

**Report on the Accreditation Commission's
Internal Quality Assurance 2014**

February 2015

STARTING POINTS FOR EVALUATION

The Accreditation Commission (ACCR) carries out regular internal evaluation and reflects on its recent activities. Internal quality assurance is to facilitate critical insight into the procedures and working structure of the ACCR, while also to reveal room for improvement and possible direction of further development. The internal quality assurance process is linked to external quality assurance conducted by the European Association for Quality Assurance in Higher Education (ENQA) that the ACCR undergoes roughly every five years. An international panel of expert reviewers assesses the ACCR's compliance with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and formulates recommendations towards their fulfilment. The positive outcome of the external review is a precondition for membership in ENQA, a major European structure representing accreditation agencies in the European Higher Education Area.

The ACCR has carried out periodic internal evaluation since 2007. Recently the internal evaluation processes have focused on reflection of the external review of 2010 and recommendations made by the panel. The 2010 internal evaluation analysed the external review report alongside the measures adopted to fulfil the review panel's recommendations. The following internal evaluation was conducted in 2011-2012 and based itself on survey research among the ACCR's members, members of its working groups, the secretariat and other involved persons; they expressed their views on the developments in the preceding period. In 2013 the ACCR compared the review panel's recommendations with the findings of survey research, identified the common ground and finally stated its position in the areas where these two evaluation processes deviated from each other. In its internal evaluation in 2012-2013 the ACCR took the opportunity to carry out yet another analysis of the measures taken to comply with the external review recommendations, pointing to room for further improvement. In its report on internal quality assurance the ACCR also accessed the draft revision of the ESG in relation to its activities and the national context and drew attention to problematic points contained in the revised standards.

The ENQA external review of the ACCR in 2010 has had a significant impact on the concept and content of internal evaluation in the following period. As the external review process emphasizes continuous remedy of deficiencies identified by the panel, the ACCR created the Progress Report on the Actions taken by 2012, which

also constitutes a part of internal quality assurance. The current internal evaluation of 2014 was carried out in light of the upcoming second external review planned for 2015 and especially with regards to the complex self-evaluation report of the ACCR that shall place its compliance with Part 2 (external quality assurance processes) and Part 3 (accreditation agencies) of the ESG under critical examination. The ACCR will be assessed against the new ESG; the adoption of their revised version is expected at the Ministers' conference in May 2015 in Yerevan.

Expert debates and policy creation in the field of quality assurance of higher education on the European level have lately placed major emphasis on the interests of stakeholders and the involvement of various groups of stakeholders in external quality assurance processes. In consequence, the internal evaluation of the ACCR in 2014 focused on the issue of stakeholders in diverse aspects of its activity. This report aims to define groups of stakeholders from the ACCR's view and analyse their involvement in external quality assurance processes in the Czech Republic. As a part of the internal evaluation, feedback on their involvement in the ACCR's activities was sought in the form of survey answers from stakeholders. Finally, a critical analysis of the current state of affairs will point to room for improvement in the cooperation with stakeholders and contribute to preparation for the upcoming external review. As the external review will assess the compliance of ACCR's procedures and processes with the ESG, this internal evaluation was conducted with reflection on the ESG.

DEFINITION OF STAKEHOLDER GROUPS

On the European level, stakeholders in quality assurance of higher education are understood as all persons and groups with a stake in the field. The ESG, which were created largely by European networks of accreditation agencies, universities and students, consider students, higher education institutions, labour market representatives and employers as stakeholders. The revised ESG to be approved in May 2015 holds "all actors within an institution, including students and staff, as well as external stakeholders such as employers and external partners of an institution" for stakeholders. It is clear that the European concept of stakeholder is rather broad and requires accreditation agencies to implant it to their respective national contexts.

In ACCR's view, "stakeholders" in the Czech context are those directly impacted by the quality of higher education. They are such actors that have their

needs and interests in the quality of higher education determined by their notion of their own prosperity and success. Therefore, higher education institutions (HEIs) are not conceptualized as stakeholders for the purposes of this analysis because they are on the contrary the providers of higher education. Similarly, state administration such as the Ministry of Education, Youth and Sports, who exercises public authority in the common interest, are not considered stakeholders (however, state administration bodies can be seen as stakeholders in their position of regulatory bodies for regulated professions – see below).

Stakeholders	students employers professional chambers, regulatory bodies
Partners	representations of HEIs
Other actors in higher education	state administration

The first group of stakeholders to be considered are **students**. The group encompasses high school students and other potential applicants to higher education study programmes, their parents, and close family of HEI students, but the most significant stakeholders are the students themselves as the recipients and active participants in higher education. Students are represented in the Council of Higher Education Institutions through its Student Chamber. Student stakeholders clearly have their expectations and needs in higher education. Although their particular interests may come across as diverse, sufficient quality of obtained education should be their central point.

