

Ivana Borošić

From: Teo Žeželj <teo.zezelj@grf.hr>
Sent: 10. travnja 2019. 15:34
To: brues@uni-wuppertal.de; bart.lamiroy@mines-nancy.univ-lorraine.fr; marija.marcelionyte-paliuke@vda.lt; marina.rajsic@apuri.hr; AZVO Odjel za akreditaciju u visokom obrazovanju; hhajdic@unizg.hr; ivica.susak@unizg.hr; rector@unizg.hr; dekan@grf.hr; reakreditacija@grf.hr
Subject: RESPONSE OF THE TEACHING ASSISTANTS TO THE RESPECTED MEMBERS OF THE EXPERT PANEL ON THE RE-ACCREDITATION OF THE UNIVERSITY OF ZAGREB FACULTY OF GRAPHIC ARTS
Attachments: Panel Report analysis - teaching assistants.pdf; GRF - izvještaj reakreditacije 2019 EN.pdf
Follow Up Flag: Follow up
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Respected members of the Expert Panel, Director of the Agency for Science and Higher Education, Rector of the University of Zagreb, Dean of the Faculty of Graphic Arts, firstly, those who do not know me, allow me to introduce myself. My name is Teo Žeželj and I am addressing you on behalf of teaching assistants from the Faculty of Graphic Arts as their elected representative at the Faculty Council.

As you all may know our institution is currently going through a process of re-accreditation and having seen the Report of the Expert Panel on the re-accreditation of the Faculty of Graphic Arts and having carefully read it we spotted many inconsistencies and, to say the least, irregularities. Thus we decided to react in the best interest of the Faculty of Graphic Arts and it's past, present and future students.

Our joint effort resulted in a response attached to this email and we kindly ask you to read it, and being the people responsible for the claims stated in the Report (also attached to this email) and people most responsible for the future of the Faculty of Graphic Arts take it into serious consideration.

Sincerely,
Teo Žeželj

REPUBLIKA HRVATSKA
355 - AGENCIJA ZA ZNANOST I VISOKO
OBRAZOVANJE

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Teaching assistant representatives
University of Zagreb
Faculty of Graphic Arts
Croatia

Agency for Science and Higher Education
The Expert Panel on the reaccreditation of the Faculty of Graphic Arts
(5th and 6th November 2018)

April 8, 2019

RESPONSE OF THE TEACHING ASSISTANTS TO THE RESPECTED MEMBERS OF THE EXPERT PANEL ON THE RE-ACCREDITATION OF THE UNIVERSITY OF ZAGREB FACULTY OF GRAPHIC ARTS

First, we would like to thank the Expert Panel for all the positive evaluations of the research, teaching and commitment of professors, assistants and students at the Faculty of Graphic Arts in Zagreb. We would like also to thank for all constructive critical remarks in the assessment, which will serve the Faculty to improve its work in the future.

However, we would like to call the attention of the respected members of the Panel to the possible consequences of the negative quality grades they assigned to some assessment areas and standard criteria for the future of studies and research at the Faculty. We would like to ask you what were the reasons for these negative grades and invite you to reconsider whether they really adequately reflect your evaluation of our Faculty. There are indications that some of these grades might have been meant differently from the consequences they might evoke. And some of them might have been based on insufficient or inadequate information in spite of our efforts to inform you as best you could.

The Report gives the Faculty evaluation of Unsatisfactory level of quality in two categories:

1. Internal quality assurance and the social role of the higher education institution, based on giving unsatisfactory grades on three points:
 1. The higher education institution has established a functional internal quality assurance system
 2. The higher education institution implements recommendations for quality improvement from previous evaluations
 3. The higher education institution supports academic integrity and freedom, prevents all types of unethical behavior, intolerance and discrimination
3. Teaching process and student support, based on giving unsatisfactory grades on three points:
 1. Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied
 7. The higher education institution ensures adequate study conditions for foreign students
 10. The higher education institution is committed to the employability of graduates

The Report also recommends Faculty of Graphic Arts at the University of Zagreb to **exclude from its programme any courses and research addressing the subjects of design or multimedia** and to **focus its attention exclusively on the topics regarding classical printing technologies, furthermore limiting its scope only to BA level programmes** because *“the field of Graphic Arts does not require MA level diplomas”*. The result of given „unsatisfactory“ grades ensure that the Faculty of Graphic Arts won't get Ministry of Education and Science's permissions to enroll new students starting from next academic year, forwards.

The Report states three main advantages of the Faculty of Graphic Arts:

1. Strong history and recognition in Graphic Arts (as related to the printing industry)
2. Very dedicated and active teaching staff
3. A broad range of industry-grade tools and equipment for applied lab and practice sessions

And lists four main disadvantages:

1. Lack of a strong collectively adopted a strategic vision
2. Lack of confidence in management
3. Sub-optimal allocation of resources
4. Lack of team spirit

ON THE ANALYSIS AND EVALUATIONS THAT GAVE „UNSATISFACTORY LEVEL OF QUALITY“ GRADES TO SIX POINTS OF THE REPORT

Internal quality assurance and the social role of the higher education institution

The Analysis of this chapter states that the Faculty did not follow the recommendations of previous re-accreditation processes and that all the changes made were purely aesthetic.

During previous reaccreditation reviews, the Faculty of Graphic Arts of the University of Zagreb received the recommendation to restructure its internal functioning, review its management and to engage in a quality assurance process. The expert panel acknowledges that the HEI has undertaken actions in each of these topics, but observes that these actions have not produced any significant impact. The restructuring of the departments is largely "aesthetic" and the previously existing departments have been reordered in a new organigram, essentially maintaining their initial perimeters. The management team did not present a convincing or realistic vision and engagement for a long-term strategy and seemed more concerned by maintaining a status quo. (...) Consequently, the expert panel considers that the HEI has missed the opportunity to engage in a global process of objective and open self-assessment, it has not leveraged its proper data to analyse its strengths and weaknesses, and, as a result, remained in a very similar situation than the one it was at the moment of the previous reaccreditation review. (1. Analysis, p: 10)

1.1 The higher education institution has established a functional internal quality assurance system

The Analysis states that the Faculty did not establish functional quality assurance system because the collected data has not been put to use in raising the quality of HEI's programme.

Notwithstanding initiatives and activities presented to the expert panel, the HEI has not established a functional quality assurance system. The expert panel had access to a large amount of collected data gathered through a very active and dedicated Quality Assurance Committee. (...) It appeared from the interaction and discussion with the management team that the data was merely collected and not put to use to measure and define further evolutions or to justify strategic choices. There is no strategic agenda for quality assurance. (1.1 Analysis, p. 15)

1.2 The higher education institution implements recommendations for quality improvement from previous evaluations

The Analysis restates the results from previous point (1.1) that any data collecting done is not put in use for „*monitoring and improvement of the quality of its teaching*“, which was one of the recommendations of last reaccreditation process, therefore it was unsatisfactory in fulfilling the conditions for this point. In no way does the Report clearly state what were the main recommendations of previous evaluations or re-accreditation processes (more on this in the second chapter of the Response).

The panel finds that the institution still is in an early stage of implementation of formal mechanisms for the monitoring and improvement of the quality of its teaching, notwithstanding the recommendations of the previous evaluation. Student survey and feedback monitoring is either informal, or where formalized, the collected data is not put to use for quality improvement feedback. (...) The internal mechanisms for research quality still need to be established and implemented. (1.2 Analysis, p. 16)

1.3 The higher education institution supports academic integrity and freedom, prevents all types of unethical behavior, intolerance and discrimination

The Analysis regarding this point restates that the mere data collecting or even the fact that self-evaluation documents contain references to various procedures, and an Ethics Committee has been set up, doesn't by itself ensure quality in management which includes assuring academic integrity and freedom, preventing all types of unethical behavior, intolerance and discrimination.

The provided self-evaluation documents contain references to various procedures, and an Ethics Committee has been set up. However, the expert panel did not find any clearly written procedures or guidelines for addressing unethical behavior, intolerance or discrimination in the documents to which it had access or was provided with. (1.3 Analysis, p. 16)

Conclusions on Reports evaluation on the I. group re-accreditation criteria

The opinion of the teaching assistants at the Faculty of Graphic Arts is that the negative judgments mentioned above are not based on sufficient grounds to derive the cited conclusions.

We also hold the opinion that the allegations mentioned above are very serious, while the evidence provided in support of such conclusions is vague or sometimes non-existent. The prevailing arguments that the Report forwards for justifying its negative evaluations are as follows:

The expert panel had access to a large amount of collected data gathered through a very active and dedicated Quality Assurance Committee. Only a very limited part of the data was available in English. (1.1 Analysis, p. 15)

The provided self-evaluation documents contain references to various procedures, and an Ethics Committee has been set up. However, the expert panel did not find any clearly written procedures or guidelines for addressing unethical behavior, intolerance or discrimination in the documents to which it had access or was provided with. During the visits and discussions, or when explicitly addressed to the management, answers were elusive. On the other hand, individual spontaneous unscheduled face-to-face meetings, on demand by permanent or temporary faculty and staff members often mentioned tensions with the management, non-transparent handling of human resources (like hiring, promotions, teaching load, salary ...) or conflicts of interest. Within the allotted time and resources of the panel visit, these claims could not be objectively assessed and confronted. (1.3 Analysis, p. 16)

The Report, it seems, states that the Panel's lack of time and resources and their inability to read documents written in Croatian (which is the official language of the state and one of the EU's official languages) made it difficult for panel's members to understand Faculty's quality control and anti-discrimination procedures. These were the main reasons for declaring that in all the three mentioned criteria the Faculty shows an Unsatisfactory level of quality. We do regret that all our documents are still in the moment not available in English, but the conclusion of the Panel would be justified if it had been stated that they should be translated in English, but not that their content lacks sufficient quality. As far as we know, all of the documents requested for the re-accreditation process by the Agency for Science and Higher Education were translated into English.

