activities they perform, and motivating them through recommendations to improve.

The process of assessment of applications for the **accreditation of study programmes** has been viewed by the review panel as clear and transparent. The criteria are clearly stated by law and transferred into Standards and recommended application forms - structured and accessible from the web site of the ACCR<sup>29</sup> together with guidelines. Each application is assessed by the ACCR within the time limit of 120 days (Act, section 79) through the multi-level system of assessment. Firstly, the submitted application is reviewed by one or more experts designated by the chair of the working group (the reviewer may be a member of the working group or another expert from the field, and stays anonymous); secondly, the written review report is discussed within the working group recommending conclusions. Finally, it is the chair of the working group that has the responsibility to present conclusions<sup>30</sup> at the plenum of the ACCR, which decides<sup>31</sup> on the standpoint. Then the standpoint is published and sent to the Ministry, which makes the decision on whether or not to award the accreditation (within 30 days after the receipt of the ACCR standpoint). If the ACCR's standpoint is negative, the Ministry cannot grant accreditation (Act and SER, p. 44). If the ACCR standpoint is positive, the Ministry can refuse to award the accreditation just on grounds of insufficient financial, technical or material resources (Act, section 79, par. 5c) or if the data presented by the applicant HEI are proved to be incorrect. Moreover, the system of appeal is defined by the legislation (Act, section 79, SER p.44) and forms an integral part of the overall process (further detailed in ESG 3.7).

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<sup>28</sup> There are different applications that are assessed according to this logic. It is the application for accreditation of study programme / of the field of studies, the application for authorisation to carry out the habilitation procedure or professorships procedure; and then applications for granting state permission to a legal entity wishing to operate as a private higher education institution (Act, section 84, par. 2).

<sup>29</sup> <http://www.msmt.cz/vzdelavani/nalezitosti-zadosti-o-akreditace-jejich-rozsireni-a-prodlouzeni-platnosti-u-bakalarskych-a-magisterskych-studijnich-programu> , 23 January 2010

<sup>30</sup> If the chair of the working group does not agree with a standpoint and proposal of recommendation approved by the working group, he or she presents his or her opinion to the ACCR together with the standpoint and recommendation of the working group (Statute, article 11, point 5)

<sup>31</sup> Usually, if a positive standpoint to the application is recommended, the plenum of the ACCR may discuss it but usually accepts the proposal without discussion. If there are any doubts or complications or if negative standpoint is recommended then it is always discussed within the plenum of the ACCR. In all the cases the ACCR is the platform that makes the final standpoint based on the input from the chair of the working group.

With respect to the selection of **experts**, the members of the ACCR are nominated by the Minister (based on the recommendations of institutional representative bodies) and appointed by the government for a six-year term, according to the defined procedure (Act, section 83); adhering to the legal regulation that the membership in the ACCR and its working groups is incompatible with positions of rector, vice-rector and dean (for more details on no-conflict-of-interest arrangements see ESG 3.6). ACCR members are carefully selected based on their expertise. This criterion should guarantee that highly professional and skilful people are selected to undertake the external quality assurance activities. There are no quotas for representatives of employers, students or international experts. Nevertheless, the ACCR repeatedly mentions the participation of employers (professionals external to the academic community) and international experts as its priority. Today's ACCR comprises of 21 members, out of them one is coming from the private company and three are international experts. Currently, there is no student as member of the ACCR plenum. The financial bonuses for the ACCR members are defined by directive of the Ministry and are generally delivered.

Members of the permanent working groups<sup>32</sup> are nominated by the chairs of respective working groups and approved by the ACCR plenum (Statute, article 7c). Nominations are done using the criterion of expertise in the respective field; nominees are not discussed with higher education representatives or student representatives. The period of office of the members of working groups usually corresponds to the term of office of the chair, but if wanted, the members can continue under a new chair as well. The panel has not found any time limitation for working group members staying in the office. International experts, students and employers participate in some of the working groups. The financial bonuses for the members of the working groups are defined by the directive of the Ministry, yet, not always the contracts are prepared so that the working group members can be awarded (due to various reasons, e.g. persisting previous practice of no financial bonuses, refuse to accept payment for quality assurance work, etc.).

Concerning the process of **institutional evaluation** which constitutes the second pillar of ACCR's work, the panel qualifies it as fully fitting for the purpose of its aim, i.e. evaluation of activities that HEIs perform, contributing to their gradual improvement. The procedure of this evaluation is well described<sup>32</sup> by the SER (p. 18, 44), corresponding to the Act and Statute, based on individualised questionnaire, self-evaluation report, site visit, draft report discussed with the evaluated HEI, published report and follow-up with possibility of penalties in case of not-fulfilling the recommendations (Act, section 85).

The review panel highly appreciates the endeavour for balanced ad-hoc working groups, nominated by the chair and appointed by the ACCR plenum for the period of institutional evaluation. In most of the ad-hoc working groups there are students as active participants nominated by the Student chamber of the Council of HEIs (hereinafter the "Student Chamber"). The participation of international experts or professionals from the private sector is not so common.

## **Analysis**

The panel confirms that the process of assessment of the applications for **accreditations** is transparent with defined criteria that are published and supported by clear and structured application forms. The review is undertaken by top experts from the field (members of the ACCR, its working groups and also the external reviewers) and procedures used are providing adequate evidence to find out whether the application fulfils the minimum standards set by the ACCR. Yet, based on the feedback from the site visit, it is advisable to shorten the duration of the accreditation process and make it more flexible.

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<sup>32</sup> There are two types of working groups; one is permanent dealing with assessment of applications (serving as an advisory body to the chair of the working group) and the other one is ad-hoc group nominated for the institutional evaluation.

The process of **institutional evaluation** is seen by the review panel as a very important part of the quality assurance system, being based on the improvement oriented approach. This type of evaluation concentrates on the activities that HEIs provide and enables the reviewers to see them within the context of the whole higher education institution. As evidenced by the review panel during the site visit, the process designed by the ACCR (in Statute) ensures the provision of sufficient information for making recommendations and conclusions on the evaluated institutions. Apart of the information usually reviewed (such as quality of accredited activities, creative and research activities, students and study conditions, human resources, information resources or internal quality assurance systems), the review panel recommends focusing also on the management systems at HEIs, both private and public.

The **current arrangements** defined by the Act make the ACCR to assess every single application for accreditation or re-accreditation (even though the minimum standards are almost always met, SER p. 33). Based on the feedback from ACCR members, the number of applications for accreditations has been constantly growing<sup>33</sup> due to fragmentation of study programmes, increase in cross-disciplinary study programmes or simply repetitive requests of applicants that have not been successful. Most of the working groups have been overloaded (SER, p. 48). The ACCR targets this issue as its priority in the internal evaluation reports and tries to prepare the shift towards the system of institutional accreditations. The review panel highly appreciates the effort of the ACCR to interlink accreditations of study programmes with evaluations as an effective and rational approach. Moreover, it is very advisable to limit the repetitive applications<sup>34</sup> (e.g. install penalties for repetitive requests due to incorrect or incomplete applications, install some minimum period of time in which the application can be submitted again, or establish higher fees<sup>35</sup>). Furthermore, when strengthening the focus on institutional evaluation<sup>36</sup>, the programme accreditation approach – required by law – could be reconsidered to rationalise resources (e.g. limiting it to a one-time initial accreditation of new programmes or, conversely, doing away with initial accreditation and accrediting ex post in not too long cycles, perhaps by disciplinary groups). Also the focus on systematic long-term strategic planning and analytical and complex work on internal quality assurance systems of HEIs is a precondition for a smooth development.

In the context of the ACCR transition towards the institutional accreditation as the leading activity in quality assurance system, the review panel values the broader initiatives in higher education sector to support it (e.g. national projects on the quality assurance, on the establishment of National qualification frameworks or the Long-term plan of the Ministry for 2011-2015). The panel also confirms that both above mentioned processes substantially ensure the aims and objectives for which they were designed. Still, recommendations towards tuning the system with the aim to balance the work load between the two key processes are recommendable, probably leading also to legislative modifications.

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<sup>33</sup> There are usually five meetings of the ACCR per year. On each meeting from 300 to 400 applications for accreditations are discussed. According to the Annual Report of the ACCR 2008 (p. 6), the ACCR issued 1961 standpoints on applications for the granting, expansion or renewal of accreditations (1832 favourable and 129 unfavourable).

<sup>34</sup> The ACCR members mentioned during the Site visit that some of the applicants had tried to succeed even 11 times.

<sup>35</sup> The assessment of application is free of charge for any institution, apart of granting state permission to a legal entity wishing to operate as a private higher education institution that costs 25.000 Czech crowns. <http://www.msmt.cz/vzdelavani/informace-o-vybirani-spravniho-poplatku-spojeneho-s-prijetim-zadosti-o-udeleni-statniho-souhlasu-pravnicke-osobe-pusobit-jako-soukromavysoka-skola-2> , 23 January 2010

<sup>36</sup> The work load estimated by the ACCR during the Site visit was: 60-70% of the capacity spent on assessment of application for the accreditation of study programmes (and habilitation and professor procedures), 30-40% devoted to the institutional evaluation.

With respect to the **experts**, members of the ACCR are carefully selected based on the criteria of expertise, according to the procedures defined by the Act (Act, section 83, par. 1 and 3). The nominations are based on the recommendations of institutional representative bodies and even though the panel recommends paying more attention to the balance of powers that come into the nomination – selection – appointment process (ESG 3.6), the relevant institutions are consulted and the process is searched to be transparent. The ACCR members are qualified by professional public met during the site visit as top experts from the field with appropriate skills and excellent abilities to perform their tasks.

The transparency of nomination and selection process at the level of permanent working groups should be also promoted. The panel advises to make the process of nomination of working group members open to comments from higher education representatives (and also the student representatives) and specify the periodic renewal/change of working group members. It is recommended even though until now the work of the ACCR and its permanent working groups was evaluated as independent, professional and highly expert by all the stakeholders that the panel met during the site visit. With respect to the functioning of the permanent working groups, unified rules of procedures and careful approach to remuneration of members of working groups and reviewers should also be strived for. The panel highly appreciates that the majority of the above mentioned recommendations to the permanent working groups are functioning at the level of ad-hoc working groups<sup>37</sup>.

With respect to the **participation of students, external stakeholders or international experts**, the panel appreciates the endeavour of the ACCR to include those actors into the process of quality assurance. This plurality of perspectives on quality of higher education (provided by different stakeholders, different countries) should be present at both levels - the ACCR plenum and also the working groups. It is worth mentioning here that the students are actively collaborating within the ad-hoc working groups, where the regular cooperation with Student chamber has been established, and their involvement is very positively evaluated by the ACCR.

Concerning the **trainings** of the members of the ACCR and its working groups, the ACCR has organised several seminars with the aim to support consistency in its outcomes (assessments of applications, reviews) and members of ACCR secretariat participate in the international seminars or trainings. The members of ACCR are also well trained by their more experienced colleagues within the ACCR, as the exchange of ACCR members is gradual (one third every two years). Nevertheless, the panel recommends paying more attention to the systematic training of members of the ACCR and members of the working groups.