Another significant group of stakeholders are **employers**, who are invested in the issue of quality of higher education mainly with regards to the quality of graduates entering the labour market. Not only individual employers but also profession-specific employer associations belong to this group of stakeholders. Also their interests should emphasize sufficient quality of higher education that would contribute to the development of their respective fields and last but not least to the competitiveness of employers of higher education graduates. As care for quality of higher education in the Czech Republic is the key mission of the ACCR, it is only natural that students as well as employers get involved in selected activities of the ACCR.

The third group of stakeholders consists of **professional chambers and regulatory bodies** in correspondence with Section 79 (1) (f) of the Higher Education Act of 1998. Professional chambers are not employers on their own but membership

in the respective chamber typically preconditions the execution of the given profession. Other regulatory bodies, mostly state administration such as ministries and other bureaus, are often major employers in regulated professions and moreover fulfil a regulatory role in professions that require specific regulations (i.e. health care, social work, and many more). In the case of the University of Defence and the Police Academy, the Ministry of Defence and the Ministry of the Interior, respectively, are considered stakeholders as they exercise special competences stipulated in the Higher Education Act towards these institutions. The needs of this stakeholder group in higher education in the respective fields should be driven primarily by the common interest in the execution of regulated professions.

The fact that HEIs are not taken for stakeholders as defined here does not imply that they take no part in the ACCR's activities. The ACCR is empowered to pursue its mission in the extent and in ways granted by the Higher Education Act; yet it is not a superior body for the HEIs nor does it assume a supervisory role. On the contrary, the ACCR aims to strengthen and develop internal quality assurance systems of HEIs through external quality assurance processes, which requires two-way discussions about the issues of quality that are beneficial for both parties. The ACCR sees the representations of HEIs – the Council of HEIs and the Czech Rectors Conference (CRC) – as its partners.

CURRENT STATE OF STAKEHOLDER INVOLVEMENT IN THE ACCR'S ACTIVITIES

While the interpretation of the term “stakeholder” in quality assurance of higher education is in the European concept very broad and translatable to diverse national contexts, the ESG are explicit in their support for a strong role of stakeholders in the care for quality of higher education. Stakeholders have been involved in the creation of quality assurance systems; their needs and interests continue to stand in the forefront of external quality assurance. The ESG (in their present and even more so in their revised version) assign stakeholders a role in the formulation of external quality assurance goals, design of processes and methodologies as well as management and activities of accreditation agencies. At the same time, however, it is crucial that agencies stay independent of stakeholders. The ESG emphasize not only organisational and functional independence but also the fact

that despite the involvement of stakeholders, the agency itself remains responsible for the outputs of external quality assurance processes.

Let us analyse the involvement of stakeholder groups in selected activities of the ACCR, in particular in the design of concepts and procedures of quality assurance in higher education but also in the accreditation and evaluation processes. It is important that the involvement of stakeholders in the ACCR's activities is not purposeless (in the sense of everyone having their representative to protect their interests); it has to make a positive impact on the ACCR's mission – care for quality of higher education. In line with this idea, stakeholders take part in activities and processes, in which their participation can contribute to better fulfilment of the ACCR's mission.

In relation to the first mentioned area of stakeholder involvement, **the design of processes and methodologies**, the ACCR's standards for study programmes and procedures of appointment of associate professors and professors play a key role. Even though today the standards are laid down in single (continuously updated) documents, they have emerged gradually over the years in correspondence to the developments in higher education and the ACCR's experience. Updates of the standards and addition of new standards are born at the ACCR's meetings that are regularly attended by representatives of the Council of HEIs and the CRC; these take active part in discussions about the standards. Students are not represented as such in these meetings.

The issue of employer stakeholders' involvement in the design of concepts of external quality assurance in higher education deserves careful consideration. They constitute a significant group of stakeholders and it can be assumed that specific groups of employers have specific interests and expectations (on the basis of their professional affiliation) on the content of study programmes and the graduate's profiles. Design of study programmes, however, belongs among the self-governing competences of the HEIs and thus employers play only a consultative role with the ACCR. Discussions about graduate employment and the labour market needs are first and foremost a matter of the relationship between HEIs and representatives of professions. The interaction between employers and HEIs is therefore crucial as the HEIs are primarily responsible for the content of study programmes and graduate's profiles. It follows that direct involvement of stakeholders in the design of study programmes can be beneficial at the HEI level. The ACCR can become a mediator

and facilitate a dialogue with reference to quality assurance processes in higher education.

