

Report of the Panel appointed to undertake a review of the European Council on Chiropractic Education (ECCE) for the purposes of full membership of the European Association for Quality Assurance in Higher Education (ENQA)

7 June 2010

PSM/Final v.7

| GLOSSARY OF TERMS | |
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| AECC | Anglo-European College of Chiropractic |
| AMoR | Annual Monitoring Report |
| CCE | Council on Chiropractic Education |
| CCEI | Council on Chiropractic Education International |
| CHE | Council for Higher Education |
| COA | Commission on Accreditation |
| DC | Doctor of Chiropractic |
| DUT | Durban University of Technology |
| ECCE | European Council on Chiropractic Education |
| ECU | European Chiropractors Union |
| EHEA | European Higher Education Area |
| ENQA | European Association for Quality Assurance in Higher Education |
| ESG | Standards & Guidelines for Quality Assurance in the European Higher Education Area |
| EU | European Union |
| GCC | General Chiropractic Council |
| HEFCE | Higher Education Funding Council for England |
| HEFCW | Higher Education Funding Council for Wales |
| HEI | Higher Education Institute |
| IFEC | Institut Franco-Européen de Chiropratique |
| QAA | Quality Assurance Agency for Higher Education |
| QAC | Quality Assurance Committee |
| SDU | Syddansk Universitet Odense (University of Southern Denmark) |
| WFC | World Federation of Chiropractic |
| WIOC | Welsh Institute of Chiropractic |

Overview

Introduction

1 The regulations of the European Association for Quality Assurance in Higher Education (ENQA) require agencies which are seeking Full membership to undergo an external review, prior to a decision being made on their application by the ENQA Board. External reviews mainly focus on how far agencies meet the criteria for Full membership; these criteria primarily reflect the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area (EHEA), adopted in Bergen in 2005 by EHEA Ministers responsible for Higher Education. Thereafter, agencies which are granted Full membership of ENQA are required to undergo successfully a further external review at least once every five years, for the purpose of renewing their membership.

2 Following an initial assessment of an application from the European Council on Chiropractic Education (ECCE) for Full membership, the ENQA Board decided on 20 December 2007 to grant ECCE Candidate membership. In doing so, it indicated a number of areas where it considered that ECCE did not, at that time, meet the criteria, and gave ECCE two years in which to make a revised application. A request was subsequently made in 2009 by ECCE for ENQA to undertake a full external evaluation of the Agency during 2010 for the purposes of gaining full ENQA membership.

Terms of Reference for the Review

3 ENQA has identified two types of nationally co-ordinated external reviews which may be undertaken for the purpose of seeking membership:

- a) a review, the sole purpose of which is to fulfil the periodic external review requirement for ENQA membership; and
- b) a review which has a number of purposes, only one of which is to fulfil the periodic external review requirement of ENQA membership.

4 This review is type A, and evaluates how, and to what extent, ECCE fulfils the criteria for ENQA membership and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The review is intended to provide information for the ENQA Board to aid its consideration of ECCE's application for Full Membership of ENQA.

Membership of the Panel

5 The members of the Panel were:

Mr Peter Williams, formerly Chief Executive, QAA (UK) and a former President of ENQA (*Chair of the Panel*), (UK)

Mr Axel Aerden, International Policy Advisor, Accreditation Organisation of the Netherlands and Flanders (NVAO), (Netherlands)

Mr Tanel Sits, Federation of Estonian Student Unions (EÜL) and Educational Policy Officer, European Students' Union (ESU), (Estonia)
Mr Andy Gibbs, Director of International Relations, School of Nursing, Midwifery and Social Care, Edinburgh Napier University, (UK)
Mr Paul Mitchell, (Secretary to the Panel), independent HE consultant, (UK).

Approach

6 The review was carried out using a process designed and managed by ENQA, independently of ECCE. The Panel sought to conduct the review in a manner that was not only professional and courteous, but also constructively searching and challenging. The review process as a whole proceeded smoothly and responsively. During the site visit, the Panel was met with unfailing courtesy and helpfulness, and by a willingness at all levels to engage candidly in the discussion and exploration of key issues.

Procedure

7 In fulfilling the purposes of the review the Panel has:

- considered the broad professional context within which ECCE operates
- considered a self-evaluation document prepared by ECCE
- considered additional documentation relevant to the Panel's lines of enquiry during the site visit
- conducted a three-day visit to ECCE (26 – 28 April 2010), hosted by the Anglo-European College of Chiropractic (AECC), (Bournemouth, UK) (Appendix 1),
- met a range of stakeholders (selected by the Panel) (Appendix 1), representative of all ECCE's operations, including:
 - the President and immediate Past-President of ECCE
 - Members of ECCE's Executive (President, Past-President, Treasurer, Chair of the Commission on Accreditation (COA), Acting Chair of the Quality Assurance Committee (QAC) and Executive Secretary)
 - Chair and Vice-Chair of the Commission on Accreditation
 - Heads (or their nominees) of accredited Colleges (AECC, IFEC, WIOC and SDU) with management responsibility for, and experience of, their College's engagement with the ECCE accreditation and annual reporting (AMoR) processes
 - a group of people who have acted for ECCE as members of evaluation teams
 - people responsible for the planning and delivery of training to evaluation team members
 - a range of current undergraduate students (from ECCE-accredited institutions)
 - a range of graduates (from ECCE-accredited institutions) and employers

Self-evaluation document

8 The self-evaluation document submitted by ECCE comprised an account of the following principal areas:

- Background information on the Higher Education System in Chiropractic
- Structure and Organisation of ECCE
- External Quality Assurance undertaken by ECCE
- Evaluation Procedures used by ECCE
- Compliance with ESG Part 2: self-evaluation against European standards and guidelines for the external quality assurance of higher education; and ESG Part 3: self-evaluation against European standards and guidelines for external quality assurance agencies
- Application for ENQA membership October 2007 (update)
- Final reflections
- Appendices containing key documents

9 The Panel considered the self-evaluation document to be both analytical and reflective. In particular it welcomed ECCE's own analysis, both in the document and in discussion, of its strengths and weaknesses and identification of those areas where enhancements to its operations could be made, with which the Panel concurs.

A summary of the supporting documentation made available to the Panel is shown at Appendix 2.