The Report also claims the Panel couldn't get insight into the procedures of quality management and their anti-discrimination policies because of managements elusiveness in answering their questions, leaving the impression that the Faculty management was trying to hide something, even though the Report repeatedly praises Faculty's cooperativeness. We believe, as members of the Faculty staff, that the Faculty management and staff did not try to hide anything, and you mention yourselves your experience of its complete cooperativeness:

The expert panel wants to insist on the very high level of commitment of the committee members and their impressive amount of work. (1.1 Analysis, p. 15)

The expert panel has had the opportunity to interact in depth with students, stakeholders and alumni. (1.5 Analysis, p. 18)

The panel also sincerely thanks the general management of the Faculty of Graphic Arts for hosting the Committee. The panel has very much appreciated the time and effort spent by the Self Evaluation Committee for providing all documents. A particular expression of gratitude is provided for the Quality Assessment Committee with the recognition of an enormous amount of work that has led to the compilation of indicators and data. (...) The panel has met and talked with very dedicated teachers, and the students with whom the panel talked seemed satisfied with the outcomes of their studies. All meetings were well attended, and the panel regrets and extends their excuses to those who attended the meetings and with whom the panel did not get the chance to talk or exchange with due to time constraints. The panel also appreciated the fact that many participants also spontaneously engaged in exchanges and discussion outside the organised slots. (Summary, p. 44)

See also: Schedule of meetings (p. 45-46)

It is also noteworthy to mention that the Panel ended the *Exit meeting with the dean and vice deans* clearly stating there was no need for its continuation, that they gathered sufficient insight and that there are no questions left unanswered.

The remaining argument proposed by the Report to justify the evaluations on the first three points of assessment is that the panel received some undocumented tips suggesting "tensions with the management, non-transparent handling of human resources (like hiring, promotions, teaching load, salary ...) or conflicts of interest". It is not clear whether any effort has been invested in checking such allegations, their reliability, the representativeness of informants, their proportion among the Faculty's staff or even membership in the staff. The report, moreover, explicitly states that the validity of claims was never verified, and no one gave the Faculty an opportunity to respond to those claims. Therefore it gives the impression that inappropriate weight was given to those undocumented tips, that may have originated in personal interests or conflicts of interests, which may have unduly influenced and disfigured the assessment.

We do not know and the Report never mentions which guidelines or documents included in *Procedure for re-accreditation of higher education institutions* allow for letting unverified anonymous tips influence the analysis or the grades of HEI's quality.

We regret that the Report, in evaluating the quality of the Faculty on the first two points, doesn't mention, and it seems that it fails to take in regard, unquestionably important facts that would speak in favor of Faculty's positive image. First, there has been no reported discriminatory or unethical behavior, or complaints of any misconduct done by the faculty or Faculty's management since the change of Faculty's management after the last re-accreditation process.

The Rule-book for quality management has been accepted by the Faculty Council on April 18, 2011, and has been adhered to since. The Faculty of Graphic Arts is often mentioned as the prime example of good practices on the University's quality council. The Report does not mention that the Faculty continuously and regularly implements its wholesome *System for Quality Management* to informedly guide its progress and that its *Committee for self-assessment and quality assurance* (strengthened in 2015. to include 9 members) makes the analysis and statistics of gathered data readily available to all faculty members. The report on all the activities of the Faculty, students' achievements and Faculty's committees' engagement follows the ESG guidelines from the year 2015 and is made available to the broad public on the Faculty's web site. All the minutes from Faculty's Council meetings are made available to all faculty members, student unions, Faculty's committees and staff via the SharePoint system. We believe that this level of transparency is seldom seen in any organization.

The Analysis of the I. group of re-accreditation criteria begins by stating that the Faculty didn't implement recommendations from previous re-accreditation processes. The re-accreditation Report from the year 2016, whose panel member was Prof. dr. rer. nat. Stefan Friedrich Herbert Brües, the Panel chair on this Report, states as the first point in its summary of Faculty's advantages that there are "*Visible improvements from the last re-accreditation of the HEI*". The same Report states in its Analysis of the chapter on Internal System of Quality Management that: "*taken in consideration that the need for the research in the field of traditional graphic technology is in decline, the Faculty should focus its research towards contemporary subjects such as new graphic materials, special applications for printing and packaging, graphic design and multimedia.*" (The Report of the Expert Panel on Re-accreditation of Postgraduate study programme: Graphic engineering and graphic product design, 2016, 2. Analysis, p. 13)

The Report in question itself gives a number of positive statements about the quality of work, teaching, research and administration at the Faculty:

Broad range of industry-grade tools and equipment for applied lab and practice sessions (3. point of advantages, Brief analysis, p. 9)

The teaching and institutional capacities are adequate and resources are sufficient in order to achieve quality teaching on an appropriate level. Teaching staff is extremely dedicated and involved. (IV. Analysis, p. 12)

However, it should be noted that, while the panel members observed an undeniable level of defiance and dissatisfaction towards the management [?], the election and nomination process of this management seemed open, sincere and regular. (1.3 Analysis, p. 17)

The expert panel has had the opportunity to interact in depth with students, stakeholders and alumni. It is clear from the resulting gathered data that the HEI has a clear understanding of its role as a reference in the domain of Graphic

Arts. Furthermore, ongoing projects indicate its sound roots with a broader socio-economic network. Recruitment and placement of students indicate that the Faculty has a good and solid positive image. (1.5 Analysis, p. 18)

Feedback from the alumni and stakeholders indicates that the education at the HEI seems to fulfil the needs of the printing industry in Croatia. (2.3 Analysis, p. 20)

It should be noted that during the visit days the panel had meetings with enthusiastic and committed employees who work on their advancement with special mention for the openness and mobile way of increasing specialized contributors to enlarge the offer of new subjects, in line with new needs and developments in the field supporting the student needs. (4.1 Analysis, p. 26)

Teacher appointment and recruitment procedures, as described in the self-evaluation document of the HEI are aligned with the legislation and internal regulations in effect. For selecting, appointing and evaluating teachers, their previous activities (teaching activity, research activity, feedback from students, etc.) are taken into account. There are methods for selecting the best candidates for each position and, in addition to the prescribed national minimum conditions for each position; it has prescribed competitive criteria ensuring the selection of excellent candidates. (4.2 Analysis, p. 27)

On the other hand, during meetings with the staff, they [the faculty] expressed their opinion that the situation with the change of faculty management has improved. (4.2 Analysis, p. 28)

Access to international mobility and opportunities for lecturer exchanges are based on bilateral agreements and the number of mobility is noticeable - 252 outgoing teachers in 5 years. (...) All resources are in place - enthusiastic young researchers, equipment, best practices. (4.3 Analysis, p. 28)

All resources are in place - enthusiastic young researchers, equipment, best practices. (4.3 Analysis, p. 29)

The Faculty encourages teachers to publish scientific articles, develop workshops, seminars programmes, and to do collaborative research-based projects. (4.3 Recommendations, p. 29)

The HEI plans and improves the infrastructure development, in line with the strategic goals. (...) The laboratory equipment and usage protocols comply with recognized international standards. Equipment is constantly updated, the Faculty purchases new equipment for the delivery of study programmes and scientific activities. (4.4 Analysis, p. 29)

The library resources, size, availability as well as the level of equipment ensure adequate student support in their learning and research (table 4.10.). Since the Faculty does not have enough space to carry out informal student activities, the library partly plays this role - community cultural gatherings: exhibitions, meetings are taking place in the library and the adjacent lobby. The HEI is a member of the Croatian Academic and Research Network - CAR NET which provides various educational programmes, tools and services from basic training, online and on-site courses to provision of complex platforms for digital educational resources. Students use these resources courses for gaining knowledge especially in new technologies and design. (4.5 Analysis, p. 30).

