

**Rejection of the Application
by European Council on Chiropractic Education (ECCE)
for Renewal of Registration**

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 1 / 7

Application of:	09/10/2015
Agency registered since:	07/05/2013
External review report of:	April 2016
Review coordinated by:	ENQA
Review panel members:	Aurelija Valeikienė (Chair), Andy Gibbs (Secretary), Vincent Wertz (academic), Janine Wulz (student)
Decision of:	20/06/2017
Absented themselves from decision-making:	N/A

1. The application of ECCE adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee considered the external review report of April 2016 on the compliance of ECCE with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
3. The Register Committee sought (letter of 3/11/2016) and received clarification from the chair of the review panel (letter of 15/11/2016).
4. The Register Committee invited ECCE to make additional representation on the grounds for possible rejection on 10/12/2016.
5. The Register Committee considered ECCE's additional representation on 27/03/2017. The Register Committee sought (letter of 29/04/2016) and received further clarifications on the additional representation (letter of 02/05/2017).

Analysis:

6. In considering ECCE's compliance with the ESG, the Register Committee took into account: *accreditation of chiropractic educational institutions in the UK and France and accreditation of chiropractic programmes in the UK, Denmark, Spain, South Africa and Switzerland.*
7. **With regard to the specific European Standards and Guidelines, the Register Committee considered the following:**

ESG 2.1: Consideration of internal quality assurance

The Register Committee further noted that the standards have not been amended following publication of the revised ESG and that no specific mapping or analysis was carried out on how ECCE's criteria and procedures address ESG Part 1. Based on its own analysis and interviews carried out, the panel concluded that Part 1 of the ESG was "transversally" reflected within ECCE's standards. The Register Committee requested the panel to further elaborate on this matter.

In its response letter (of 15/11/2016) the panel stated that the focus of the analysis was the link between external and internal QA and that this was well established. The panel further added that "*whilst it could not be demonstrated on a one to one basis that the standards 1.1 - 10 were addressed, the panel satisfied itself that the link existed*".

In the additional representation, ECCE provided a mapping of the link between the ESG Part 1 and its own standards. The Register Committee considered the mapping and noted that standards 1.1 – 1.10 are addressed in the agency's criteria and processes for institutions/programmes.

Having considered the additional representation the Register Committee was able to concur with the panel that ECCE is compliant with ESG 2.1.

ESG 2.4: Peer review experts

In its decision of inclusion the Register Committee noted that it should receive attention how effective ECCE's mechanisms to eliminate conflicts of interest within its accreditation procedures are in practice (see also 3.3)

The panel stated that the agency's conflict of interest procedure has not been addressed since the agency's initial review. The analysis of the panel showed that ECCE's procedure lack clear criteria with regards to areas of possible conflict of interest and that this has led to unsatisfactory choices of experts in a number of reviews carried out by ECCE.

The panel further expressed concern regarding the presence of an evaluation secretary from ECCE's staff within each expert panel.

In its additional representation ECCE stated that it has nominated two non-chiropractic experts to evaluation panels and that it has de-centralised the secretary function, so that there is a separate secretary for each review. The Register Committee noted that ECCE has made steps to address the independence of its review panels.

The Register Committee therefore concurred with the panel that ECCE is (substantially) compliant with ESG 2.4.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 2 / 7

ESG 2.5: Criteria for outcomes

The panel's analysis showed that the agency's criteria are unclear with regard to the period of institutional accreditation. The accreditation is given for a period of up to five years, but there is no specification in which cases the accreditation period will be shorter than five years.

In its clarification to the additional representation (letter of 02/05/2017) ECCE stated that it had developed a "Compliance Table" and a list of the critical standards to assist panels as well as institutions to understand the expectation of each standard. ECCE expects to formally adopt this practice at their general meeting in November 2017.

While the Register Committee acknowledge ECCE's plans of a new set of criteria to ensure consistency and clarity in the application of criteria, the Committee noted that the agency has neither published the 'Compliance Table' nor formalised this practice. The Committee therefore considered that, as it stands, ECCE complies only partially with standard 2.5.

ESG 2.7 Complaints and appeals

With a view to ECCE's complaints and appeals processes, institutions held the view that there was little point pursuing a complaint or appeal as the only restitution available was annulment of the whole accreditation process. The panel formed the view that ECCE's current appeals' procedure required updating and further improvement to meet the expectations of the standard.

In its clarification to its additional representation (letter of 02/05/2017) ECCE responded that it had since the review, resolved one appeal situation (in favour of the institution) and that the agency is currently taking steps to revise its Appeals and Complaints processes.

While the Register Committee noted the agency's intention to revise its complaints and appeals processes, the Committee considered that this has not yet taken place and thus could not conclude that ECCE fully addressed the panel's recommendations. The Register Committee therefore concurs with the panel that ECCE complies only partially with standard 2.7.

ESG 3.1: Activities, policy, and processes for quality assurance

The panel noted that, while the goals and objectives of ECCE are clearly described, *'the strategic planning work seems to be underdeveloped and lagging behind'* and *'there is no clear evidence of robust yearly work planning and how it ties to the long or medium term strategies'* (review report, p. 56).

The panel further stated that stakeholder involvement has not been fully ensured and especially recommended the involvement of students in the governance structures of ECCE.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 3 / 7

In its additional representation ECCE submitted a revised Strategic Plan (dated November 2016) with 'indicators of success'. The agency also added that a student will be included in its Commission of Accreditation with effect from ECCE's general meeting in November 2017.

