Report on the Accreditation Commission's Internal Quality Assurance 2010

January 2011

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INTRODUCTION

The Accreditation Commission of the Czech Republic (the ACCR) pays systematic attention to evaluation and assessment of the quality of higher education institutions and assists them in their quality assurance processes. This mission of the Accreditation Commission is derived from Act No. 111/1998 Coll. on higher education institutions and on amendments and supplements to some other acts, and from the ACCR's membership of international associations such as the ENQA (European Association for Quality Assurance in Higher Education) and INQAAHE (International Network for Quality Assurance Agencies in Higher Education).

The Accreditation Commission realises that independent evaluation must be of high quality, mainly because the ACCR itself strives to achieve a high level of quality in its operations. These are the reasons behind the ACCR's efforts aimed at the continuous improvement of its activities.

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereinafter referred to as ESG), the implementation of which is one of the conditions for ENQA membership, set out a cyclical review of accreditation agencies (so-called peer review) as a necessary part of the quality assurance process. This evaluation must be implemented in two ways – as an external review and as an internal quality assurance process. The latter consists in the accreditation body's developing internal mechanisms through which it monitors and assesses the quality of its own activities. The internal quality assurance procedure should serve as a basis for the external review. This means that every 3-5 years a comprehensive self-evaluation report should be developed that will be assessed by an independent panel established for the purpose of external review. However, internal quality assurance must be carried out every year, since it is necessary to implement a regular analysis of topical problems and of ways in which the Accreditation Commission has been dealing with the recommendations resulting from the previous internal quality assurance report.

2010 is exceptional in that the first external review of the Accreditation Commission was completed in this year. In June 2010 the report on the external review of the ACCR was assessed by the ENQA committee and based on this the ENQA General Assembly confirmed the Accreditation Commission's full membership status for another five-year period. The report on the external review of the ACCR is a detailed analytical work containing a number

of important observations and recommendations concerning the ACCR's activities and, in general, the system of quality assurance in higher education in the Czech Republic. It appears to be an absolute necessity to carry out a detailed review of this report and to consider ways of incorporating the recommendations made in the report within the ACCR's operations.

The internal assurance process for 2010 therefore combines an analysis on the one hand of the ways in which, and the extent to which, drawbacks and risks mentioned in the previous internal quality assurance reports are being redressed (the so-called follow-up report), with reflection on the report on the external review of the Accreditation Commission on the other hand.

STARTING POINTS FOR ASSESSING THE CURRENT STATE OF AFFAIRS

The internal quality assurance reports for 2007, 2008 and 2009 presented the strengths and weaknesses of the work of the Accreditation Commission. The clearly positive observations were as follows: 1) all procedures and results of the ACCR's activities are in line with its mission and goals related to quality assurance; 2) the ACCR has a well-operating system for avoiding a conflict of interests, while its decisions and recommendations are consistent and independent of the pressures exerted by interest groups and government institutions; 3) the ACCR has a well-operating system for the internal quality assurance of its activities. Internal feedback is part of this system (so that attention is paid to the views of the members of the ACCR and the standing working groups, as well as to those of the Secretariat staff and the academic community).

The internal process has also identified the main areas where there is still major room for improvement as concerns implementation of the ESG and good practice examples of foreign higher education quality assurance agencies. Along with identifying these weaknesses, recommendations were made for eliminating shortcomings and for enhancing the way activities were carried out. A significant number of these shortcomings were removed as early as 2008 and 2009. This result was mentioned in both previous reports on internal quality assurance. However, many of the problems and risks could not be eliminated in an operational manner, either because they are policy-related and a change is impossible without the corresponding agreement on the part of institutions regulating higher education policies (e.g. some changes may only be implemented as part of the legislative process), or because their elimination requires a longer time period.

Many of these points were also mentioned in the report on the external review of the Accreditation Commission. Moreover, the report described certain risks that the ACCR did

not perceive as topical, but that may pose severe potential difficulties in the long term and in the context of the higher education quality assurance system as a whole.