Financial stability of the HEI is partly harmonised with its mission and enables all students to graduate from their programmes. (4.6 Analysis, p. 31)

The higher education institution rationally manages its financial resources: Satisfactory level of quality (4.6 Quality grade, p. 32)

Research of the highest quality is found in projects with a lot of cooperation with external partners such as other European universities and research institutes. Also, close cooperation with companies in the printing area is of importance both for the Faculty /University and for the companies. The Faculty has advanced equipment and measurement technologies as well as printing technology area and this together with the pre-press soft and hardware available is of great importance. (5.2 Analysis, p. 33)

The scientific activity of the HEI seems to be sustainable as well as making developmental achievements. This is also a research area that seems to be of great importance for many companies in Croatia. We found that companies collaborating with the Faculty of Graphic Arts have supplied important printing technology equipment for research purposes which both shows that the research performed is of industrial importance. This implies that the strategy of the Faculty should be to build its future on the high level of competence in printing technologies. (5.4 Analysis, p. 35)

The panel has very much appreciated the time and effort spent by the Self Evaluation Committee for providing all documents. A particular expression of gratitude is provided for the Quality Assessment Committee with the recognition of an enormous amount of work that has led to the compilation of indicators and data. The panel hopes these efforts can be put to good profit and continuous improvement of practices in the Faculty. The Faculty of Graphic Arts has a long history of academic achievements and was for long the only institution in Croatia addressing this topic. The Faculty has strong and intimate relations with the industry and the professional organisations in Graphical Arts and is very well recognised as an asset to the profession. The panel has met and talked with very dedicated teachers, and the students with whom the panel talked seemed satisfied with the outcomes of their studies. (Summary, p. 44)

The HEI has a website that is essentially targeted towards a Croatian public with some parts translated into English. The expert panel also had access to compiled information from internal sources that was of sufficient quality. Not all information available on the website is up to date, and part of it may be outdated, incomplete or linking to unavailable documents. (1.4 Analysis, p. 17)

We find it difficult, given the examples of Report's assessments above, to find sufficient grounds to evaluate the *Internal quality assurance and the social role of the higher education institution* unsatisfactory.

The financial structure is solid, the equipment is of the highest quality, the procedures for selecting qualified staff are optimized, faculty is divergent, highly qualified, experienced and very dedicated, their self-improvement and continuous education is highly encouraged, the Faculty is highly praised in the community and industry, the students are satisfied and competitive on the job market. All the legal obligations for the HEI's transparency are met if only by the Faculty's website. The site publishes all relevant documents, managerial decisions, reports on Faculty's activities; it has implemented a specialized script algorithm for automatic translation of all articles in English; and, in spite of the Report statement that it is not accessible for non-Croatian public and that parts of the site *may be outdated*, the site is updated almost daily, presenting all current news and documents, and equipped with a programme for automatic translation in English.

Since, by meeting with the Expert panel and talking to them throughout the re-accreditation process, none of the faculty members found a reason to doubt panel members' expertise or good intentions, we have doubts whether the official Report truthfully reflects the opinion of the Panel members.

Teaching process and student support

The Report states in chapter III. that the Faculty of Graphic Arts is lacking institutional student support, that its (graduate) student employment rates are low and that it lacks project-oriented student-centered learning. The chapter further states that student evaluation is inconsistent and inefficient, that the student international exchanges are limited to neighbouring countries due to the lack of courses in English. It is stated that the procedures for handling student conflicts, their complaints or discrimination are confusing and that the implementation of these procedures lacks sufficient transparency.

The expert panel received contradictory inputs indicating that the support to students essentially comes from involvement by individual teachers, and that institutional support is lacking. Employment rates are low, as well as project-based student-centered learning.

Teaching is done on a voluntary extra-curriculum basis. Student evaluation seems not always consistent. Incoming international exchanges are too limited to neighbouring countries, due to the lack of courses in English. The various processes presented to the expert panel for handling conflicts, complaints or discrimination are confusing and bureaucratic rather than being focused on easy access and efficiency. Their implementation lacks transparency. (I. Analysis, p. 11)

3.1 Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied

The Analysis of this criteria suggests that the admission criteria for the Faculty of Graphic Arts are unsatisfying because they test knowledge mainly in the field of Technical Sciences for both study programmes. The criteria for the continuation of the studies are unsatisfying because during the visit days the panel has received some amount of uncited emails in which students expressed their lack of understanding of the criteria for grading their achievement in courses in the area of Graphic Design and Multimedia. The Report's full detailed analysis goes as follows:

The HEI has published clear admission criteria. The admission criteria ensure the selection of candidates with appropriate prior knowledge in the field of Printing Technology (Graphic Engineering). It has effective mechanisms for recognizing prior learning, but mainly in the field of Technical Sciences. The criteria for admission are the same for both of study programmes: Graphic Engineering and Graphic Design, but it is in line with the requirements of Graphic Engineering study programme only. During the visit days, the panel has received emails in which students expressed dissatisfaction with unclear criteria of

grading, in particular, regarding courses in Graphic Design and Multimedia modules/courses. (3.1 Analysis, p. 21)

3.7 The higher education institution ensures adequate study conditions for foreign students

The Report's Analysis of this criterion states that the incoming student exchanges are essentially from the Balkan states and that the classes are not taught in foreign languages (meaning English). The mentioned assessments lead to giving an unsatisfactory grade of quality for this criterion. The full detailed analysis goes as follows:

In the last 5 years, 94 students participated in outgoing mobility, while 36 students participated in incoming mobility (essentially from Balkan states).

The HEI is open to foreign students, but since classes are not taught in a foreign language (English), the opportunities for attracting students from abroad at present are limited. Only a limited number of courses are published as being possibly delivered in a language other than Croatian. On many meetings with panel members, teachers have spoken in Croatian. (3.7 Analysis, p. 24)

3.10 The higher education institution is committed to the employability of graduates

The Report's detailed analysis uses the statistics of Employment Office in Croatia as the only argument that should lead to the conclusion of the unsatisfactory grade of Faculty's quality on this criterion.

Looking at the data on the employment of graduates, the results are not satisfactory. According to the statistics of the Employment Office, there were 63 unemployed alumni out of 95 MA graduates at the national level during 2017. The results of unemployment are far better with BA graduates of the same year; 26 of 68 graduates were unemployed. Teachers are committed, but the institution is not succeeding in helping the graduates getting employed over the past years. (3.10 Analysis, p. 25)

Conclusions on Reports evaluation of III. group of re-accreditation criteria

We, the teaching assistants at the Faculty of Graphic Arts, find that this argumentation is subjective and not based on sufficient grounds to derive from it representative quality assessments required in the evaluation of highest academic institutions. We also find it confusing that the overall sum of concerns

raised by the Panel's members at the Expert panel's meeting with teaching assistants painted a completely different picture, where the issue of the necessity of faculty being overworked in maintaining the recognized high degree of course quality and teacher-student engagement was raised repeatedly.

The Report's evaluation on these points isn't based on the information available in the Faculty's fundamental published documents. The Faculty of Graphic Arts does not offer two *study programmes* named Graphic engineering and Graphic Design, but three study courses: Undergraduate Study Course of Graphic Technology, Graduate Study Course of Graphic Technology and Postgraduate Study Course of Graphic Engineering and Graphic Product Modelling. Undergraduate and graduate study courses offer each two study programs named Graphic Engineering and Graphic product design. Graphic Engineering study programme of Graduate study course offers five-course modules: Graphic Technology, Multimedia, Packaging, Management and Organisation, and Publishing Art. All of its study courses are based in Technical Sciences as registered at and approved by the Croatian Ministry of Science and Education and the University of Zagreb. The entrance exams and conditions for enrolment in each four, undergraduate and graduate, study programs present specialized requirements and skill testing in accordance with the requirements of the profession and have been doing so since the study courses acceptance by the University in 1992. All data regarding Faculty's study courses are available in its public documents handed to the Panel and on its website, presented in Croatian and English languages (official translation). There is no apparent reason for Report's miss representing of Faculty's study courses. We find the claim that "the admission criteria for Faculty's studies is unclear or inconsistent" unsubstantial.

In the mentioned statement we find it equally wrong that the conditions for the continuation of studies are insufficiently clear because the Panel received some uncited emails from supposed students that stated their lack of understanding of conditions for grading their achievements in courses regarding graphic design and multimedia. Although those misunderstandings could be the mere consequence of complexity of nature of subject areas (What makes design good? What are contemporary expectations of well-developed multimedia product?), again, the Report nowhere displays the methods used to question validity of claims in this emails, confirmation of senders students status, analysis of whether those claims reflect opinions of Faculty's student population in any considerable way, nor which guidelines or documents included in *Procedure for re-accreditation of higher education institutions* allow for this kind of inputs heavily influencing final evaluation of HEI's quality. The absence of such reasoning leaves the impression of a guided misdirection of discourse.

Suggesting that the Faculty's student exchange programme is essentially based on students from *Balkan states* as an argument for lowering the assessment of HEI's quality seems unjustly discriminating and, we regret to say, misinformed. This kind of statement could lead to the misinterpretation that the Report is advocating disadvantaging the position of countries in southern Europe and denying them access to fair academic competition. We are convinced that that could not be the case here and are left wondering who authored the Reports text. The percentage of foreign exchange students on Faculty of Graphic Arts coming from neighbouring southern countries since the University's inclusion in the Bologna system is very low (2.5% Belgium, 2.5% China, 2.5% Taiwan, 2.5% US, 2.5% Czech Republic, 5% Germany, 5% Greece, 5% Spain, 7.6% Ukraine, 7.6% Serbia, 7.6% Slovenia, 20.5% Poland, 28% Portugal). Again, this data was readily available to the Panel in the provided documentation.