**Conclusion:** substantial compliance

## **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.

**Guidelines:** In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

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<sup>37</sup> Nomination is done by chair of the working group, appointment by the ACCR, previous information to the evaluated institution on the review team, inclusion of students based on consultation with Student Chamber, application of unified rules of procedures.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

## **Evidence**

Both outcomes of the evaluation processes, the report of institutional evaluation and the standpoint on the application for the accreditation of study programmes (or habilitations and professors procedures), are proved to be clear, readable to the intended readership, written in the relevant and comprehensible style and publicly available, based on the panel study of such reports and also the feedback of relevant stakeholders facilitated by the interviews during the site visit.

ACCR is obliged by the Statute (article 2, point 3) and Act (section 84, par. 1a) to publish outcomes of all its activities with the help of the secretariat, which they fully perform. Standpoints of ACCR and other recommendations are publicly available in Minutes of ACCR meetings<sup>38</sup> and reports from institutional evaluation are published on the web site of the ACCR as well<sup>39</sup>. As the reports are published, any of the interested public may comment on the report. Furthermore, guests from representative bodies of HEIs and Ministry are regularly invited to attend the ACCR meetings<sup>40</sup> (Statute, article 12, point 6), so they have the information and documentation needed and may react.

What concerns the **reviews of applications for accreditation**, the proposal of the review is written by an expert chosen by the chair of the working group. It is elaborated according to the recommended form so that it is structured and priority issues are not omitted. The form is publicly available together with guidelines<sup>41</sup>. The proposal is further presented by the chair of the working group and discussed within the plenum of the ACCR, then the standpoint is formulated, published as part of the Minutes (if there is a negative standpoint, it is always explained) and submitted to the Ministry to make the decision. If any applicant asks for more information, the documentation is available to her or him at the ACCR secretariat. The feedback provided by the stakeholders during the site visit was positive and they evaluated the system of reporting as efficient, knowing where to find ACCR standpoints and if necessary knowing how to react.

The reports for **institutional evaluation** are elaborated by ad-hoc working group as a result of a specifically designed procedure (Statute, article 3; SER p. 45). The report is structured according to the priority areas evaluated, always starting with an introduction (mentioning the objective of the evaluation, members of the ad-hoc working group, listing the documentation used and interviews done), then analysing the priority areas and finally ending the report with conclusions and recommendations (separately mentioning recommendations that influence the accreditation, necessary follow-up and possible penalties in case of not implementing them within the mentioned deadline).

Before the report is published, it is discussed with the representatives of the evaluated institution at the ACCR meeting (and may still be amended if any misunderstanding happened). Then the report is finalised and published on the web pages of the ACCR together with the position paper of the HEI representatives.

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<sup>38</sup> Minutes for 2009 are available on web site of the ACCR <http://www.msmt.cz/vzdelavani/2009> .

<sup>39</sup> <http://www.msmt.cz/vzdelavani/zpravy-z-hodnoceni-a-prijata-doporuceni> , 26 January 2010

<sup>40</sup> These guests may attend the ACCR meetings but do not have right to vote.

<sup>41</sup> Available on the web pages of the ACCR, 26 January 2010  
[http://www.msmt.cz/uploads/soubory/akak/nalezitosti\\_zadosti/prirucka\\_pro\\_posuzovatele.doc](http://www.msmt.cz/uploads/soubory/akak/nalezitosti_zadosti/prirucka_pro_posuzovatele.doc) ,

## Analysis

With respect to the above mentioned evidence, the review panel finds the reporting of the ACCR reflecting the principles of ESG 2.5.

Firstly, reports on institutional evaluation are structured to cover the descriptive and analytical part, concluding with summary and binding recommendations.

Secondly, the results of assessments of applications for accreditation, standpoints, are published in the ACCR Minutes so that the broader public is informed. It is usually a brief statement whether the ACCR recommends the accreditation to be awarded (by the Ministry) or not. Negative standpoints are always explained (Act, section 79, par. 6) and if more information is asked by the applicant, it is available at the ACCR secretariat. In this context the result is not a report and cannot be evaluated with measures for reporting. The review panel finds such a process effective in the perspective of current legislation that demands accreditation for every single study programme and field of study (which is counted in hundreds per one meeting). For future work, it would be desirable to shift the system towards institutional evaluation/accreditation where reporting is a standard way of presenting results. As this issue of systemic change belongs to ESG 2.4 (where it is also treated), it is not taken into account within this standard.

The review panel also confirms, based on the interviews with various stakeholders during the site visit, that reports are understandable to the intended readership and are generally well commented regarding the style, content, professional attitude of the expert team and accepted as beneficial for development of the evaluated institution.

**Conclusion:** full compliance

## 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

**Guidelines:** Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

## Evidence

According to the Act (section 84), the ACCR is "concerned for the quality of higher education and carries out comprehensive evaluation of teaching, scholarly, scientific and research work, development, innovation, artistic and other creative activities of higher education institutions"<sup>42</sup>. There are two possible ways through which the ACCR has the right to evaluate / assess the quality assurance processes, then make recommendations for action and require a subsequent action plan. It is the evaluation of the activities of HEIs and the quality of accredited activities and then it is the process of accreditation where the ACCR issues a standpoint on the applications for accreditation<sup>43</sup>.

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<sup>42</sup> Main objective of the activities of ACCR as defined by the Act (section 84, par. 1)

<sup>43</sup> It is the application for accreditation of degree programmes, the application for authorisation to carry out the habilitation procedure and the procedure for the appointment of professors (Act, section 84, par. 2)

The first process mentioned above, **the institutional evaluation**, proceeds according to the Statute (article 3, point 3) in several steps with the objective to evaluate crucial activities that HEIs perform enacted by law. The process starts with elaboration of an individualised questionnaire by the ACCR that serves as the basis for the self-evaluation report of the evaluated institution, continues with the site visit and draft report – discussed during the ACCR meeting together with representatives of respective HEI. Then the report is finalised, approved by the ACCR (through voting) and published together with the position paper of evaluated institution. Recommendations and conclusions are submitted to the Ministry (Statute, article 5, point f); they have a formal character and are binding on HEIs.

If any deficiency is discovered in the activities of evaluated HEI, the subsequent action plan is designed in the report (in recommendations and conclusion), i.e. targeting the problematic issues that must have been solved within a concrete deadline (one or two years depending on the seriousness of the deficiency). The HEI is obliged to remedy the situation within the specified time and present a report on how the identified shortcomings were fixed. This report is then studied by the ACCR; if shortcomings are successfully solved by the HEI, the evaluation process has come to its end; if any further doubts persist the ACCR requests more information. In case the evaluated institution does not submit the requested information or the additional explanation does not show sufficient solution of the deficiencies, the ACCR makes its decision on the basis of the original documentation. The standpoint of the ACCR will involve a proposal to the Ministry that includes some of the following steps (Act, section 85, par. 2), depending on the nature of the case:

1. limitation of accreditation, consisting in a ban on admitting new applicants to study in the relevant degree programme; or
2. temporary termination of accreditation, consisting in a ban on holding state examinations and awarding academic degrees; or
3. revocation of accreditation<sup>44</sup>.

The above mentioned procedure is valid for deficiencies arising in the course of the implementation of a degree programme, habilitation procedure or procedure for the appointment of professors. Finally, it is important to mention that if the reasons for taking measures of limitation (ad 1) or temporary termination of accreditation (ad 2) cease to exist, the Accreditation Commission will ask the Ministry to rescind these measures.

The second process that empowers the ACCR to make recommendations for action and require a subsequent action plan constitutes the **assessment of applications** for accreditation. Such a recommendation is related to the process of making standpoints on new accreditation, re-accreditation or extension to the accreditation of degree programme. Based on the quality of the application, different standpoints may be issued by the ACCR<sup>45</sup>:

1. positive (without reserve) – recommending ministerial award of accreditation for ten years at most (based on Act, section 80, 82);
2. positive (under condition) – recommending ministerial award of accreditation but with the obligation to report back within the fixed deadline (1 - 2 years) on the problematic issue thus demonstrating that minor shortcomings, issued by the

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<sup>44</sup> In the event of temporary termination or revocation of accreditation of a degree programme, the higher education institution must provide students with the possibility of continuing their studies in the same or a similar degree programme at the same or another higher education institution. The Ministry will stipulate a reasonable length of time for fulfilling the obligation (Act, section 86).

<sup>45</sup> The information is based on the study of standpoints of ACCR in the minutes of its meetings, <http://www.msmt.cz/vzdelavani/2009> , 26 January 2010

ACCR in its standpoint, have been solved (it is similar situation as described above about institutional evaluation);

3. positive (with restrictions) - limitation or temporary termination of accreditation (Act, section 85, par. 2)
4. negative standpoint.

### **Analysis**

The review panel has found the ACCR fully compliant with the ESG 2.6 as the formal decisions or recommendations of the ACCR that require a subsequent action plan have adequate follow-up activities installed and those are being implemented consistently (also with the help of suitable legislation). The way of work of the ACCR efficiently helps to motivate HEIs for gradual improvement.

**Conclusion:** full compliance

### **ESG 2.7 Periodic reviews**

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

**Guidelines:** Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

### **Evidence**

Based on the Act (section 2) higher education institutions provide accredited degree programmes on the Bachelor's, Master's or Doctoral level (and have also exclusive right to carry out the procedures for conferring "venium docendi", i.e. habilitation, and for appointment of professors). Without accreditation it is not possible for any HEI to offer degree programme, admit any applicants, hold classes, and carry out examinations or award academic degrees (Act, section 78). Similarly, it is not possible to carry out procedures for habilitation or appointment of professors without accreditation.

The accreditation is awarded by the Ministry (based on the standpoint of the ACCR) for maximum of ten years (Act, section 80, 82). It means that the limited period of accreditation makes the process cyclical.

Before the accreditation expires it is necessary that HEI applies for re-accreditation. The application procedure as well as the documentation requested is defined by the Act (section 79) and the Decree. The length of period for which the accreditation is awarded to a study programme (compliant with the Standards) is predominantly twice as long as the regular study period is. Therefore, the cycle of accreditation for bachelor degree programmes is generally from six to eight years, for master study programmes from four to six years and for doctoral degree programmes for four or eight years, depending on the quality of the study programme submitted and resources secured for it (SER, p. 46). It is not very common that the accreditation is awarded for the maximum length that the Act permits (ten years).

The second field of activities that the ACCR performs involves institutional evaluation. It is a process with a different purpose than accreditation; it is oriented on ad-hoc and more complex evaluation of activities that HEIs perform (thus complementing the strictly regular accreditation of degree programmes). It is an evaluation with ambitions to target individual institution and its specific problems, it may focus on the whole institution, on one faculty, or cross-institutional evaluations of similar degree programmes – it varies according to the strategic plan and actual needs of the ACCR. Therefore, the cycle that is

planned by the ACCR with respect to institutional evaluation allow for at least one evaluation on each higher education institution (both private and public) in five years. It is not always the complex evaluation of the whole institution, even though this is the direction where the ACCR would like to dedicate more time and strive for a shift towards the accreditation of institutions in the future.

According to the information provided by the ACCR during the site visit, annual lists of institutions to be evaluated are prepared and communicated to the professional public and academic institutions through web pages of the ACCR. The information is also communicated to representatives of HEIs (Czech rectors conference, Council of HEIs), who regularly take part in sessions of the ACCR as guests. Moreover, direct information to institutions to be evaluated is sent by the chairwoman of the ACCR. Letter is written with sufficient time in advance to inform about the evaluation process and the composition of an ad-hoc working group and also to ask for preparation of support documents (e.g. elaboration of the self evaluation report in structure recommended). Hence, higher education institutions know in advance plans of evaluations and also take into account the fact that they will be included in plans of institutional evaluation with the cycle of approximately five years.