Candidate membership of ENQA

10 On 20 December 2007 the Board of ENQA agreed to grant ECCE Candidate membership of the Association. In doing so, the Board advised that, in order to meet the criteria for Full membership within the next two years, ECCE should address the following matters:

- Students were not involved in the evaluation process;
- Evaluation reports were not published in their entirety;
- ECCE did not take into account the presence and effectiveness of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG);
- The no-conflict-of-interest mechanism of ECCE was not satisfactory as: (i) there was no written declaration to be signed, (ii) an expert affected by a conflict of interest might anyway undertake the evaluation and (iii) a Council Member who had declared a conflict of interest might be excluded from voting by simple majority vote of at least a quarter of the Council members present at the meeting;
- The composition and the appointment criteria and procedures of the expert panel members should be clearly defined and reconsidered to guarantee full independence;
- The composition of the appeal panel should be clarified. In addition, according to ECCE rules, it seemed that an appeal

was not possible on the arguments of the decision itself, only on factual faults;

- The resources of ECCE could be improved, as there now seemed to be only one permanent staff member;
- There was no internal (cyclical) quality assurance system.

In the course of the review, therefore, the Panel members paid special attention to the way in which these questions have been addressed.

The Local and Professional Contexts

11 Chiropractic as a form of treating disorders of the spine originated in the USA at the end of the 19th century; the first chiropractic educational institution was established in Davenport, Iowa. As the practice of chiropractic proliferated throughout America, so the number of chiropractic educational institutions grew. Today, there are 17 chiropractic colleges in the USA, accredited by the Council on Chiropractic Education (CCE USA), together with chiropractic colleges in Canada, Australia, New Zealand, Asia, South Africa, South America and Europe.

12 As part of this world-wide network of chiropractic education and training establishments, chiropractic colleges are accredited by the Councils on Chiropractic Education (CCEs) depending on their geographic distribution. There are four such accrediting bodies: CCE (USA), CCE (Canada), CCE (Australasia) and CCE (Europe). This last is registered as the European Council on Chiropractic Education (ECCE) and is the (sole) subject of this report. To ensure parity of educational standards world-wide, the Council on Chiropractic Education International (CCEI) was established in 2001. CCE (USA), CCE (Canada), CCE (Australasia) and ECCE are all member agencies of CCEI. CCEI publishes a set of 'model core standards' which the standards set by the individual CCEs follow. This reciprocity of standards allows world-wide recognition to be granted to those chiropractors who have graduated from CCE-accredited institutions in different countries and facilitates the movement of chiropractors across national and international borders. Within this international framework, however, each CCE is an autonomous agency, setting its own standards, establishing its own policies and procedures, and acting independently from all other CCEs, and from the CCEI itself.

13 ECCE is, therefore, an autonomous and independent, not for profit, external accreditation agency for (first qualification) chiropractic education and training in Europe. Chiropractors are healthcare practitioners concerned with the diagnosis and management of a range of musculoskeletal disorders, particularly back pain, neck pain and headache. Although patients are managed using a diversity of treatment approaches, including advice about self-help, exercise, diet and lifestyle, there is an emphasis on manual treatments including manipulation of the spine. As primary contact practitioners, chiropractors must be proficient in the diagnosis of commonly presenting conditions, and safe and competent in treating those conditions considered amenable to chiropractic care. Chiropractic is a statutory regulated profession in some, but not all, countries in Europe. Chiropractic education and training occurs throughout

the world, and in Europe there are a growing number of educational institutions offering undergraduate chiropractic education and training. Some of these institutions are private, but an increasing number are part of the higher education university system in their respective countries. Chiropractic education and training leads to a professional qualification. In line with other professional degrees, such as medicine, chiropractic education and training is subject to accreditation by the relevant professional or statutory bodies. In the UK, for example, undergraduate chiropractic education and training is accredited by the General Chiropractic Council, which is a UK-wide statutory body established by parliament through the Chiropractors Act 1994. In contrast, ECCE is an agency set up by the chiropractic profession itself in Europe for the accreditation of institutions irrespective of national boundaries.

14 ECCE was established in 1991 by the General Council of the European Chiropractors Union (ECU) to oversee the accreditation of chiropractic education and training in Europe on behalf of the chiropractic profession. Its principal focus therefore centres on the accreditation of European chiropractic education institutions. The agency's purpose and Constitution is registered in Aachen, Germany at the Register of Associations (*Vereinsregister 73 VR 2732*). The ECU is the union of the majority of national chiropractic professional associations in Europe and represents a majority proportion of the chiropractic profession in Europe. In 1986, ECCE formally separated from the ECU, and in 1991 registered under its own name and Constitution (appendix I). The first institution to receive ECCE accreditation was the AECC in 1992. ECCE accreditation is intended to assure the standard of education and training, and that graduates are safe and competent to practise chiropractic. To accredit an institution, compliance of education and training with pre-determined criteria must be demonstrated through established procedures. Once accredited, institutions are monitored on an annual basis by ECCE, and undergo a re-accreditation event on a cyclical basis.

15 At the time of the Panel's site visit, ECCE had accredited four institutions in Europe as follows:

- Anglo-European College of Chiropractic, UK
- Institut Franco-Européen de Chiropratique, France
- Syddansk Universitet Odense, Denmark,
- Welsh Institute of Chiropractic, UK

And one in South Africa

- Durban University of Technology

It currently expects the number of institutions seeking accreditation to increase substantially (bearing in mind the inherently small numbers involved in chiropractic education and training in Europe) during the coming years.

16 ECCE's stated intention in seeking membership of ENQA is to become part of a wider network of quality assurance agencies in higher education

in Europe. ECCE believes that its policies and procedures fit with those of other quality assurance agencies in higher education, and membership is seen as an opportunity to learn and improve its own practice, as well as sharing in best practice with other agencies with a similar purpose and remit, and gaining enhanced recognition of chiropractic as an acknowledged profession within the EHEA.