The internal assurance reports for 2007, 2008 and 2009 contain six major recommendations to enhance the quality of the work of the Accreditation Commission:

1. The ACCR should strive to increase the effectiveness of its operations and to create space for discussion on policy matters.
2. Discussion is also needed that should lead to specification of the criteria applied, above all, to Master and Doctoral study programmes and to applications for accreditation of procedures concerning associate professors (so-called "habilitation") and full professors.
3. It is necessary to strengthen communication between the ACCR and the working groups. It is necessary to ensure there is a uniform methodology for assessing applications and evaluating institutions by standing working groups and working groups set up for a particular purpose (ad-hoc working groups). In this context it is necessary to make better use of the websites as well as direct contact with the working groups.
4. It is necessary to focus on enhancing awareness on the part of higher education institutions and the general public about the work of the ACCR.
5. The ACCR should strive for a higher level of involvement of students and experts from industry in both the standing and ad-hoc working groups.
6. It is necessary to make a request to the Ministry of Education, Youth and Sports (MoEYS) to increase the budget of the ACCR in relation to the new tasks resulting from the Czech Republic's participation in the Bologna process and for enhancing the work of the ACCR's Secretariat (in terms of both human and material resources).

The report on the external review of the Accreditation Commission of 2010 stated, apart from other things, the following major recommendations:

A) While complying with the ESG standards (No. 2.1. – 2.8.) the ACCR should:
1. enhance the monitoring of the level of development of the internal quality assurance procedures at higher education institutions; contribute to the development of these systems and their harmonisation;
2. enlarge the scope of cooperation with students and experts from industry in external quality assurance;

3. streamline the process of submitting applications for accreditation; complete its new website design; arrange for the development of a web-based application that would facilitate modernisation of the ACCR's administrative procedures, including the system for archiving all materials and written documents.

4. emphasise the ACCR's general requirements and criteria at the expense of specific requirements of the working groups. These specific requirements of working groups for various fields of study should not be accepted unless they are approved by the ACCR. The professional public should be involved in the design of the criteria and in discussion about standards.

5. reduce the length of the accreditation process and make it more flexible;

6. limit the proportion of repeatedly filed applications for accreditation that have not been granted as a result of the proceedings;

7. train members of the ACCR and the working groups in a systematic manner;

8. make the process of nominating members of working groups open to comments from representatives of higher education institutions, and introduce a system for regular change in the composition of the working groups;

9. strive for the introduction of uniform rules of procedure for all working groups and rules for remuneration of the members of working groups and reviewers;

10. enhance levels of cooperation with representatives of employers. This cooperation should also include expert analyses. The summary analysis of the quality of higher education (that is part of the annual report) should be complemented by a chapter on research.

B) While complying with the ESG standards (No. 3.1. – 3.8.) the ACCR should:

1. ensure a stable budget for its activities each year; this means a certain minimum level of financial resources should be annually allocated to the ACCR from the national budget; expand the scope of funding so that the ACCR may develop its activities as a quality assurance agency; find alternative sources of funding and ensure they are incorporated with the national legislation;

2. formulate its own policy statement that should set out its policies and overall strategy;

3. change the procedure for nominating members of the ACCR so that the ACCR's composition is the result of a consensus between the government, representatives of higher education institutions and other key institutions; accept representatives of students as members of the Accreditation Commission;

4. make the operations of the working groups more formal; set the rules for selecting members of the working groups so that representatives of higher education institutions and other key institutions may express their views on the nominees; introduce an obligation to work as part of a working group so that no member of the ACCR can work on his/her own;

5. remove the ACCR's Secretariat from the organisational structure of the Ministry of Education, Youth and Sports; strengthen its autonomy and independence of the activities of the Ministry (including internal regulations, financial planning and human resources management);

6. formulate a methodology for the internal and external quality assurance of the Accreditation; define formal requirements for reports (including follow-up steps and the action plan); identify instruments to be used in securing feedback and clarify the relationship between the annually published report on internal quality assurance and the self-evaluation report (prepared once every five years as a basis for external review); codify the internal and external assurance procedures in the Accreditation Commission's official documents.