While making up the annual plan of institutional evaluation, the ACCR is particular in selecting also newly established HEIs that already have first graduates, HEIs that show instability or some significant problems and other HEIs taking into account the time and outcome of the previous evaluations.

### **Analysis**

The review panel came to the conclusion that the concept of quality assurance based on cyclical accreditation, complemented by the evaluation of activities that HEIs perform in its complexity constitutes a well balanced system, where relevant stakeholders are informed about the processes, motivated for improvement and also for fulfilling everyday duties treated in legislation.

**Conclusion:** full compliance

### **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.

**Guidelines:** All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

### **Evidence**

The ACCR collects information from wide range of quality assurance activities and draws up summary reports each year that is published on web pages of the ACCR<sup>46</sup>. Based on the Statute (article 4), annual reports must include the results of evaluations of institutions, an overview of the ACCR's standpoints and other conclusions approved by the ACCR during the calendar year. The Statute's requirements on the content of annual

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<sup>46</sup> Annual reports in Czech are available for every year on <http://www.msmt.cz/vzdelavani/vyrocnizpravy> , in English on <http://www.msmt.cz/areas-of-work/annual-reports-1> , 27 January 2010

reports (oriented mainly on listing activities and outcomes) have been extended to the analytical part as a consequence of the ESG implementation.

Thus since 2007 the first part of the annual report is focused on the analysis of activities executed by the ACCR, mainly focusing on tendencies and lessons learned from the activities performed and most problematic issues occurred during the period (or keep persisting for a longer time). Furthermore, possible solutions are designed and cooperation with the Ministry on legislative changes is described. The reports also summarise most common problems that appear in applications or self-evaluation reports which might be useful for the academic community to know to avoid repeating them. Then the annual report continues with the data on the evaluations done and statistical information on the standpoints issued. Even though the ACCR does not have its own research activities, some of the institutional evaluations (the review panel studied the activities undertaken during the last two years) show quite deep analyses of specific issues. They thus convey valuable information and feedback, for example the evaluation of fields for habilitation procedures and professorship procedures at philosophical faculties or faculties of art, and other cross-cutting comparisons of a certain types of accredited activities.

### **Analysis**

The review panel, while considering the compliance of the ACCR with ESG 2.8, takes into account the annual reports as such, the activities of individual members of the ACCR (lectures, discussions, articles in journals; SER, p. 47) and also the interviews with external stakeholders during the site visit. The people interviewed (the academic community, representatives of the Ministry or other stakeholders), were qualifying the activities as very professional and the outcomes as valuable sources of information, no critical remarks were articulated in context of annual reports of the ACCR. It should be mentioned here that each annual report is submitted also to the Ministry (Statute, article 4, point 2) and usually serves as a source of information for policy development.

Furthermore, the panel was informed by the ACCR that the feedback from external stakeholders is provided through various channels - communication with the higher education community is maintained in the course of the quality assurance processes, visits at the secretariat, invitations of representatives of evaluated HEIs to the ACCR meetings and mainly through the presence of regularly invited guests (nominated by the higher education representations: the Czech rectors conference and the Council for HEIs) at all ACCR meetings. Furthermore, the ACCR chair regularly participates in the plenary conferences of the Czech rectors conference and informs about the activities undertaken by the ACCR. If any urgent issues appear within the matters of quality assurance, the chair of the ACCR is invited to the sessions of the presidium of the Czech rectors conference or Council of HEIs. ACCR chair also maintains communication with the minister of education, education boards of the Parliament and the Senate of the Czech Republic.

In addition, ACCR members and working group members are part of the academic community as well; hence, they can easily receive the feedback on the work of the ACCR from their colleagues. The ACCR also very positively qualifies the cooperation with the Student Chamber and students as members of ad-hoc working groups. The review panel supports the enhancement of the ACCR to include more representatives of employers and cultivate the cooperation (both within the members of the ACCR and members of its working groups); recommendable is also the cooperation on analytical studies.

For the future, the review panel would recommend to maintain and broaden such a field of analysis (including SWOT analysis), mainly to a formal, direct questioning or analysis of the results of accreditations and evaluations within the higher education community,

as for example on the impact of the Bologna process.<sup>47</sup> Hence the consequences drawn in response to such a formal research would be very valuable not just for policy developments but also for the general public. The promotion of ACCR activities through publications and other materials for the general public appears as priority also in the internal evaluation report 2009 and should be followed through (with resource management as its integral part, discussed further in ESG 3.4)<sup>48</sup>.

To conclude, there are number of initiatives at the ACCR to reflect on the consequences of its work, both in occasional discussions at meetings and especially in the process leading to the annual reports initiated in 2006. This latter process, which has produced three annual reports so far, constitutes a formal analysis of the consequences of ACCR decisions and procedures.

**Conclusion:** full compliance

### 3.2. Part 3 of the ESG

#### ESG 3.1 Use of external quality assurance procedures for higher education

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

**Guidelines:** The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions.

The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

#### Evidence and analysis

The review panel confirms that the external quality processes described in Part 2 of the ESG are fully applied by the ACCR, caring for their presence and effectiveness.

**Conclusion:** full compliance

#### 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

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<sup>47</sup> The internal evaluation report of ACCR from 2007 itself mentions the need to "systematically focus on an analysis of the impact of the Bologna Process on the quality of Bachelor's and Master's degree programs", page 9.

[http://www.msmt.cz/uploads/soubory/akak/anglicka\\_verze/internal\\_evaluation\\_ac/AKCR\\_Inter.doc](http://www.msmt.cz/uploads/soubory/akak/anglicka_verze/internal_evaluation_ac/AKCR_Inter.doc) , 27 January 2010

<sup>48</sup> Internal evaluation report of the ACCR 2009, p. 10. <http://www.msmt.cz/areas-of-work/internal-evaluation-of-accreditation-commission> , 27 January 2010

The ACCR operates according to the Act<sup>49</sup> where its activities, responsibilities and processes are set (sections 78 – 86). The Act (section 79, par. 7) also defines that more detailed information “on the contents of the written application for the accreditation of the degree programme” will be specified in the Decree<sup>50</sup>. The Decree is issued by the Ministry after agreement with the ACCR. Both legislative documents above mentioned are published in collection of laws of the Czech Republic.

What concerns the internal functioning of the ACCR, the Act (section 83, par. 8) further states that “the manner in which the ACCR and its working groups carry out their discussions is stipulated in the Statute of the ACCR, which is approved by the government”. The up-to-date Statute<sup>51</sup> was approved by the Czech government in 2004 and is publicly available.

In addition, the process of appeal, i.e. the appeal against all Ministry’s decisions, is defined by the Rules of Administrative Procedures of the Czech Republic (Act No. 500/2004). Thus, the process of appeal against the Ministry’s decision on accreditations is set up by this Act No 500/2004 as well (and is fully compatible to the processes of the ACCR).

### **Analysis**

As consequence of the above mentioned legislative basis, the formal recognition of the ACCR by competent public authorities in the EHEA should be obvious. Moreover, the ACCR has the exclusive right to care for the quality of higher education in the Czech Republic and full support of Czech legislation and public authorities.

The review panel finds the ACCR fully compliant with ESG 3.2.

**Conclusion:** full compliance

### **ESG 3.3 Activities**

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

**Guidelines:** These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

### **Evidence**

The activities that the ACCR carries out are derived from the Act (section 84) and well described in the SER (p. 17 – 22). The ACCR is entrusted with general care for the quality of higher education, involving:

1. evaluations of institutions or their accredited activities;  
or other reviews affecting the system of higher education, when asked by the Minister
2. elaboration of professional standpoints on
  - requests for accreditation of degree programmes;

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<sup>49</sup> Act No 111/1998 Coll., amended and consolidated, on higher education institutions and on amendments and supplements to some other acts, Higher Education Act. Its actualised version is available also in English at web pages of the Ministry of Education, Youth and Sports, <http://www.msmt.cz/areas-of-work/the-higher-education-act> , 27 January 2010

<sup>50</sup> Decree No 42, Decree of the Ministry of Education, Youth and Sports of 10 February 1999 on the content of applications for accreditation of study programmes, <http://www.msmt.cz/areas-of-work/42-decree-issued-by-ministry-of-education-youth-and-sports-on-contents-of-application-for-study-programme-accreditation-1> , 27 January 2010

<sup>51</sup> The Statute of the Accreditation Commission was approved by the Government Decree, No. 744 dated 28 July 2004 and has come into effect on this day. <http://www.msmt.cz/areas-of-work/statute-of-the-accreditation-commission> , 27 January 2010

- requests for authorization to carry out the habilitation procedure and the procedure for the appointment of professors;
- the establishment, merger, amalgamation, splitting or dissolution of a faculty of a public higher education institution;
- the granting of state permission to a legal entity wishing to operate as a private higher education institution;
- specification of the type of higher education institution.

## Analysis

As previously noted, the activities of the ACCR are performed with two main aims, to ensure a minimum standard level of quality of degree programmes (through accreditation) and motivate for gradual improvement of higher education institutions in its complexity (through institutional evaluation and evaluation of accredited activities).

The review panel confirms that the external quality assurance activities are undertaken by the ACCR on a regular basis. As the accreditation is awarded for a limited period of maximum of ten years (Act, sections 80, 82), the process of re-accreditation makes it cyclical. The institutional evaluation follows the annual plans prepared by the ACCR with the strategy to evaluate each institution (or its accredited activities) at least once every five years.

The review panel finds the ACCR fully compliant with the ESG 3.3.

**Conclusion:** full compliance

## ESG 3.4 Resources

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

### Evidence

The resources for activities of the ACCR are fully provided by the Ministry. It is a legal obligation of the Ministry to provide as much resources (material and financial) as needed to enable the ACCR to perform its activities (Act, section 83, par. 9, 11). According to the memorandum of the minister, "the level of budgetary resources earmarked for the activities of the ACCR guarantees that the ACCR will be able to carry out its activities as determined by the Act to the full extent and that the independence of the ACCR will not be threatened by a decrease in the level of these resources".<sup>52</sup> No minimum or maximum level of the annual budget is stated, the annual financial plan is set up according to the scope of activities planned by the ACCR for the upcoming year.

There are 3 main components in the ACCR budget (managed according to the minister instruction)<sup>53</sup>:

1. organizational costs of the meetings of the ACCR and its working groups<sup>54</sup>, reimbursement of the travel costs,

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<sup>52</sup> Memorandum of the Minister of Education, Youth and Sports on the Independence of the Accreditation Commission (Article III, point 1), January 2010, available at <http://www.msmt.cz/areas-of-work/memorandum-of-the-minister-of-education-youth-and-sports-on> .

<sup>53</sup> Instruction of the Minister of Education, Youth and Sports, No. 19/2009 on the provision of material and financial resources for the activities of the Accreditation Commission established in line with Act No. 111/1998 Coll. on higher education institutions and on amendments and supplements to some other acts (the Higher education act), as amended and of its working groups; valid from June 1, 2009.

2. remuneration for chair, vice-chair, members of the ACCR and members of its working groups (set by the chair in collaboration with the secretary, with the amount determined by public employee and instruction of the minister of education); then also payments for external reviewers
3. fees for membership of the ACCR in international organizations.

As all the financial means for the ACCR come from the Ministry, these are subject to ex-ante, interim and ex-post financial audit according to rules valid for the Ministry and for public administration.

