

National action plan
for quality assurance development
in the Czech Republic



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1. Introduction

This national action plan was adopted as a part of the Supporting European QA Agencies in Meeting the ESG (SEQA-ESG) project that is coordinated by the European Association for Quality Assurance in Higher Education (ENQA). The project is co-financed by the European Commission in the framework of a call for Initiatives to support the implementation of European Higher Education Area (EHEA) reforms. The duration of the project is June 2020 – May 2022 and six EHEA countries are supported in developing their quality assurance systems further towards achievement of full compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). In the Czech Republic, the Ministry of Education, Youth and Sports (MEYS) has become a partner in this project.

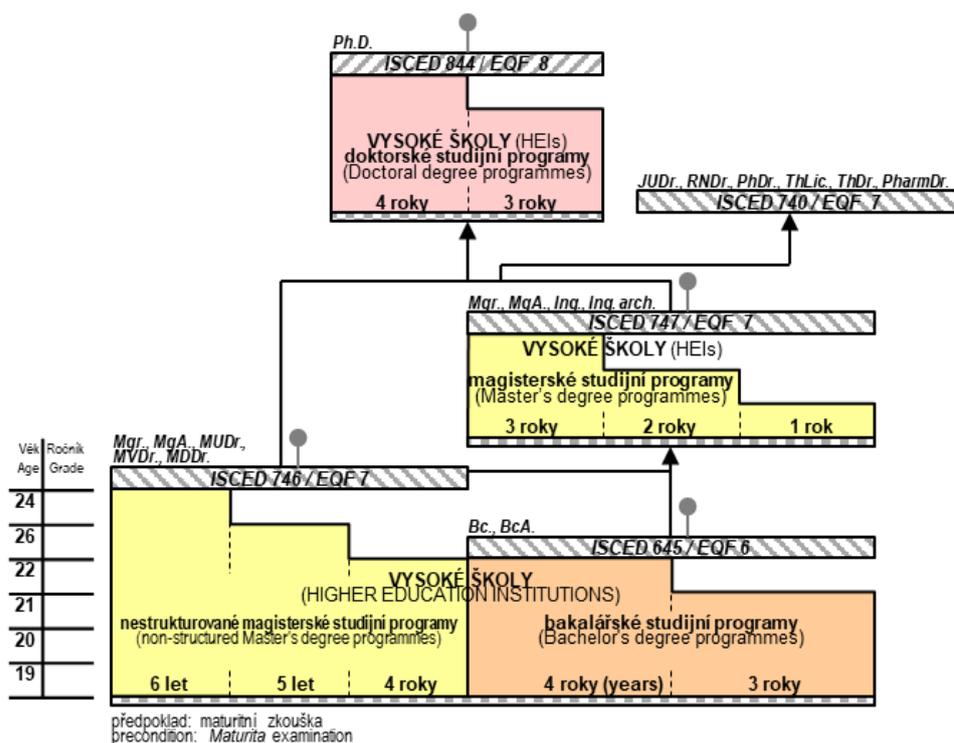
The national action plan for quality assurance development in the Czech Republic has been developed in close cooperation between the MEYS and the national quality assurance agency, the National Accreditation Bureau for Higher Education (NAB). Discussions were held regarding the issue areas covered in this action plan and on future plans to take the national quality assurance system further. Representatives of the MEYS and of NAB cooperated on identifying the priority areas with regards to ESG compliance and on establishing the necessary steps to be taken. The overall goal shared by all is achievement of compliance with the ESG and integration into the European quality assurance structures, thus fostering international recognition of the national system and strengthening cooperation with other relevant bodies in the EHEA.

2. Country's higher education system

In the Czech Republic the higher education is provided by the higher education institutions which form the highest level of the Czech education system and have the sole right to award academic degrees.

The field of higher education is regulated by the Act No. 111/1998 Coll., on Higher Education Institutions and on Amendments to Other Acts (Act on Higher Education Institutions). The central governing body for higher education is the Ministry of Education, Youth and Sports. The diagram which displays the overview of the higher education system in the Czech Republic is presented below.

Schéma vysokoškolského vzdělávání v České republice v akademickém roce 2020/21
Diagram of the higher education in the Czech Republic 2020/21



The whole structure of the Czech Education System can be found here: https://www.studyin.cz/soubory/clanky/0021_publications/StudyIN-EduSystem-2017.pdf

Higher education institutions are supreme centres of education, independent knowledge and creative activities. Considerable autonomy of higher education institutions is manifested in the area of education (implementation of study programmes, admission requirements/procedures, etc.), science

and research, and to some extent in managing the funds allocated by the Ministry of Education, Youth and Sports.

The general goal of higher education is to provide students with adequate professional qualification, prepare them for engagement in research and participation in life-long learning, make them contribute to the development of civic society and international, particularly European cooperation.

Higher education institutions are public (26), state (2) and private (33). The public and private higher education institutions come under the responsibility of the Ministry of Education, Youth and Sports, while state institutions (the University of Defence – Ministry of Defence and the Police Academy – Ministry of the Interior) are legally established and under the control of the relevant ministries.

Public higher education institutions are established by a special law. Competence towards them according to the Act No. 111/1998 Coll., on Higher Education Institutions and on Amendments to Other Acts, is exercised by the Ministry of Education, Youth and Sports.

Private higher education institutions are legal entities that have been granted state approval by the Ministry to operate as a private university. Their activities are specifically regulated by Sections 39-43 of Act No. 111/1998 Coll., on Higher Education Institutions and on Amendments to Other Acts.

In terms of the study programmes they offer; higher education institutions may be of a non-university or university type. Universities may offer all types of study programmes and carry out associated activities in science and research, development and innovation as well as artistic or other creative activities. Non-university institutions mainly offer bachelor's study programmes. They can also offer master's programmes, but not doctoral programmes. They are not divided into faculties.