In order to implement the aforementioned recommendations the Accreditation Commission took the following steps in 2010:

ENHANCING THE EFFECTIVENESS OF ACTIVITIES AND CREATING ROOM FOR DISCUSSION ON POLICY MATTERS

a) The principal step towards improving the effectiveness of the work of the ACCR: a shift from accreditation of study programmes to accreditation of institutions.

The transition from programme accreditation to institutional accreditation was launched in 2008 when the ACCR began to connect evaluation of institutions with a statement on the extension of accreditation granted to study programmes. Good practice examples in this context are the evaluation of Jan Evangelista Purkyně University in Ústí nad Labem (the evaluation report was discussed at ACCR's meeting No. 5/2008 in November 2008) and the evaluation of Karlovy Vary Higher Education Institution, o.p.s. (the evaluation report was discussed at ACCR's meeting No. 2/2010 in April 2010). Following a thorough evaluation of these higher education institutions, the Accreditation Commission agreed to extend the

validity of accreditation granted to all Bachelor (Master) degree programmes. In this way the period of validity of accreditation of all study programmes was unified, which means that next time institutions will apply for an extension of accreditation for all programmes at the same time. The ACCR will therefore be able to evaluate the accredited activities from a more comprehensive perspective and there will also be a significant decrease in the administrative burden in the meantime.

These two examples illustrate the ACCR's efforts to make its operations more effective. At present, there is the link between evaluation and re-accreditation in nearly all institutions undergoing evaluation. However, in view of the number of higher education institutions, the number of accredited study programmes and the existing legislation, it is not possible to use this model fully to replace the system of extending the validity of study programme accreditation.

A systemic change from study programme accreditation to institutional accreditation is not possible without an amendment to the Higher Education Act. The Accreditation Commission has therefore expressed its support for changing the parameters of the accreditation system as part of tertiary education reform. Unlike some authors who contributed to the draft version of the tertiary education bill, the ACCR believes that, after switching to institutional accreditation, programme accreditation should still be in place for new study programmes. The validity of the accreditation would be extended through periodic institutional evaluation. Such a quality assurance system requires higher education institutions to implement internal quality assurance procedures in line with specific externally set criteria.

Strengthening the monitoring of the level of development of the internal quality assurance processes at higher education institutions and contributing to the development of these systems and their harmonisation are among the major recommendations the ACCR received as part of the external review. Suggesting possible ways towards building functional internal quality assurance systems at higher education institutions should be one of the outcomes of a project of the Ministry of Education, Youth and Sports (as part of the Education for Competitiveness Operational Programme) that was launched in 2010. The ACCR is not directly involved in the project implementation but hopes that its outcomes will contribute to the process of putting the recommendations in this area into practice.

b) Applications should be submitted and processed electronically.

The approach using the form of a new decree on the content of applications for the accreditation of study programmes turned out to be unfeasible as early as 2008. In 2011 the ACCR together with the Ministry of Education, Youth and Sports will attempt to amend the decree again so that it includes, among other things, the new procedure for submitting applications for accreditation. However, the main change is likely to occur only in connection with the new tertiary education act that is in the process of development.

In the course of 2009 the ACCR asked the MoEYS to develop a modern software application to facilitate the management of its administrative activities. The application should replace the existing outdated database system (using *Paradox*) and the system for distribution of applications for accreditation and other electronic materials (via FTP). It is desirable that the new application should facilitate filling in the relevant documents in the appropriate place and provide for electronic submission of the applications. This should streamline and facilitate the receipt, filing and distribution of applications, and make the ACCR's administration more effective.

In spite of the MoEYS's reassurance that this issue would be addressed as a priority, no major progress was made in 2010. As late as towards the end of 2010 a partial feasibility study on the new software application was launched.