Other resources are provided to the secretariat of the ACCR directly by the Ministry, as the ACCR secretariat belongs to the section for research and higher education of the Ministry, i.e. offices are given to the ACCR in the ministry's building, payments are awarded to members of the secretariat according to the Ministerial regulations. However, the Ministry does not direct the secretariat; it is the ACCR chair that manages and gives tasks to secretariat.

What concerns human resources; there are 21 members of the ACCR plenum/council (according to the Act, section 83, par. 1) and approximately 200 members of working groups. Then, also ad-hoc evaluators are invited to cooperate both on accreditation and evaluations. The ACCR secretariat operates with five people.

### **Analysis**

The ACCR disposes each year with the financial resources that should allow it to fulfil legally defined activities. Nevertheless, as evident from SER (p.52) and internal evaluation reports of the ACCR<sup>55</sup>, shortage of financial and human resources has been repeatedly detected by the ACCR mainly due to "the increase in requirements for processing of evaluator documentation, higher demands for language competences due to greater cooperation in international panels (ENQA, CEEN, ECA, etc.) and higher demands on the internationalization of Accreditation Commission activities"<sup>56</sup>.

The reports have mainly supported claims to increase financial, material and human resources for secretariat. It has been observed also by the review panel that the current funding scheme suffices mainly for conducting day-to-day administrative tasks and formal system-wide analysis is very difficult to manage, even though it is understood by the ACCR and also by broader public as very necessary (e.g. the analysis of effects of the introduction of bachelor/master system on the quality of HE).

Funding should be increased to such a level as to allow for adequate resources for the secretariat to cover all administrative and technical work supporting the ACCR decision-making process, but also to strengthen its role as a body that could be given a more direct involvement in preparing the ACCR debates. Such a position would be based on the secretariat expertise in quality assurance field in the broader sense, which means it should be able to feed inputs to ACCR discussions on various issues, e.g. internal quality assurance at HEIs, life-long learning, outcome descriptors, etc. and based on the ACCR comments and expertise then elaborate respective methodologies and provide assistance to HEIs<sup>57</sup>. Staff experience could be used for preparing training and seminars for the ACCR and working group members and HEI representatives. This is especially true for

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<sup>54</sup> It has been emphasized during the site visit that meetings of ACCR plenum never take place in Prague and never take place at the facilities of the HEIs.

<sup>55</sup> Internal evaluation report of the ACCR 2009 (p. 11-12), Internal evaluation report of the ACCR 2008 (p. 6-7), Internal evaluation report of the ACCR 2007 (p. 8) <http://www.msmt.cz/areas-of-work/internal-evaluation-of-accreditation-commission>

<sup>56</sup> Internal evaluation report of the ACCR 2009 (p. 11)

<sup>57</sup> For example, very common in Europe is the distribution of responsibility among staff members for specific institutions and/or groups of study fields in whose decision-making process they provide the technical background.

quality assurance issues, since it is the members of the secretariat who are up to date also with international developments in the field.

An integral part of well functioning of the agency is also expertise in legal and financial issues. In the perspective of needing more resources, financial management and planning should be vital.

It is important to mention that financial resources for the ACCR provided by Ministry are constantly growing each year<sup>58</sup> and according to the feedback of the ACCR (during the site visit) it has never happened that the quality activities of the ACCR did not have adequate financial coverage. Yet, there is no guaranteed public funding per year and there is no alternative funding allowed. Therefore, it is advisable that a minimum level of annual public funding is guaranteed (e.g. in the form a percentage of annual public education budget; SER p.38), alternative funding sources are looked into and permitted by law.

It should be noted here that according to the feedback from the academic community, the quality of the ACCR's work is not influenced by the lack of resources. The explanation is based on the historical context. The ACCR was established in 1990 and at that time the work within the ACCR plenum (council) has been understood as an honour, a service for the development of higher education. For this reason, for quite a long time no financial benefits were connected to such a work. Gradually, as the quality assurance system became growing complex and the work highly time and capacity demanding, such a concept was no longer feasible.

Thus, the rules for awarding members of the ACCR and members of working groups were issued by the Ministry (the most recent one is from June 2009). Yet, many activities are carried out on a voluntary basis and some of the fees are described by the ACCR as "token amounts" (SER p. 49). For this reason, the review panel emphasizes the need for promotion and necessary support to the professionalization of quality assurance work accompanied by adequate financial awarding and a right for ACCR members (or working group members) to get the work load at their home HEIs temporarily shortened with respect to quality assurance duties.

To conclude, the review panel confirms that the ACCR is provided with public resources (material, financial and human) allowing for performing its duties as defined by the Act. However, possibilities to implement significant activities beyond the scope of legally binding operations are limited. It is strongly recommended to increase and mainly diversify funding in order to develop the function of the ACCR as a quality agency that develops quality assurance strategies and has the capacity to maintain an improvement oriented approach towards HEIs in its activities (supported by professional secretariat), and cares for its long-term development while taking into account also the international context and challenges it brings. Alternative funding should be searched and supported by national legislation.

**Conclusion:** substantial compliance

### **ESG 3.5 Mission statement**

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

**Guidelines:** These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality

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<sup>58</sup> Even during the period of crisis when the total ministerial budget decreased, the absolute amount of financial means for ACCR has grown by 50%.

assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

### **Evidence**

The goals and objectives of the ACCR are stated in publicly available documents, Act (section 84), Statute (article 1), as well as the respective processes. The criteria are specified by the Act, Decree and Standards. Thus all information forming the mission statement is available to public through the above mentioned documents (as described by the SER, p. 49).

### **Analysis**

Nevertheless, the review panel would like to point out that the definition of goals and objectives and respective processes mentioned in various documents does not suffice for a complete mission statement. The purpose of the mission statement is to define the *raison d'être* of an agency for the public, but also as an instrument for self-reflection. It is the image of an organisation from which its logo, its face towards the outside world and itself is conveyed. From it, all other tasks and objectives, documents and procedures are derived. While legislation may describe the tasks of an agency, it is good for the agency to formulate its own mission statement (in accordance with the legislation) as a conceptual document around which it develops its overall strategy.

The review panel acknowledges that the purpose and tasks of the ACCR exist documented, legislated and published, if not in the conventional form of a mission statement as such.

**Conclusion:** substantial compliance

## **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.

**Guidelines:** An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

### **Evidence**

The independence of the ACCR decision-making is guaranteed by law. Members of the ACCR are independent while carrying out their duties (Act, section 83). The Act (Section 83) also outlines the **no-conflict-of-interest** conditions for members of the ACCR and its working groups (Statute, article 9), i.e. the membership in the ACCR is incompatible with positions of rector, vice-rector and dean. It is also prohibited for a senior staff of a HEI to be member of ad-hoc working group evaluating activities of this institution. Furthermore, there is an agreement that a member of the ACCR cannot participate on evaluation or assessment of applications for accreditation of his home institution.

What concerns the **procedural arrangements**, the ACCR issues its standpoint to every application for accreditation. If a negative standpoint is given, no other body than the ACCR can change this decision (Act, section 79, par. 5f)<sup>59</sup>; not until the case gets to court. That means, given that the ACCR is an advisory body as in a great number of countries, that the ministry may not grant accreditation if the ACCR has given a negative standpoint. If a positive standpoint is issued by the ACCR, the Ministry may decide negatively just taking into consideration facts not related to quality and explicitly defined by the Act (section 79, par. 5).

**Nomination and appointment** of ACCR members is based on the criterion of expertise in the field (for which they are supposed to be nominated and appointed). The chair, vice-chair and members of the ACCR are nominated by the Minister and appointed by the government. Prior to submitting Minister's nominations, he or she asks for references from the representative bodies of the country's higher education institutions, the Research and development council and the Academy of sciences of the Czech Republic, and discusses the nominations with these institutions (Act, section 83, par. 1). The Minister abides exclusively by the criterion of expertise<sup>60</sup>. Members do not represent any institution or organization; they must be independent and widely regarded as authorities in their fields (Act, section 83, par. 3). As noticed by the panel from the interviews, they enjoy confidence and respect from the public in its work.

The ACCR consists of 21 members, out of them one comes from industry. There is no student in the plenum of the ACCR. The legislated continuity of ACCR appointments, whereby one third is (re)appointed every two years, is a form of checks and balances between the earlier and newly entering groups regarding not only their levels of experience but also potential external influence of the group as a whole.

**Working groups** are understood by the legislation (Act, section 83, par. 7) as consultative bodies<sup>61</sup> that may or may not be established based on the needs of chairs of working groups. If they are established then their composition must correspond to the type of degree programme under consideration, its mode and its study objectives. Members of working groups are nominated by the chairs of respective working groups and approved by the ACCR plenum. Apart of the above mentioned requirement for working groups' composition, no detailed criteria of selection of experts to working groups (that would be publically available) have been found by the review panel. Based on the site visit findings, the students and employers are present just in some of the working groups.

**Secretariat** of the ACCR is organisationally integrated into the Ministry and its staff is ministry employees. Thus, the secretariat is subject to relevant labour regulations and internal regulations of the Ministry, however, "the Ministry is not authorised to intervene, by means of imposing obligations on the ACCR secretariat, in the expert activities of the ACCR and to influence its decision-making process and mechanisms of operation through such obligations"<sup>62</sup>. The head of ACCR secretariat (secretary) is nominated by the ACCR chair and appointed by the Minister. Without the agreement of ACCR chair the secretary cannot be appointed or dismissed.

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<sup>59</sup> If the ACCR does not change its negative standpoint during the process of appeal, then the applicant may continue to appeal to the court of justice – at this level the ACCR's negative standpoint may be changed.

<sup>60</sup> Article II, point 1: Memorandum of the Minister of Education, Youth and Sports on the Independence of the Accreditation Commission (Article III, point 1), January 2010, available at <http://www.msmt.cz/areas-of-work/memorandum-of-the-minister-of-education-youth-and-sports-on> .

<sup>61</sup> The term of office of the working group members usually corresponds to the term of office of the chair of the working group.

<sup>62</sup> Article IV, point 2, Memorandum (as mentioned in footnote 44)

As mentioned during the site visit (and in compliance with the Statute, Article 12, point 6) the **representatives of HEIs and Ministry** are regularly invited to participate in the meetings of the ACCR (without voting powers). Even though the meetings are not open to public they provide platform where applicant institutions or **other guests** may also be invited by the chair. Generally, the feedback from the academic community during the site visit provided quite positive reactions on the work of the ACCR and ways of communication (trying to find a balance between cooperation with institutions and other stakeholders but keeping the independence for final decisions). No perceptible concern about the independence of the ACCR from political actors, HEIs or other stakeholders was detected.

## **Analysis**

The panel confirms that the ACCR has autonomous responsibility applied in such a way that its conclusions and recommendations are not influenced by third parties (and no such suspicion was articulated by representatives of HEIs or other stakeholders during the site visit). The tools used are as follows: a no-conflict-of-interest arrangement is in place, there is an exclusive competence for the ACCR to issue a negative standpoint without a possibility to be changed by the Ministry, the transparency of the ACCR activities is based on publicly available criteria and readable processes, the assessment of study programmes proceeds on three levels so that any personal viewpoints is avoided, reviewers of study programmes remain anonymous, each of the ACCR decisions that has a formal character must be approved by majority vote of all ACCR members; the nomination system (collecting proposals from various representatives of HEIs and research organizations) allows for finding highly expert people, willing to devote to the work on quality assurance.