The same principle applies for stakeholders from professional chambers and regulatory bodies. The nature of their involvement in the design of concepts and methodologies of quality assurance is consultative. In the past year, for instance, a conceptual debate took place between the ACCR's working group for veterinary medicine and the Chamber of Veterinary Surgeons of the Czech Republic; it revolved around the content of study programmes in veterinary medicine and their graduate's profiles. Cooperation of professional chambers directly with HEIs is however no less important; the ACCR can act as a facilitator. Debates with representatives of employers, professional chambers and regulatory bodies can also serve as useful feedback for the work of working groups and the ACCR itself.

Stakeholders play a role also in **the undertaking of external quality assurance processes in higher education**. Yet, it is necessary to keep in mind that also in this case a purely representative principle, when stakeholders are not accountable for the activity and mission of the institution, is counterproductive and does not make a contribution to the fulfilment of the ACCR's mission. Participation of stakeholders in external quality assurance procedures must allow for independence of the ACCR and lead to objective formal as well as informal outputs of these processes, uninfluenced by third parties. In the context of the ACCR, stakeholders take part in the accreditation and evaluation processes.

Non-academic experts are represented in the ACCR's permanent working groups that form one level of accreditation application assessment. At present there are twelve experts from industry in nine working groups.

ACCR's working group	Number of non-academic experts
Agriculture, forestry and food studies	0
Applied informatics and computer technology	0
Art sciences	1
Biology and ecology	0
Economics	1
Education, psychology and sports studies	2
Geosciences	0
Health care	0
History	0
Chemistry	0
Law and public administration	2

Mathematics and theoretical informatics	1
Medical and health sciences	1
Military and security studies	1
Pharmacy	2
Philology and literary science	0
Philosophy, theology and religious sciences	0
Physics	0
Social sciences	0
Subjects didactics	0
Technical sciences	0
Veterinary medicine	1

Importantly, the non-academic experts are not appointed to the working groups primarily as representatives of specific employers or employer associations, but rather for their expertise and qualification. Their main role is not to represent and put forward the interests of their home institution (same as for working groups' members who are academic staff of the HEIs or scientific staff of institutes of the Academy of Sciences); they are expected to introduce the perspective of industry to the working group. The ACCR's standards for assessment of applications are binding for all members of working groups. Up until June 2013, a non-academic expert was a member of the ACCR and had the opportunity to participate in conceptual debates about quality of higher education from the employers' point of view. Today there is no non-academic expert in the composition of the ACCR; an opportunity to appoint one does not come up until part of the mandates expires in 2016.

Concerning study programmes leading to execution of regulated professions, the regulatory bodies enter the accreditation process in line with the Higher Education Act. They are mostly state administration bodies (ministries and other bureaus), professional chambers and the Ministry of Health for study programmes in health care. The regulatory bodies (and the Ministry of Health where relevant) issue statements to applications for accreditation of study programmes that lead to the execution of regulated (or health) professions with regards to the preparedness of graduates to carry out the profession. They hereby become another group of actors that are involved in the design of study programmes. The ACCR takes into account their statements when issuing its own statements to applications for accreditation. In the case of study programmes of the military HEI, it is the Ministry of Defence, and in the case of the police HEI, the Ministry of the Interior issues their statement. These statements, however, are requested by the Ministry of Education, Youth and Sports in

the process of issuing the accreditation decision – after assessment and statement by the ACCR. The Ministries of Defence and the Interior therefore do not exert direct influence on the ACCR's activity. The procedure for involvement of regulatory bodies and ministries with special competences is stipulated in the Higher Education Act.

The involvement of students makes a great contribution to evaluation of the quality of the HEIs, which is another quality assurance tool used by the ACCR in its care for quality of higher education. Student representatives nominated by the Student Chamber of the Council of HEIs regularly take part in the work of ad-hoc working groups that are appointed for evaluation of HEIs and their accredited activities. In 2014 they participated in every evaluation of HEIs and their units. The students' tasks include evaluation of the quality of studies from the point of view of students through surveys and interviews with students during the site visit. The ACCR highly values cooperation with the Student Chamber of the Council of HEIs and considers student participation in the evaluation of HEIs as an effective way to capture significant aspects of a HEI's operation. Non-academic experts, mostly those who are members of permanent working groups, are also involved in evaluation of HEIs as members of the ad-hoc working groups. Ten evaluations of HEIs and their units were conducted in 2014; a non-academic expert participated in three of those.