A summary of measures adopted:

- Evaluation of HE institutions is linked to the statement on extension of the validity of accreditation of study programmes;
- Support for changing the parameters of the accreditation system as part of tertiary education reform so as to allow for transition from programme to institutional accreditation (while preserving accreditation of new study programmes); in this context, support for the building of functional internal quality assurance systems at HE institutions that would facilitate this transition;
- Commissioning the development of a new software application that would make the Accreditation Commission's administration more effective.

DISCUSSION ABOUT THE CRITERIA USED BY THE ACCREDITATION COMMISSION

We can point out that, in 2010, the Accreditation Commission opened discussion about the standards for study programmes, particularly in connection with the amendment to

the Higher Education Act stipulating that only an associate professor or full professor might be a study programme guarantor. Minor specifications were also made concerning the standards for assessing the fields of study within which proceedings for appointing associate professors and full professors are carried out. In order to ensure transparency of the accreditation process these standards have been published on the ACCR's website.

In view of the fact that higher education quality assurance is a continuous process, the criteria can never be deemed to be final and must be permanently subject to discussion.

In line with the recommendation stated in the external review report, the Accreditation Commission paid special attention to discussion with the professional public on the new standards, and strove to make sure that they were used and interpreted in a consistent manner in evaluating study programmes across the range of fields of study. For 2011 the ACCR plans to hold seminars for evaluators (members of working groups) and for the professional public (representatives of HE institutions) that will deal with these standards and their application in assessing the quality of degree programmes.

A summary of measures adopted:
- Definition and publication of new standards of the ACCR for study programmes (particularly in connection with the amendment to the Higher Education Act stipulation that only an associate professor or full professor may be a guarantor of a study programme);
- Definition and publication of the *Standards of the ACCR concerning the assessment of applications for accreditation in the fields covering the habilitation procedure and the procedure for appointment as a professor*.

IMPROVEMENT OF COMMUNICATION BETWEEN THE ACCREDITATION COMMISSION AND THE WORKING GROUPS

Since 2007, when the first internal quality assurance process was completed, there has been major progress. The working groups apply the ACCR's standards to individual fields (the issue of setting the level of standards with regard to the nature of the field or discipline), and comply with the ACCR's criteria in their activities. The ACCR stresses, first of all, the role of working groups as advisory bodies to members of the ACCR (not as independent decision-making boards).

In 2010 the ACCR found a way of providing the working groups with better administrative support by means of establishing the position of secretary to each working group. The secretaries cooperate externally with the ACCR's Secretariat and provide technical support to the working groups.

ˊThe task that has spilled over to the following period is to review and modify the orders of procedure for the working groups (also with respect to the relevant recommendation made as a result of the ACCR's external review). The discussion about the criteria between the ACCR and the working groups, and between the working groups mutually, must be of a continuous nature.

A summary of measures adopted:

- Emphasising the role of a working group as an advisory body to members of the ACCR (with no decision-making powers), and a three-level evaluation model (reviewers – working groups – the Accreditation Commission);

- Strict implementation of the rule that the office term of the chairperson of a working group must not exceed the length of the office term of a member of the ACCR (i.e. 6 years); two chairpersons of working groups left their post as a result of this measure;

- Making the number of working groups more effective – a new working group for didactics in specific fields;

- Involving chairpersons of working groups (non-members of the ACCR) in discussions about criteria for assessing applications;

- Strict requirements concerning the writing of minutes from meetings of working groups and presenting them to the ACCR Secretariat; as concerns negative statements, specific argumentation in line with the ACCR standards is required;

- Providing for better technical and administrative support (the establishment of the post of working group secretary).

ENHANCING THE LEVEL OF AWARENESS OF THE WORK OF THE ACCREDITATION COMMISSION ON THE PART OF HIGHER EDUCATION INSTITUTIONS AND THE GENERAL PUBLIC

The 2007 report drew attention to problems in communication between the ACCR and the public and stated that it was necessary to seek the most appropriate ways of disseminating information about the mission and activities of the ACCR and its working groups. In this

respect it is necessary to focus, among other things, on the ACCR's website and to improve its quality – particularly that of the English version. A similar recommendation can also be found in the external review report.