Even though the review panel has not noticed a lack of independence in the real functioning of the ACCR, there are certain areas where the system of quality assurance may be re-defined in order to avoid possible vulnerability of ACCR to external circumstances.

Firstly, it is the nomination process of ACCR members and members of the working groups. With respect to the **ACCR members**, their nomination is done by the minister based on the proposals of institutional representative bodies. It is not the minister who appoints, yet he (she) influences the nominations by preparing final group of nominees for the government (which then appoints). Even though the final list of nominees is discussed with the representative bodies before presenting it to the government, still, minister plays an important role in the selection process<sup>63</sup>. It would be recommendable to ensure the balance of powers between the Ministry, institutional representative bodies and the government while selecting and appointing the nominees so that the final decision is the consensus of all the entities involved. The review panel welcomed the endeavour of the ACCR to include international experts and people from the industry. It should be further promoted together with the inclusion of student (at the moment students form part of working groups but not the ACCR plenum).

Regarding the nomination and appointment to **working groups**, current arrangement gives significant authority to the ACCR members. They can decide whether to establish a working group (that serves as an advisory body to him or her) and they nominate its members that are further approved by the plenum of ACCR. With respect to the fact that the majority of the assessment work load rest on the permanent working group members and they play very important role in setting the detailed standards for the respective fields, it is advisable to make the process of selecting members of working groups more formal and invite institutional representative bodies to comment on the nominations. The panel further recommends the permanent working groups to be obligatory so that no

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<sup>63</sup> The minister prepares the final list by selecting nominees from the list of institutional representative bodies or by including other candidates.

member of ACCR may act alone for the respective field. Each working group should integrate also the professionals from outside the academic sector (from practice) and students. The review panel points out that this is more a recommendation for formalisation of the above mentioned issues and inclusion in the published documents so that the practice of real functioning is transparent to the public and formally documented.

Concerning the procedures and methods that the ACCR applies to fulfil its aims and objectives (which are to assure quality of higher education using the institutional evaluation and the assessment of applications for accreditation, defined by the Act), they are specified mainly by the Statute, within the framework of quality assurance given by the Act. The Statute is prepared by the ACCR and approved by the government. With respect to the operation of the defined procedures and methods, as well as determination of the outcomes of quality assurance processes, these are undertaken with full autonomy and independency of the ACCR.

The review panel confirms that no evidence of infringement of independence was found and the work of ACCR is perceived by the stakeholders as very professional and of high quality. Nevertheless, the panel recommends excluding the ACCR secretariat from the Ministry organisation. Firstly, to make formal the independence that is claimed and evidently followed by the ACCR and the Ministry; and secondly, to give autonomy to the ACCR secretariat in its internal regulations, financial planning or human resources. Organisational separation of the ACCR from the Ministry will help to make the internal functioning simpler and will support the idea of professionalization of the secretariat. Together with such an arrangement the possibilities of alternative funding should be further studied so that the resource allocation does not come exclusively from the Ministry.

**Conclusion:** substantial compliance

### **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.

**Guidelines:** Agencies may develop and use other processes and procedures for particular purposes.

Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences 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.

#### **Evidence**

The processes, criteria and procedures used by the ACCR are pre-defined and publicly available to all the interested (and professional) public who wish to learn them. The

criteria for accreditation of study programmes are published at the web sites of the ACCR as Standards<sup>64</sup> (criteria for procedure for habilitation and professorship have similar document elaborated<sup>65</sup>). Standards are compliant with international standards and are based on the legal document of the Czech legislation system, the ministerial Decree No. 42<sup>66</sup>.

Processes, criteria and procedures are updated based on the experience and new circumstances. Every change is being discussed and then carefully considered and voted for by the plenum of the ACCR. Summary information on these changes/revisions, as well as processes that have catalysed them, is annually published in self-evaluation reports of the ACCR or annual reports.

What concerns the **process of the evaluation of institutions** (or accredited activities); it is defined by the Statute (article 3, 9) as follows: it always consists of self-evaluation report, site visit (for verification of information), draft report, public final report with recommendations and necessary follow-up.

Self-evaluation report, prepared by the subject of the evaluation (most often HEI or faculty) is an obligatory component of any evaluation. It represents one of the most important inputs for further complex analysis. It is based on the questions prepared by the ACCR ad-hoc working group (in compliance with the orientation of the evaluation). Its members are ACCR members, other experts from the field (as members of working groups or other invited experts from professional public) and one student. The student representative is nominated by the Student Chamber and forms part of the evaluating team since 2007<sup>67</sup>. The review panel was informed by the ACCR members during the site visit that cooperation with Student Chamber has proved to be very fruitful and will continue (as also mentioned in the annual report 2008<sup>68</sup>). The membership in ad-hoc working group is not allowed to a person holding any position of director at the evaluated institution (Statute, article 9, point 5).

The evaluation further continues with the site visit at the evaluated institution so that the ad-hoc working group could meet face to face with direct actors of the evaluation (teachers, students, representatives of evaluated institution and its faculties, technical staff – e.g. from the study departments or libraries - and representatives of academic senate) and allow for verification of submitted information. According to the statute, at least three members of the ad-hoc working group must participate in the site visit.

Then, the draft report is being elaborated and discussed with representatives of evaluated institution at the meeting of the ACCR, final report is agreed by the plenum of the ACCR and published at the its web site. Each report is structured and contains in its final part conclusions and recommendations, carefully explained. If any deficiencies are found, a follow-up is proposed for future work and elimination of those deficiencies by a specific deadline. When the deadline is over, a control report of implementation is written by the evaluated institution. If deficiencies are not fixed (the necessary criteria of quality

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<sup>64</sup> Accreditation Commission standards for assessing applications for the granting, extension and renewal of accreditation for study programmes and fields of study; approved by the ACCR in 2003, amended in 2005, 2007 and 2009.

<sup>65</sup> Standards of the ACCR for assessing applications for fields of habilitation procedures and procedures for the appointment of professors, approved by the ACCR in 2003 (for more information see 2.2. ESG)

<sup>66</sup> Decree of the Ministry of Education, Youth and Sports of 10<sup>th</sup> February 1999 on the content of applications for the accreditation of study programmes

<sup>67</sup> Annual report 2007,  
[http://www.msmt.cz/uploads/soubory/akak/vyrocní\\_zpravy\\_ak/vyrocní\\_zprava\\_ak\\_2007.doc](http://www.msmt.cz/uploads/soubory/akak/vyrocní_zpravy_ak/vyrocní_zprava_ak_2007.doc)

<sup>68</sup> „Consultations with students from the evaluated HEI play a valuable role, both in terms of trust and openness of student testimonies, and from the aspect of being able to make comparisons between particular department being assessed and the parent HEI.” (Annual report 2008, p. 11)  
<http://www.msmt.cz/areas-of-work/annual-report-of-the-accreditation-comission-for-the-year>

has not been met) then the limitation, temporary termination or revocation of the accreditation is proposed to the Ministry (already mentioned in Part 2, 2.3 and 2.6.<sup>69</sup>).

Concerning the **process of accreditation**, it is based on the information from the application form filled in by the applicant institution. The application is then externally assessed within the respective working group of the ACCR and discussed at the plenum of the ACCR which decides on the result. A site visit may form an optional part of this process (SER, p. 50). The ACCR standpoint is then published as part of the Minutes from the meeting and proposed to the Ministry for decision. Accreditation is awarded by the Ministry decision based on the ACCR standpoint. If any hesitations occur regarding the quality of the presented application, further check reports may be requested during the period of accreditation validity. Each study programme is accredited for maximum of ten years then must be re-accredited again.

What concerns the **procedure of appeal** it is defined by the Act (section 79, par. 8), by the Statute (article 1, point 2f) and by the Rules and administrative procedures of the Czech Republic (Act No 500/2004). The process is as follows.

The appeal may be lodged against the formal Ministry decision by any applicant HEI. It is the Ministry which formally decides on the accreditation and state permission for private HEIs, however, it is the ACCR that provides expertise for this decision. If the ACCR issues a positive standpoint on the application for accreditation of a study programme, the Ministry may refuse to award the accreditation just in special cases not connected to the quality of the study programme and specifically stated in the Act (section 79, par. 5 c, d, e), e.g. lack of financial, material or technical resources. If the ACCR issues a negative standpoint, the Ministry is obliged by the Act to respect it and make the decision accordingly (Act, section 79, par. 5 f).

Each HEI may lodge an appeal against the Ministry decision based on the Rules and administrative procedures of the Czech Republic. The appeal is delivered through the Ministry to the Minister who then appoints an independent expert committee (where more than a half of the members come from outside the Ministry and no one from the ACCR) to review again the application for accreditation<sup>70</sup>. If the expert committee comes to the same conclusion as the ACCR, then the committee recommends to Minister rejecting the appeal. If the expert committee comes to different conclusion than the ACCR issued in its standpoint, the application is given back to the ACCR for re-assessment. The ACCR either changes its standpoint accepting the arguments of the expert committee (then the committee recommends Minister to accept the appeal and change the Ministry decision), or the ACCR confirms its previous standpoint (then the expert committee and also Minister in its decision must respect it and reject the appeal<sup>71</sup>). Change in the formal decision may be done by Minister only on the basis of the revised ACCR standpoint.

If the appellate procedure above described ends with rejecting the appeal and confirms the previous standpoint of the ACCR, the applicant HEI has the right to appeal to the court of justice. The resulting verdict may confirm or change the decision of the Ministry or the jury may return the case back to the Ministry for new assessment of the application.

### **Analysis**

The review panel considers the work of the ACCR as highly professional, both the expert activities performed and the way how they are organised, thus corresponding to the

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<sup>69</sup> Act, section 85, par. 2

<sup>70</sup> Or other standpoint that the ACCR issued and on which the Ministry then made a formal decision.

<sup>71</sup> The Ministry (the same is valid for the minister) cannot give positive decision and award accreditation if the ACCR has not given positive standpoint on the application (Act, section 79, par. 5f).

opinion articulated by the majority of the stakeholders and ACCR members interviewed during the site visit. With regard to consistency, the panel acknowledges that every effort is made to apply the criteria consistently (SER, p. 9).

The panel also confirms that the system of appeal is defined by the legislation and forms an integral part of the overall process. The ACCR plays a crucial role in the appeals procedure because it is the only body that can change the negative standpoint issued to the application. If the request for re-assessment is delivered to the ACCR from the independent expert committee and if the ACCR comes through the repeated assessment to the negative standpoint; in this case the review panel recommends to approve such standpoint by significant majority – e.g. 60% of votes of all members of ACCR to prove that the standpoint corresponds to the majority opinion of the ACCR members.

To conclude, the review panel finds the ACCR fully compliant with the ESG 3.7 with respect to the processes, criteria and procedures used by the ACCR, including the system of appeal. Even though there are some recommendations towards the effectiveness of the appeals procedure, the panel finds the current concept as fitting to the overall functioning of the quality assurance in the Czech Republic and corresponding to the constitution of the ACCR.