We find the observation that Faculty's study programs present no courses held in English partially true, but we find the conclusion that this shows Faculty's insufficient level of quality of study conditions and foreign student support misguided. The Faculty of Graphic Arts ranks high on percentage of foreign

student enrolments among its student population in comparison to other HEI-s in Croatia, but due to Faculty's size, the absolute number of foreign exchange students in a given moment is, as the Report recognizes, quite small: "In the last 5 years, 36 students participated in incoming mobility" (3.7 Analysis, p. 24). For now, courses rarely saw a need for organizing specially scheduled lectures taught on English for foreign student groups, rather the foreign students were included in regular groups and these lectures and practicums were held in English or special consultation terms were arranged for the exchange students where they received one-on-one tutoring and course subject discussions. No exchange student ever noted that they felt how this approach lowered the quality of the study programme, quite the contrary. Although not mentioned anywhere in the Report, we are confident that Panel got the confirmation of our claims when contacting the exchange students to evaluate Faculty's support for them.

The Report in its arguing for unsatisfying assessment of Faculty's study conditions for foreign students ends with mentioning that on many meetings with Panel members, teachers have spoken in Croatian, the official language of the country the Faculty is situated in and which also counts as one of 24 official EU languages. It seems like the sentence was meanly placed there just to further the suspicions on Panel member's supremacist attitudes rather than present evidence for mistreating foreign students, none of which were present at mentioned meetings. It should be noted that the appointed translator was present on all Panel's meetings and that during the scheduled Panel's meeting with teaching assistants employed by the Faculty, Panel's members repeatedly encouraged attendees to speak in Croatian with no result. The entire meeting was held in English.

While reasoning the passing of unsatisfactory grade regarding the quality of Faculty's commitment to the employability of graduates, the Report mentions only a couple of numbers retrieved from the statistical report of the Croatian Employment Office for the year 2017: there were 63 unemployed alumni out of 95 MA graduates at the national level. The only context provided for interpreting those numbers is the statistics of unemployed BA graduates of the same year: 26 out of 68; which could only lead to the conclusion that the MA programme somehow makes students forget their know-how and lose part of the competencies gained during the BA program. We find it unfair that the Report doesn't asses in any way the accuracy of Employment Office's statistics, doesn't put the results in context of comparison of other HEI-s employment rates in Croatia and doesn't mention specificities of the graphics trade where more accomplished designers and multimedia developers prefer to work as freelancers that are counted for as unemployed in the given statistics. There is no attempt in explaining how an MA degree could lessen the graduate's desirability on the job market.

The statement in the Report's overall analysis of the Faculty's quality of III. chapter's re-accreditation criteria that "Employment rates are low, as well as project-based student-centered learning" is equally misguided, and we apologize again if the relevant documentation wasn't available in English. The common knowledge in Croatia is that graduates from the Faculty of Graphic Arts are in the industry highly regarded for their broad knowledge of graphic technologies and versatility and are often preferred for hiring on higher positions than the graduates from any other institution offering courses in design or multimedia. Our graduates are engaged in a great deal of Croatia's graphic production. They work as art directors in many prestigious design studios and publishers, they are assigned team leaders in developer firms, run prepress and production in printing/press enterprises and often keep in touch with the faculty members throughout their careers. Some of them, as the Report noticed, after gaining significant expertise return to the Faculty of Graphic Arts to further advance their grasp of current trends in graphic industry: "The only related cases that the expert panel encountered were students who enrolled for a

standard M.Sc. degree or Ph.D. after having spent a significant amount of time in the industry.” (1.6 Analysis, p. 18) Many of the Ph.D. students are therefore employed by the Faculty to contribute to aligning printing, multimedia and design courses to latest and best practices found in today’s graphic industry.

Faculty of Graphic Arts, as the Report repeatedly recognizes, has a strong connection with the academic and civil community and with the industry (as clearly shown in the Report's references presented below). This kind of involvement ensures the Faculty a large pool of real-world projects it can offer to its students for participation and project-oriented course assignments. The student response and engagement are impressive. Beside the countless personal and professional real-world projects students come across and involve themselves with through the Faculty's industry connections, forwarded as students' course project-assignments and realized through a great deal of faculty's mentorship, students at the Faculty of Graphic Arts are continuously engaged in great deal of Faculty's collaborative professional and scientific projects with dozens of HEI-s, major cultural and academic institutions and dozens of non-governmental organisations. To name just a few of these collaborations, Faculty of Graphic Arts is currently responsible for directing the whole rebranding processes of the Faculty of Economic Studies at the University of Zagreb, University Department of Croatian Studies, Faculty of Education at the University of Zagreb, Faculty of Veterinary Medicine and our own Faculty. These collaborations include designing whole visual identities, designing and realizing whole repertoires of branded office and promotional materials, designing signage systems on respective HEI's campuses, web design and development of official sites and directing whole new creative approaches for their public campaigns. The Faculty has years-long collaboration with the Faculty of Agriculture at the University of Zagreb in student-project-oriented package design and realization for all of the HEI's products. It is engaged in designing the whole branding campaign of the yearlong celebration of the 100th anniversary of higher education in technical sciences in Croatia, the event that embraces twelve faculty's in the field of Technical Sciences at the University of Zagreb, the Faculty of Food Technology and Zagreb University of Applied Sciences. Faculty is also engaged in collaboration with the University Department of Croatian Studies and the Croatian Academy of Sciences and Arts' Glyptotheque in designing and developing virtual museum exhibition of Croatia's monuments under UNESCO's protection and is currently arranging collaboration with Academy's Glyptotheque in bringing our technical support and know-how in creating digital 3D archive of Glyptotheque's entire collection of Croatia's cultural sculptural heritage. The Faculty of Graphic Arts just signed the legal agreement with Croatian Qualifications Framework worth 3,7 million kunas (500 000 €) to enrich its equipment and resources to further develop its project-oriented teaching in the fields of multimedia and visual communications.

Students at the Faculty of Graphic Arts continuously engage in participation on Faculty's research projects. One of the highly popular projects among students is the renowned innovation by the team of professors of the Faculty, the INFRAREDESIGN technology, awarded with highest honors at many innovation forums such as SVIIF 2018, 45th International Exhibition of Inventions in Geneva, iENA 2017 and INNOVA 2016. The innovation accumulated over 70 awards since its inception. Our project-oriented learning model led to students' worldwide recognition by winning medals at IEI & WIIF 2018, ISIF 2018, IWIS 2017 and so on, not counting a number of Rector's awards at the University of Zagreb. Through the Faculty's ICT-AAC and In-Public-In-Particular projects students get to realize their creative ideas, engage in public communications and get their effort recognized and awarded with honors. We won't even try to list here all the awards our students won on design festivals worldwide by presenting their mentored course projects or skills learned through course practicums. The Faculty of Graphic Arts actively supports its students by arranging exhibitions throughout Croatia on which students promote their work

(<https://www.grf.unizg.hr/studentski-projekti/>) and involving them in international conferences where they present their latest research projects.

The Faculty is one of two HEI's in Croatia involved in the socially engaged project funded by the EU's Fundus for Development of Civil Society (<http://www.odraz.hr/hr/projekti/svi-projekti/odrazi-se-znanjem-pokreni-zajednicu>) which led by ODRAZ connects NGO-s selected through open tender competition with HEI's. The project is one of its kind, focused on promoting socially responsible teaching with special attention given to human rights, sustainable development, the inclusion of persons with special needs into society and overall raising social awareness on civil issues. Through this project students of the Faculty of Graphic Arts are paired with students from Faculty of Economic Studies into PR teams that help NGO's raise their public visibility through developing creative communication strategies, designing their graphic and multimedia materials, rationalizing their publication expenses. The individual projects are carried through various design and multimedia courses and are realized through ample faculty's mentorship recorded in detail in the project's documents. Responses of the NGO's on our student's skills and engagement are more than flattering.