Stakeholders do not interfere with the ACCR's independence through their involvement. The ACCR is by law an independent body composed of widely recognized expert authorities; it consists of 21 members. Its structure does not provide for a council or board, unlike many European accreditation agencies, in which stakeholders could take part in management and influence the ACCR's activity on the organizational level. Non-academic experts and students engage in selected activities of the ACCR in a way that allows them to make a contribution to better care for quality of higher education. The ACCR nevertheless maintains its independence and responsibility for formal outputs of its activity.

POSSIBILITIES AND OUTLOOK FOR STAKEHOLDER INVOLVEMENT

The present state of stakeholder involvement in the ACCR's activities has its strengths as well as weaknesses.

Strengths	<ul style="list-style-type: none"> • purposeful involvement of stakeholders and partners in specific activities of the ACCR • preserved independence of the ACCR from stakeholders and partners
Weaknesses	<ul style="list-style-type: none"> • limited involvement of stakeholders in the design of concepts and procedures of external quality assurance

Among the strengths is the emphasis on purposeful involvement of stakeholders over a purely representative principle of everyone having their representative to protect their interests. The ACCR has effectively used the participation of stakeholders in specific aspects of its activities to better fulfilment of its mission to care for the quality of higher education; although there is still room for improvement. Another strength of the present approach is the preservation of the ACCR's independence from stakeholders and the HEIs alike. The present approach to stakeholders does not allow the ACCR to become a tool of one group of stakeholders to pursue their partial interests vis-à-vis other actors. The ACCR, on the contrary, perceives its role as an intermediary in key conceptual debates, providing the opportunity to bring in conceptual and procedural elements of external quality assurance of higher education. In line with this role, the ACCR representatives have attended national roundtables for the conception of future teachers' higher education, which are organized by the Ministry of Education, Youth and Sports and involve mainly HEIs and primary and secondary schools representatives.

A weakness could be seen in the fact that the involvement of stakeholders in the design of concepts and procedures of external quality assurance of higher education is only limited. They do not directly participate in key discussions that give rise to updates and additions to the ACCR's standards. None of employer representatives, students or professional chambers and regulatory bodies attend the ACCR's meetings; moreover, there is no mechanism for their consultation outside the meetings. On the other hand, the ACCR bases its work on the assumption that the main interest of students, employers, professional chambers and regulatory bodies in higher education is its quality that enables successful career paths to graduates and development of professions as well as recruitment of quality employees to employers. The ACCR seeks to pursue its mission and tasks endowed by the Higher Education

Act in a way that leads to fulfilment of these expectations. There is indeed space for greater involvement of stakeholders in conceptual discussions about the standards and procedures of the ACCR; however it is necessary to always weigh the purpose and possible benefit of involving specific groups of stakeholders in specific cases and to avoid their purposeless involvement.

It might be necessary to clarify the ACCR's interpretation of "stakeholder" in the national context as it does not include the HEIs, while the ESG do consider HEIs to be stakeholders. The representations of HEIs are natural partners for the ACCR, as follows from its mission statement, and do take part in the ACCR's activities mainly in the issues of design of concepts and standards. Their involvement in the accreditation and evaluation processes is, on the other hand, not desirable by nature.

The ACCR did small-scale survey research among selected stakeholders to obtain feedback about their own assessment of their involvement in the ACCR's activities, the benefit it brings them, and their idea of future participation in the ACCR's activities. Three members of permanent working groups (two of those engaged in evaluation of HEIs in 2014), three members of the Student Chamber of the Council of HEIs, and one member of a representation of HEIs responded to the survey.

The survey showed that the respondents view their involvement in the ACCR's activities as necessary and useful not only for the ACCR but also for the groups of stakeholders they represent. Employer representatives appreciate in particular the chance to voice their opinion on the proposed study programmes when they participate in the accreditation process on the working group level, as well as the opportunity for the academic community and industry to engage with one another in the working groups. According to the students from the Student Chamber of the Council of HEIs, their involvement allows them to acquaint themselves with the accreditation process and the role of the ACCR in higher education, providing also for more effective representation of students in the internal representative bodies of HEIs. From the point of view of the representation of HEIs, the opportunities to observe the accreditation process, directly communicate with the ACCR members about higher education and together discuss opinions and positions with other guests at the ACCR meetings are especially valued. The survey results more or less confirm the findings of the internal evaluation of the ACCR. The responses reveal that the stakeholders

consider their involvement in the ACCR's activities to be beneficial and propose further course of development.