At the beginning of 2010 a separate website of the ACCR was launched, which meant the definite separation of the ACCR's web-based presentation from the website of the Ministry of Education, Youth and Sports. This has facilitated users' access to information and supported the view of the ACCR as an independent body. The ACCR's website was also launched in the English language. Improvements are planned for 2011 to the web-based presentation and it will also be used for internal administrative purposes (as a partial substitute for the outdated FTP).

We may say, in principle, that in the trend of increasing the public's awareness of the role of the Accreditation Commission continued in 2010. This process was facilitated, above all, by the media coverage of some problems in higher education which the ACCR was addressing during that year (particularly those related to the cases of wrongdoing at the Faculty of Law at the University of West Bohemia, Rašín College, s.r.o., and Jan Amos Komenský University in Prague, s.r.o.). However, in the future the ACCR must intensify the provision of information about its activities – for example by means of developing documents that would contain in-depth data about quality assurance processes in Czech higher education (as stated, for that matter, in the external review report – the recommendation is marked as A10). In connection with presenting the ACCR's activities abroad, these documents will have to be translated into foreign languages, and special attention will have to be paid to the English version of the website.

In autumn 2010 the Accreditation Commission developed an information booklet in English with basic information about the status, mission and activities of the ACCR. The booklet is used, above all, for presenting the ACCR abroad.

A summary of measures adopted:
- Designing and launching a separate website of the ACCR and making it accessible via a unique domain (www.akreditacnikomise.cz);
- Regular updating of the website and publishing all major documents; translating important documents into English and making them public;
- Greater attention paid to explaining the procedures, criteria and standards of the ACCR;

- Developing an information booklet about the activities of the Accreditation Commission in English for the purpose of presenting the ACCR abroad.

INVOLVEMENT OF STUDENTS AND EXPERTS FROM INDUSTRY IN THE WORKING GROUPS

The reports about internal quality assurance as well as the external review report state that the composition of the Accreditation Commission, in terms of the representation of fields of study, is on the whole appropriate. The involvement of experts from industry should be improved, and the trend towards cooperation with international experts should continue. This issue has been addressed by means of regular changes in the membership of the ACCR in line with the relevant legal regulations.

The involvement of students in the evaluation of HE institutions, and in activities that are subject to accreditation by the ACCR, may be evaluated as positive. In this respect the ACCR has established cooperation with the Student Chamber of the Council of Higher Education Institutions that nominates its representatives (students) to the ad hoc working groups. As yet, the involvement of experts from industry has not been much increased, since they often lack motivation for such activities. It is perhaps worth discussing the specific fields or areas of study for which the contribution of these experts would be of benefit. In would also be beneficial to strengthen the involvement of foreign experts in the working groups (particularly those who are experienced in quality assurance processes outside the Czech Republic). At present there are such experts only in some of the groups. They could also take part in the process of evaluating HE institutions (i.e. participation in ad hoc working groups). The obstacles to this are, in addition to the language barrier (the involvement of most of these experts would require interpretation into English or using English as a working language during the evaluation), a lack of financial resources which could ensure that their work, including their time devoted to it, could be properly remunerated.

A summary of measures adopted:
- Involvement of students in the activities of ad hoc working groups of the Accreditation Commission in evaluating HE institutions;
- Discussion about the involvement of experts from industry and foreign experts in the activities of the working groups.

The 2007 report stated that the Secretariat of the Accreditation Commission works very well in view of the demanding nature of its activities, but that it is considerably understaffed and underfunded. The rationale behind this statement was that there are growing demands for the development of evaluation materials, the staff's language skills in relation to their cooperation with international bodies (ENQA, CEEN, ECA, etc.), and for the internationalisation of the ACCR's activities.