ECCE's Structure and function

17 The purposes of ECCE are contained in its constitution. It is an organisation created to pursue the following objectives:

- To encourage the highest possible standards in chiropractic education and training
- To establish standards of excellence for the education and training of chiropractors as safe and competent primary contact practitioners
- To foster academic environments in which ethically and professionally responsible future practitioners of chiropractic can be educated and trained
- To evaluate and accredit chiropractic institutions (and/or chiropractic educational programmes) according to, and against, a pre-determined and evolving set of procedures and *Standards*
- To publish a list of those institutions that deliver programmes in compliance with the Council's procedures and *Standards*
- To ensure that institutions holding Accredited status with the Council are comparable in their educational programmes in achieving the core competencies
- To actively seek recognition of the Council as the policy-making body for chiropractic education and training by all relevant authorities whether independent, national or international
- To develop equivalent accreditation agreements where appropriate with other co-operating accreditation bodies
- The Council exclusively and directly pursues not-for-profit objectives in accordance with the Section "Tax-deductible objectives" of the German tax regulations
- The Council is engaged altruistically. It does not pursue any own profit-making goals. The funds of the Council are required to be spent in accordance with the Constitution only. Members do not receive allocations from the Council's funds. Expenditure and remunerations must not exceed the costs actually incurred. They shall be documented by the Council's accounting records. No person shall benefit from expenditure which are alien to the purpose of the Council.'

18 In organisational terms, ECCE comprises the Council, the Executive, and two standing committees: the Commission on Accreditation (COA), and the Quality Assurance Committee (QAC). The constitutions and terms of reference of these groups are set out in detail in the Constitution. In broad terms, the Council is the sovereign body and the Executive Committee is a subset which carries out the day to day responsibilities,

assisted by a part-time Executive Secretary. The two standing committees have specific responsibilities; the COA organises and makes decisions on accreditation and re-accreditation applications, while the QAC is responsible for the continuous review and evaluation of ECCE's policies and procedures, the Constitution and the ECCE Accreditation Procedures and Standards. The QAC is also responsible for ECCE's internal quality assurance activities.

19 Members of the full Council are nominated by a range of constituencies and elected by the Council. It comprises fourteen members, drawn from a variety of constituencies, plus one representative from each of the accredited institutions. Members of the Council must comply with the requirements set out in ECCE's Constitution, which are designed to ensure the independence of members and reduce the possibility of conflicts of interest. (For example, members of Council must not be acting in an executive capacity in a chiropractic professional association). ECCE aims to introduce a spread of expertise and experience and there are categories of membership to ensure chiropractors and non-chiropractors contribute to the work of the Council. Institutional members remain on Council for as long as they have accredited status with the ECCE. All other members, with the exception of the member elected to the post of Secretary/Treasurer, are able to serve a maximum of two terms, each of four years. Council meets as required, including an Annual General Meeting, and observers can be invited at the discretion of the Executive. Minutes of Council meetings are recorded, circulated amongst members and approved by the Council.

20 Outside of the full Council, the day to day work of the ECCE is carried out by the Executive Committee, which comprises the President, Vice-President, Secretary/Treasurer, Chair of the Commission on Accreditation (COA) and Chair of the Quality Assurance Committee (QAC). The ECCE has two standing committees: the Commission on Accreditation (COA) and the Quality Assurance Committee (QAC). The Chair of the QAC is elected by the full membership of the Council and the Chair of the COA by members of the COA. Both Chairs are members of the ECCE Executive. The membership of the Commission on Accreditation consists of a minimum of five members. Members are elected to the COA by the Council for a period of three years and thereafter for one further period of three years. Members of the COA are required to sign a Declaration of Confidentiality. The membership of the QAC consists of a minimum of three members. Members are elected by the Council for a period of three years and thereafter for one further period of three years.

21 Because of the relatively small number of people eligible to participate in these various groupings, and the need to ensure the independence of members and the autonomy of ECCE, mechanisms have been put in place to ensure that conflicts between the membership roles of each of them are avoided. Members of the COA, for example, although selected from the membership of Council, cannot include any institutional representatives or ECU Executive member.

ECCE compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESG Part 2: European standards and guidelines for the external quality assurance of higher education

ESG 2.1 Use of internal quality assurance procedures (ENQA Criterion 1)

Standard:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

ECCE compliance

22 Since its acceptance by ENQA as a Candidate member, ECCE has undertaken considerable further work to demonstrate the ways in which it has taken account of the ESG and has amended its procedures and documentation in consequence. In the Self-Evaluation submitted to the Panel, ECCE set down an account of the way in which it has sought to address all aspects of the ESG.

23 ECCE's general approach to the review process is set out in its 'Accreditation Procedures and Standards' document ¹ which defines ECCE standards across the following ten areas:

- Aims and objectives
- Educational programme
- Assessment of students
- Students
- Academic and clinical staff
- Educational resources
- The relationship between teaching and research
- Programme evaluation
- Governance and administration
- Continuous renewal and improvement

Within each of these ten areas, there are sub-areas which define specific performance indicators. These are the standards that must be broadly met by the institution to gain accredited status. In total there are 36

¹ (Self-evaluation Appendix II; Part 2 Section 2.2)

standards, each of which is annotated to clarify, amplify or exemplify expressions that are used in the standards; these annotations are used as guidelines in interpreting the standards.

24 The Panel reviewed in detail ECCE's 'Accreditation Procedures and Standards' document. In the Panel's view the procedures and guidelines are in accordance with recognized good practice in terms of consistency, independent judgement, openness and clear communication and map closely to ESG Part 1. Based on recent individual examples available to the Panel (albeit these are limited in number), and its discussions with representatives of ECCE, the Panel considers that ECCE's processes are effective in testing and challenging institutions' internal quality assurance policies and their procedures for managing quality and standards, and believes that the processes are compatible with section 1 of the ESG.

Panel judgement:

Fully compliant.

ESG 2.2 Development of external quality assurance processes

(ENQA Criterion 1 cont.)

Standard:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

ECCE compliance

25 The standards, policies and procedures adopted by ECCE have been developed, revised and reviewed over a period of time, and discussed with a range of stakeholders. ECCE has kept its Accreditation Policies, Procedures and Standards under regular review. All procedures, policies and the ECCE standards are documented and available on the ECCE website. Given the current relatively small size and close-knit nature of the chiropractic educational community across Europe and the inclusive operational style of the ECCE Council, it has been possible to carry out effective consultation on these policies and procedures in a relatively informal way.

26 The Panel considers that these arrangements fulfil the expectations of the standard. However, the Panel also believes that, as ECCE extends its reach in the context of the current expansion in chiropractic education institutions in Europe, and also seeks as a matter of policy to involve more professionals with education experience outside chiropractic, there will be an increasing need for ECCE to formalise these arrangements in a more structured way.

Panel judgement:

Fully compliant.

ESG 2.3 Criteria for decisions

(ENQA Criterion 1 cont.)