The employer representatives voice a desire for even greater cooperation with the ACCR not only in design of the concepts of education to specific professions but also in assessment of different aspects of study programmes like the employability of graduates. The ACCR is interested in maintaining the membership of non-academic experts in its working groups and preserve their representation when the working groups' composition changes. It would also be beneficial to ensure the involvement of non-academic experts in evaluation of HEIs in cases when the nature of the study programmes requires it (especially in fields with a strong connection to specific professions). A non-academic expert is lacking from the membership of the ACCR, therefore it would be desirable to consider appointment of an expert authority from the non-academic sphere in the next round of appointment of the ACCR members.

Student respondents unanimously stand for maintaining or possibly deepening cooperation with the ACCR. One of the respondents from the Student Chamber of the Council of HEIs pointed to the need to clarify the role of students in evaluation of HEIs and to provide him/her with a better feedback on their work. It is the strong interest of the ACCR to continue and develop cooperation with the Student Chamber of the Council of HEIs in evaluation of HEIs. An appropriate way to do so could be to obtain and analyse wider feedback from its members who have participated in the evaluations. The results of such analysis could reflect into the ACCR's activities. More effective involvement of students in evaluation of HEIs should also be aided by a methodical guide for the ad-hoc working groups that is currently being drafted.

As concerns the representation of HEIs, mutual interaction with the ACCR should continue and strive to balance independence of the ACCR on one hand and the role that belongs to the representations on the other. The respondent would welcome a reciprocal relationship such that a representative of the ACCR would on occasion attend the meetings of the representation of HEIs in return. The ACCR intends to continue to involve guests from representations of HEIs in conceptual debates at its meetings and if possible to participate in the representations' meetings when invited. With respect to the professional chambers and other regulatory bodies who constitute the third group of stakeholders, the ACCR will continue to follow the procedures stipulated in the Higher Education Act.

The self-evaluation process and the drafting of the self-evaluation report of the ACCR during the ENQA external review in 2015 will provide another significant opportunity to involve stakeholders.

CONCLUSIONS AND RECOMMENDATIONS

The ACCR takes care of the quality of higher education; interaction with other actors in higher education is an integral part of its activity. Employers, students, professional chambers and regulatory bodies are stakeholders in external quality assurance of higher education, while the representations of HEIs are natural partners for the ACCR. Stakeholders are engaged in the design of concepts and procedures of external quality assurance as well as the accreditation and evaluation processes to different degrees. In the former case, their participation in the ACCR's activities is limited and has rather a consultative nature. The representations of HEIs take part in discussions about updates and additions to the ACCR standards to a greater degree. In the latter case, the accreditation and evaluation processes grant a role to all groups of stakeholders: employers (in accreditation and evaluation processes), students (mainly in evaluation), professional chambers and regulatory bodies (mainly in accreditation).

The ACCR adheres to the principle of purposefulness of stakeholder involvement and avoids their purposeless engagement on the basis of a purely representative principle. At the same time, the ACCR maintains its independence from stakeholders and partners alike. On the other hand, there is still room for greater involvement of stakeholders in the design of concepts and procedures of external quality assurance and also in the accreditation and evaluation processes. This analysis and the survey research findings lead to the following recommendations:

- 1) Continue to ensure the involvement of stakeholders in selected activities of the ACCR on the basis of its purpose and possible benefit to the ACCR's mission.
- 2) Continuously reflect on the state of stakeholder involvement and open new possibilities if their participation can contribute to better care for the quality of higher education.
- 3) Pay attention to preserving the independence of the ACCR on third parties when involving stakeholders and partners and when interacting with other actors in higher education.

- 4) Consider appointment of a non-academic expert in the next round of appointment of ACCR members.
- 5) Maintain and possibly increase the representation of non-academic experts in permanent working groups of the ACCR and involve them in ad-hoc working groups as required.
- 6) Continue and develop cooperation with the Student Chamber of the Council of HEIs on the ACCR's activities, particularly in evaluation of HEIs.

The ACCR shall have the major share on fulfilling these recommendations; however it is obvious that some measures necessitate actions of other actors in higher education (e.g. recommendation 4). The recommendations can be lived up to only gradually and need to reflect the future development of the ACCR and its activities.

The key significance of this internal evaluation lies in the analysis of one of the aspects of the ACCR's activity, emphasizing the strengths and weaknesses and pointing to further possibilities in the ACCR's approach to stakeholder involvement. The internal evaluation will contribute to drafting the self-evaluation report for the ENQA external review in 2015. The expert panel of reviewers will assess the compliance of the ACCR's activities, including engagement of stakeholders, with the ESG. This analysis of stakeholder involvement in the ACCR's activities will constitute a basis for elaborating this issue in the self-evaluation report.