In 2009 there turned out to be a need for increasing the number of the Secretariat's staff by hiring a specialist, preferably with qualifications in law, to deal with the evaluation of administrative activities of HE institutions and those of their internal regulations that are not subject to registration by the Ministry of Education, Youth and Sports and that are related to the implementation of their educational and creative activities (e.g. recognition of the knowledge acquired in lifelong learning programmes as a condition for admitting students to accredited study programmes). There were also plans that the new member of the staff would deal with the rapidly expanding accreditation agenda that is subject in every detail to administrative proceedings. This need was not addressed in a satisfactory manner in 2010. The situation may be partly solved by close cooperation between the ACCR's Secretariat and a person who, from 2011, shall be employed as a co-manager of the Quality project (under the Education for Competitiveness Operational Programme). Although this represents important progress in dealing with the aforementioned need, it is not a satisfactory solution in the long term.

From a long-term perspective, the interconnectedness of the ACCR's Secretariat and the department concerned with higher education institutions at the Ministry of Education, Youth and Sports appears to be an extremely inappropriate arrangement (recommendation B5 in the external review report states the same). In spite of the apparent willingness to respect the independence of the Accreditation Commission it is not possible to prevent interventions from the head of the department (or possibly from the Deputy Minister for research and higher education) in the activities of the ACCR's Secretariat. Moreover, the Secretariat engages in activities (particularly of an administrative nature) that fall within the purview of the Ministry. This arrangement is the result of past developments and there used to be a rationale behind it. However, at present it is of the utmost importance to separate the ACCR's

Secretariat from the HE department of the MoEYS both in formal and agenda terms (the Secretariat should exclusively deal with the activities of the Accreditation Commission and not with the MoEYS's agenda).

In 2010 the budget of the ACCR was increased. Although the budget for that year was sufficient (in view of the ACCR's tasks), it will be necessary to seek ways in which to secure funding for the ACCR that will not depend directly on the budget of the MoEYS. One of the reasons for this is the fact that, in spite of the sufficient budget level, the Accreditation Commission cannot use these resources to satisfy its needs, since there are very strict and complex internal rules governing the financial management of the MoEYS's budget that make the system of funding difficult and clumsy.

In recent years the Accreditation Commission has proposed that its budget could be determined as a percentage of the annual budget for higher education institutions. Adoption of such a budgetary rule would help protect the ACCR from political pressures and the pressures of various interest groups, and it would establish appropriate conditions for its professionalisation. For that matter, this requirement is in line with another recommendation set out in the external review report (B1).

A summary of measures adopted:

- Securing an increase in the ACCR's budget for 2010; this made it possible to use a broader spectrum of experts for higher education evaluation and accreditation activities;

- Partial increase in the staff for specialist agendas of the ACCR (an expert brought in from outside and paid with the help of resources from European programmes);

- Opening discussion about the organisational structure and the agendas of the ACCR's Secretariat, and the Secretariat's formal ties with the department of higher education institutions at the Ministry of Education, Youth and Sports.

IMPLEMENTATION OF RECOMMENDATIONS STATED IN THE EXTERNAL REVIEW REPORT

The external review of the Accreditation Commission has provided an independent outlook on the ACCR's operations. It has pinpointed its strengths, but also weaknesses and possible risks in the ACCR's work and in the quality assurance system. Another benefit of the

external review is that it involved a comparison of the ACCR with other European higher education quality assurance agencies in terms of compliance with ESG standards.

The conclusions of the external review are very favourable for the Accreditation Commission, as the review panel found a sufficient level of compliance with ESG standards, thus confirming the legitimacy of ACCR's membership of ENQA. In none of the 16 standards under review did the ACCR receive a rating that would be lower than "substantial compliance", while the implementation of 9 of the standards was rated at the highest level – i.e. "full compliance".