Standard:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guidelines:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

ECCE compliance

27 The criteria for decisions within ECCE's quality assurance processes and the decision making process are published prior to the implementation of the process. Criteria for reaching decisions on the accreditation of institutions are set out in the eligibility criteria and the ECCE Accreditation Procedures and Standards. Members of evaluation teams and the COA are selected for their expertise and experience in higher education, and members of evaluation teams must have attended a training event beforehand to support consistency of judgements. The final report is required to give the supporting evidence on which analyses and judgements are based. The COA provides full and frank feedback to institutions on the way in which its decisions have been reached. Decisions are thus taken by more than one person against publicly available criteria, which aim to support an evidence-based decision-making process which is fair, coherent and transparent. To this extent the Council, in the view of the Panel, complies with the standard.

28 As part of its reporting format, the ECCE evaluation team is asked to consider each ECCE standard separately and to make a judgement as to whether the institution under review 'fully complies, substantially complies, partially complies, or does not comply' with the relevant standard (thereby following ENQA's own practice and terminology). The Panel found that these judgement categories were not clearly defined and articulated in written form, and relied on implicit understandings of what was intended, on the part of the evaluation team members. In the view of the Panel this could encourage inconsistency and a lack of clarity in judgements. In consequence the Panel considers that the lack of agreed definitions for the judgment categories should be attended to as quickly as possible, so that the process can demonstrate appropriate rigour. The outcomes of reports seen by the Panel were presented in clusters of institutional 'strengths,' 'weaknesses' and 'concerns' and there was no reason to believe that these overall outcomes had in any way been undermined. Similar guidance on the relative weightings and interpretation of these outcomes for the purposes of determining overall accreditation decisions would help bring enhanced clarity and consistency.

Panel judgement: Partially compliant.

ESG 2.4 Processes fit for purpose

(ENQA Criterion 1 cont.)

Standard:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guidelines:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task
- the exercise of care in the selection of experts
- the provision of appropriate briefing or training for experts
- the use of international experts
- participation of students
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

ECCE compliance

29 ECCE bases its procedures on a 'fitness for purpose' principle.

The processes it uses share the following common features:

- Members of evaluation teams are appointed by the ECCE Executive with due regard to experience and expertise.
- In appointing a team, members are selected on an international basis and the totality of members will not be from any one country.
- Where there is more than one institution in a country, members of the team will not normally have any link with the other institution(s) in that country.
- Due regard is given to language needs, and although self-study reports are provided, and evaluations carried out, in English, there will be at least one member whose native language is that in which the programme is delivered.
- Training events are held by ECCE and all members of evaluation teams must have attended at least one of these.
- The self-study report and an intensive on-site visit are considered a sufficient basis on which to scrutinise the relevant evidence which is to underpin analyses and judgements.
- Teams are debriefed on completion of their work
- Institutions are invited, on completion of the accreditation process, to give feedback to ECCE's COA on the process for quality enhancement purposes.

30 Institutional improvement and enhancement policies are recognised as essential in the assurance of quality and explicitly referred to in the ECCE standards in the context of continuous renewal and improvement, although the Panel considered that this was an area in which ECCE could do more. This is discussed further under Standard 2.8 below.

31 The Panel noted that there has been no tradition within ECCE of including students as members of evaluation teams, although it was pleased to note that this situation is under active review. In its self evaluation, ECCE recognised the desirability of increasing student participation in its accreditation processes and is consulting the accredited institutions about this; as a first step, students are to be invited to attend ECCE team training events. Those from the profession and the accredited institutions who met the Panel suggested that such a move would be welcomed. Some reservations were expressed by others, however, who believed that the logistic complications resulting from the inclusion of students on accreditation panels might not justify the move. The Panel observes that the inclusion of students in review activity is fully within the spirit of the European Standards and Guidelines and would urge ECCE to expedite its consultation and move towards implementation as soon as practicable.

32 At the time of the granting of ENQA Candidate membership in 2007, ECCE was informed of a number of specific concerns relating to the appointment of its evaluation teams. These are listed below, together with a description of the way in which they have been addressed by ECCE. It is the Panel's view that ECCE has addressed these satisfactorily.

a) The no-conflict-of-interest mechanism of ECCE is not satisfactory as:

i) There is no written declaration to be signed

A written declaration has now been implemented for all members serving on an evaluation team. This must be signed prior to the visit taking place. This is now included as appendix 2 in the Evaluation Team Manual and referred to in section 4.2 of the Manual (appendix VI).

ii) an expert affected by a conflict of interest may anyway undertake the evaluation

This is not now permissible if the issue is considered by the ECCE Executive to be likely to compromise the objectivity and fairness of any decisions, judgements and opinions made as part of the evaluation process. This is referred to under 2.3.8 of the Evaluation Manual. Thus, the Executive decides, after the declaration has been made known to the institution and the institution has agreed the evaluation team membership, whether any declaration does constitute such a compromise. In such cases, a replacement is appointed

iii) a Council member who has declared a conflict of interest may be excluded from voting by a simple majority vote of a quarter of the Council members present at the meeting.

Reference to conflicts of interest of members of the Council (section 8.6 of the Constitution) (appendix I) has now been revised and reads: 'A conflict of interest on the part of any member in any matter under discussion must be declared by the said member either before or during the meeting. In all cases, the member will be excluded from the meeting for the said matter. A perceived conflict of interest of any member in any matter under discussion can also be raised by any member of the Council either before or during the meeting. If this objection is supported by a simple majority vote, then the said member will be excluded from the meeting for the said matter.'

b) The composition and appointment criteria and procedures of the expert panel members should be clearly defined and reconsidered to guarantee full independence.

Expert panel members must be impartial and not influenced by any previous associations with the institution, staff or students. To ensure this is the case, additional criteria have been entered in the Evaluation Team Manual (appendix VI) under section 2:

'2.9 No association with the institution either as a member of staff, either in a permanent, visiting or temporary capacity, or as an external examiner, either currently or for the previous 5 years.

2.10. not related to a current member of staff or a current student at the institution.'

The Panel considers that these amendments to regulations and procedures are sufficient to meet the criticisms voiced by the ENQA Board in 2007.

Panel judgement:

Fully compliant.

ESG 2.5 Reporting

(ENQA Criterion 1 cont.)

Standard:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership.

Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations.