The Report's detailed analysis on three points, as it seems, focuses only on the incomplete data responded to above, and fails to mention any data that would disavow current assessments of unsatisfactory quality of student support. The Report, again, itself gives a number of positive statements about the quality of student support at the Faculty that contradict the assessment of Faculty's unsatisfactory quality for this chapter's criteria:

The teaching and institutional capacities are adequate and resources are sufficient in order to achieve quality teaching on an appropriate level. Teaching staff is extremely dedicated and involved. (IV. Analysis, p. 12)

The expert panel has had the opportunity to interact in depth with students, stakeholders and alumni. It is clear from the resulting gathered data that the HEI has a clear understanding of its role as a reference in the domain of Graphic Arts. Furthermore, ongoing projects indicate its sound roots with a broader socio-economic network. Recruitment and placement of students indicate that the Faculty has a good and solid positive image. (1.5 Analysis, p. 18)

The expert panel had the impression that there is a large amount of practice in the educational programme at the HEI. (2.6 Analysis, p. 21)

Available and committed teachers/assistants contribute to the motivation of students and their engagement. Although they are trying to encourage interactive and research based learning, project based learning can be implemented more. (3.3 Analysis, p. 22)

The higher education institution provides guidance on studying and career opportunities to students, mostly by assistants who are teaching, tutoring, and

with whom students are consulting about their projects (for classes and private). During organized meetings with the students, the panel members found out assistants are providing great help to students. (3.4 Analysis, p. 22)

The higher education institution is providing help for people with disabilities. (3.5 Analysis, p. 23)

Students are informed about the opportunities for completing part of their study abroad. The HEI provides support to students in applying for and carrying out exchange programmes. Students have the opportunity to choose from among around 15 institutions abroad, with which the HEI has Erasmus agreements. (3.6 Analysis, p. 23)

The HEI ensures evaluation and assessment of student achievements and carries out evaluation of grading. (3.8 Analysis, p. 24)

From a global perspective, the composition, number and professional profile of staff members meet legal requirements and are appropriate for the delivery of study programmes and achievement of the intended learning outcomes. (...) It should be noted that during the visit days the panel had meetings with enthusiastic and committed employees who work on their advancement with special mention for the openness and mobile way of increasing specialized contributors to enlarge the offer of new subjects, in line with new needs and developments in the field supporting the student needs. (4.1 Analysis, p. 26)

The average number of students per lecture group is 150, and the average number of students per laboratory/practicum group is 10. On the one hand, a small group ensures higher quality studies, but on the other hand, teachers are forced to repeat the same basic information many times (thus filling hours of workload). (4.4 Analysis, p. 29)

The library resources, size, availability as well as the level of equipment ensure adequate student support in their learning and research. (4.5 Analysis, p. 30)

Financial stability of the HEI is partly harmonised with its mission and enables all students to graduate from their programmes. The management of its revenues and expenditures is largely determined by the State higher education laws. The Faculty affirms that the specified structure of own-source revenues is satisfactory, but that it plans to put more effort in increasing the revenues

generated from international and commercial projects and from collaboration projects with industry. (4.6 Analysis, p. 31)

The teachers and assistants are to a large extent committed but this is on an individual level. (5.1 Analysis, p. 33)

The professors seem to be very engaged in their PhD students that largely also are working part time as teachers at the HEI. (...) The Faculty spends a lot of time on teaching in quite small labs, typically with room for about 10 students. This means that PhD students use many hours in vain. In spite of the fact that many PhD students combine teaching with research they seem to finalize their exams. (...) In any case, this means that the PhD students are generally very engaged in their research work and that some teachers / professors have the knowledge and creativity to create interesting research projects. (5.5 Analysis, p. 36)

The Faculty of Graphic Arts has a long history of academic achievements and was for long the only institution in Croatia addressing this topic. The Faculty has strong and intimate relations with the industry and the professional organisations in Graphical Arts and is very well recognised as an asset to the profession. The panel has met and talked with very dedicated teachers, and the students with whom the panel talked seemed satisfied with the outcomes of their studies. (...) The panel acknowledges that the Faculty of Graphic Arts has a very fundamentally sound structure for delivering quality training and research in the domain of Graphic Arts (...) (Summary, p. 44)

The Report begins by stating that one of Faculty's main strengths is: "Very dedicated and active teaching staff." (2nd point in Brief Analysis, p. 9), but still manages to assess its quality of student support: "unsatisfactory". We find it hard to believe that this is the Report of the Panel we were privileged to meet during the re-accreditation process.

Our analysis of the full Report found some patterns of oversights that undermine its validity and the worth of its recommendations. The next chapter is purposely written to show the extent to which these faults could mislead the eager reader in interpreting the Report's intentions and reject it in bulk from a defensive stance. We implore you to keep in mind that the next chapter is not written in an attempt to undermine the Panel members' effort or to lessen the worth of its many positive recommendations, but to illustrate the need for revision of some presented facts and for rethinking some of the Report's implications so that the Report's well-intended calls to action could, as we see it, fall on fruitful ground, the Report's validity wouldn't be defensively rejected and we could all see some beneficial outcomes come to life. We offer you here our worst-case scenario interpretation:

ON THE OVERSIGHTS OF THE REPORT'S ARGUMENTATION

The Report passes strikingly low quality-assessments on many points of the re-accreditation criteria painting the bleak picture of the quality of the Faculty and doing in that way potential damage to its academic reputation. Nevertheless, the Report often doesn't seem to find the need to support its evaluations with sufficient evidence base and needed explanatory context. Our strong impression is that this way of constructing arguments doesn't contribute to the Report's broad acceptance and could lead to its rejection as a whole.

Using a lack of evidence as the evidence of lack of HEI's quality

The Report, too often to pass unnoticed, bases its claims not on evidence, but on stating that the evidence to prove otherwise wasn't observed. This kind of argument doesn't hold its persuasiveness when subjected to a level of academic scrutiny we're all used to in our everyday surroundings.

Many examples of arguments relying on potentially intentional lack of observed evidence have already been presented above in the discussions of the validity of unsatisfactory grades. Here we present one more sample of Report's statements to run this point to complete clarity:

The expert panel received contradictory inputs indicating that the support to students essentially comes from involvement by individual teachers, and that institutional support is lacking. Employment rates are low, as well as project-based student-centred learning. (III. Analysis, p. 11)

Recruitment and promotion procedures are documented, but their implementation lacks transparency. (IV. Analysis, p. 12)

The expert panel did not observe any scientific activity related to multimedia technologies, nor did it observe any significant activity related to design nor creative and artistic production. The global strategic plans were presented in Croatian, and could therefore not be assessed in depth by the expert panel due to time and resource constraints. (V. Analysis, p. 13)

On many meetings with panel members, teachers have spoken in Croatian. (3.7 Analysis, p. 24)

The expert panel was not convinced that the processes in the self-evaluation document are fully implemented, and received indications that the process still lacked transparency. Due to the lack of time, the panel members did not have the opportunity, nor the mandate to investigate these issues. But it is a signal to the Faculty management to review the reappointment and evaluating

procedures of the teachers and implement it in a very clear and formalized way. (4.2 Analysis, p. 27)

In order for future re-accreditation committees to operate correctly, the HEI should provide more efforts to make documents available in English, rather than Croatian. (4.2 Recommendations, p. 28)

It was not possible to see how the system works with scientific activities. There are references to strategic plans, these have however not been translated in to English. The research regarding security printing seems to be in the forefront and there is some good quality work on the recycling and biodegradability of print inks. The provided information did not allow the expert panel to evaluate artistic activities. (...) The situation regarding scientific research in the multimedia area is probably on a low international level as the expert panel could not find any proof of scientific excellence in this area. (5.1 Analysis, p. 33)

There is no evidence published with regard to the artistic side when it comes to scientific research. The transfer of knowledge seems to work through conferences organized two times per annum and project meetings with partner companies. It is not so easy to find information via the web page. (5.2 Analysis, p. 34)

It would be useful both for the Faculty management, for the professors/supervisors and for the Ph.D. students to have study plans that are successively updated. Maybe something like this exists, but it was difficult to find if you don't understand the Croatian language. (...) For the future, it is important to have all the strategy documents in English. (5.5 Recommendations, p. 36)

No small part of the reasoning for quality grades on respective re-accreditation criteria is based chiefly on this fallacy. We recognize that this kind of argumentation heavily influenced quality grades for at least the following criteria:

- 1.1 The higher education institution has established a functional internal quality assurance system,
- 1.3 The higher education institution supports academic integrity and freedom, prevents all types of unethical behavior, intolerance and discrimination
- 1.4 The higher education institution ensures the availability of information on important aspects of its activities (teaching, scientific/artistic and social).

- 4.2 Teacher recruitment, advancement and re-appointment is based on objective and transparent procedures which include the evaluation of excellence,
- 5.1 Teachers and associates employed at the higher education institution are committed to the achievement of high quality and quantity of scientific research,
- 5.2 The higher education institution provides evidence for the social relevance of its scientific/artistic/ professional research and transfer of knowledge,
- 5.3 Scientific/artistic and professional achievements of the higher education institution are recognized in the regional, national and international context,
- 5.4 The scientific/artistic activity of the higher education institution is both sustainable and developmental
- 5.5 Scientific/artistic and professional activities and achievements of the higher education institution improve the teaching process.

Using unevidenced, untraceable and uncited claims as evidence in decrementing the HEI's quality assessments

A great deal of Report's assessments of quality seem to miss an opportunity to reference data from official documentation, Panel's insights in assessing Faculty's strengths and reputation in community and industry, and lend themselves to be chiefly influenced by some (unspecified) amount of anonymous or undocumented inputs of, we believe, questionable validity. Again, the Report doesn't mention which guidelines or documents included in Procedure for re-accreditation of higher education institutions allow for this kind of inputs heavily influencing the final evaluation of HEI's quality. While analyzing the Report we got the strong impression that the Panel was at some time exposed to some misleading or even false information and, although not doubting the Panel's good intentions, it seems that it did manage to somewhat misdirect the re-accreditation discourse.