While the Register Committee took note of the revised strategic plan and the intention to improve student involvement into the governance of ECCE, the Committee considers that these changes still have to be enacted and externally reviewed by a panel (i.e. showing evidence of a robust yearly work planning, adoption of a strategic plan) and therefore concluded that ECCE is only partially compliant with standard 3.1.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 4 / 7

ESG 3.3: Independence

Due to the small chiropractic community, the review team noted that experts from the field may lack independence. While this issue was highlighted in ECCE's previous external review, the panel noted that the situation remained unchanged.

The panel further stated that the move of experts and committee members within ECCE's different organisational structures (panel experts, the Commission on Accreditation, Quality Assurance Committee, Executive) may pose questions to the effective independence of the agency.

In its additional representation the agency stated that two additional experts from outside the chiropractic field were nominated and that the position of 'Evaluation Team Secretary' was replaced with newly appointed panel members. The agency also added that a list of conditions was prepared to be integrated as part of its conflict of interest statement.

The Register Committee acknowledged the intention of ECCE to eliminate possible conflict of interest within its accreditation procedures and to improve its organisational and operational independence. Based on the evidence provided, the Committee could not yet verify that ECCE has addressed the earlier mentioned concerns (no clear explanation of conflict of interest for members of CoA, QAC or the Executive) and the nomination of two non-chiropractic experts is not yet enacted, since it has to be voted on at the General Meeting of ECCE in November.

The Committee was thus unable to concur with the panel's conclusion of compliance and considered that ECCE only partially complies with ESG 3.3.

ESG 3.4: Thematic Analysis

In its decision of inclusion the Register the Committee noted that attention should be given to whether ECCE publishes regularly and systematically overarching analyses from its accreditation activity.

The review panel's finding showed that ECCE had not undertaken an analysis into its external quality assurance activities although the agency had committed to a *series of research of pedagogic papers* in its Draft Strategic Plan 2016-2020.

The Register Committee underlined the view of the panel that while the need to undertake such analysis had increased (as a result of the rise in the number of reviews) that ECCE lacked the human resources and capacity to undertake such a structured analysis.

In its additional representation ECCE provided three research papers co-authored by one of the accreditation committee members that were used to update ECCE standards. The agency also stated that the newly hired consultant will be expected to perform specific research on the internal activities of the organisation.

While the Register Committee noted that resources were allocated into the development of thematic analysis, the Committee could not conclude that ECCE's research papers describe and analyse the general findings of the agency's activities nor that ECCE has developed a plan to ensure that thematic analysis will be regularly undertaken.

The Register Committee concluded that the flag was only partially addressed and was therefore unable to concur with the panel's view of substantial compliance, but considered that ECCE complies only partially with standard 3.4.

ESG 3.5 Resources

The panel noted that ECCE's level of financing was not fully ensured to professionally run external QA and make possible the further development of the organisation.

In its additional representation (of 27/03/2017) ECCE informed that the membership fees of the agency have increased, that allowed the agency to improve its financial resources and employ a quality assurance consultant. The Committee was therefore satisfied that ECCE has improved its financial and human resources and that the agency is now compliant with the requirements of standard 3.4.

ESG 3.6 Internal quality assurance and professional conduct

The panel noted that while ECCE's procedures for managing the external quality assurance were robust, this was not the case for any of its other activities (e.g. lack of strategic planning, absence of policies and procedures for external QA activities, failure to monitor and ensure the effective use of its Equal Opportunities policy).

The panel recommended that ECCE develop a single consolidated internal quality assurance document that includes internal and external feedback mechanisms for continuous improvement.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 5 / 7

In its additional representation the agency stated that while the internal QA and professional conduct was an issue at the time of the external review ECCE had since put in place a number of measures to address these issues, i.e. a Complaints and Appeals procedures (document expected to be finalised in May 2017), questionnaires to collect feedback from ECCE committee members and is planning a study to compare its standards.

Given that most of these steps are plans and their effectiveness has not yet been reviewed by an external panel, the Register Committee could not conclude that, as it stands, the agency’s internal quality assurance processes are fully sufficient to assure and enhance the quality and integrity of its activities. The Committee underlined the need for an external review of the changes to its internal quality assurance related to defining, assuring and enhancing the quality and integrity of the agency’s activities.

The Register Committee therefore concurred with the panel’s conclusion that ECCE complies only partially with ESG 3.6.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 6 / 7

Conclusion:

8. Based on the external review report and the considerations above, the Register Committee concluded on ECCE’s compliance with each individual standard of the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantially compliant	Compliance
2.2	Substantially compliant	Compliance
2.3	Fully compliant	Compliance
2.4	Substantially compliant	Compliance
2.5	Partially compliant	Partial compliance
2.6	Fully compliant	Compliance
2.7	Partially compliant	Partial compliance
3.1	Substantially compliant	Partial compliance
3.2	Fully compliant	Compliance
3.3	Substantially compliant	Partial compliance
3.4	Substantially compliant	Partial compliance
3.5	Partially compliant	Compliance
3.6	Partially compliant	Partial compliance
3.7	(not expected)	Compliance (by virtue of applying)

9. In a significant number of areas, the Register Committee was unable to follow the panel’s conclusions and, also after considering the clarifications from the panel, found that certain practices were, in fact, not in compliance with the ESG.
10. On the basis of the documentation at its disposal and the considerations above, after having duly considered ECCE's additional

representations, the Register Committee thus remained unable to conclude that ECCE complies substantially with the ESG.

11. The Register Committee therefore rejected the application. ECCE has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.

Register Committee

Ref. RC19/A29

Ver. 1.0

Date 2017-06-20

Page 7 / 7