There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

ECCE compliance

33 It is ECCE's intention to present evaluation reports in a clear and accessible language. Evaluation reports are produced in hard copy and (since 2007) are published on the ECCE website. Each report considers the evidence in relation to each individual ECCE Standard and concludes with a clear summary of strengths, weaknesses and concerns, which sets out the key findings of the evaluation team and enables the reader to find the conclusions of the team easily.

The Panel has read the only report to have been published so far, following the revision of its standards, and considers that it satisfies the ESG standard.

Panel judgement:

Fully compliant.

ESG 2.6 Follow up-procedures

(ENQA Criterion 1 cont.)

Standard:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines:

Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

ECCE compliance

34 Following the accreditation (or re-accreditation) of an institution, the relationship between the institution and ECCE continues on a formal basis through the annual monitoring and reporting (AMoR) process. Institutions are required to complete an AMoR report that documents key outcomes for the year including student admissions and progression, completion of clinical requirements by students, the student/staff ratio, and documentation of any changes to staffing and other resources.

35 ECCE's Commission on Accreditation (COA) pays particular attention to tracking any remaining issues from the previous accreditation and to reviewing progress made in addressing any weaknesses and concerns raised in the evaluation report. Follow-up is enhanced by an annual meeting between COA and the institution, at which the institution speaks to its AMoR (submitted to COA beforehand). As such, the external review undertaken by ECCE does not end with publication of the evaluation report but continues on a regular basis through meetings and scrutiny of documentary evidence, facilitating improvement and further enhancement of the institution.

On the basis of the evidence it has reviewed, the Panel considers this to be a particularly robust and effective process.

Panel judgement:

Fully compliant.

ESG 2.7 Periodic reviews

(ENQA Criterion 1 cont.)

Standard:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines:

Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

ECCE compliance

36 ECCE conducts external reviews of institutions on a cyclical basis, once every three or five years. The interval between accreditation events depends on the COA's view of the maturity of an institution and a judgement on whether an institution would benefit by a review in a shorter time frame (three years). Reviews for re-accreditation are notified to an institution well in advance so that a mutually agreed date can be identified within the timeframe of the existing accreditation period.

37 The Panel considers that as ECCE increases its level of accreditation activity, the current risk-based, variable time period approach to accreditation visits should continue to guarantee the integrity of its operations.

Panel judgement:

Fully compliant.

ESG 2.8 System-wide analysis

(ENQA Criterion 1 cont.)

Standard:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

Guidelines:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

ECCE compliance

38 ECCE disseminates much of its work through its website and is represented on the Council on Chiropractic Education International (CCEI) where it shares best practice with other external review agencies in chiropractic education on a world-wide basis. ECCE also presents its work at relevant conferences, and writes a regular news item for a journal (*Backspace*) distributed three times a year to the chiropractic profession in Europe. A report by the President on the work of ECCE is also submitted twice a year to the ECCE Council, a copy of which is submitted to the European Chiropractors Union (ECU). Much of the work of ECCE is taken up with the core business of evaluation of institutions. This is reflected on internally at Executive and COA meetings, and in extensive discussions with institutions and other stakeholders

39 Worthwhile though these activities are, the Panel nevertheless believes that there is more work to be done in the area of dissemination and quality enhancement activity, which is likely to require the provision of appropriate additional resources. ECCE does not, at present, make much use of the cumulative information it acquires about its accredited institutions, in order to identify and promulgate methodically systemic good practice and analyse commonly encountered problems. Through the production of analytical reports and the commissioning of developmental initiatives relating to the generic, sector-wide aspects of its work, ECCE could expand its impact as the principal vehicle for quality promotion and the enhancement of teaching, learning and research in chiropractic. That having been said, the Panel is also conscious of the small number of accredited institutions and relative infrequency of evaluations, which will inevitably mean that the opportunities for undertaking projects of this kind may be more limited than might be the case for larger agencies. Nevertheless there is an opportunity for ECCE, by increasing its capacity

to undertake system wide analysis, to make a major contribution to the development of chiropractic education both within Europe and also internationally through the world wide CCE network.

Panel judgement:

Partially compliant

ESG Part 3: European standards and guidelines for external quality assurance agencies

ESG 3.1 Use of external quality assurance procedures for higher education (ENQA Criterion 1 cont.)

Standard:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Guidelines:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

ECCE compliance

40 The Panel confirms that, as described in the previous section, ECCE's processes and procedures are based on, and are compliant with, Part 2 of the ESG.

Panel judgement:

Fully compliant.

ESG 3.2 Official status

(ENQA Criterion 2)

Standard:

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

ECCE compliance

41 Although ECCE is neither a national nor a statutory organisation, it is nonetheless recognised as an external quality assurance agency by public authorities in a number of countries within the European Higher Education Area (and more recently in South Africa, which does not have a comparable body). The Panel has carefully reviewed documented sources in relation to ECCE's recognition by competent public authorities in the EHEA, and is satisfied with the following statements submitted by ECCE:

- In Switzerland, the 'European accepted Standards in Undergraduate Education and Training established by the European Council on Chiropractic Education (ECCE)' are used to inform the quality standards contained in the Accreditation of Postgraduate Chiropractic Education Quality Standards, operated by the Centre of Accreditation and Quality Assurance of the Swiss Universities (OAQ), January 2009.
- In the UK, ECCE was referred to when setting up the public regulatory General Chiropractic Council following the Chiropractors Act 1994. The minimum standards of education are defined as equivalent to those of ECCE; '...that the minimum standards of education and training should be equivalent to those of the European Council on Chiropractic Education at 1 January 1992'
- In Norway, the Ministry of Health and Care Services defines the requirement to practise as a chiropractor as having 'passed the chiropractor training accredited by the European Council on Chiropractic Education (ECCE).' In addition, the Norwegian Registration Authority for Health Personnel refers to authorisation to practise as a chiropractor '...granted to applicants who have successfully completed education/training as a chiropractor at an educational institution approved by the European Council on Chiropractic Education (ECCE)...
- In Finland, 'the National Authority for Medicolegal Affairs has accepted the degree of Doctor of Chiropractic, issued at educational institutions accepted by the WFC or ECU, and the chiropractic quality assurance institution CCE, as a degree for the professional title of Educated Chiropractor'

- In Denmark, the Chiropractors Act (1991) regulating chiropractic practice refers to the Council on Chiropractic Education accredited institutions as the approved education for persons wishing to practise as chiropractors (translation). A letter from the National Board of Health (21 March 2006) verifies that ECCE/CCE will continue to be used as the reference base for acknowledging overseas chiropractic education
- In South Africa, the national external quality assurance agency (Higher Education Quality Committee, Council for Higher Education (CHE)) evaluated the chiropractic programme at Durban University of Technology. The CHE evaluation report (August 2006), which was available to the Panel, specifically refers to the expectation that the institution would subsequently attain international accreditation with ECCE (CHE Evaluation Report)

42 ECCE is registered as a non-profit making organisation in Aachen, Germany. The current composition (named members) of the Executive Committee and the Constitution document is filed at Amtsgericht Aachen. ECCE is legally registered on the Register of Associations (*Vereinsregister* VR 2732).