In the Czech Republic 21 foreign higher education institutions provide the studies in a foreign higher education degree programme. The provision of foreign higher education in the Czech Republic, the status and obligations of foreign higher education institutions and their branches are regulated in Sections 93a to 93i of Act No. 111/1998 Coll., on Higher Education Institutions and on Amendments to Other Acts (Act on Higher Education Institutions), as amended.

Completed secondary education with a secondary school – leaving examination is the basic prerequisite for entry into Bachelor's and non-structured Master's programmes. Detailed admission requirements are set by a relevant higher education institution and usually include an entrance examination.

HEIs offer accredited study programmes at 3 cycles according to QF/EHEA: Bachelor's, Master's, and Doctoral.

Structure of the cycles:

Type of study programme	Years of studies	ECTS	EQF/ISCED
Bachelor's degree programmes, lasting	3–4 years;	180 – 240 ECTS	6
Master's degree programmes, lasting	1–3 years,	60 – 180 ECTS	7
Master's degree programmes, lasting 4–6 years in case of programmes not following Bachelor's degree programmes (non-structured programmes) – study programmes in medicine, pedagogy, law, veterinary science, dentist, etc.		300 – 360 ECTS	7
Doctoral degree programmes, lasting	3–4 years,	180 – 240 ECTS	8

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Higher education is provided through accredited study programmes in accordance with the relevant curricula and forms of studies. Degree programmes can take the form of on-site courses, distance learning courses (very rare) or a combination of both (common form). All public higher education institutions and most private higher education institutions have implemented the European Credit Transfer System (ECTS) or a system compatible with ECTS.

The higher education diploma and a Diploma supplement¹ are produced by higher education institutions are the official documents which confirm the completion of studies and the right to use the relevant academic title.

The complete list of higher education institutions is available at:
<https://www.msmt.cz/vzdelavani/vysoke-skolstvi/prehled-vysokych-skol-v-cr-3>

¹ The Diploma Supplement contains eight sections providing information regarding: the holder of the qualification, the qualification type and its originating institution, the qualification level, the content of the course and results gained function of the qualification certification of the supplement details of the national higher education system concerned (provided by the National Academic Recognition Information Centres (NARICs)) and other relevant details

3. Quality assurance of higher education in the country

3.1 Legal framework

The main integral component of the legal framework is the Act No. 111/1998 Coll. (amended and consolidated) on Higher Education Institutions and on Amendments and Supplements to Some Other Acts (Higher Education Act). The Higher Education Act² represents the legal norm governing higher education and quality assurance. The latest significant amendment terminated the operations of the previous QA agency, the Accreditation Commission (full member of ENQA), and established the current agency NAB in 2016. NAB was established as an independent body not subordinated to any other body but it is not a legal entity (does not have legal personality). NAB is the only quality assurance agency in the country, has the required legal authority carry out its activities as prescribed by the Higher Education Act and is recognised as such by all stakeholders in higher education.

Apart from the Higher Education Act, NAB carries out its tasks in accordance with related government regulations (especially Government Regulation No. 274/2016 Coll., On Standards for Accreditation in Higher Education, and Government Regulation No. 275/2016 Coll., On Fields of Study in Higher Education).

The Statute of NAB is approved by the Government. The 2016 Statute was amended at the initiative of the Board of NAB in 2018 with the purpose to facilitate smoother functioning of the agency on the basis of experience collected since 2016. The Statute mainly specifies internal procedures of NAB including rules of operation of the Board, external quality assurance procedures, composition of evaluation committees etc.

As a body of public administration, the NAB is also bound by the Administrative Procedure Code that applies to all administrative proceedings carried out by these bodies. The Code stipulates general rules of administrative proceedings (in the case of NAB, the accreditation procedures and procedures to impose a sanction) and defines the rights and obligations of all parties to the proceedings. Stipulations in the Administrative Procedure Act can be superseded only by stipulations in another law such as the Higher Education Act.

Lastly, the Statute of NAB determines that the audit procedures (audit of compliance of compliance with legal regulations in HEIs' activities) are regulated by Act No. 255/2012 Coll., on inspection (Code of Inspection).

With regard to **organisational independence**³, Board members are appointed by the Government. Five members including the Chair are proposed to the Government by the Minister of Education from nominations by the MEYS, other central public administration bodies, professional chambers, employers' organisations and other institutions. The nomination of the Chair must be discussed between the Minister and the representative bodies of HEIs (the Czech Rectors Conference and the Council of HEIs). Ten members including a student member are proposed to the Government by the Minister of Education from nominations by the representative bodies of HEIs.

The Higher Education Act explicitly stipulates that the members of the bodies of NAB are independent in their decisions related to the NAB's quality assurance activities and decisions. According to the Higher Education Act, actions that compromise the independence of Board members may lead to dismissal from the role by the Government. According to the Code of Ethics of NAB⁴, all persons

² Available in English: <https://www.msmt.cz/areas-of-work/tertiary-education/the-higher-education-act>

³ This analysis partially draws on the ENQA ANALYSIS OF THE EUROPEAN STANDARDS AND GUIDELINES (ESG) IN EXTERNAL REVIEW REPORTS: SYSTEM-WIDE ANALYSIS, RESOURCES, AND INDEPENDENCE, Workshop Report 23 (2015): https://www.engq.eu/wp-content/uploads/ENQA_workshop_report_23.pdf

⁴ Available in English: https://www.nauvs.cz/attachments/article/132/Etický_kodex_NAU_2017_01_27_EN.pdf

involved in NAB's activities (Board members, evaluators, members of the Appeals Committee, staff of the Office) must perform their work independently of all other institutions and persons, including those that participate through nomination or appointment. The Higher Education Act also prohibits members of the parliament, judges etc. from simultaneously becoming a member of the Board. The Chair and Vice-chairs of NAB are not allowed to act in remunerated or unremunerated positions at HEIs in order to prevent conflicts of interest.

The Higher Education Act also stipulates that the NAB's activities are materially, administratively, and financially secured by the MEYS. The NAB is located on the MEYS's premises in a building in the vicinity but separate from the main building complex of the MEYS. Tasks related to professional, administrative and technical support of the NAB activities are carried out by the Office of NAB, which is a department of MEYS – a unit subordinated directly under the Minister. Staff members of the Office are civil servants with civil service contracts under the Civil Service Act. The Higher Education Act authorizes the Chair and Vice-chairs of NAB to give orders for the performance of civil service under the Civil Service Act or binding instructions under the Labour Code to staff of the Office.

With regards to financial matters, NAB is not a legal entity, cannot have its own employees or assets and cannot be a recipient of any external funding such as EC projects or through contracts. It is an organizational unit of the state but does not hold its own budget, it is financed fully from the MEYS's chapter and through MEYS. The HEIs do not pay any fees for external QA procedures nor contribute towards the operations of NAB.

Operational independence in the area of processes and procedures is manifested in the fact that the NAB designs its own processes and procedures in its Statute as well as other procedural acts ratified by the Board or issued by the Chair (within the applicable legal framework). The evaluation criteria were adopted by the Government in the form of a government regulation (No. 274/2016 Coll., On Standards for Accreditation in Higher Education). NAB has elaborated and interpreted these generic criteria in its methodical guidelines and issues statements on the interpretation of specific criteria when necessary. The Higher Education Act furthermore explicitly gives NAB the power to propose changes to the government regulation on standards for accreditation.

Independence of formal outcomes is granted by the legislative arrangement that entrusts the Board of NAB with the competence to take decisions in external QA procedures. The NAB Board has full authority to make decisions on accreditation and assessment and on sanctions in the case of serious deficiencies. Board members cast their votes in the decision-making process on the basis of their own discretion and the Board has full responsibility for formal decisions. The decisions under the Administrative Procedures Act are legally binding. The MEYS or any other institution is not entitled to change or cancel its decision. The appeals procedure is also independent from other bodies. An Appeals Committee is a part of the NAB's structure and deals with all appeals to NAB's decisions and processes. The only other option of appeal after an appeal has been dealt with by the Appeals Committee is the court of law.

The Higher Education Act established the NAB in 2016 but did not specify the exact legal nature of NAB. As such, NAB is not a legal entity. It has full authority and sole responsibility to make legally binding decisions on accreditation and QA assessment, but the administrative, material and financial support is provided by the MEYS. The MEYS has refrained from any interventions in the NAB's competences and activities through administrative, material or financial means. Yet this organization set-up is not common in the EHEA and is recognized as one of the pressing issues with regards to ESG compliance.

3.2 QA activities and their methodologies

NAB is the only quality assurance agency in higher education in the Czech Republic. It has the authority to mainly:

1. decide on
 - a) accreditation of degree programmes
 - b) institutional accreditation
 - c) accreditation of fields for appointment of professors and associate professors (does not fall under the ESG)
2. perform audits of compliance with legal regulations in carrying out accredited activities
3. carry out external evaluations of educational, scientific, research, development, and innovation, artistic and other related activities of higher education institutions.

All accreditation procedures are started by the submission of an application by the respective HEI and are subject to administrative deadlines set by the Higher Education Act (120 days for degree programme accreditation and 150 days for institutional accreditation procedures). Contrary to the common practice in many other countries, NAB therefore cannot plan the accreditation procedures in advance, group them into larger clusters, create annual accreditation plans, etc.

An evaluation committee (panel of experts) is appointed for each application for accreditation. It typically consists of 5 members, one of them a student, and one of them a labour market representative when a practically oriented degree programme is being evaluated. For institutional accreditation (and for external evaluation) procedures, the committees are larger due to the need to cover more scientific disciplines. The application is assessed first in the evaluation committee and then by Board member(s) responsible for the given discipline in the NAB Board. Finally, the assessment is completed and a decision is taken by the Board.

A **self-assessment report**, adequately detailed and adjusted according to the requirements related to the specific kind of the application/proceedings, is required in all the related procedures except for audits, constitutes a part of the application/proceedings and is reviewed by the evaluation committee composed of selected experts.

External assessment is carried out in the form of evaluating the documents submitted with the application for accreditation or requested during the external evaluation of the respective HEI's activities. The assessment is based on the legal evaluation criteria (requirements of the Higher Education Act, standards for accreditation), methodical guidelines developed by NAB and the administrative practice as a body of accumulated knowledge on the higher education sector that enables comparison with other cases and benchmarking.

Site visits are essential parts of evaluations of HEIs in case of applications for institutional accreditation and in case of external evaluations of HEI's activities. These visits should in particular verify and, where appropriate, supplement the information provided in the self-assessment report. The programme of the visits includes in particular meetings with the HEIs' management, on-site inspections of the premises, review of the documents submitted on site and – in relevant cases – also discussions with students and/or staff. In the case of audits, a site visit is also an essential part of the process and serves to audit specific areas of operations of the HEI and to provide further context to the findings.

Site visits have not become an established practice in accreditation procedures related to degree programmes, although they have taken place in some cases. The reason is largely practical. The compulsory ex-ante accreditation model means that a very high volume of procedures is carried out by NAB every year (hundreds of applications for accreditation of degree programmes annually, in addition to dozens or even hundreds of applications for accreditation of fields of appointment of

professors and associate professors that undergo the same external assessment procedure). Human resources as well as administrative and financial capacities to carry out site visits have been a significant limiting factor. The application-based model does not allow NAB to create yearly plans of procedures or to cluster degree programmes into larger blocs, because applications must be processed continuously as they are received. A final decision on accreditation should be taken within the 120-day deadline stipulated by the Higher Education Act.

In the case of accreditation of degree programmes and institutional accreditation, there are several kinds of **reports resulting from the external assessment**: 1) The one created by the members of the evaluation committee (composed of selected experts; 2) the one(s) prepared by the respective member(s) of the Board responsible for the respective field of study; 3) after each meeting of the Board, minutes containing the statement in the given matter and a brief justification are created and published, and 4) a written decision of NAB on the accreditation that constitutes legal rights and obligations for the HEI. Only the third mentioned report is made public. A list of all decisions taken by NAB is also published.

In regard to external evaluations of educational, scientific, research, development, innovation, artistic and other related activities of HEIs, the evaluation committee produces a report summarizing the external evaluation. It is prepared on the basis of all available documents, considering the HEI's report on the internal evaluation and the outcomes of the site visit. The report is submitted to and approved by the Board. The evaluated HEI has a chance to comment on the draft report as well as to object to the approved report. The final report is made public.

In the case of audit, the persons designated to carry it out produce a report describing the process and findings. The Chair of NAB may make modifications to the report if the HEI makes objections to it. After that the report is final and self-standing; the Board takes note of the report but does not have the competence to alter it. The report is not published but generalized findings from audits carried out in a given year are included in the annual report of NAB.

Regarding **follow-up processes**, HEIs are in accordance with the Higher Education Act obliged to carry out internal evaluations every 5 years of their educational, creative, and related activities and elaborate a report on the evaluation describing its attained qualitative outputs together with measures adopted for removing potential deficiencies. The report has to be updated every year by means of an appendix. It has to be made available for NAB and MEYS. This mechanism has the potential to contribute to a consistent follow-up by NAB with regards to periodically reviewing and assessing the quality of HEIs' activities.

In the case of granted accreditation of degree programmes, one or two follow-up reports are sometimes requested from the respective HEI by the Board. These reports are not requested in every case but rather depend on the result of assessment. Regarding institutional accreditation, a similar mechanism for follow-up procedures has been implemented. The Board typically requests a follow-up report on the institutional environment of the HEI. Follow-up reports on the fields of study in which NAB grants institutional accreditation are requested in relevant cases depending on the result of assessment. The Board has evaluated between 100 and 150 follow-up reports every year.

HEIs are also obliged to inform NAB about significant changes that are taking place at the HEI and that have or may have an impact on the implementation of accredited activities. This is an important tool for NAB to monitor the ongoing implementation of the accredited degree programmes. NAB has released a methodical guideline specifying what kind of changes need to be reported. Around 300 notifications of significant changes from HEIs are evaluated by the Board every year.

Pursuant to the Higher Education Act, NAB carries out external evaluations of teaching, creative, and related activities of HEIs. This evaluation can fulfil the role of a follow-up procedure by in-depth assessment of the respective HEI's activities during the accreditation period. NAB has initiated seven external evaluations so far, four of which have had a special focus on implementation of institutional

accreditation. Emphasis is placed on follow-up of the conclusions and recommendations that arise from the evaluation. Follow-up reports are requested from the HEI after completion of an evaluation.

The four-stage method is followed in principle in the Czech external QA activities. External evaluation procedures comply with this method but space for improvement exists in accreditation procedures. On the one hand, self-assessment is a fixed and established part of the procedures and relatively robust although not entirely consistent follow-up procedures are in place. On the other hand, a significant challenge continues to be site visits that are virtually absent in accreditation processes for degree programmes mainly for practical reasons. Multiple reports are created during the accreditation process but they are not published except for the brief and formal resolution of the Board on accreditation with only a basic justification.

3.3 National/agency criteria in external quality assurance

Respective standards (pursuant to the Higher Education Act and the Government Regulation on Standards for Accreditation in Higher Education) are divided into a part covering institutional accreditation and a part applicable to degree programme accreditation. Generally speaking the standards focus on two basic areas:

- **requirements for the institutional environment of the HEI:** strategy and management of the HEI; degree programmes and their students; creative activities (especially research); international cooperation; cooperation with practice; academics; resources; the system for assuring quality of teaching, creative and related activities; and internal evaluation of teaching, creative and related activities;
- **requirements for degree programmes:** content specification of the degree programme; the profile of the graduate; professional knowledge and skills in relation to the given field of study; personnel, financial, material, and other provisions of the degree programme, including requirements associated with ensuring equal access to HE for applicants and students with disabilities; the extent of international cooperation and of cooperation with professional practice.

The criteria for assessment cover both these areas in detail in the case of degree programme accreditation. HEIs have to include in their applications a self-assessment report describing and evaluating the fulfilment of individual requirements resulting from accreditation standards. In regard to the focus of the ESG on quality assurance related to learning and teaching including the learning environment, HEIs have to prove they are able to secure the degree programme from the point of view of provision of information technology, access to study literature, capacity of teaching rooms, laboratories and other pertinent facilities. Data on the credit burden of individual subjects are also an obligatory part of the application, as well as information about their creative, resp. scientific and artistic activity related to the given degree programme. So as to contribute to the future employability of graduates, HEIs have to give the estimated number of applicants admitted in the future and information on the expected applicability of their graduates on the labour market.

In the case of institutional accreditation, the focus lies more heavily on the institutional environment. The HEI needs to prove that it has a well-established internal quality assurance system and that the mechanism function in an effective way, making a positive impact on quality enhancement at the HEI. However, a part of the standards also covers the conditions for carrying out educational, creative and other related activities in the given field(s) of study.

National action plan for quality assurance development in the Czech Republic

ESG	National requirements	Notes
1.1 Policy for quality assurance	Covered in HEA and Standards: Internal QA system and regular internal evaluation	Focus on formal arrangements of the system, need for tools to assess its actual effectiveness
1.2 Design and approval of programmes	Covered in HEA and Standards	NQF not yet fully incorporated into legislation and assessment criteria
1.3 Student-centred learning, teaching and assessment	Covered to some degree in Standards	Included implicitly in some standards Few explicit requirements on aspects of student-centred learning
1.4 Student admission, progression, recognition and certification	Covered extensively in HEA	Well covered - HEA on the general level and in internal regulations of HEIs more specifically
1.5 Teaching staff	Covered in HEA and extensively in Standards	Well covered – detailed requirements on qualifications of teaching staff and future perspectives
1.6 Learning resources and student support	Covered in Standards	Well covered in all aspects Attention to study supports for distance study
1.7 Information management	Covered to some degree in Standards	Limited coverage of collection and use of data in Standards for programmes, more in Standards for institutional accreditation
1.8 Public information	Covered to some degree in HEA and Standards	Requirements limited to info on educational activity, other areas of activity not explicitly mentioned
1.9 On-going monitoring and periodic review of programmes	Covered in HEA and Standards	Focus on formal arrangements of the system, need for tools to assess its actual effectiveness
1.10 Cyclical external quality assurance	Regulated by HEA: Compulsory reaccreditation of programmes (after max. 10 years)	Well ensured by compulsory ex-ante accreditation

HEA = Higher Education Act, Standards = Government Regulation no. 274/2016 Coll., NQF = National Qualification Frameworks

As in cases of other proceedings, NAB provides a methodical guideline to help HEIs with the preparation of the accreditation application. As its integral part of the application, NAB requires a report on the HEI's internal evaluation of its quality of educational, creative and related activities and any amendments to it; and secondly a self-assessment report describing and evaluating the fulfilment of individual requirements resulting from relevant accreditation standards, including requirements persistent to financial, material and other sources to secure the HEI's activities and its development. A HEI with institutional accreditation receives the right to approve internally its degree programmes within the accredited field/s of study (Government Regulation No. 275/2016 Coll., On Fields of Study in Higher Education) and type/s of degree programmes without having to apply for programme accreditation to NAB. Therefore, the HEIs must ensure that the internally approved (self-accredited) programmes comply with the standards for degree programmes laid out by Government Regulation No. 274/2016 Coll., On Standards for Accreditation in Higher Education.

Formally the standards for accreditation are well aligned with the ESG. The institutional accreditation standards focus on the quality assurance system of the HEI and the degree programme accreditation cover the institutional environment as well. The challenge is rather how to assess the actual effectiveness of the described processes and verify their functionality in practice. This issue is most relevant for the first round of institutional accreditation. As HEIs only receive the right to internally accredit their own degree programmes with granted institutional accreditation, it is not possible to fully verify the HEI's ability to apply standards for degree programme accreditation on its own degree programmes during the assessment of its institutional accreditation application. The experience with institutional accreditation to date (5 years since introduction into legislation and 3 years since the first decision on an application for institutional accreditation) has shown that some issues on the institutional level may not be discovered during the assessment process but become pronounced later on.

3.4 Peer review experts

NAB administers a Pool of Evaluators in 37 fields of study (Government Regulation No. 275/2016 Coll., On Fields of Study in Higher Education) as a database of persons eligible to be appointed to evaluation committees as peer-reviewers in NAB'S activities. As stipulated by the Higher Education Act, only persons enrolled in the Pool of Evaluators may be appointed to evaluation committees. The Statute of NAB sets the maximum number of persons that can be enrolled in the Pool of Evaluators in each field of study and indicates the target proportion of experts from the academia, research institutions, the labour market and the student body. Currently, there are about 1500 experts enrolled in the Pool.

With regards to **recruitment**, NAB regularly launches calls for nominations of persons to be included in the Pool of Evaluators. Nominations may come from representative bodies of HEIs, central bodies of public administration, employers' organisations, or interested individuals may nominate themselves.

Only a person who is a generally recognized as an expert authority in the relevant field of education or a student who meet the "Conditions for inclusion" can be entered in the Pool of Evaluators. The Conditions were approved by the Board in 2019 and list indicative requirements and criteria for inclusion in the Pool: minimum level of education, academic positions, teaching, research and creative activities, previous positions held at HEIs, participation in accreditation activities, professional activities, etc. The requirements are differentiated for the various spheres from which persons can be nominated (higher education, research institutions, state/public administration, labour market, students). Nominees are **selected** for the Pool of Evaluators mainly on the basis of their expertise and experience as well as the needs of the Pool to ensure a balanced and functional composition.

Evaluators enrolled in the Pool of Evaluators must be thoroughly acquainted with the assessment procedures, standards and their application. For this purpose, NAB creates methodical guidelines and evaluators have also been systematically **trained**. Introductory training sessions organized by the Office take place continuously as needed although last trainings took place in 2018 due to relatively small numbers of evaluators being added to the Pool since then. Students have had a special training targeted at them specifically. Targeted trainings are carried out in the field of institutional accreditation (each evaluator has to undergo the training at least once in order to participate in this assessment). In external evaluation procedures, a training-oriented meeting is held with the chair and vice-chair of each committee in the initial stages of the procedure.

Another activity that contributes to training are the methodical materials that serve as guidelines for experts in evaluation of applications for accreditation of the study programs, for the preparation and evaluation of an application for institutional accreditation and for external evaluation of HEIs' activities.

NAB has practically not engaged international experts with the exception of a small number of evaluators from Slovakia and Czech evaluators living abroad. The structural obstacle to their involvement is the requirement for all experts to undergo the nomination procedure and to be permanently enrolled in the Pool of Evaluators. Engagement of ad hoc international experts who could make a significant contribution in specific cases is not allowed by the Higher Education Act. Practical issues arise with remuneration of experts that does not reach the EHEA standard and with the language, because all procedures are carried out in the Czech language. Accreditation procedures fall under the jurisdiction of the Administrative Procedures Code and the Code does not allow for a foreign language. External evaluation is not covered by this law and the procedure could potentially be carried out in English.

In order to meet the requirements for **impartiality and independence** of experts, NAB consults the selection of persons to be included in the Pool of Evaluators with the representative bodies of HEIs. During administrative proceedings and in external evaluation procedures, HEIs have also the right to veto members of evaluation committees without having to give a reason (only once). NAB then changes the composition of the committee accordingly.

The Statute of NAB includes stipulations ensuring impartiality and independence of experts, mainly eliminates space for conflict of interests for members of evaluation committees. Persons enrolled in the Pool of Evaluators are obliged to inform NAB without delay of any changes to their personal data, which enables continuous monitoring of possible conflicts of interest. NAB is also entitled to exclude members from the Pool of Evaluators in case of proven doubts about their independence or unethical behaviour.

Members of evaluation committees (along with all other persons involved in NAB's activities) are also subject to the Code of Ethics, approved by the Board in 2017. This document emphasizes the public interest, independence, impartiality, objectivity, ethicality and transparency.

The Pool of Evaluators has been implemented in a way that ensures effective recruitment and selection procedures. The trainings have been organized face-to-face in the form of introductory and rather general training. There is potential for a more elaborated training method and for more tailored training for different types of procedures. Attention has started to be paid also to further development of the capacities of experts. Impartiality and independence of experts is adequately secured. A disadvantage of the current design has been the inability to involve international experts in order to benefit from their experience and different outlook on QA.

3.5 Stakeholder engagement

The main external stakeholders include HEIs through their representative bodies (the Czech Rectors Conference and the Council of HEIs), central bodies of the state administration including related ministries, professional and employers' organisations and other bodies involved in educational and creative activities, and students. Students are represented via the Student Chamber of the Council of HEIs.

One way that stakeholders are involved is in the **nomination of members to the Board of NAB**. Representative bodies of HEIs, bodies of central administration including ministries, professional and employers' organisations and other bodies involved in educational and creative activities are entitled to nominate members. These stakeholders may also nominate persons for enrolled in the Pool of Evaluators.

Employers, state and public administration, research institutions and students are all represented among **persons enrolled in the Pool of Evaluators** along with evaluators from HEIs who form the majority of the Pool. Employers and/or state and public administration's representatives are compulsory members of committees for practically oriented degree programmes where they are full members with the right to vote and to influence the decision-making process. They are sometimes members of evaluation committees for other matters as well.

Students are extensively involved. One student is a member of the Board of NAB and a student is always appointed as a member of an evaluation committee. They are full members with the right to vote and to influence the decision-making process. The student member of the Board is responsible for enhancing student involvement in external QA procedures and developing the student part of the Pool of Evaluators. While students are a part of all evaluation committees, in some cases their involvement is not fully reasonable. This issue is pronounced in accreditation of fields of appointment of associate professors and professors, where student involvement in evaluation does not have a clear purpose when compared with the criteria for accreditation. Furthermore, many students are not actively involved in the assessment of degree programmes or in external evaluation after agreeing to be appointed to a committee. With notable exceptions, students generally tend to play a more passive role in committees.

Another standard form of cooperation with stakeholders are **consultations of NAB's drafted methodical guidelines or proposals on amendments to legal documents** such as the Statute with the representative bodies of HEIs. In addition, representatives of the bodies of representation of HEIs, MEYS and the labour union of employees of HEIs are invited to extended Board's meetings (usually take place one or twice a year with over-night stay at the site). In turn, representatives of NAB attend and speak at meetings of the representative bodies of HEIs and other related events such as meetings of deans' associations.

The forms and level of involvement of various stakeholders is largely based on the nature of each area of NAB's operation. In many areas involvement of stakeholders is directly stipulated by the Higher Education Act and/or Statute of NAB. In addition, cooperation is maintained also on the informal level. Real student involvement can however be seen as a challenge. Not only is their compulsory involvement unreasonable in certain types of procedures, they often tend to be passive members of evaluation committees with only formal engagement.

4. Priority actions

The following priority areas have been identified:

a) Independence of NAB

There is a close and complex relationship between MEYS and NAB because MEYS is responsible for providing to NAB administratively, materially and financially. NAB is not a legal subject which limits its operations significantly although it also lessens the administrative burden normally related to fully managing an agency's operations. However, there is a recognized need to define the mutual relationship more clearly, laying out the competences of each institutional partner and formulating rights and obligations. In the short to medium term, independence of NAB should be supported and enhanced through a memorandum to be signed by MEYS and NAB. This endeavour will require consensus and cooperation of both MEYS and NAB. It should be signed by March 2022 and secure a clear definition of roles, tasks and responsibilities. Emphasis will be placed on the independent nature of NAB, confirming the guarantee that MEYS will in no way interfere with NAB's activities or decision-making through administrative, material or financial means.

In the long term, the end goal is full organisational independence of NAB as a legal entity by acquiring legal personality. While acknowledging the increased volume of resources necessary to run the operations of a legal entity, the benefits will undoubtedly contribute to the independence of NAB. Besides being able to fully manage its own finances, premises and staff, NAB will also be able to diversify the sources of its financing to external projects. Establishment of NAB as a legal entity will require a change in legislation and creation of a new budget chapter. MEYS is the body responsible for submitting legislative proposal to the government. The legislative process will involve a variety of actors from other ministries to members of the parliament and support of key stakeholders is crucial. This goal is perceived as the next step in achieving full organisational independence of NAB and in maturation of the agency. Concrete steps to initiate the transformation of legal status can be expected by 2025.

b) Accreditation criteria

The current standards for accreditation were developed in 2016 prior to the establishment of NAB. The standards for degree programmes have built on previous accreditation standards of the Accreditation Commission, while the standards on institutional accreditation were newly created. They have a legal nature (government regulation) and NAB does not have to the authority to alter them, although NAB can use and has used its own discretion in applying them. The standards as a whole need to be re-evaluated and possibly revised according to the lessons learned from their implementation to date. The Board of NAB has the competence to propose changes to the government regulation to MEYS who would then submit a proposal for changes to the government. A broad discussion and general consensus on the updated standards will need to be reached with stakeholders, in particular with the representative bodies of HEIs. A reasonable timeline for submission of the proposal to the government is, given need for consultation, June 2023.

National qualification frameworks (NQF) were developed as a national document and approved by relevant stakeholders as a generally accepted framework for creation and assessment of degree programmes. NAB will incorporate the NQF into its methodical guidelines for evaluation in their next revision.