Presented here is a sample of mentioned statements to further illustrate the point:

The expert panel received contradictory inputs indicating that the support to students essentially comes from involvement by individual teachers, and that institutional support is lacking. (III. Analysis, p. 11)

The students' views about the appropriateness of the teaching strategies were mixed. In some cases, the students indicated that the strategies and teaching material were not well matched. Notably, some complained of some out-dated material, lack of international case studies and lack of practically relevant exercises. (2.4 Analysis, p. 20)

During the visit days, the panel has received emails in which students expressed dissatisfaction with unclear criteria of grading, in particular, regarding courses in Graphic Design and Multimedia modules/courses. (3.1 Analysis, p. 21)

The panel members have received emails in which students showed dissatisfaction with unclear criteria of grading, in particular subjects in Graphic design and multimedia modules/subjects. The panel has not been able to investigate that subject, but the comments do exist. (3.8 Analysis, p. 24)

The Review team cannot ignore anonymously received complaints that there are subjects in the curriculum taught by the Faculty professors the content of which is obsolete and not relevant, and their salaries are significantly higher than those of young teachers who teach the most relevant issues of today. (4.6 Analysis, p. 31)

No small part of quality grades on respective re-accreditation criteria is heavily influenced by this kind of unsubstantiated evidence. We observe that it heavily influenced quality grades for at least the following criteria:

- 1.3 The higher education institution supports academic integrity and freedom, prevents all types of unethical behavior, intolerance and discrimination,
- 2.4 The HEI uses feedback from students, employers, professional organizations and alumni in the procedures of planning, proposing and approving new programmes, and revising or closing the existing programmes,
- 3.1 Admission criteria or criteria for the continuation of studies are in line with the requirements of the study programme, clearly defined, published and consistently applied,
- 3.8 The higher education institution ensures an objective and consistent evaluation and assessment of student achievements,
- 4.6 The higher education institution rationally manages its financial resources

Showing a level of disregard for graphic profession

The Report, from time to time, paints a misleading picture of a graphic profession that doesn't accurately present its contemporary technological achievements and market needs. To illustrate the point, here is a sample of Report's claims:

The main strength and core historical recognition of the HEI lies in the domain of Graphic Arts (understood as the engineering, technologies and processes related to printing). (II. Analysis, p. 11)

The research activity conducted at the HEI is essentially applied and development of research in various domains related to printing technologies

and connected domains. Research in these domains is of decent quality. The expert panel did not observe any scientific activity related to multimedia technologies, nor did it observe any significant activity related to design nor creative and artistic production. (V. Analysis, p. 13)

The panel recommends the HEI to refocus on its BA programme, to be more in line with the industry needs. It is not sure if the field of Graphic Arts requires MA level diplomas. In the field of Graphic product design/multimedia this HEI does not have the required teaching capacity, neither is the programme in line with today's industry needs. (3.10 Recommendations, p. 25)

The recommendation is that the scientific part continues to focus in order to become top tier in Europe in printing technologies. As mentioned earlier, printing technologies will continue to be important both as printed media and increasingly so in the packaging area worldwide. This is due even if other means of communication are increasing far more than printed media. Thus, a strategy to become scientifically excellent in an area asked for by the local printing industry is important. The importance of this research area would increase if the collaboration with other parts of the Zagreb University and also internationally would increase. (5.3 Recommendations, p. 34)

Again, regarding the artistic part the situation is not easy to evaluate, as there was no research nor production presented from the Faculty so this part could not be judged. The artistic aspects of the research are probably too new and therefore not possible to review from a research perspective. (5.4 Analysis, p. 35)

It is also recommended that the research continues to focus on the printing technology issues as this is the area where the Faculty have the best chance to produce research of high international quality. (5.4 Recommendations, p. 35)

We believe that the statements cited above should not be present in a document that judges the quality of graphic or graphic related study programme. They could be viewed as shocking to someone emerged in the graphic profession as they do injustice to the field of graphic arts and its industry trends at the top reaches of contemporary European culture of visual communication. To counter the statements cited above, we offer here few fundamental questions for consideration: *Which aspects of good graphic print product isn't the result of educated design process or isn't aligned with the criteria for good multimedia product?, What is the difference in requirements from study programmes between education for competent multimedia designer and the prepress/press technology developer? or Which areas of scientific research are necessary for becoming a contemporary printing/press expert that are not necessary for becoming an expert in design or multimedia development, and vice versa?. The answer to*

all these questions, we firmly believe, is **none**. The graphic productiveness in the printing industry is stronger than ever and in no part overpowered by "paperless" production. All the relevant data shows that the pace of raise in web or multimedia production has in the last decade confidently been matched by the raise in print production, both driven by the global economic growth and connectedness. Colloquially the word "design" is considered to be an artistic discipline. However, considering the meaning of the word as it is globally used, it is equally connected to technology, engineering, ergonomics, communications, etc. When it comes to the graphic industry the ambivalence of the word "design" is even more pronounced. For example packaging design and production have to take into consideration many additional features of design: those connected with transportation, utilization, preservation, communication and ecological aspects of packaging. Furthermore, there is a trend of integrating multimedia contents to products of the above-mentioned packaging industry and packaging design profession. The subject matter gets even more complex due to the nature of product display and distribution in the rising web-shop economy. We feel that it is naïve to view graphic profession as composed of several rivaling fields rather than many its vital counterparts. All of our students find this true and readily mix their study programmes by enrolling courses from all of our study courses to help themselves grow into a well rounded and integrated graphic experts. The industry recognizes their effort and employs them because of this versatility requested by the contemporary graphic industry professionals.

Defaming the University of Zagreb's HEI to advance foreign interests

A great number of the statements in Report openly state that they are purposely lowering the re-accreditation's quality grades for the Faculty of Graphic Arts at the University of Zagreb to advance the position of some unnamed foreign competitive educational institutions. Those statements could be viewed as threats directed at the Faculty to withdraw from enrolling students in study courses that cover the subjects of multimedia and design production or the Faculty will be denied its license to offer its HE services. The reason, offered by the Report, is to prevent duplication of course subjects that are already covered by services of other, more competent, HE institutions. We highly regret that the Report never names these institutions, nor does it give any attention to describing the criteria by which these alleged institutions surpass study programs offered at the Faculty of Graphic Arts. We do believe that it is necessary that this information accompanies the statements cited below. In offering following sample of Report's statements it is also worth to mention that many readers of the Report felt a need to express their concerns that the international Expert panel has not been introduced to any other HEI at University of Zagreb or, for that matter, any other HEI in Croatia, or was given access to their documentation.

The HEI has no significant academic presence (research or artistic production) or record of accomplishment in Graphics Design. Consequently, the Graphics Design study programme is not as solid as the Graphics Engineering. The management has expressed its wish to extend the study programme to media design and digital media. However, this new programme has not been formalized and is not operational at the time of writing this report. (II. Analysis, p. 11)

The general statement of the expert panel recommends the Faculty of Graphic Arts of the University of Zagreb to re-focus education and research to the

printing industry and disengage from design, media design and digital media. (...) The HEI should focus on what it does best and where it serves the needs of stakeholders and related industry. Other existing institutions and study programmes are much better suited for developing and offering programmes in media design and digital media. Engaging in this direction would create unnecessary duplication of resources and costs at the expense of global quality. (II. Recommendations for improvement, p. 11)

Refocusing on a single programme related to Graphic Arts (printing technology) should allow making available resources for implementing higher quality involvement for the students. Transverse topics (multimedia, design) can be handled through developing focused collaboration and exchange programmes with other institutions or within the University of Zagreb. (III. Recommendations, p. 12)

Due to the general statement given above, the Faculty of Graphic Arts of the University of Zagreb needs to re-focus education and research in the printing industry. The institution has defined formal processes for the proposal, approval and implementation of new study programmes but the situation is different in real life. If the HEI focuses on printing industry, the general objectives are on a satisfactory level. (2.1 Analysis, p. 19)

It [the HEI] has effective mechanisms for recognising prior learning, but mainly in the field of Technical Sciences. The criteria for admission are the same for both of study programmes: Graphic Engineering and Graphic Design, but it is in line with the requirements of Graphic Engineering study programme only. (3.1 Analysis, p. 21)

The other suggestion is to promote assistants into professors and to reassess qualifications of full time employed professors. Furthermore, the HEI has a majority of professors qualified for teaching in courses of Graphic engineering study programme only. (3.4 Analysis, p. 24)

Students are gaining competencies required for the employment in an international environment in field of printmaking / Graphic engineering, but not in the field of Graphic product design / multimedia. (3.6 Analysis, p. 23)

However, the expert panel acknowledges that staff qualifications and available resources are inadequate or not developed in order to ensure the quality of

subjects and learning outcomes in Graphic design and multimedia. (4.1 Analysis, p. 26)

Teachers and associates employed at the higher education institution are committed to the achievement of high quality and quantity of scientific research: Minimum level of quality (printing technology research seems to be of good quality while the part related to multimedia and art is not visible on the PhD level). (5.1 Quality grade, p. 33)

Regarding the artistic part, the situation is unclear since this has in practice not really been in focus for this Faculty. The focus related to research is on printing technologies. (5.3 Analysis, p. 34)

Rather than dispersing resources to try and broaden the scope to multimedia and design (for which on the one hand it does not have the resources, and for which other, competing institutions are far better equipped) the panel suggests the energy and resources be used to try and achieve top tier European recognition in the domain of Graphic Arts (printing technology). The panel believes the Faculty of Graphic Arts has the capacity to achieve this goal. (Summary, p. 44)

The Faculty of Graphic Arts study programs are based on a multidisciplinary approach of the graphic profession including design and multimedia subjects since its conception in the year 1959. Claiming that the faculty employed at the Faculty teaching art and design courses don't have sufficient visibility or qualifications is false and we regret if the provided documentation wasn't clear on this point. The great majority of professors holding courses in art, design and multimedia employed by the Faculty are active members of design community and show significant visibility in Web of Science Core Collection's journals with impact factor Q1, Q2, Q3 or Q4 regarding papers in the field of art and multimedia.