43 The Panel notes that ECCE is recognised in its key purposes by the relevant professional regulatory bodies and believes that ECCE meets the requirement for this standard.

Panel judgement:

Fully compliant.

ESG 3.3 Activities

(ENQA Criterion 1 cont.)

Standard:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

ECCE compliance

44 Although ECCE undertakes all its external quality assurance activities at institutional level, in practice this means that individual programme(s) are also accredited (because the accredited institutions each offer only one eligible programme). A new programme proposal in an accredited institution would need to be evaluated separately and found to be satisfactory, for the institution's accreditation to be continued. Institutions undergo periodic review for re-accreditation on a three or five year cycle depending on the COA's view of the maturity of the institution and the findings from previous evaluations. Superimposed on this is an annual reporting (AMoR) process for all accredited institutions. In this, institutions are required to report systematically on current activity, including the provision of staff and student data, and to inform the COA of any changes in activities in the period since the previous AMoR. They are also required to state how they are addressing any weaknesses/concerns from the previous evaluation report. This information is provided in writing and also in an annual face to face meeting between the institution's representative (normally the Head/Principal) and the COA.

The Panel heard that ECCE is also considering a review of its accreditation processes, with a view to the re-accreditation procedure focusing more on development and enhancement rather than just on minimum compliance requirements. The Panel would support this move.

Panel judgement:

Fully compliant.

ESG 3.4 Resources

(ENQA Criterion 3)

Standard:

Agencies should have adequate and proportionate resources, both human and financial, to enable them to organise and run their external quality assurance process (es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures (*and staff*) (*Addition by ENQA for ENQA criterion*)

ECCE compliance

45 The Council and its sub-Committees are responsible for ECCE's strategic direction and conducting ECCE's business. Members of the full Council are elected as set out in the Constitution. The Executive is responsible for the day to day operation of the Council and conducts its business through emails, and telephone conferencing as appropriate, and meets three times a year. The full Council meets annually. The Commission on Accreditation (COA) is responsible for the core business of ECCE, in particular external reviews and evaluations, and decisions thereof. The COA meets at least once a year, and at other times when institutions are in the process of being (re-)accredited.

46 Although ECCE employs an Executive Secretary (part-time), who is responsible for the administration of the Council, much of ECCE's work is carried out without remuneration by its officers and members. Outside of its own membership, ECCE is also able to draw on the experience and expertise of individuals in education (both within and outside chiropractic) to serve on evaluation teams that make on-site visits to institutions. Members of the evaluation teams are remunerated for their work.

47 ECCE is funded by subscriptions and fees from the chiropractic education institutions as set out in its Financial Policy, and by an annual subscription from the ECU, which represents the chiropractic profession's interests in Europe. The ECU is made up of the majority of professional chiropractic associations in Europe, which are in turn members of the World Federation of Chiropractic (WFC). In addition to subscriptions, institutions applying for accredited and candidate (for accredited) status are charged a fee, as are all institutions undergoing a periodic re-accreditation ECCE is in a relatively sound financial position, in relation to its current scale of operations, with an annual income of c. €50,000 and with reserves of c. €65,000. The accounts are subject to an annual external financial audit.

48 At the time of the granting of Candidate status, ENQA commented 'The resources of ECCE could be improved as there seems to be only one permanent staff member'. ECCE has responded that it is a relatively small organisation compared to other external quality assurance agencies and so far one permanent Executive Secretary to administer the work has proven sufficient. ECCE also indicated to the Panel, however, that as the

number of institutions seeking accreditation (and re-accreditation) increased, this resource capacity would be kept under review and expanded as appropriate. With more accreditation activity, the income to ECCE will consequentially and proportionally increase and finances will be available to meet the needs of the agency to ensure it continues to be fit for purpose, and financially secure.

49 The Panel considers that whilst ECCE's current level of resource may be sufficient for its immediate purposes, and was reassured by the existence of contingency plans to cover any absence of the Executive Secretary at a critical moment, resourcing nevertheless remains an issue of concern. The Panel believes there is a need for ECCE to develop and put in place (in collaboration with funders) a more sustainable administrative staffing structure over the next two years, in line with the expected expansion in demand for accreditation. This should:

- deliver a net increase of at least an additional .5 FTE in ECCE's core professional staffing
- position ECCE to respond to the expected increase in demand for accreditations
- mitigate the organisational risk inherent in the current somewhat fragile staffing structure
- ensure, in governance terms, a clearer separation between governance and administration in ECCE's operation
- provide some administrative capacity within ECCE to support system-wide analysis as discussed under 2.8 above.

Subject to the outcome of the present ENQA review, it is suggested that ENQA seek a progress report on the issue of resources in January 2012.

Panel judgement:

Substantially compliant.

ESG 3.5 Mission statement

(ENQA Criterion 4)

Standard:

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

ECCE compliance

50 The mission statement of ECCE is 'to establish standards of excellence for the education and training of chiropractors as safe and competent primary contact practitioners'. This statement is available on the home page of ECCE. The purpose of ECCE (see Para. 17 above) is detailed in Part 1 of the ECCE Accreditation Procedures and Standards (appendix II) and in the Constitution (appendix I). Both are available in print format and in electronic format from the ECCE website.

51 ECCE is concerned first and foremost with the external quality assurance of institutions providing chiropractic education and training in Europe. In the ECCE Accreditation Procedures and Standards, ECCE is defined as:

'An international autonomous organisation concerned with accreditation (and re-accreditation) of institutions offering chiropractic education and training. Accreditation (and re-accreditation) of institutions is determined by the quality of chiropractic education and training judged against a set of educational standards'.