Recognizing that the government regulation on standards for accreditation is a generic document which strives to be applicable to all types of institutions and to all scientific disciplines, the need has

emerged for discipline-specific criteria in some fields of study. NAB has already implemented permanent committees for the methodology of assessment within its structure. These advisory bodies established in each field of study and consisting of experienced peer-review experts will serve as a platform for development and consultation of the discipline-specific criteria where needed. The criteria will become a useful tool for NAB in external QA processes as well as a guideline for HEIs. NAB will involve stakeholders mainly from the representative bodies of HEIs in drafting of the discipline-specific criteria. Taking into consideration the varied timelines of activities of the permanent committees, these criteria will be deliberated and adopted over the next several years.

c) Reporting from external QA activities

Reporting is one of the challenges posed by the ESG to the national QA system. Reports from external QA activities are made fully public in external evaluation procedures, but not in accreditation procedures where the yes/no decision along with a brief summary justification are published. Yet the accreditation procedures constitute the majority of NAB's external QA activities. NAB is currently not authorized to publish more than the above-mentioned parts of accreditation decisions. A legislative change to the Higher Education Act is needed to override the Administrative Procedures Act and to make a provision for publication of full reports from accreditation procedures. MEYS is the body in charge of submitting legislative proposals to the government. The support from relevant stakeholders, mainly the representations of HEIs, will be required in the legislative process. Due to the upcoming parliamentary elections in October 2021, submission of the proposal to the government will be realistic by December 2023. This action will result in removing the legislative barrier to publication of reports as required by the ESG.

Aside from removing the legislative barrier, it is necessary for NAB to determine which of the reports created during accreditation processes should be published. There are currently multiple reports in the process, resulting from the three-level assessment model. Their nature and role in the process will need to be carefully considered. Adjustments might be necessary to the form and content of the main report in order to satisfy the ESG requirements on reporting.

d) Peer-review assessment processes and site visits

The current model of accreditation processes is administratively demanding and lengthy. Given the high volume of applications for accreditation every year, the need to compose ad hoc evaluation committees for each case creates a major bottleneck in the process. Involvement in multiple evaluation committees at the same time is also burdensome for peer-review experts enrolled in the Pool of Evaluators. The entire process is moreover highly demanding on the NAB staff who compose the committees and administer contracts, coordinate the procedures and support the evaluation committees in their work. As a result, the final decision on an application for accreditation is almost never taken within 120 days of its submission, as is expected by the Higher Education Act. These reasons also lead to the fact that site visits are not a fixed part of degree programme accreditation processes (only of institutional accreditation processes, external evaluation and audit). A way needs to be found to incorporate site visits into degree programme accreditation without significantly increasing the workload for evaluation committees or staff and prolonging the length of the process. The site visits would also have to be thoughtfully designed with respect to the fact that in the ex-ante accreditation model, the assessed degree programme is not yet carried out at the time of assessment.

The accreditation processes need to be reconsidered and revised with regards to their effectiveness and fitness for purpose. They are laid out in the Statute of NAB. Change to the procedures will require constructive cooperation of stakeholders, mainly representative bodies of HEIs, and MEYS that is in

charge of submitting a new Statute of NAB to the government for approval. Any proposed changes should be informed by the good practice and expertise gained within the framework of the SEQA-ESG project. The proposal for a revision of the Statute is therefore envisioned by June 2023.

e) Training and development of the peer-review expert body

The majority of experts enrolled in the Pool of Evaluators have undergone initial face-to-face training in the processes and methods of external QA. However, this training mechanism has not reached all experts and has proved unpractical in the recent period when the Pool of Evaluators ceased to gain great numbers of new experts. The need has arisen for a more comprehensive, transparent and systematized training mechanism. Training of experts is fully in the competence of NAB. The new model will be implemented by December 2021. While initial training can be carried out in the distance (online) mode better suited to individual needs and more responsive to situations such as the pandemic, further development of the expert body will be best ensured by targeted meetings within and outside the permanent committees and thematic workshops or focus groups. The focus here should be not on basic information necessary to engage in assessment but rather on exchange of experience and expertise as well as on discussion of more in-depth topics related to assessment.

Absence of international experts, aside from Slovak experts and Czech experts living abroad, is perceived as another shortcoming in external QA processes. As a result, the current external QA system lacks international insights, enriching experience and expertise from other systems. They could be invited to individual procedures where their involvement would bring added value, in particular institutional accreditation and external evaluation. To facilitate this, a change in the Higher Education Act is needed to provide the option to appoint experts from outside the Pool of Evaluators to evaluation committees ad hoc in relevant cases. This proposal for legislative provision regarding the Pool of Evaluators should be made by December 2023.

The next steps will consist of adjusting remuneration regulations and of removing technical barriers, such as language of the procedure. While external evaluation could be carried out in English, the Administrative Procedures Act currently disallows accreditation procedures in a foreign language. Pursuant to this Code, NAB may accept documents from HEIs in a foreign language but is not entitled to carry out its procedures in a language other than Czech. A provision in the Higher Education Act would be necessary in order to override the Code and to permit NAB to carry out a part of the procedure in English, which would on the practical level enable involvement of international experts. Support and cooperation of MEYS and relevant stakeholders is a precondition to achieving this goal. A proposal for legislative provision in the Higher Education permitting NAB to use a foreign language in conducting its procedures is envisioned by December 2023.

f) Student involvement

Students have been extensively involved in external QA procedures as well as in NAB's structure when it comes to formal arrangements. However, their actual engagement in activities has not been pronounced (aside from the student member in NAB's Board). It is necessary to enhance their active participation in evaluation committees through more targeted communication and special training to better suit students' needs. The best way to facilitate this would be through more intensive cooperation with the Czech Student Chamber that is a member of ESU and can thus benefit from ESU's expertise on student training and engagement. Fostering a closer relationship with the Student Chamber would also have a positive impact on NAB's stakeholder relations. On the NAB's side, efforts will be made to create a more structured framework for student involvement in evaluation committees. Best practice gathered through the SEQA-ESG project should be used in building up

student involvement in NAB's activities, therefore an agreement on its enhancement through targeted training and adjustment of NAB's assessment frameworks will be done by December 2022. In addition to that, students should not be required to participate in evaluation committees for procedures where they cannot meaningfully contribute and their involvement does not bring added value, notably in accreditation of fields for appointment of professors. An amendment to the Higher Education Act is necessary to relieve the obligation to include students in all evaluation committees and the proposal has already been discussed with stakeholders and submitted to the parliament. The goal of this effort is to provide for a more effective and fit-for-purpose student engagement in external QA. All relevant stakeholders, mainly the student representative body and representative bodies of HEIs, as well as NAB and MEYS must come together to achieve this goal.