The Faculty of Graphic Arts is the only institution that offers a Ph.D. study course regarding graphic product design (including multimedia production) in Croatia and its neighbouring countries. The Faculty's postgraduate programme got its positive re-accreditation in 2016. The suggestion to cancel its MA programme (probably suggesting the newly re-accredited Ph.D. programme too) because the graphic profession doesn't require higher education than the BA level or recommending to the Faculty to forego of its extremely productive and, as the Report states and the rest of this analysis confirms, highly respected design and multimedia courses in interest of some unnamed competitive institutions is quite a shock. Claiming, although not given a mandate to judge on these issues, that Faculty of Graphic Arts should do so to prevent duplication of study programmes or to do so in a name of rationalization of educational resources cannot be correct. The Faculty of Graphic Arts is from its conception the oldest and most productive and resource efficient institution that offers courses in the field of graphic design and multimedia in the country and its surroundings. We found no one who brings this fact to question. The Report itself states: "The expert panel has had the opportunity to interact in depth with students, stakeholders and alumni. It is clear from the resulting gathered data that the HEI has a clear

understanding of its role as a reference in the domain of Graphic Arts. Furthermore, ongoing projects indicate its sound roots with a broader socio-economic network. Recruitment and placement of students indicate that the Faculty has a good and solid positive image." (1.5 Analysis, p. 18), and the Report summarises: "The panel has met and talked with very dedicated teachers, and the students with whom the panel talked seemed satisfied with the outcomes of their studies" (Summary, p. 44).

This kind of statements presented in the form of official re-accreditation report could be viewed as an attempt to sabotage the Faculty or even the Croatian national interests. Without Faculty's MA and Ph.D. programmes, all other HEI's in Croatia and its vicinity offering study programmes related to graphic design or multimedia would lose their chief resource of qualified faculty and swiftly fail to meet the future re-accreditation criteria, triggering a deterrent domino effect. As we progress further into the Information age, the graphic profession will only gain on its importance in achieving visibility and accessing global markets. We believe that, if the goal is a realization of as many well-intended recommendations with as little resistance as possible, these statements need to be supported by the examples of good practices in competitive HEI's in the neighbourhood and detailed analysis of their strengths and achievements compared to the Faculty of Graphic Arts. The analysis of the Croatian job market and widely accepted foresights of industry needs seems equally necessary if the Report's intention is to argue for some kind of rationalization of resources, especially when talking about investing in education, media literacy and visual communication. We believe that without this kind of backing, statements cited above will predominantly fall on deaf ears, raise tensions and trigger defensive negative reactions. We firmly believe that the statements mentioned above will, if not sufficiently supported, do more harm to the Report than they contribute to its evaluations.

Misrepresenting the Reports intentions

The Report continuously states that all its assessments are forwarded for the benefit of students and the graphic arts industry in Croatia.

The HEI should focus on what it does best and where it serves the needs of stakeholders and related industry. (II. Recommendations, p. 11)

It is recommended that a formal system of regular feedback of quality monitoring, especially from the student survey, is instituted for staff and students on institutional level. (1.2 Analysis, p. 16)

If the HEI focuses on printing industry, the general objectives are on a satisfactory level. (2.2 Analysis, str. 19)

The expert panel has doubts if the HEI really takes care about student requests in this matter. (2.4 Analysis, p. 20)

The HEI should implement more learning methods, such as site-specific visits. Teaching methods should be more appreciated when it comes to grading. Also,

they should be more adapted to a diverse student population. (3.3 Recommendations, p. 22)

Looking at the data on the employment of graduates, the results are not satisfactory. (...) Teachers are committed, but the institution is not succeeding in helping the graduates getting employed over the past years. (3.10 Analysis, p. 25)

The panel recommends the HEI to refocus on its BA programme, to be more in line with the industry needs. (3.10 Recommendations, p. 25)

The expert panel recommends that the HEI develop means for teachers to receive compensation or decreased hours in classrooms with the aim of accumulating knowledge, and actively involve students to develop their relevant skills and to expand the variety of teaching methods. By implementing such practices, the learning outcomes of the study programme would be more up-to-date and in line with today's high education and employment requirements. The Faculty has to establish a permanent community meeting tradition where the atmosphere of open debates prevails. (4.3 Recommendations, p. 29)

The recommendation is that the scientific part continues to focus in order to become top tier in Europe in printing technologies. As mentioned earlier, printing technologies will continue to be important both as printed media and increasingly so in the packaging area worldwide. This is due even if other means of communication are increasing far more than printed media. Thus, a strategy to become scientifically excellent in an area asked for by the local printing industry is important. (5.3 Recommendations, p. 34)

We haven't found in the Report's text any reasoning that backs up forecasts of benefits for students or graphic industry in support of some most repeated recommendations. There is no mention of any survey of the student or industry representatives, no market analysis, no strategic plans disclosed that would reasonably foresee incoming benefits if the Report's recommendations were followed. On the contrary, all the student, alumni and industry opinions gathered by the Panel's members and included in their Report suggest that they believe that complying with any of the Report's main recommendations would dramatically worsen their current state.

The Report recommends canceling MA degree study programmes. It also recommends foregoing of all course subjects that touch on topics of design and multimedia. The quality grades Report presents oblige

the Croatian Ministry of Science and Education not to permit any more student enrolments at the Faculty of Graphic Arts.

These Report's recommendations are in complete contradiction with the clear interest of the students whose frequency of placing the study courses of graphic product design at the Faculty of Graphic Arts as their first choice during the applications for university entrance at the national level is multiple times higher than for any other study programme offering courses in the field of design and multimedia in Croatia. The Report also starts its chapter I. Analysis by stating that the Faculty doesn't seem to follow the last re-accreditation guidelines. The Report then continues to recommend canceling design and multimedia courses and punishing the Faculty with shockingly low quality-assessments for evolving their programs in line with the recommendations of the last study programs re-accreditation from the year 2012 which recommended strengthening the design and multimedia courses and turning towards contemporary *paperless* graphic technologies, more relevant to today's industry needs. The re-accreditation report from the year 2016 for Faculty's postgraduate programme states in its Summary that "*taken in consideration that the need for the research in the field of traditional graphic technology is in decline, the Faculty should focus its research towards contemporary subjects such as new graphic materials, special applications for printing and packaging, graphic design and multimedia*".

By reading the mismatching claims of the Report's intentions and recommendations alongside the statements of students, industry representatives and previous re-accreditation reports, one could hastily suspect them to be an attempt to conceal one's own conflicts of interest. Since we, the teaching assistants, do not conceive any direct profit any of the Panel's members could personally gain by the detriment of Faculty's image and productiveness, we are left wondering how did this mismatch come to be and does the published Report truthfully depict the Expert panel's opinions?

Basing conclusions on unverified data in an official re-accreditation document

The Report makes it hard for the reader to place his trust in its valuable recommendations when the text of the analysis that led to the recommendation displays false data. We regret if the documents requested for translation by the Agency for Science and Higher Education weren't sufficient to get the clear picture of Faculty's outputs and if someone did a great disservice to you and to the Faculty by providing the Panel with false data. Although it would be impractical to list here all the inaccuracies, here is our representative sample:

To start off, we offer you for reconsideration the first points of Faculty's summarized disadvantages:

Lack of a strong, collectively adopted strategic vision. (1. Point of Disadvantages of the Institution, p. 9)

Lack of confidence in management. (2. Point of Disadvantages of the Institution, p. 9)

Lack of team spirit. (4. Point of Disadvantages of the Institution, p. 9)

Although the Expert panel claims several times throughout the Report that there is a significant lack of confidence in management and, as mentioned above, lack of team spirit, it offers no firm evidence to support these claims. Evidence to counter this claim is shown in Appendix 1 attached to the Faculty's

response to the Agency's Re-accreditation Report, displaying strong accord of the faculty members in the matters of decision and policy-making concerning the Faculty's future direction. The report recognizes that the "the election and nomination process of this management seemed open, sincere and regular" (1.3 Analysis, p. 17) and that the faculty believes that "the situation with the change of faculty management has improved" (4.2 Analysis, p. 28). All the objective evidence that could be used to evaluate these criteria speak against the Panel's conclusion on the question of Faculty's main disadvantages. This data, when compared to the state the Faculty was in during the last reaccreditation process, before the change of the Faculty's management in the year 2015, clearly shows significant improvements and overall reforms made by the new management since and clearly disputes Panel assessments of merely aesthetic changes in Faculty's overall quality. Furthermore, we base our claim on the fact that this Response was confirmed by unanimous consensus of teaching assistants as were the responses of Faculty Council and Student Body.