All of the documents and the procedures operated by ECCE are based on the ECCE standards developed to ensure that chiropractic education and training provided by institutions ensures that graduates achieve the learning outcomes consistent with safe and competent practice. These outcomes are detailed in Part 2, Section 2.1 of the ECCE Accreditation Procedures and Standards. The panel considers that this standard is met.

Panel judgement:

Fully compliant

ESG 3.6 Independence

(ENQA Criterion 5)

Standard:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines:

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts)
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

ECCE compliance

52 The chiropractic community in Europe is small: there are a very limited number of institutions educating and training chiropractors. The first higher education institution (HEI) for the education and training of chiropractors in Europe (the Anglo-European College of Chiropractic (AECC)) was established in Bournemouth, UK in 1965 and currently offers a (HEFCE-supported) integrated undergraduate Masters degree (MChiro) validated by Bournemouth University. The AECC is accredited by ECCE and also by the General Chiropractic Council (GCC), in line with UK national legislation. There are two other HEIs in the UK delivering chiropractic education and training: the (HEFCW-supported) Welsh Institute of Chiropractic (WIOC), operating as a Division within the Faculty of Health of the University of Glamorgan) and McTimoney College of Chiropractic, which is a private college in Oxford. WIOC and McTimoney College both deliver an integrated Masters degree, albeit using different delivery models, validated by the Universities of Glamorgan and Wales respectively. WIOC and McTimoney College are both accredited by the GCC, while WIOC is also accredited by ECCE.

53 Outside the UK, chiropractic colleges are established in France (Institute Franco-Européen de Chiropratique) (IFEC Ivry-sur-Seine and IFEC Toulouse), Denmark (Syddansk Universitet Odense), Sweden ((Skandinaviska) Scandinavian College of Chiropractic), Spain (Real Centro Universitario Escorial-Maria Christina and Barcelona College of Chiropractic) and Switzerland (University of Zurich). There are developments in other European countries to establish chiropractic

education including Norway (University of Stavanger), Italy and the Netherlands. In the light of the growth of complementary healthcare alongside orthodox medicine, and government regulation of chiropractic in countries such as the UK, Norway and Switzerland, chiropractic education and training in Europe is likely to increase incrementally in the future.

54 ECCE itself is a small organisation and ECCE Officers and Council members inevitably play a number of roles on the wider stage of chiropractic in Europe. It has embarked upon an initiative to involve more independent educational experts from outside the field of chiropractic, both in relation to Council membership and in relation to Accreditation Panel membership. The Panel considers that ECCE has acted conscientiously and with great integrity in seeking to set up an independent structure within the limitations imposed by a small academic community with some inevitable formal and informal interdependencies. Despite the practical limitations imposed by the size of the community, ECCE has scrupulously sought to ensure that:

- ECCE operates as an independent body, registered as a not for profit organisation
- it has no formal links to any government authority, chiropractic professional organisation or individual chiropractic education institution
- all decisions regarding all operations are taken by ECCE alone or by its delegated authority, i.e. the Commission on Accreditation (COA)
- decisions on accreditation (and re-accreditation) are taken solely by the COA, without influence from the ECCE Council or any other body. In this respect, no (education) institutional member of the Council is eligible to be a member of COA
- membership of ECCE is governed by strict eligibility criteria to ensure there is no influence from either professional organisations and/or institutions
- the nomination and appointment of members of an evaluation team are determined by the ECCE Executive in consultation with the institution under review
- the final decision on external reviewers, including independent experts, remains with the ECCE Executive
- procedures have been put in place to handle real or perceived conflicts of interest.

55 The Panel has explored the issue of independence in some depth. It appreciates the potentially increased risks to independence posed by the operation of ECCE within such a relatively small community. Equally, it recognises ECCE's determination to ensure that independence of judgement is upheld in its key decision-making processes. It welcomes

ECCE's intention over time to continue to move to a more inclusive model of governance and to re-balance the composition of its formal bodies and teams, so as to increase representation from other stakeholders and experts from higher education more broadly. The Panel believes that this will further strengthen ECCE's overall independence and capacity. The current application to ENQA similarly illustrates the desire of ECCE to externalise its perspectives.

Panel judgement:

Substantially compliant.

ESG 3.7 External quality assurance criteria and processes used by the agencies
(ENQA Criterion 6)

Standard:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process
- an external assessment by a group of experts, including, as appropriate, student member(s), and site visits as decided by the agency
- publication of a report, including any decisions, recommendations or other formal outcomes
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines:

Agencies may develop and use other processes and procedures for particular purposes.

Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

ECCE compliance

56 All applications for accredited status, including candidate status, and for periodic re-accreditation, are required to be accompanied by a self-study report. This report is expected to be based on the ECCE standards, and the approved format is set out in the institutional self-evaluation section (Part 3) of the ECCE Accreditation Procedures and Standards. An on-site evaluation is also a required part of the accreditation process, and at each periodic re-accreditation thereafter. Full details of the protocols for the on-site visit are set out in Section 9 of the Evaluation Team Manual, and in Part 4 of the ECCE Accreditation Procedures and Standards.

57 As indicated in discussion of Standard 2.4, ECCE is consulting on the inclusion of students as full Panel members and will be offering training to them.

58 An evaluation report is produced at the end of every on-site visit, and used by COA as part of its procedures in reaching a decision on accredited (or re-accredited) status of an institution. The format for the evaluation report is detailed in section 10 of the Evaluation Team Manual, and in Part 4, Section 3.1.4 of the ECCE Accreditation Procedures and Standards, and includes a summary of the strengths, weaknesses and any concerns as

detailed by the evaluation team. The evaluation report is published in its entirety on the ECCE website.

59 A formal annual reporting (AMoR) process is in place, in which institutions must report formally on student and staff data, and address any weaknesses and/or concerns identified in the evaluation report. Each institution is required to participate on an annual basis between periodic re-accreditation events. To ensure consistency, all external reviewers are required to attend formal training events held by ECCE.

60 The appeals process, which can be invoked only in cases of refusal of accredited (or re-accredited) status of an institution, is the responsibility of the COA. Appeals are submitted in writing, and an appeals hearing at which the institution is represented follows. The appellant institution has the right to appoint one member of the appeals panel, subject to defined eligibility criteria. Details of the appeals process is set out in Part 4, Section 4 of the ECCE Accreditation Procedures and Standards.