**Conclusion:** full compliance

### **ESG 3.8 Accountability procedures**

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

**Guidelines:** These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
  - the agency's processes and results reflect its mission and goals of quality assurance;
  - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
  - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
  - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years which includes a report on its conformity with the membership criteria of ENQA

### **Evidence**

The ACCR is a leading expert authority that fosters the quality of higher education and evaluates the scholarly, scientific and research work, development, innovation, artistic and other creative activities of higher education institutions<sup>72</sup>. It means, it is a body, made up of independent experts (nominated by the Ministry based on recommendations

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<sup>72</sup> Quoted from the „Memorandum of the Minister of Education, Youth and Sports on the independence of the Accreditation Commission“, available at <http://www.msmt.cz/areas-of-work/memorandum-of-the-minister-of-education-youth-and-sports-on> , March 2010

of HEIs and other stakeholders and appointed by the government), acting in compliance with the Act, Decree and Statute, i.e. documents approved by the Parliament (Act), Ministry (Decree) and Government (Statute).

The ACCR operates in a complex system resulting in "account giving" to multiple stakeholders.

- It adheres to the legislative norms that regulate its activities (above mentioned).
- It meets the requirement for financial accountability towards the Ministry as the funding authority through annual reports on activities and reports on material and financial assurance of these activities. Publicly available is just the annual report on ACCR 's activities<sup>73</sup> (as indicated in the Statute, article 4).
- It cares for the evaluation of its own activities through internal and external mechanisms, providing publically available information (reports) to relevant stakeholders on the quality of activities and outcomes done in specific periods.
- It reports also to the broader professional public and any interested individuals, providing publically all the outcomes of its activities in order to make its work transparent (institutional evaluation reports, standpoints, criteria used, rules of procedures, minutes from the meetings, etc.). Annual reports<sup>74</sup> are elaborated each year and published on the web pages of the ACCR.
- It maintains communication with HEIs and employers thus enabling the feedback on criteria used and general feedback on its work as such. It also invites guests from the higher education community and Ministry to be present at ACCR meetings and invites applicant institutions to discuss their applications or evaluation reports.

With respect to the **policy for quality assurance of the ACCR itself**, it has been noted that mechanisms supporting quality of activities, processes and procedures of the ACCR are in its majority applied by the ACCR, even though these are not formulated in one single document. The most important role in defining procedures supporting accountability of the ACCR to external partners plays the Statute<sup>75</sup> (publicly available). Apart of the Statute, there is also the Act<sup>76</sup> and then good practice applied by the ACCR but not formally defined. The policy of quality assurance of the ACCR is therefore scattered between different documents making it more difficult for the public to orientate.

What concerns the documentation demonstrating some of the **procedures for accountability** mentioned in ESG 3.8, it is as follows:

- The mission and goals of the ACCR are defined by the Act. As the processes and results are also described by the Act (and by Statute), it is supposed that they do reflect mission and goals of the ACCR. The relevant information on all activities, processes and results of the ACCR, together with results of internal evaluation of the ACCR, are subject to annual reports.

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<sup>73</sup> Available in Czech and English, <http://www.msmt.cz/areas-of-work/annual-reports-1>

<sup>74</sup> Annual reports are prepared in compliance with the Statute (article 4). They have been regularly elaborated and published since 1999; in last 3 years focusing more on analyses and tendencies of the higher education system and effects of ACCR work. Reports are available at <http://www.msmt.cz/areas-of-work/annual-reports-1>.

<sup>75</sup> It is the Statute that defines rules of procedure (article 12), mechanisms to prevent conflict of interests for members of working groups (article 9), obligation to prepare and publish annual reports (article 4) or obligation to make publicly available results of ACCR activities (article 2, point 3).

<sup>76</sup> the Act defines the mechanisms to prevent conflict of interests for members of ACCR (section 83, par. 4) and also the procedure for nomination and appointment of ACCR members (section 83, par. 1)

- A no-conflict-of-interest mechanism defined in the Act and Statute is based on the notion that experts working in the ACCR plenum or its working groups cannot hold the functions of rector, vice-rector, dean or director of an institution. Furthermore, the head of an evaluated institution cannot become a member of an ad-hoc working group. There is also a rule applied by the ACCR that reviewers may not review their own institutions. Even though the rule is known and followed by the members of the ACCR, it is not documented in the written form.
- The ACCR cooperates with numerous experts from different fields, both during the process of assessment of applications for accreditation (the expert review is subcontracted) and institutional evaluation (the expert is nominated to an ad-hoc working group). The quality of subcontracted work is guaranteed by the ACCR members as they nominate the experts to be subcontracted (keeping in mind the criterion of expertise), the work of subcontractors serve as an input for discussions within the working groups and then each outcome must be approved by the plenum of the ACCR to get the formal validity. The quality and consistency of activities and materials produced is therefore maintained through this multi-level system of work.
- **A system of internal and external evaluation** of the ACCR has been drawn up in cooperation with the Accreditation Commission of the Slovak Republic and put into operation in 2007. According to the information mentioned in the SER (p. 24 – 29), it involves internal evaluation of the ACCR carried out annually (resulting in reports that are written in a set structure); and it also includes external evaluation every five years.

The review panel confirms that internal evaluation reports are elaborated each year since 2007 and are publicly available on the web pages of the ACCR<sup>77</sup>. The first report from 2007 initiated the process with an in-depth survey among ACCR members and brought interesting information thus defining priorities for improvement for the coming period. Following reports (2008, 2009) have been rather reactive to priorities marked in 2007, did not use surveys and did not go back to the recommended structure (as defined by SER, p. 26-28). In this context, it would be advisable to make up a document defining a policy of internal and external evaluation of the ACCR that would state formal requirements on reports (including follow-up and action plan), recommend tools to be used to collect feedback, and clarify the relationship of annual internal evaluation reports and a self-evaluation report (prepared every five years as basis for external evaluation).

The review panel acknowledges that the system of internal evaluation is quite recently installed and some of the formal and administrative requisites have not yet been properly implemented. Nevertheless, the panel confirms that the ACCR is open to receive feedback from its internal members and also from reviewed institutions and the professional public. Internal members are invited to participate in discussions on conceptual and strategic issues (which form an integral part of each ACCR meeting), they are informed of each document which is to be approved by the ACCR plenum and may comment on it. A formal survey among ACCR members was held, until now, just once (in 2007 as part of the internal evaluation). The panel cannot confirm that such surveys are going to be cyclical.

Feedback from evaluated institutions is received by several means. Institutions may give feedback during the process of evaluation (when they are invited to

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<sup>77</sup> In Czech available at <http://www.msmt.cz/vzdelavani/vnitřni-hodnoceni-akreditacni-komise> and in English available at <http://www.msmt.cz/areas-of-work/internal-evaluation-of-accreditation-commission> .

ACCR meetings to discuss the draft report) or after the evaluation is finished and they wish to comment on the report through a position paper (which is then published together with the report). Communication with and feedback from the academic community is ensured through regular guests present at ACCR meetings. Other representatives or stakeholders may also be invited to ACCR meetings and participate in the special part of the programme when broader issues are discussed.

The review panel confirms that the ACCR is able to react to recommendations received through the above mentioned feedback, as evidenced from the internal evaluation reports (that concrete reactions were realized). The reaction is, of course, possible just within the valid legislation. Recommendations for legislative changes are delivered by the ACCR to the Ministry as well (through the annual reports, formal or informal meetings). If legislative changes are planned in the field of quality assurance, the ACCR is invited to participate in its preparation (as confirmed by both Ministry and ACCR members during the site visit).

According to the policy accepted by the ACCR, an external review of its own activities is mandatory at least once every five years. The first external evaluation that the agency has been undergoing is of type A, resulting in a report on its conformity with the membership criteria of ENQA. For the future development, it might be beneficial to seek a type B evaluation - involving also the broader public and external stakeholders into the process.

### **Analysis**

The ACCR has gradually implemented the majority of the procedures for its own accountability. There are aspects of the accountability that have been traditionally used by the ACCR for many years. This includes of course respecting the legal framework within which the ACCR operates (following legal documents approved by Parliament, Ministry or government, and also its own documents); then it is reporting to the public on its own activities and results (annual reports, reports on institutional evaluation); and care for developing communication with and feedback from the academic community, evaluated institutions, Ministry and other stakeholders. These traditional activities are generally well arranged and documented.

The panel would further recommend formalising some of the activities done by the ACCR (e.g. formal surveys among HEIs about how satisfied they are with the ACCR work, formalising the policy that is now followed based on the general agreement – that the reviewers do not to participate in the reviews of their own institutions). There are also aspects of the accountability concept (as articulated by the ESG 3.8) that have been introduced into the system of quality assurance quite recently and have not yet been stabilised in form and documentation. This concerns mainly the system of internal and external evaluation that is not sufficiently described in formal policy documents that would allow for explicit and comparable results and adequate added value from the process. The elaboration of one single policy document on quality assurance of the agency itself, including the accountability procedures and system of internal and external evaluation would be advisable.

**Conclusion:** substantial compliance

### **Miscellaneous criterion**

- 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 judgments and decisions are reached in a consistent manner, even if the judgments 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 the agency.

iii. The agency is willing to contribute actively to the aims of ENQA.

## **Evidence**

### **I. Overall adherence to the declared principles**

The agency pays attention to its declared principles and tries to be consistent in the processes of decision making as formulated in its statute.

With regard to this point the Czech Accreditation Commission reaches full compliance. Though the report shows that the ACCR is not fully compliant with each and every proposed European standard, the Czech Accreditation Commission has established a system of evaluation and accreditation that seems to be well-functioning as well as sufficiently transparent to all parties involved in the process of accreditation as has become evident during the interviews with external and internal stakeholders.

### **II. Appeals procedure**

Appeals procedure is launched and defined by the Act, Statute and Rules and administrative procedures of the Czech Republic (Act No 500/2004). Detailed description is subject to ESG 3.7.

The appeal can be lodged against the formal decision on accreditation; it means the decision of the Ministry (based on the standpoint of the ACCR). If the appeal is applied, the application is reviewed again by specially nominated group of experts external to the ACCR. Then, their findings are sent again to the ACCR for re-assessment. Formal decisions may be changed only on the basis of revised the ACCR standpoints or by the decision of the court of justice.

This procedure corresponds to the spirit of the ACCR – an advisory body of highly expert people, concentrating top professionals and academics from the respective fields – and its exclusive right for negative decisions has been installed as a tool to oppose possible influence of political administration. On the other hand, such a procedure may get quite demanding on the ACCR (because of double assessment) and also on applicants (if they appeal against decision to the court of justice the process takes a long time).

As the interviews have shown, a specification of the appeals procedure as well as its inclusion in the statutes is very much in demand not only by the external stakeholders but by the members of accreditation commission as well in order to facilitate the process of reviewing and denying appeals and to make this process more time-efficient and transparent.

### **III. The agency is willing to contribute actively to the aims of ENQA**

The external evaluation has shown that the Czech agency is willing to work on its own improvement in order to comply with the ESG and also actively participate on the international level to contribute to the development of quality assurance standards and guidelines. The ACCR's member, prof. Sojka, was also a member of the ENQA Board and a very active person within the central and eastern European quality assurance cooperation. The ACCR regularly participates in ENQA meetings and seminars.

A significant example of active contribution to the aims of ENQA was the cooperation of the ACCR with the Accreditation commission of the Slovak Republic. Both agencies closely cooperated on developing an internal and external system of evaluation, as their common history and understandable language make the mutual cooperation easier.

**Conclusion:** substantial compliance

## 4. Conclusion

### 4.1. Overall conclusion

In the light of the documentary and oral evidence considered by it, the Review Panel is of the opinion that, in the performance of its functions, the Accreditation Commission of the Czech Republic is not fully compliant with the *ENQA Membership Provisions*. The agency is, nonetheless, in the opinion of the Review Panel, **sufficiently compliant** to justify full membership of ENQA.

The criteria where **full compliance** is achieved are:

ENQA criterion 1: Activities (ESG 3.1)

ENQA criterion 1: Activities (ESG 3.3)

ENQA criterion 2: Official Status (ESG 3.2)

ENQA criterion 6: External quality assurance criteria and processes used by the members (ESG 3.7)

The criteria where full compliance has not been achieved (and the ACCR is **substantially compliant** in these criteria) are:

ENQA criterion 3: Resources (ESG 3.4)

ENQA criterion 4: Mission statement (ESG 3.5)

ENQA criterion 5: Independence (ESG 3.6)

ENQA criterion 7: Accountability procedures (ESG 3.8)

ENQA criterion 8: Miscellaneous

and the agency is recommended to take appropriate action, so far as it is empowered to do so, to achieve full compliance with these criteria at the earliest opportunity.

### 4.2. Recommendations

The recommendations were proposed by the review panel directly to the relevant standards (ESG). The reader can find them in the analytical text of the ESG.

## 5. Annexes

### 5.1. Itinerary for site visit

<b>ITINERARY FOR THE SITE VISIT</b>		
<b>Day 1: Wednesday, December 16, 2009</b> Meeting place: Residence Dlouhá 17, Prague		
Time	Event	Person for interview
15:00	Briefing Meeting	All the Evaluation Board members
1	Secretariat of the ACCR (visit of the ACCR in the secretariat office)	PhDr. Jiří Smrčka, Ph.D. Bc. Jana Koziolová Jan Dvořák and others if needed
20:00	Dinner	

<b>Day 2: Thursday, December 17, 2009</b> Meeting place: Residence Dlouhá 17, Prague		
Time	Event	Person for interview
7:45 - 8:00	Meeting of the Evaluation Board	EB
2	8:00 - 8:45 Members of the ACCR that has been responsible for internal evaluation of the ACCR + member of the ACCR from private company	prof. PhDr. Petr Kyloušek, CSc. doc. Mgr. Ing. Karel Chadt, CSc.
3	8:45 - 9:30 Member of the ACCR from private company  + representatives of the professional org. for lawyers, for doctors, for architects for engineers	doc. Mgr. Ing. Karel Chadt, CSc.  JUDr. Johan Justoň (ČAK, chair) +1 MUDr. Milan Kubek (ČLK, chair) +1 Ing. Arch. Jan Vrana +1 Ing. Pavel Křeček +1
9:30 - 10:00	Reflections of EB + small break	
4	10:00 - 11:00 Members of the ACCR representing different working groups for economics for pedagogy, psychology, kinantropology for law and precautionary branches for medicine	prof. PhDr. Jana Geršlová, CSc. +1 prof. PaedDr. Iva Stuchlíková, CSc. +1 JUDr. Radim Boháč +1 prof. MUDr. Michal Anděl, CSc. +1
11:00 - 11:30	Reflections of EB + small break	
5	11:30 - 12:30 Representatives of HE institutions UJEP (dean of pedagogical faculty)  VUT UJAK	doc. PhDr. et Mgr. Zdeněk Radvanovský, CSc.+2 prof. Ing. Karel Rais, CSc., MBA +1 doc. PhDr. Luboš Chaloupka, CSc. +1
12:30 - 13:00	Reflections of EB	

13:00 - 14:00	Lunch	
14:00 - 15:30 6	Chairwomen of the ACCR Secretary of the AC	prof. PhDr. Vladimíra Dvořáková, CSc. PhDr. Jiří Smrčka, Ph.D.
15:30 - 16:00	Reflections of EB + small break	
16:00 - 17:00 7	Representatives of the Ministry of Education vice-minister for research and HE director of HE department	prof. Ing. Vlastimil Růžička, CSc. doc. Ing. Václav Vinš, CSc
17:00 - 17:30	Reflections of EB + small break	
17:30 - 18:30 8	Academy of Sciences Czech rectors conference Council of HEIs of the Czech Republic (representative for quality)	prof. RNDr. Jan Zima, DrSc. Prof. MVDr. Vladimír Večerek, CSc., MBA prof. Ing. Vladimír Haasz, CSc. (+ doc. Ing. Eva Münsterová, CSc.)
18:30 - 19:30	Final debriefing of the day	members of the Evaluation Board
20:00	Dinner at the restaurant	
21:00	Discussion among the members of the EB	

### Day 3: Friday, December 18, 2009

Meeting place: Residence Dlouhá 17, Prague

Time	Event	Person for interview
7:45	Meeting of the Evaluation Board	EB
8:00 - 8:50 9	Previous members of the AC previous member of the AC (till 2006)	prof. PhDr. Jiří Mareš, CSc.
8:50 - 9:20	Reflections of EB + small break	
9:20 - 10:10 10	Group of students, Student Chamber of Council of HEIs vice-chair of the Student Chamber Academic Senate, AS UK, AS MFF UK Academic Senate, AS MFF UK Academic Senate, vice chair AS ČVUT	Radovan Iglar Marek Radecki Jiří Lipovský Vladimír Hromek
10:10 - 11:00	Debriefing of the EB, internal	EB
11:00 - 12:00 11	Final meeting with the president of the ACCR and its secretariat	prof. PhDr. Vladimíra Dvořáková, CSc. PhDr. Jiří Smrčka, Ph.D.
12:00 - 13:30	Final debriefing of the EB, internal	EB
13:30	Lunch	EB

Note on the abbreviations used: EB: evaluation board, UJEP: Jan Evangelista Purkyně University in Ústí nad Labem, VUT: Brno University of Technology, UJAK: Jan Ámos Komenský University Prague, AS: academic senate, UK: Charles University in Prague, MFF UK: Faculty of Mathematics and Physics of the Charles University in Prague, ČVUT: Czech Technical University in Prague.

## **5.2. Documentation provided**

Act No 111/1998 Coll. (amended and consolidated) on higher education institutions and on amendments and supplements to some other acts (The higher education act), <http://www.msmt.cz/areas-of-work/the-higher-education-act>

Statute of the Accreditation Commission, approved by the Government Decree, No. 744 dated 28<sup>th</sup> July 2004, accessible through the web site of the ACCR on <http://www.msmt.cz/areas-of-work/legislative-norms-and-associate>

Self-evaluation report of the ACCR, July 2009, available at <http://www.msmt.cz/areas-of-work/sebehodnotici-zprava-akreditacni-komise>

Decree of the Ministry of Education, Youth and Sports of 10<sup>th</sup> February 1999 on the content of applications for the accreditation of study programmes, <http://www.msmt.cz/areas-of-work/42-decree-issued-by-ministry-of-education-youth-and-sports-on-contents-of-application-for-study-programme-accreditation-1>

Accreditation Commission standards for assessing applications for the granting, extension and renewal of accreditation for study programmes and fields of study, approved by the ACCR at meeting No. 4/2003, amended in 2005, 2006 and 2009, <http://www.msmt.cz/areas-of-work/recommended-standards-of-the-accreditation-commission-for>

The field specifications of Standards, <http://www.msmt.cz/vzdelavani/specificke-pozadavky-pro-skupiny-oboru>

Annual reports of the ACCR, <http://www.msmt.cz/areas-of-work/annual-reports-1>

Internal evaluation reports on the ACCR, <http://www.msmt.cz/areas-of-work/internal-evaluation-of-accreditation-commission> and <http://www.msmt.cz/vzdelavani/vnitri-hodnoceni-akreditacni-komise>

Evaluation reports, <http://www.msmt.cz/vzdelavani/hodnoceni-vysokych-skol?ired=1>

Memorandum of the Minister of Education, Youth and Sports on the Independence of the Accreditation Commission (Article III, point 1), January 2010, available at <http://www.msmt.cz/areas-of-work/memorandum-of-the-minister-of-education-youth-and-sports-on>

Instruction of the Minister of Education, Youth and Sports, No. 19/2009 on the provision of material and financial resources for the activities of the Accreditation Commission established in line with Act No. 111/1998 Coll. on higher education institutions and on amendments and supplements to some other acts (the Higher education act), as amended and of its working groups; valid from June 1, 2009

### **Other documentation studied**

Minutes of the ACCR meetings, <http://www.msmt.cz/vzdelavani/2009>

Recommended form for the reviewers, [http://www.msmt.cz/uploads/soubory/akak/nalezitosti\\_zadosti/prirucka\\_pro\\_posuzovatele.doc](http://www.msmt.cz/uploads/soubory/akak/nalezitosti_zadosti/prirucka_pro_posuzovatele.doc)

Long-term plan for educational, scientific, research, development, artistic and other creative activities of higher education institutions for 2011-2015, available at web site of the Ministry <http://www.msmt.cz/vzdelavani/dlouhodoby-zamer-vzdelavaci-a-vedecke-vyzkumne-vyvojove-a>

Questionnaire for evaluation of non-university type of higher education institution, available in Czech on [http://aplikace.msmt.cz/AK/Dotaznik\\_NVS-2005.doc](http://aplikace.msmt.cz/AK/Dotaznik_NVS-2005.doc)

Framework scheme recommended by the Ministry: Annual report on activities of higher education institution for 2008 (Doporučená rámcová osnova: Výroční zpráva o činnosti veřejné vysoké školy za rok 2008), available at

[http://www.msmt.cz/uploads/soubory/vysoke\\_skoly/Doporucena\\_ramcova\\_osnova\\_Vyrocnizpravy\\_o\\_cinnostivvs\\_za\\_rok\\_2008.doc](http://www.msmt.cz/uploads/soubory/vysoke_skoly/Doporucena_ramcova_osnova_Vyrocnizpravy_o_cinnostivvs_za_rok_2008.doc)

Jan Evangelista Purkyně University in Ústí nad Labem, the evaluation report of the ACCR is available at

[http://www.msmt.cz/uploads/soubory/akak/hodnoceni\\_vs/hodnoceni\\_ujep\\_2008.doc](http://www.msmt.cz/uploads/soubory/akak/hodnoceni_vs/hodnoceni_ujep_2008.doc)

Higher education in the Czech Republic 2008, <http://www.msmt.cz/vzdelavani/publikace-k-vysokemu-skolstvi-v-cr-2008>

Other documents available at the web pages of the ACCR in English at <http://www.msmt.cz/areas-of-work/akreditacni-komise> and in Czech at <http://www.msmt.cz/vzdelavani/akreditacni-komise>

### **5.3. ENQA documents**

Guidelines for external reviews of quality assurance agencies in the European Higher Education Area, available at web pages of ENQA, <http://www.enqa.eu/documents.lasso>

ENQA membership provisions (page 43 of above mentioned document)

Regulations of ENQA (page 32)

Standards and Guidelines for Quality Assurance in the European Higher Education Area (page 48)

### **5.4. Terms of reference of the review**

#### **Terms of reference for External Evaluation of the Accreditation Commission of the Czech Republic**

##### **Article 1**

##### **Objectives, Scope and Deliverables**

- (1) The objective of external evaluation of the Accreditation Commission of the Czech Republic (hereinafter the "ACCR") is to check compliance with the ENQA membership criteria<sup>78</sup> and thereby the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (hereinafter the "ESG") developed by the European Association of Quality Assurance in Higher Education (hereinafter the "ENQA") and adopted by the European Ministers in charge of higher education in Bergen in 2005.
- (2) In line with the principle of subsidiarity, this review is conducted at national level, under the commission of the Ministry of Education, Youth and Sports of the Czech Republic (hereinafter "Ministry"). The interval between external evaluation cycles should not exceed 5 years. One external evaluation cycle should not exceed 18 months.
- (3) The external evaluation is of type A, as defined in the *ENQA Guidelines for national reviews of ENQA member agencies*, page 6 and 7 (hereinafter the "Guidelines"). The purpose of the review is the fulfilment of ENQA's membership criteria, i.e. European standards for the external quality assurance of higher education (part 2 of the ESG), European standards for external quality assurance agencies (part 3 of the ESG) and the miscellaneous criteria of ENQA.