On the question of Faculty's strategic vision, the Faculty of Graphic Arts accepted and published its documents for strategic development for the period 2017 – 2022 which clearly define its strategic vision and mission statements. The strategy is completely aligned with the guidelines of University's strategy for internalization (http://www.unizg.hr/fileadmin/rektorat/O_Sveucilistu/Dokumenti_javnost/Dokumenti/Javne_rasprave/Pet_strateskih_dokumenata_01.2014/Strategija_internacionalizacije/Strategija_Internacionalizacija_-_konacno_230115.pdf). The Report itself mentions those documents on many occasions and bases its assessments of Faculty's quality in accordance with its understanding of the Faculty's strategic vision.

The global strategic plans were presented in Croatian, and could therefore not be assessed in depth by the expert panel due to time and resource constraints. (V. Analysis, p. 13)

All the requested strategic documents were translated into English and made available to the Expert panel. The official translator was appointed to the Panel and accompanied them throughout the entire reaccreditation process.

Teaching staff turnover is able to ensure an adequate provision of the programme. Staff turnover is relatively stable. The review team found that since 2012 (Table 4.2.) some staff had retired and were replaced by staff active in areas needed by the programme. (4.1 Analysis, p. 26)

Teacher appointment and recruitment procedures, as described in the self-evaluation document of the HEI are aligned with the legislation and internal regulations in effect. For selecting, appointing and evaluating teachers, their previous activities (teaching activity, research activity, feedback from students, etc.) are taken into account. There are methods for selecting the best candidates for each position and, in addition to the prescribed national minimum conditions for each position; it has prescribed competitive criteria ensuring the selection of excellent candidates. (4.2 Analysis, p. 27)

On the other hand, during meetings with the staff, they expressed their opinion that the situation with the change of faculty management has improved. (4.2 Analysis, p. 28)

[The destinations of mobility] should be based on developing the study curriculum first of all and directed to expand the contexts of the research field (if meeting the mission of the Faculty: 'Contemporary European and global trends in the development of higher education'). (4.3 Analysis, p. 28)

The HEI plans and improves the infrastructure development, in line with the strategic goals. (...) The laboratory equipment and usage protocols comply with recognized international standards. Equipment is constantly updated, the Faculty purchases new equipment for the delivery of study programmes and scientific activities (Table 4.9.). (4.4. Analysis, p. 29)

We believe that this Response can also serve as an expression of Faculty's collectively adopted strategic vision and its deliberation to see its through.

And, to continue with simpler examples:

Recruitment and promotion procedures are documented, but their implementation lacks transparency. (IV. Analysis, p. 12)

Since the change of Faculty's management there have been no reports of irregularity or discrimination to internal or external committees. The election of members of the faculty is carried out according to all regulations, transparently and unanimously at the Faculty's Council which includes all senior staff members, student body and teaching assistants representatives and the Faculty's administration staff. As the Report states, all these proceedings are documented and made available to the public.

Hiring is entirely conducted in accordance with Croatian legislature (https://narodne-novine.nn.hr/clanci/sluzbeni/2017_03_28_652.html)

(...) the HEI Has not established a functional quality assurance system. (...) There is no strategic agenda for quality assurance. (1.1 Analysis, p. 15)

The Faculty implements its own specialized System of Quality Management, highly regarded by the University's Councils. The document arrived from our regular use of Quality Assurance forms the report on all activities of the Faculty, students' achievements and Faculty's committees' engagement, follows the ESG guidelines from the year 2015 and is made available to the broad public on the Faculty's web site. The analysis of this document is regularly used at the Faculty Departments' meetings to ensure concordance of the Department's activities with the Faculty's strategic plans. The mentioned documents are also regularly referenced on Faculty Council's meetings.

(...) while 36 students participated in incoming mobility (essentially from Balkan states). (3.7 Analysis, p. 24)

The number of students that participated in incoming mobility since the year 2012 is 39 and only 2.5% of them arrive from "Balkan states".

The faculty is very involved in Acta Graphica where most of their work is published. (V. Analysis, p. 13)

There are many articles published in Acta Graphica. However, its editorial board is managed by members of the Faculty and it cannot be found among the 156 Croatian Scientific Journals in the SJR (Scimago Journal and Country Rank). (5.2 Recommendations, p. 34)

Acta Graphica is, although not yet listed in the SJR due to its longlasting entrance procedures, an internationally recognized scientific journal in the field of graphic communications with a diverse editorial board. Its editorial board is consisted out of 33 members, 16 of whom are from abroad (India, Greece, Bosnia and Herzegovina, Spain, Italy, Slovenia, Ireland, Serbia, Bulgaria, USA and UK), compared to only eight board members employed at the Faculty. Nevertheless, no more than roughly 5% of the faculty's scientific output is published in Acta Graphica. The Faculty's scientific output is visible in the WoSCC and CROSCI databases (<https://www.bib.irb.hr/prehled/ustanove/128?report=1>).

There is no evidence published with regard to the artistic side when it comes to scientific research. The transfer of knowledge seems to work through conferences organized two times per annum and project meetings with partner companies. (5.2 Analysis, p. 34)

The published papers in the field of design, visual communication and multimedia are visible in the WoSCC and CROSCI databases. The list of Ph. D. dissertations in these fields is provided in the Faculty's answer to the re-accreditation Report on point 5.1. Beside two faculty members with professional excellence in the area of arts, there are at least four more faculty members that meet all the requirements for the title (Strgar Kurečić, Žiljak Stanimirović, Mikota, Pavlović). In Croatia, there is a clear distinction of scientific and artistic output and there is no recognized field of artistic-scientific research. The faculty and its students participate and are recognized for excellence on many design and visual communication festivals, showcase their work through exhibitions and are highly regarded in the graphic arts industry, as the testimonies of industry representatives and partner HEI-s have made clear.

The internal mechanisms for research quality still need to be established and implemented. (1.2 Analysis, p. 16)

The Faculty records staff research productivity through its Quality Assurance System whose summaries are made public via Faculty's web site. All of the Faculty's research output is published in peer-reviewed magazines, chiefly international.

However, the destinations of the mobility need to expand to other locations than just neighbouring countries. (4.3 Analysis, p. 28)

We couldn't find any record of discernible teacher mobility to neighbouring countries in the last five years, but our teachers went in that period on several occasions to the University of Cincinnati, USA; Deenbandhu Chhotu Ram University Of Science And Technology, India; University College Arteveldehogeschool Gent, Belgium; ESAD College of Art and Design Escola Superior de Artes e Design Porto, Portugal; Germany; Vietnam; Chile; Peru; Spain, Portugal, France and Hungary as a part of fellowship programme of the European Institute of Innovation and Technology; to name a few.

The admission criteria ensure the selection of candidates with appropriate prior knowledge in the field of Printing Technology (Graphic Engineering). It has effective mechanisms for recognizing prior learning, but mainly in the field of Technical Sciences. The criteria for admission are the same for both of study programmes: Graphic Engineering and Graphic Design, but it is in line with the requirements of Graphic Engineering study programme only. (3.1 Analysis, p. 21)

The Faculty of Graphic Arts at the University of Zagreb offers no study programs named Graphical Engineering and Graphic Design. The admission criteria, entrance exams and quotas for the study courses named Graphical Engineering and Graphic Product Design, which both fall in the field of Technical Sciences, are clearly distinct and in line with the differences in the requirements of the respective professions. The comparison of the admission criteria is readily available in the official public tender documentation for the Faculty of Graphic Arts.

Overall conclusions on the Reports expected outcomes

We, the teaching assistants of the Faculty of Graphic Arts at the University of Zagreb, strongly believe that the Report of the Expert Panel on the Re-accreditation of the Faculty of Graphic Arts University of Zagreb from the year 2019, although meaning well, in its current form will not reach the desired goal of improving the quality of Faculty's study programmes and therefore benefiting students and Croatian graphic industry. While we recognize the great effort the Expert panel's members have put into creating this document and are grateful for their fullhearted willingness to place themselves in the service of Croatian and European higher education and industry needs, we fear that the mishaps in the Report pointed out above greatly undermine its potency to evoke change. The HEI's re-accreditation report should be resistant to wild accusations such as that it presents a conscious attempt to defame the Faculty, to incapacitate its research and educational potency in service of some foreign interest, to maim the University of Zagreb by depriving it contributions of one of its valuable and productive components, and most extremely, to do an inestimable economic damage to Croatia's global market competitiveness by incapacitating one of its chief resources of qualified visual communication and media production experts. As we have descried through our contacts with students, the academic community and industry professionals, the Report in its current form fails to do so. We cannot hope for lasting positive outcomes while the Report is being wholly rejected in a defensive manner. We fear that in its current form, instead of helping us improve, the Report does a great disservice to the reputation of all parties involved,

including the respected Panel members. Due to all the raised points and their implications we urge you to revise the published Report. Please, give us as well, as soon as you find possible, your comments on our Response and your opinions on our stated worries. If you have any questions, please contact us at any time through our assistant or student representatives.

With best regards,

Teaching assistants at the University of Zagreb Faculty of Graphic Arts

Teaching assistant representatives:

Marko Maričević

Teo Žeželj

Teaching and research assistants at the University of Zagreb Faculty of Graphic Arts:

