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National study: Survey of internal quality assurance systems (WP 5)

Czech Republic

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1. Introduction: National policy on higher education quality assurance

The post-1989 transformation of Czech society also involved higher education. In higher education, dissociation from the communist-like practices primarily took the form of liberalising academic structures. Under the Act on Higher Education no. 172/1990 Coll. (Act of 1990), sectoral liberalisation was made the key reform concept whose realisation brought the system far towards delegation of decision-making powers from the state to academe (Harach et al. 1992). These developments reflected the widespread social distrust to government and government decision-making following the unhappy experience with 40 years of centralised planning by the Communist Party (Neave 2003). Under such conditions, policy and policy-making became forbidden words, and the Ministry was left responsible for the allocation of the budget and coordination of system development. All other powers resided with the institutions (De Boer and Goedegebuure 2003).

Assurance of minimal quality standards through accreditation was supposed to be part of systemic coordination as attested by the establishment of the Accreditation Commission (AC) in September 1990. Once implemented, accreditation would allay the growing academeled concerns on the dropping standards of quality of tuition (Hendrichová 1993). Nonetheless, due to the legally unspecified status of accreditation in the Act of 1990, systemic quality assurance in the early 1990s boiled down to approval of six new regional universities and discussions between the AC members how to handle the accreditation scheme. The discussions on the take up of accreditation resulted in the initiation of improvement-oriented evaluations of faculties in the related fields of study which the AC started in 1993.

The establishment and functioning of the AC in 1990 suggests that quality of higher education was on the agenda in the early 1990s (Vinš 2003). However, it was assigned a secondary role, as the major reform thrust was oriented towards sectoral liberalisation. In addition, there were three other factors working against the formation of a system-level quality assurance policy. These were: the missing specification of accreditation in the provisions of the Act of 1990, social disdain for policy-making, and the lack of general expertise in quality matters (cf. Cerych 2002). Altogether, they gave rise to the situation characterised by the presence of accreditation as an implementation instrument but absence of the factual policy content to be implemented.

The absence of the system-level policy on quality assurance was kept throughout the mid 1990s. This was largely because of the fact that, in the mid 1990s, efforts primarily concentrated on the creation of a new legal framework to account for the most glaring limitations brought about by sectoral liberalisation and decentralisation (namely confinement of the status of legal persons to faculties) (Hendrichová and Šebková 1995; Beneš, Staněk, and Šebková 2006). Under the absence of the system-level policy, the AC continued with the improvement-oriented evaluations of faculties and the HEDF with the distribution of the grants to support improvement of educational activities at HEIs and their organisational parts (faculties, departments). As a result, no programme accreditation to set the minimal quality standards was in operation either in early or the mid 1990s.

The situation changed from the late 1990s onwards after the adoption of a new legal framework set by the Act on Higher Education no. 111/1998 Coll. (Act of 1998). The passage of the Act of 1998 had ramifications for consolidation of sectoral governance and policy formation. Under the Act of 1998, the system moved from a full institutional focus to a more balanced state-institution-market focus and domain-specific policies with the development goals emerged (De Boer and Goedegebuure 2003). The commencing market orientation of the system, represented by the possibility of establishing private HEIs financed through the tuition fees, was accounted for by the initiation of programme accreditation. The

responsibility for assuring quality of educational activities of HEIs externally was legally vested in the AC. As a result, the AC was legally mandated to

- evaluate activities pursued by the HEIs and the quality of accredited activities, and publish the results of such evaluations;
- assess other issues concerning the system of higher education, and express its standpoints on these issues (Act of 1998, § 84).

In practice these lines of responsibility of the AC refer to: accreditation of study programmes, approval of private HEIs to operate within the sector¹, and external evaluations of HEIs including evaluation of accredited activities. From this, it follows that the Act of 1998 considerably extended the scope of activities and workload of the AC (Šebková 2004, 2009). The Act of 1998 is less specific about internal (institutional) quality assurance measures, stipulating only that every HEI is obligated to undertake internal evaluation procedures and make the results of these procedures public.

The formation of a system-level quality assurance policy was made more specific in the Ministry's Plan for 2000-2005 and the Ministry's Plan for 2006-2010. The corresponding policy goals as read off from the two Plans comprise assurance of the minimal quality standards and promotion of excellence through continuous improvement in areas in which institutional capacities exist. At the same time, the efficiency in financial management is stressed overall. The new Ministry's Plan for 2011-2015 largely keeps the domain-specific policy goals as already formulated. However, the Ministry's Plan for 2011-2015 elaborates on the link between the quality of tuition and the levels of the block grants for educational activities allotted to HEIs funded from public sources. In this respect, the Plan suggests that the Ministry will adopt new indicators for calculating the grant levels to enhance institutional diversity of the Czech higher education landscape.

2. Higher education institutions selected for enquiry

Four higher education institutions were selected for the IBAR enquiry. The selections were made on the basis of:

- *Type* to account for institutions whose activities are *funded from public* (3 HEIs) *and private* (1 HEI) *sources*. The ratio 3:1 follows the overall distribution in higher education enrolments from which circa 15% pertains to private HEIs;
- *Profile* to include both *comprehensive* (1 HEI) and *specialised* (3 HEIs) institutions, again following their representation in the system of higher education (73 HEIs in total out of which 11 comprehensive, 62 specialised).

Profiles of selected four HEIs follow. Institution A is a university with the tradition dating back to the 1920s. The present-day organisational structure of HEI A comprises four faculties with significant research-orientation² due to a very high percentage of applied research and doctoral students. Founded in the sixteenth century, Institution B belongs among the oldest universities in the Czech Republic. At present, Institution B is a comprehensive, multi-field university with eight faculties. Major research activities show the diversity of disciplines, including research into quantum optics, hematooncology or medieval and renaissance texts. Institution B is especially proud of its international activities, comprising not only student and teacher mobilities but also a wide offer of programmes taught in foreign languages and educational activities of several international centres. Institution C was founded in the

¹ Based, among other criteria, on accreditation of at least one study programme.

² See the high ratio of research activities per academic staff member compared to other Czech HEIs.

nineteenth century. The foundation foreshadowed many dramatical and complicated developments in the century to come. Despite historical difficulties, the post 1989 conditions were conducive towards re-establishing Institution C, which, in the last 20 years, has become all-round modern institution, offering technology-oriented study possibilities at eight faculties. Institution C also shows a strong research profile, helping it to reach the 400-600th position in QS World University Rankings. Institution D is private institution established in the late 1990s. Institution D offers higher education studies in nine programmes at two faculties focusing on economics and management. The BA/MA levels of programme offer were complemented by the third tier in 2009. The mission of Institution D is to become the top respected and sought after educational and research institution, providing its graduates with full-fledged personal development and the competitive advantage in career opportunities in the labour market.

3. Internal quality assurance policies: formation in institutional contexts

The institutionalisation of internal quality assurance is, in its widest form, based on the national quality assurance policy and its facets. The national quality assurance policy, set in the Act of 1998 and the long-term plans of the Ministry as major strategic documents, aims at assuring of the minimal quality standards through programme accreditation and promotion of institutional excellence, in effect though internal and external evaluations³. Stressing the aspects of efficiency, the national policy further stipulates that all HEIs should do internal evaluations of their activities and make the results public. HEIS are legally obligated to follow the Act of 1998 by creating their own long-term plans of institutional development. HEIs use their institutional plans, made by the top governance bodies (vice-rectors, academic senate)⁴ as a rule for five years to declare having the internal quality assurance policy in place and to specify its aims and basic characteristics. This is even more so in case that the Ministry Plan makes quality assurance the explicit priority of system development, such as in case of the Ministry Plan for 2006-2010 and for 2011-2015.

Institutions A, B, C, and D are no exception to this rule. Their institutional policies on internal quality assurance, including the corresponding policy goals, are parts of their longterm plans for 2011-2015. To make an example, the Long-term Plan of Institution C for 2011-2015 reads: "Following the identification of trends in implementing criteria and mechanisms of quality assurance into institutional activities, Institution C will analyse and clarify its strategic goals and take the steps as set in the annual updates to the Plan. Institution C is aware that quality of all institutional activities with the prior focus on outputs is the key characteristic of the university which has to be identified, managed, monitored, and enhanced. To enhance the quality ... Institution C will make use of its own experience as well as outcomes of Institution C's involvement in national and internal projects including results of the EUA re-evaluation of Institution C. The envisaged steps for policy implementation entail especially: development of internal quality management processes; enhancement of effectiveness of all activities with the major focus on education and research; data collection, their systematic monitoring and analysis; making of predictive models to create conditions for changes in organisational and governance structures to be up to the impact of the external environment; and concentration on continuous improvement of quality of working conditions of Institution C's employees at all organisational levels" (Dlouhodobý záměr instituce C

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³ Undertaking of external evaluations, including evaluations of accredited activities, is nationally within the competence of the Accreditation Commission, though nothing prevents HEIs to undergo external institutional evaluations by other agencies/subjects (EUA, FEANI etc.) the outputs of whose are, however, not legally binding for Czech state authorities (the Accreditation Commission).

⁴ Once they had been discussed by the Board of Trustees and the Scientific Council.

2011-2015). The formulation and implementation of these steps is concretised in the *Rector's directive* and is further within the competence of the *Department for Quality Assurance*, organisationally part of the institution C Rectorate. The activities of the Department for Quality Assurance are overseen by the Council for Quality Assurance, set up in 2009 and composed of members of Institution C top management, staff of the QA Department, and faculty representatives (Výroční zpráva instituce C 2009).

In comparison, the quality assurance policy of Institution D is put forward more succinctly in the institution's Long-term Plan for 2011-2015. The corresponding part states: "Institution D will make efforts to produce material and organisational conditions conducive to strengthening the quality of its educational and research activities, e.g. through participation in competitive procedures. Institution D will continuously innovate study courses in its programme offer and will increase the numbers of high-quality outputs of research activities such as publications with the impact factor. Institution D will make use of methodical, process, and content-based instruments of internal evaluation to continuously enhance professional and pedagogical competencies of academic staff" (Dlouhodobý záměr instituce D 2011-2015).

Regardless of their length, institutional policies on quality assurance are set in institutional development plans at a low level of specificity. This is, understandably so, to enable their concretisation in the process of implementation by individual units (faculties) that are supposed to formulate their own development goals in faculty plans and act accordingly. The plans and goals of the faculties should be in line with the institutional plan. Nonetheless, despite keeping to the general level in goal formulation, the quality assurance policies of Institution C and Institution D do include explicit reference to the ESG⁵ as well as the National qualifications framework for tertiary education⁶. The forming internal quality assurance policy of Institution A also sets implementation of the outcomes of the National qualifications framework as one its goals (Dlouhodobý záměr instituce A 2011-2015).

However, long-term plans of institutional as well as faculty activities are not the only strategic policy documents setting the goals and subject matter of internal policies on quality assurance. To this end, Institution A, Institution B, Institution C and Institution D also make use of the *institutional statute*. The statute is the major internal regulation of the corresponding HEI. The statute of Institution A gives the priority lines of institutional quality assurance policy as follows: "Assuring quality of institutional activities is made on the basis of internal evaluation. The internal evaluation is undertaken with the aim of systematic monitoring, stimulating, correcting, and influencing all activities of Institution A to attain high quality of educational, scientific, research, development and other creative activities of Institution A. Two types of internal evaluation are distinguished. These are: regular (periodic) evaluation done every year in correspondence to the making of the annual report and complex evaluation undertaken every 3-6 years on the basis of internal evaluation report of Institution A and expert peer review, including the on-site visit and final discussion on the findings [with the representatives of Institution A]" (Statut instituce A 2006).

Similarly, the statute of Institution B also identifies internal evaluation as the basis of the institutional policy on quality assurance. In this respect, the statute states: "Internal evaluation of activities of Institution B concentrates on regular evaluation of effectiveness of the level of educational, scientific, research, development and other creative activities as well as the efficiency in resource management. The evaluation is done as the evaluation of courses, faculties and other units of Institution B. Evaluations of academic staff by students are part of the process and are done for the internal purposes at the faculty level. The evaluation results

⁵ In case of Institution C made explicit in the annual report on institutional activities for 2009.

⁶ As still developed within the Individual National project "Národní kvalifikační rámec terciárního vzdělávání [National qualifications framework for tertiary education] (Q-Ram)" to be finalised in 2011.

are communicated to deans and the faculty boards overseeing quality of courses as one of the criteria for personnel development and management. The scope and focus of the internal evaluation is set by the Scientific Board of Institution B. Faculties undergo evaluation at least once in every five years; Institution B as the institution as a whole once in every four years, the period of which corresponds to the rector's term of office. The evaluation is done by the internal committee whose members are nominated by the rector. The results of the internal evaluation are reflected in the *annual report on institutional activities* and in the *update to the institutional long-term plan of development*" (Statut instituce B 2008).

Given the general nature of institutional statutes covering a wide range of issues, it is not without interest that internal quality assurance procedures, especially in case of Institution B, are treated in some level of detail, including the organisational structure. The logical explanation is twofold. First, the Act of 1998 obligates HEIs to address internal quality assurance processes (§ 17). Second, the statutory rules and responsibilities compensate for a self-standing policy on internal quality assurance that would be based on specific documentation.

In consideration of what is said above about Institution A, Institution B, Institution C and Institution D, it is possible to identify a distinct pattern of formation and implementation of institutional quality assurance policies. The pattern goes like this:

Act of 1998 + Long-term Plan of the Ministry as external sources ---> statute ---> long-term plan of institutional development (concretised in quality assurance by rector's directive⁷) ---> (goals to implement elaborated by Department for Quality Assurance⁸) ---> implementation ---> annual report on institutional activities + update to long-term plan of institutional development

With the implementation phase referred to in Section 4, the linkage of strategic documents deserves a brief commentary. The Act of 1998 sets the elaboration of all of the documents (the Ministry plan incl. annual update, institutional statutes, institutional plans incl. annual updates, annual report on institutional activities). Although the linkage, made on the legal basis, shows the logical interconnectedness between individual documents, it is also conducive to making the overall pattern very formal in nature and top-down oriented, encouraging reactive, compliant policies. As to the sources of external impact, there is one more that needs to be mentioned. It is the questionnaires used by the Accreditation Commission (AC) as the pre-requisite for external evaluations of institutional educational activities. The questionnaire structure, showing the orientation towards input parameters such as staff qualifications or infrastructure (File et al. 2006), is reflected by Institution A, Institution B, Institution C and Institution D in the design of their internal quality assurance processes, as the external evaluation outcomes bear on (not) granting (re) accreditation of study programme(s) at the evaluated (part) of the institution by the AC. The detailed probing into the facets of internal quality assurance policy at Institution D has revealed that the Institution D internal evaluation procedure adopts the external criteria of the AC almost to the letter (Čechák 2008).

Hence, the foregoing suggests that internal quality assurance policies of Institution A, Institution B, Institution C and Institution D are formulated in parts of mandatory strategic documents made by the institution (long-term plan + updates). The documents are accessible publicly (another legal requirement of the Act of 1998), though only in Czech language. In this respect, the approach of Institution C is somewhat exceptional in sense of having the policy detailed in the rector's directive and institutionalised by the Department for Quality

⁷ Applicable especially to Institution C.

⁸ Applicable especially to Institution C.

Assurance. The directive itself, however, is not publicly available. Despite the "legalistic" policy context, hindering proactive institutional commitment, the respective institutional policies of Institution C and Institution D refer to the ESG. They also include the indirect reference to learning outcomes through taking into account the outcomes of the corresponding national project (Q-Ram). In comparison, the institutional quality assurance policies of Institution A and Institution B seem to be more reactive in content, though in case of the former institution, the policy refers indirectly to learning outcomes again through the mention of Q-Ram project. The utilisation of learning outcomes by HEIs as pre-designed within the Q-Ram project, is, however, uncertain, as a) the project is yet to be finalised, b) the national higher education policy-making is much unsettled. Overall, the institutional quality assurance policies of Institution A and Institution B tend to rely more on compliance with external quality measures taken by the AC, especially external evaluations and programme accreditation, which are in turn taken as measures of quality internally. The corresponding section of the long-term plan of Institution A speaks volumes, "At the present time, quality of educational activities is assured first of all on the basis of evaluation of study programmes by the Accreditation Commission" (Dlouhodobý záměr instituce A 2011-2015 11). Similarly, Institution B concedes not having the internal quality assurance policy yet institutionalised, for the implementation of the internal system of quality assurance is set as the development priority for the 2011-2015 period (Dlouhodobý záměr instituce B 2011-2015 9). The institutionalisation is hampered by the fact that, in 2008, the student-representatives submitted "the Strategy of evaluation of quality of educational activities at Institution B" to the rector's advisory board. The advisory board, however, did not recommend the acceptance of the strategy, for "its many formal and factual shortcomings" (Výroční zpráva instituce B 2008).

4. Internal quality assurance policies: Implementation

As argued in Section 3, institutional contexts are not much conducive to forming selfstanding, proactive policies on internal quality assurance. For this reason, the organisational aspects of implementation of these policies again follow the contents of the institutional statute and (or) long-term plan. These two regulatory policy instruments (statute, long-term plan) make the groundwork for the institutional quality assurance policy to function and be implemented. The analysis of the documents in question at Institution A, Institution B, Institution C and Institution D shows that the substance (underlying organisational principle) of their institutional quality assurance policies is *internal evaluation*. In case of Institution A, Institution B and Institution C, the internal evaluation takes two forms. First, there is the regular (periodic) evaluation which is done every year for the sake of making the annual report on institutional activities. This evaluation thus concentrates on collection and analysis of data required externally (by Ministry, Council of Research and Development) to be reported, most notably the types and numbers of publication outputs, which is used as a performance indicator for staff assessment. Different sorts of institutional databases are used as instruments for this regular evaluation. Aside from that, Institution C also looks into quality of staff pedagogical activities through participatory observations, mentoring, and exchange of experience between staff members to be used for innovation and modernisation of curricula and for enhancement of teaching skills of Institution C academic staff (Výroční zpráva Institution C 2009).

Second, there is the *complex evaluation involving major organisational units* (*faculties*, *institutes*) organised less frequently, i.e. every 3-6 years (Institution A, Institution C), or 4-5 years (Institution B), based on the *internal evaluation report* and, in case of Institution C, with the involvement of the EUA evaluators. In terms of its internal evaluations, Institution C capitalises on involvement in project activities, led by the EUA, ESMU or CHES

in the mid 2000s, aimed at developing and managing internal quality assurance processes (incl. data collection and analyses, piloting the assembly of self-evaluation report and intra-institutional collaboration between different units and levels). At Institution C, the organisational responsibility for implementation of the internal quality assurance policy involves the top level (rector, vice-rectors, academic senate plus also Department for Quality Assurance, Council for Quality Assurance) and mid-level (deans, faculty boards overseeing quality of courses) institutional management. The top-management level as being responsible for quality assurance policy implementation also applies to Institution A (rector) and Institution B (Scientific Board, rector), however, the responsibility of lower level organisational units is not delineated. Hence, in practice it very much depends on personal initiative of faculty staff namely those sitting on the faculty senate, with up to half places occupied by students (legally set minimal representation of students is one third of the senate members).

The case of Institution D as a private institution is, to some extent, different in the organisational matters from publicly funded universities (Institution A, Institution B, Institution C). Firstly, Institution D does not discriminate between regular and complex internal evaluations. Despite this, the analysis shows that Institution D does undertake the complex internal evaluation in a five-year interval (see Vnitřní hodnocení instituce D 2006-2010). Secondly, as already suggested, the internal evaluation procedure in its scope and focus corresponds to the structure and content of the *questionnaire developed* and used by the *AC* for external evaluations of private HEIs (Čechák 2008). The *AC*'s questionnaire therefore serves as a template for internal evaluation at Institution D. The areas covered entail educational activities, research activities, students, graduates, management and organisation and material infrastructure incl. information and communication technologies. Specific criteria are set for each area to identify its strengths and weaknesses. Thirdly, Institution D explicitly declares the implementation of its internal quality assurance policy measures be in line with the ESG (Vnitřní hodnocení instituce D 2006-2010). The measures also account for student involvement in evaluation of tuition (see further). Fourthly and similarly to public universities, the organisation and implementation of the internal quality assurance policy is initiated by and falls within the competence of the rector and her advisory board including vice-rectors. The delineation of internal organisational structure also specifies competencies and responsibilities of organisational units up to the level of heads of departments (rector – vice-rectors – deans – heads of departments).

Quality assurance policies at analysed institutions take account of student involvement, as all four institutions declare in their strategic documents. The approaches towards the involvement, however, differ across Institution A, Institution B, Institution C, and Institution D. Institution C and Institution D combine student evaluations of quality of tuition with *graduate surveys* on quality of studies and employability. At both institutions, student evaluations are done twice an academic year (after winter and summer semester) by means of questionnaires distributed either electronically or in paper form (both methods used). The response rate is between 10% (Institution C) and 30% (Institution D). The graduate surveys organised by Institution C and Institution D take place in the one-to-two-year interval, based on a *questionnaire*, sent out electronically. In this respect, Institution D capitalises on its Club of Graduates, established in 2007 and having more than 550 members (Vnitřní hodnocení instituce D 2006-2010). The evaluation results are taken into consideration in the assessment of academic staff by faculty governance (heads of departments, deans), and factor into the content of strategic policy documents. At Institution C students are involved in the questionnaire design through their representatives in the faculty senates. Student representatives are elected by students of the given faculty. This approach is not applied at Institution D, where there is no student involvement in institutional governance bodies, and

the questionnaire designs are made by the advisory board of the rector, including vice-rectors. Students thus function as recipients rather than makers of student evaluation procedures (Čechák, 2008). As far as Institution A and Institution B are concerned, their approach towards student evaluation is different. In both cases, organisation of student evaluations has so far been largely left to individual initiatives of faculty members. However, Institution A has already taken some steps towards implementation of student-centred evaluation procedures institution-wide. These steps entail organising student evaluations of academic staff in the academic year 2008/09 through the *questionnaire*, electronically distributed to BA and MA students at all faculties of Institution A.

The analysis of implementation of internal quality assurance policies at Institution A, Institution B, Institution C, and Institution D reveals little if any officially documented relationship between teaching and research. This finding is somewhat surprising, given the university status of all four institutions, presupposing a tight connection between these two basic activities through MA and PhD study programmes. The closest reference to the relationship in question can be found in case of Institution D's policy, making the connection between the focus of MA/PhD theses and research and development activities in individual fields and at individual workplaces as a development goal for the 2011-2015 period. The other officially documented evidence is inconclusive. The likely explanation for the lack of a take up on research in institutional quality assurance policies is that research policies are developed independently (in parallel to) quality assurance policies on education, and that the research results, mostly narrowed down to numbers of published items/patents and the like, are de facto taken as a proxy for quality of institutional education. This parallelism is strengthened by differentiated state funding streams for higher education and research. Finally, there is again the impact of accreditation as the external quality measure, significantly taking into account scientific qualifications (the ranks of professors and associate professors) in the process of programme (re-) accreditation. In effect, external measures taken by the AC support the *implicit* link between assurance of the quality of research and education within HEIs, with *explicit* internally applied measures underdeveloped.

Due to the taken-for-granted approach to the relationship between quality of tuition and research, there is, policy-wise, a lot of unlocked potential. This is because of the existence of instruments specifically aimed at strengthening the relationship in question. First, there is *specific research* funding, distributed by the Ministry among publicly funded universities on the formula basis and aimed at promoting study-related research activities of students enrolled in Master and doctoral programmes. Second, there is *the Higher Education Development Fund* (HEDF) with one of its priority areas specifically focusing on the support of *student creative activities for innovation of education*. The HEDF functions on a competitive basis, and the priority referred to is open for doctoral students and their supervisors to develop their educational activities with research grounding. Third, there can be *the internal institutional grant agency* (IGA), serving the similar purpose by the distribution of grants on the competitive basis. Finally, there are *staff and student mobility grants from Erasmus programme*, allowing to gain experience and expertise abroad that can again be utilised for linking teaching and research activities even inter-institutionally.

Judging from the available documentation, Institution A, Institution B, Institution C, and Institution D make use of these instruments. Institution A and Institution D have even started the internal grant agencies. The point, however, is that, so far, the links between quality of tuition and research have not been made part of their institutional quality assurance policies. Their policies concentrate on quality of education, with the tacit assumption that results of the independently formulated research policies will do the job, i.e. demonstrate high quality tuition within MA and PhD programmes.

The above analysis into the institutional implementation of the quality assurance policies by Institution A, Institution B, Institution C, and Institution D shows that this implementation is significantly top-down oriented. This top-down orientation is corroborated by the organisational responsibilities entrusted to the top institutional governance level (rectorate, scientific council, university academic senate) as well as mid-level governance bodies (deans, faculty senates) as in case of Institution A, C, D (deans, heads of departments). In this respect, Institution C also makes use of its Department for Quality Assurance (rectorate level), also enhancing the implementation of its institutional quality assurance policy *explicitly* through the project undertaken by Institution A in 2009-10 and aimed at impact assessment of implementation of the three-tier study was also instrumental in developing the internal quality assurance policy.

Street-level academics and students seem to be peripheral to such a top-down implementation style. Nonetheless, they may turn to their elected representatives in the decision-making bodies (academic senates) with suggestions and initiatives.

As far as the collaboration with secondary schools is concerned, the analysis reveals this aspect be covered in quality assurance policies of Institution A, Institution C, and Institution D. The most likely reason for such a state of affairs is increasing competition among Czech HEIs. Providing higher education in technology and chemistry fields, generally perceived as unpopular and difficult to study, Institution A and Institution C face limited demand for study places whilst study opportunities remain wide at several locations. Institution D, as a private university dependent on tuition fees and competing for students with other similarly-profiled HEIs, also faces a lot of external competition. The examples of implementation instruments used include scholarships for talented students or for students from deprived socio-economic backgrounds, summer schools, on-site demonstrations of popular experiments, laboratory courses led by higher education staff (all at secondary school's premises), media presentations, and student job-fair presentations. Institution D presents a particularly inspiring approach by being a member of the Unity of Education *Institutions*. Organisationally, this Unity entails Institution D, tertiary professional school, secondary professional school, 8-year grammar school, all focused on economics and management and funded by the same private consortium. The plans are to open a kindergarten and primary "magic" school to cover all ISCED levels. In this way, the Unity offers a student the possibility of studies, led by the principally one organisational pattern through different educational levels.

5. Answering the research questions

The analysis concerning Institution A, Institution B, Institution C, and Institution D, made in Section 3 and 4, makes it possible to formulate answers to the pertaining research questions.

Ad. I: The national policy, stipulating that all HEIs must perform internal evaluations and make the results public, is understandably rather general, giving HEIs a leeway for implementing internal policies in line with their profile, needs, and development preferences. Nonetheless, the mandatory elaboration of statutes, institutional development plans and their updates, reflecting on state priorities, brings in a certain systemic pattern to be followed (also applicable for other higher education policy domains). Institutional quality assurance policies of Institution A, Institution B, Institution C, and Institution D are still (far) more based on

⁹ In 2009, Institution C launched the development project "Assurance of quality at Brno University of Technology" which was used to build up the organisational structure and material, technical, and human capacities of the Department for Quality Assurance (Výroční zpráva instituce C, 2009).

inputs (staff qualifications, infrastructure) than outputs (such as learning outcomes). This is due to the programme accreditation requirements applied externally. With the exception of Institution C, the other three institutions do not have "self-standing" quality assurance policies, the corresponding policy lines are set in statutes and long-term plans. The explicit references to the ESG are included in case of Institution C and Institution D's policies. The details of quality assurance policy of Institution C are set in the Rector's directive, which cannot be accessed publicly. All other pertinent documentation (long-term plans, etc.) is accessible on institutional web pages in case of all four institutions, but the information is always available in Czech language only.

- **Ad. II:** Broad schemes for organising internal quality assurance policies can be found at all four institutions under analysis. The schemes entail regular and complex internal evaluations, with former done rudimentary on a yearly basis and the latter initiated circa every 4-5 years. Questionnaires and databases, along with self-evaluation reports (for complex evaluation) figure among the major implementation instruments.
- **Ad. III:** Responsibilities for implementation of internal quality assurance policies at Institution A, Institution B, Institution C, and Institution D involve the top institutional governance level. This refers to the rectorate, including the rector, rector's advisory board, vice-rectors, university academic senate and other bodies such as the Department for Quality Assurance, the scientific council. Variations in the extent of involvement of functionaries and bodies have been found (e.g. scientific council as an initiator of complex internal evaluation at Institution B, involvement of the Department for Quality Assurance at Institution C). Quality assurance policies of Institution C and Institution D also set the responsibilities of mid-level organisational units (deans, heads of departments in case of Institution D, deans and faculty senates in case of Institution C).
- **Ad. IV:** Again, all analysed institutions declare student involvement in internal quality assurance procedures through student evaluation of tuition on a questionnaire basis. Under closer scrutiny, four HEIs seems to show possibilities for more active involvement of students in communicating the construction of the corresponding evaluation designs through their representatives co-opted into the university senate and faculty senates (i.e. the designing of evaluation procedures is more likely to reach down to the street-level, not taking place only at the top decision-making level (senates)).
- **Ad. V:** The linkage between teaching and research in internal policies on quality assurance, as formulated at Institution A, Institution B, Institution C, and Institution D in their policies, leaves something to be desired. This is despite the existence of several instruments functioning as incentives (specific research funding, HEDF, IGAs, mobilities) for developing the linkage. The assumption is that the linkage is considered as taken-for-granted, primarily due to institutionally provided MA/PhD programmes passing the accreditation requirements that do consider staff research qualifications and outputs. Hence, accreditation and evaluations by the Accreditation Commission done externally along with research results achieved by the institution internally function as a proxy for the linkage in question.
- **Ad. VI:** The implementation of internal quality assurance at the four institutions under analysis is significantly top-down oriented. The distribution of organisational responsibilities (see III) is conducive to this orientation. The policies are monitored on a yearly basis as part of period internal evaluations, however, the extent to which corresponding measures are taken does differ, ranging from repetition of information presumably due to the lack of initiative

(Institution B in annual reports) to using funding from the Development Programmes to aid in policy implementation (Institution C).

Ad. VII: Statements on collaboration with secondary schools are part of internal quality assurance policies of Institution A, Institution C, and Institution D. The explanation at hand is that these specialised institutions face greater competition than comprehensive Institution B. The instruments made use of range from more traditional (scholarships, summer schools, media marketing, marketing at job fairs) to more innovative (laboratory courses at secondary institutions led by higher education staff and the Unity of Education Institutions) (see p. 10).

6. Conclusions: barriers and good practice in implementation of institutional policies on quality assurance (in reflection of ESG)

Institutional policies on internal quality assurance have been under development since the late 1990s after the adoption of the new legal framework. The newly formed state policy was set in the major policy documents, most relevantly in the Long-term Plan of the Ministry for 2006-2010, which gave the general policy lines and priorities. These lines and priorities were to be reflected by HEIs in their policy documents and implemented into their institutional settings. Thus, the linkage, comprising the Act of 1998 ---> the long-term plan of the Ministry (+ annual updates) ---> statutes and long-term plans of HEIs (+ annual updates) ---> annual reports on activities of HEIs ---> annual report of the Ministry on the higher education sector¹⁰, was put into operation throughout the 2000s. The outside view suggests that this linkage of strategic policy documents and annual reports is logical and instrumental to formulation and implementation of sound policies at institutional level. However, from the inside analytical perspective, the take-up of the Ministry and HEIs on this linkage may be problematic, due to complex implementation structures and processes it tends to induce. More to the point, the impact of the above-mentioned mandatory policy documents on institutional environments is impaired by several factors, i.e. missing analyses according to standardised methodology, missing evaluation of previously made strategic documents when elaborating new ones, approaching long-term plans of HEIs as "necessary evil", purely formal role of annual reports, and no link between the plans of HEIs and the accreditation procedure (Ježek 2005), which, in effect, may promote reactive policy-making and compliance cultures rather than strategic planning.

As to quality assurance, the reactive policy-making at institutional level is augmented by the externally applied measures. The negative aspects of accreditation have been identified and elaborated on (Harvey 2004; Stensaker and Harvey 2006), so there is little need to go into them. Suffice to say, that still predominantly input-oriented accreditation procedures do little to promote quality enhancement intra-institutionally, once the minimal standards have been met. The same goes for the spill-over effects of external institutional evaluations. *The special case is the institutional reliance on inputs to the accreditation process – especially staff qualifications – as proxies for quality of educational activities applicable for research and development purposes.* In this respect, the separate development of policies on quality of educational activities and those on quality of research hinders genuine quality enhancement in Master's and doctoral programmes. The fact that the Accreditation Commission successfully underwent the ENQA's evaluation against the ESG Part 2 and 3 Standards may play a role here in sense of institutional reliance on externally certified authority.

¹⁰ Based on annual reports of individual higher education institutions (both public and private).

Finally, the very top-down orientation of internal quality assurance policies may be the barrier to their effective implementation in traditionally decentralised institutional settings. In case of all four HEIs under analysis, the policies are initiated by top-management at rectorate and/or faculty level. Whilst conducive to devising strategic policy documents and intra-institutional coordination, this top-down implementation style may turn not so effective in implementing policy goals *in the long-term* due to the limitations in involvement of front-line institutional staff (academics, administrators). Empirical enquiry, drawing on primary data from interviews by different types of actors involved, is further needed to substantiate this document review-based finding.

Despite the analysed policies are likely to have few problematic features, their implementation also points to some examples of good practice. Two of the examples should be mentioned in particular. The first one is the usage of funding provided from the Development Programmes by Institution C to build up its Department for Quality Assurance. The making use of this system-level, funding-type of the implementation instrument for implementation of quality enhancement-oriented institutional measures up to five years may be worth emulating in other contexts. The same goes for measures taken by Institution A, Institution C, and Institution D on enhancing collaboration with secondary education sector, especially on-site demonstrations and courses at secondary education institutions. The case of Unity of Education Institutions also has its potential, especially for private (higher) education providers.

Based on the foregoing argumentation drawing from the enquiry at Institution A, Institution B, Institution C, and Institution D, the barriers to effective implementation of institutional policies on quality assurance can be identified as follows:

- Reactive policy-making, based on the plethora of mandatory policy documents conducive to formal adoption of goals and missing "follow-through" measures;
- Strong external impact of accreditation measures, inhibiting pro-active institutional commitment;
- Dichotomy in developing measures on assuring the quality of research and educational activities (again under the impact of accreditation and evaluations of the Accreditation Commission that are relied on as an external proxy instead of developing explicit internal linkages);
- Heavily top-down oriented implementation style.

Examples of good practice can be identified as:

- Funding from the Development Programmes for building up internal quality enhancement capacities in the mid-term perspective;
- Enhancement of collaboration with secondary education institutions through on-site demonstrations and courses, Unity of Education Institutions (providing education from kindergarten to university).

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