Full compliance was found in the case of the following ENQA criteria (ESG Part 3 standards):

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 ENQA criteria in Part 3 of ESG where less than full compliance was attained (but where the ACCR is in substantial compliance) are as follows:

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

Full compliance was found with ESG Part 2 standards in the following criteria:

ESG 2.3 Criteria for decisions

ESG 2.5 Reporting

ESG 2.6 Follow-up procedures

ESG 2.7 Periodic reviews

ESG 2.8 System-wide analyses

The ACCR achieved substantial compliance in ESG Part 2 in the following criteria:

ESG 2.1 Use of internal quality assurance procedures

ESG2.2 Development of external quality assurance processes

ESG 2.4 Processes fit for purpose

The report on the external review of the Accreditation Commission contains recommendations on improving the quality of quality assurance activities and processes. However, these recommendations are not summarised and can only be found as part of the findings concerning individual standards. This is why one of the objectives of the internal quality assurance process in 2010 was to analyse the report and to make a list of recommendations on which further work can be done- - for the purpose of both enhancing the quality of the quality assurance system and compliance with ESG standards.

This objective was fulfilled and the result of the analysis is a list of 16 recommendations (that are not directly linked to individual ESG standards). 10 of these recommendations relate to the implementation of Part 2 of ESG standards (marked as A), and 6 are concerned with the implementation of Part 3 of ESG standards (labelled as B). The complete list is on pages 4 – 6 of this report.

Most of the recommendations concerning the operations of the ACCR were addressed as part of internal quality assurance processes in previous years. However, it should be noted in this context that the ACCR is of the opinion that not all the recommendations can be implemented in the conditions of quality assurance in the Czech Republic, and that the ACCR does not fully identify with some of the recommendations (e.g. the diverging views concerning the position of working groups in the ACCR's operations). From this perspective it is clear that the Accreditation Commission will have to deal not only with the feasibility of some of the recommendations, but also with their usefulness. However, this corresponds to the understanding of the quality assurance process as an open system with no once-and-for-all solutions, one that is the result of a consensus between the parties involved who may differ in their views of the role of its various components.

The positive starting point is that the ACCR seeks to fulfil some of the recommendations on a continuous basis (e.g. A1, A2, A4, A7), while the implementation of certain recommendations will still require considerable effort and more profound expert reflection. Although most of the 16 recommendations may be put into practice by the ACCR under current legislative conditions, the review panel also made recommendations that, by their nature, are designed for institutions that design higher education policies rather than for the ACCR (for example recommendations A3, A6, B1, B3, B5). Possible implementation of these recommendations must be subject to cooperation between the Accreditation Commission and the Ministry of Education, Youth and Sports and other bodies.

TASKS AND RECOMMENDATIONS FOR THE 2011 INTERNAL QUALITY ASSURANCE PROCESS

2011 is the year that concludes the first stage in the implementation of the system for evaluation of the Accreditation Commission. In line with the ESG, in 2007-2010, a mechanism for periodic internal quality assurance procedures was developed, including a follow-up reflection process, and the external review was conducted for the first time. In the following period the ACCR will reflect in detail on the conclusions and recommendations made as part of the external review. Other tasks include work on improving and standardising the internal quality assurance methodology (and, possibly, its codification in the official documents of the ACCR – this is also in line with the B6 recommendation of the external reviewers). The internal quality assurance process in the coming year must no longer be based only on an analysis of the tasks set out in previous reports and elimination of the shortcomings identified. It must also rely on new, independent research efforts (including, for example, research carried out by members of the ACCR, working groups, the Secretariat staff, or external reviewers) that will generate fresh insights into the quality of the work of the ACCR, compliance with ESG standards and, possibly, the current problems, challenges and risks.

As regards the external review of the Accreditation Commission, it is necessary to continue dealing with the individual recommendations – i.e. examining their usefulness for the operations of the ACCR and the possibilities of their implementation (for most the recommendations, this should be done together with representatives of other institutions, particularly the MoEYS). The internal evaluation process in 2011 will be of key importance as it will provide a basis for preparing a feedback report as required by ENQA for 2012.