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<sup>78</sup> ENQA membership criteria as mentioned in Annex 1 (Membership Provisions) of the Regulations of the European Association for Quality Assurance in Higher Education (ENQA) (from 26 September 2008).

- (4) The outcome of the external evaluation is the Report written by the Evaluation Board, analysing and concluding of how far the ACCR does (or does not) meet the criteria for full membership of ENQA (hereinafter the "Report").

## **Article 2**

### **Members of the Evaluation Board**

#### **Appointment and Nomination**

- (1) Members of the Evaluation Board are appointed by the Minister of Education, Youth and Sports for one external evaluation cycle as stated in Article 1 (2).
- (2) The Evaluation Board consists of at least six and at most nine members. Members of the Evaluation Board are representatives of stakeholders, experts in quality assurance in higher education and the secretary (hereinafter the "Evaluation Board").
- (3) The stakeholders in the Evaluation Board are represented by
  - a) one person as nominated by the employers' association,
  - b) one higher education student as nominated by the Student Chamber of the Council of Higher Education Institutions of the Czech Republic,
  - c) one representative of a higher education institution as nominated by the Czech Rectors Conference,
  - d) one expert from ENIC/NARIC as nominated by the ENIC/NARIC of the Czech Republic.
- (4) The experts on the Evaluation Board are internationally renowned specialists in higher education quality assurance. There are at most four experts on the Evaluation Board nominated for their positions by the Ministry.
- (5) The Evaluation Board secretary is recommended to be an employee of the Ministry and an expert in higher education. She / he is nominated for the post by the Ministry.
- (6) The ACCR has the right to comment just on the nominee whose impartial work in the Evaluation Board member could be in conflict with some other interests.

#### **Roles and Responsibilities**

- (7) Evaluation Board members vote for the chair and the vice-chair according to the electoral rules as defined in the Attachment 1 to this document. Roles and responsibilities of the chair, the vice-chair, the secretary and members of the Evaluation Board differ in respects mentioned below.
- (8) The **chair** of the Evaluation Board (hereinafter the "Chair")
  - a) is responsible for the Evaluation Board's activities and for the implementation of external evaluation of the ACCR,
  - b) convenes and chairs meetings of the Evaluation Board,
  - c) cooperates with the Evaluation Board's secretary in developing the Report on external evaluation and preparing background materials such as the schedule, a checklist of questions and a list of meetings during the site visit,
  - d) is responsible for the production of the Report on external evaluation and for discussing it with the ACCR; countersigns the final version of the Report,
  - e) carries out activities pursuant to Article 2 (11).
- (9) The **vice-chair** of the Evaluation Board (hereinafter the "Vice-chair")

- a) stands in for the Chair at meetings of the Evaluation Board and other meetings when the Chair is absent or when authorised by him/her to do so,
  - b) carries out activities pursuant to Article 2 (11).
- (10) The **secretary** of the Evaluation Board (hereinafter the "Secretary")
- a) is responsible for coordination of the external evaluation process and for providing all Board members with the relevant background materials in due time,
  - b) draws up the Report in cooperation with the Chair and distributes it to all Evaluation Board members, incorporates their comments and develops the first draft version and sends it to the ACCR for comments on factual correctness. After incorporating its comments, develops a final version of the Report,
  - c) carries out activities pursuant to Article 2 (11).
- (11) A **member** of the Evaluation Board
- a) takes part in the Evaluation Board's meetings,
  - b) is obliged to acquire a thorough knowledge of the ESG and support materials on external evaluation recommended by the ENQA - i.e. the Guidelines, the self-evaluation report of the ACCR and other materials as required,
  - c) comments on the draft of the Report and takes part in developing the final version of the Report,
  - d) cooperates in the development of background materials such as the schedule, a checklist of questions and a list of meetings during the site visit,
  - e) participates in other activities associated with external evaluation,
  - f) can be elected as Chair or Vice-chair of the Evaluation Board; the only member that cannot be elected Chair or Vice-chair is the Secretary,
  - g) has the right to vote.

### **Article 3**

#### **Process of External Evaluation**

- (1) The process of external evaluation of the ACCR is initiated based on a request by the ACCR to the Ministry, followed by the ministerial notification of the external evaluation to the ENQA Board.

#### **Evaluating the ACCR**

- (2) The Evaluation Board members, nominated and appointed according to the Article 2, carry out the external evaluation of the ACCR by testing its compliance with the ENQA membership criteria / ESG, as stated in Article 1 (3).
- (3) The Evaluation Board collects information about the ACCR from
  - a) the self-evaluation report of the ACCR (hereinafter the "SER"),
  - b) the criteria, procedures and outcomes of internal evaluation of the ACCR,
  - c) the interviews with the ACCR conducted as part of the site visit to the ACCR,
  - d) evaluation of the implementation of recommendations set out in the previous external evaluation report.

#### **Site Visit**

- (4) The Evaluation Board members make a site visit to the ACCR with the aim to check the validity of information contained in the SER and gather additional evidence as to the ACCR's operation and its compliance with ENQA membership criteria / ESG.

- (5) The site visit lasts two or three days and should involve, among other things, a meeting with
  - a) the chair of the ACCR,
  - b) the vice-chair of the ACCR,
  - c) the staff of the secretariat of the ACCR,
  - d) representatives of higher education institutions that the ACCR evaluates,
  - e) other members of the ACCR and other stakeholders who are involved in and understand the process of higher education quality assurance at the discretion of the Evaluation Board (representatives of employers, students, etc.).

## **Report**

- (6) The outcome of the external evaluation of the ACCR is a Report. The length should not exceed 40 pages in length, excluding the annexes.
- (7) The structure of the Report follows the Guidelines, report type A, mentioning
  - a) an executive summary, contextual information, the Terms of reference, the details of the timescale over which the review was conducted, the identity of all panel members and administrative support arrangements, a description of the main stages of the review, any recommendations for improvement,
  - b) for each criterion (the ESG part 2 and 3 / ENQA membership criteria) a summary of the evidence gathered, an analysis testing the compliance of the ACCR with the criterion, a summative conclusion stating a level of compliance (fully or substantially compliant, partially compliant, non-compliant),
  - c) any recommendations and conclusion
  - d) annexes may be added.
- (8) The Report is drafted by the Secretary in cooperation with the Chair, based on the Evaluation Board findings. First draft version is sent to the ACCR for comments on its factual accuracy within six weeks of the site visit. The ACCR will submit any amendments to the Report relating to factual accuracy to the Secretary for consideration, in two weeks after the receipt of the draft Report. After incorporating its comments, the Report is finalised and sent to the ACCR and the ENQA secretariat by the Secretary.
- (9) The Report will be completed within ten weeks after the site visit.
- (10) The ACCR can form a statement to the final version of the Report (hereinafter the "Statement") and send it to the ENQA secretariat and the Secretary. The Report along with the Statement is made public.

## **Article 4 Time Schedule**

The time plan for the External evaluation of the ACCR is as follows:

Production of the Statute	June 10, 2008
Request by the ACCR for the external evaluation	Novem. 11, 2008
Nominations and appointment of the Evaluation Board members	June 2009
Production of the self-evaluation report by the ACCR	July 2009
Briefing meeting	July 2009
All the documentation sent to the Evaluation Board members	July 2009
Modification of the Terms of reference	September 2009
Preparatory meeting for the site visit	October 2009
Site visit	Nov./Dec. 2009

Draft of the Report delivered to the ACCR for factual correctness	January 2010
Statement of the ACCR to Evaluation Board, if necessary	January 2010
Submission of the final version of the Report to the ACCR and ENQA	February 2010
Statement of the ACCR on the Report, sent to the ENQA	February 2010
Consideration of the Report and the Statement by ENQA	March 2010
Publication of the Report and the Statement	April 2010

## **Article 5 Evaluation Board Resources**

The material and technical resources for the activities of the Board for evaluation of the ACCR are provided by the Ministry of Education, Youth and Sports of the Czech Republic.

## **Article 6 Special Provision**

- (1) This Terms of Reference for External Evaluation of the Accreditation Commission modifies the Statute for the Evaluation Board for the External Evaluation of the Accreditation Commission of the Czech Republic and the Accreditation Commission of the Slovak Republic approved by the respective ministers on 10<sup>th</sup> June 2008. The change has been made based on the ENQA Board recommendations made on its official meeting held on September 7, 2009.
- (2) The Terms of reference for External Evaluation of the ACCR may be amended to incorporate comments by the European Association of Quality Assurance in Higher Education (ENQA).

## **Article 7 Final Provision**

The Terms of reference for External Evaluation of the ACCR has been approved by the Ministry of Education, Youth and Sports of the Czech Republic.

In Prague on 30 September 2009

Miroslava Kopicová, Minister of Education, Youth and Sports

## **Attachment 1 Electoral Rules and Rules of Procedure**

- (1) The Evaluation Board has between six and nine members, all of them having the same voting right. The quorum is a majority of all Evaluation Board members.
- (2) Evaluation Board meetings are not open to the public. Representatives of the ACCR and other guests may only be invited to the meeting by the Chair or the Vice-chair in line with Article 2 (9).
- (3) The first meeting of the Evaluation Board is convened by the Secretary.
- (4) The first meeting is chaired by the Secretary or by an Evaluation Board member authorised to do so by him/her. In the course of the first meeting the Evaluation Board sets up a two-member election committee in order to elect the Chair and the Vice-chair. Nominated candidates for the posts of Chair and Vice-chair who have expressed consent to their candidature cannot be members of the election committee. The election of the Chair and the Vice-chair is overseen by the more senior member of the election committee. If the election committee cannot be set up via the procedure described above it will consist of the Secretary and one member identified by drawing lots.

- (5) All members of the Evaluation Board are entitled to present nominations for the Chair and Vice-chair. The Evaluation Board takes decisions on the nominations via a secret ballot. In the first round the member who gets a majority of votes of all Board members is elected Chair or Vice-chair. If there is no such majority after the first round, then in the second round the member is elected who gets a majority of votes of the members present. If there is no such majority, in the third round the member who gets the largest number of the votes is elected. If there is a tie in the third round, the election is repeated only for those candidates who each obtained the largest number of votes.
- (6) If the Chair or the Vice-chair is not elected in line with the rules described above, the election process is repeated. The Chair and Vice-chair must be elected in this second election process.
- (7) The second and following meetings of the Evaluation Board are convened by the Chair or by the Vice-chair pursuant to Article 2 (9).
- (8) The Report, including conclusions and recommendations resulting from the external evaluation process, is discussed by all members of the Evaluation Board. The final version of the Report is agreed upon by the Evaluation Board by means of voting. The Report is adopted provided that a majority of all present members of the Evaluation Board voted in favour (pursuant to point 1 of the Electoral Rules and Rules of Procedure). If there is a tie, the Chair or Vice-chair has a casting vote pursuant to Article 2 (9).

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