5. Summary table

No.	Priority action	Was the priority action already identified in BFUG TPG C-QA? (YES/NO)	Activity steps (including status of implementation in case the activity was already identified in BFUG TPG C-QA)	Actors	Timeline	Desired outcome
1	Memorandum between MEYS and NAB	NO	Reaching consensus on content → drafting memorandum → signing memorandum → implementation	NAB, MEYS	March 2022	enhancement and formal confirmation of NAB's independence from MEYS
2	Establishment of NAB as a legal entity	NO	Survey/ex-ante evaluation of legislation, detailed discussion with project experts about the independence issues, preparation of the proposal, incl. economic and legal aspects by MEYS, negotiations on legal form of NAB → consultation with stakeholders → submission to government by MEYS	MEYS, NAB, stakeholders (Ministry of Finance etc.)	by 2025	full organisational independence of NAB
3	Revision of accreditation criteria	NO	Proposal from NAB submitted to MEYS → consultation with stakeholders → submission to government by MEYS	NAB, MEYS, stakeholders (mainly HEIs)	by June 2023	more appropriate and up-to-date standards, increased ownership of the standards for NAB
4	Legislative provision for publication of reports	YES (as a part of general need to make procedures ESG-compliant)	Proposal from NAB submitted to MEYS → consultation with	MEYS, NAB, stakeholders (mainly HEIs)	by December 2023	removal of legislative barrier

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			stakeholders → submission to government by MEYS			
5	Revision of NAB Statute	YES (as a part of general need to make procedures ESG-compliant)	Proposal from NAB → consultation with stakeholders → submission to government through MEYS	NAB, MEYS, stakeholders (mainly HEIs)	by June 2023	more effective and fit-for-purpose procedures, less overload on experts and staff, incorporated site visits
6	Development of new mechanism for training of experts	NO	Preparation of content → technical solution → implementation	NAB	by December 2021	more comprehensive, transparent and systematic training
7	Provisions for involvement of international experts	YES (as a part of general need to make procedures ESG-compliant)	Proposal from NAB submitted to MEYS → consultation with stakeholders → submission to government by MEYS → (pending adoption of legislative change) adjustment of remuneration regulations → removal of technical barriers, i.e. language	NAB, MEYS, stakeholders (mainly HEIs)	by December 2023	possibility to involve international experts where fit for purpose
8	Enhancement of student involvement	NO	Establishment of closer cooperation with Student Chamber → consensus on and creating conditions for student engagement → implementation	NAB, stakeholders (mainly HEIs and students)	by December 2022	more effective and fit-for-purpose student involvement

6. Conclusions

In 2020 MEYS made public two strategic documents for higher education sector in the Czech Republic for the next period: Strategic Plan of the Ministry for Higher Education for the Period from 2021 and Strategy for the Internationalisation of Higher Education for the Period from 2021. Both documents were discussed and agreed on with wide range of stakeholders (higher education institutions, NAB, other ministries, employers, student's representation, etc.). Cooperation with NAB is mentioned several times in both documents. NAB is successor of Accreditation Commission the Czech Republic and was established by the Amendment to the Higher Education Act in September 2016. After the initial period is now time for NAB to be more engaged internationally and get prepared for full membership in ENQA and in EQAR as well.

Internationalisation of higher education should also be reflected in ensuring its quality at the national level. A key aspect of internationalisation is the application of the ESG in the work of NAB, which requires full integration into European accreditation agency structures and international recognition of the national higher education evaluation and quality assurance system. It is also necessary to integrate elements of internationalisation into the structure and activities of NAB so that it can act in the international environment as a sought-after partner and develop effective contacts and forms of bilateral or multilateral cooperation. Possible tools for internationalisation include the involvement of foreign experts in the activities of national accreditation agencies and quality assessment processes, which is common in the EHEA and helps to transfer good practice, new perspectives and impulses from abroad.

One of the objectives of the Bologna Process is to ensure the quality of higher education through an independent, internationally recognised accreditation agency. For full international recognition of the national quality assurance system of higher education, it is necessary to meet the ESG standards and successfully pass the external evaluation of compliance with these standards by an international panel of experts. In order to gain international renown, strengthen the quality of its activities, and develop international cooperation, NAB will:

- seek integration into the European networks of accreditation agencies, take concrete steps by 2021 to apply for full membership to ENQA and to register in the EQAR register,
- participate, as much as possible, in ENQA projects and working groups, develop cooperation and strengthen its position within CEENQA,
- following registration in EQAR, enter accreditation data into the Database of External Quality Assurance Reports (DEQAR).

Increasing the degree of internationalisation in NAB's activities is a prerequisite for successful involvement in European structures, and operation in the international environment. It is also important to establish and maintain international contacts and take advantage of opportunities to engage in international activities within higher education quality assurance.

- NAB, in cooperation with MEYS, will strive to strengthen the representation of foreign experts in NAB bodies and enable the involvement of foreign evaluators, and will support the participation of Czech evaluators in accreditations abroad,
- NAB will develop bilateral cooperation with foreign accreditation agencies, maintain and develop contacts, exchange of information, and exchange internships for accreditation agency employees,
- NAB will be involved in relevant international projects through MEYS.