In its response to ECCE's application for candidate status, ENQA commented in 2007 that 'the composition of the appeal panel should be clarified. In addition, according to ECCE rules, it seems that an appeal is not possible on the arguments of the decision itself, only on factual faults'. ECCE has considered this point and has confirmed that the grounds for appeal on a decision on accreditation (and re-accreditation) should be based on procedural issues only. ECCE would make an analogy here with the decisions of academic examiners, whereby the decisions themselves are matters of academic judgement and appeals can only be based on alleged defects in procedure.

The appeals process is described in Part 4, Section 4 of the ECCE Accreditation Procedures and Standards (appendix II). Members of the appeals panel must be impartial and in no way compromised by virtue either of professional or personal circumstances, or of association with the decision of the COA. Thus, any member of the Appeal Panel will:

- i) not be a member of the ECCE Council
- ii) not be a member of staff (either permanent or visiting or temporary) or an external examiner of the appellant institution, either currently or for the previous five years
- iii) not be related to a current member of staff, or a current student at the appellant institution
- iv) sign a 'No Conflict of Interest' statement and Confidentiality Agreement.

61 ECCE distinguishes between appeals and complaints. Complaints are dealt with by procedures set out in Part 4, Section 9 of the ECCE Accreditation Procedures and Standards.

62 The Panel is thus able to confirm that ECCE institutional review processes include self-evaluation; external assessments and site visits by a group of experts; publication of a report; and a follow-up procedure to review actions taken following the recommendations made. Detailed information regarding these processes is publicly available. As already indicated, the Panel would urge ECCE to move towards implementation of

student participation in review activity as soon as practicable. The Panel found that some of the operational aspects of the Appeals process would benefit from a tighter description of timescales and greater clarity in the allocation of operational responsibilities within the process.

Panel judgement:

Fully compliant.

ESG 3.8 Accountability procedures

(ENQA Criterion 7)

Standard:

Agencies should have in place procedures for their own accountability.

Guidelines:

These procedures are expected to include the following:

1 A published policy for the assurance of the quality of the agency itself, made available on its website.

2 Documentation which demonstrates that:

- the agency's processes and results reflect its mission and goals of quality assurance
- the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts
- the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties
- the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/Board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

3 A mandatory cyclical external review of the agency's activities at least once every five years.

ECCE compliance

63 In its response to ECCE's application for candidate status in 2007, ENQA commented that there was at that time 'no internal (cyclical) quality assurance process'.

The Quality Assurance Committee (QAC) is a standing committee of ECCE. It is responsible for the quality assurance of the policies and procedures of ECCE, and in particular the policies and procedures for the accreditation and re-accreditation of institutions. The COA Chair is a member of the Executive Committee and issues/concerns are raised at this level of operation. ECCE, and in particular the Commission on Accreditation (COA), receives annual feedback from its accredited institutions through the annual reporting (AMoR) arrangement, which the Panel considers to be a robust process. This feedback is passed to the QAC. Similarly, feedback is presented from the institutions at the annual meeting of the Council in the standing agenda item 'Reports from Institutions'. Representatives of all accredited institutions are required to attend the COA on an annual basis and give an oral report in a face-to-face meeting. Moreover, at the time of accreditation or re-accreditation, a questionnaire is sent to the Chair and members of the evaluation team, and to the

institution, asking for feedback on the evaluation process. This information is passed to the QAC for review and, if appropriate, discussion and action at the Executive level. The introduction of feedback questionnaires for the annual Council meeting and training event are under consideration.

64 A formal system of feedback on the accreditation (and re-accreditation) take place, with feedback questionnaires distributed to the Chair and members of the evaluation team, and to the institution undergoing review. Any appropriate actions are notified to the Executive through the Chair of the QAC, who is also a member of the Executive.

65 The appointment of members of evaluation teams is subject to eligibility criteria as set out in Section 2 of the Evaluation Team Manual; all members sign a Conflict of Interest statement. The Executive Secretary works closely with members of an evaluation team to ensure evaluation reports are of the required standard and fit for purpose.

66 The Panel considers that ECCE, within the limitations of its current resources, meets this standard. Increased resources would enable it to enhance further its procedures for forward planning and monitoring its own performance at corporate level.

Panel judgement:

Fully compliant.

ENQA Criterion 8

i. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups;

ii. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency;

iii. The agency is willing to contribute actively to the aims of ENQA.

ECCE compliance

67 The purpose and mission statement of ECCE are clearly set out in the agency's documentation. ECCE seeks to operate in a fair and open manner, and consults regularly with its stakeholders, both formally and informally. ECCE's policies and procedures are described in its Accreditation Procedures and Policies and ECCE is governed by these in all of its actions and decision-making processes. The ECCE Accreditation Procedures and Policies are thus the benchmark for the conduct and decisions of ECCE, and provide the reference point for internal and external stakeholders alike. Moreover, the transparency of these policies and procedures is designed to ensure that judgements and decisions are made consistently and are not dependent on any one person or group of individuals.

68 ECCE does make formal quality assurance decisions, which have formal consequences for institutions in terms of peer recognition and portability of qualifications, allowing graduates to work beyond their national boundaries. The formal appeals procedure for decisions on accreditation and re-accreditation has already been discussed (see also Para. 60 above).

69 ECCE representatives made it clear to the Panel that it would welcome the opportunity to contribute to ENQA as a Full member. In that capacity, ECCE says that it would actively share good practice in quality assurance of higher education institutions with other members, and also learn from them so as to enhance and improve its own activities and performance. ECCE is a relatively small organisation, but the Panel believes that the issues faced by ECCE are not simply challenges resulting from its scale of operation, but ones in all probability shared by other agencies, regardless of size. ECCE is unusual in that it is concerned with accreditation of education and training that ensures safe and competent practice in primary healthcare, and as such works to maintain educational and training standards within a professional context. ECCE is also concerned with transnational education across Europe, and has some valuable experience to share on the issues associated with accreditation of institutions in more than one country. ECCE has a strong European heritage and outlook, and strives to ensure parity and equality of representation. It is because of these differences, and not in spite of

them, that the Panel believes that ECCE can, and would, contribute in a relevant manner to the activities of ENQA.

Panel judgement: Fully compliant.

Overall Conclusions

70 ECCE is an unusual agency in many respects. It is very small, it accredits institutions in a single professional area, it is not accountable to any national authority, and it operates in several countries. In many respects ECCE has demonstrated through this evaluation that it is not necessary for an agency to be big to be able to conform to the European Standards and Guidelines. In most of the areas the Panel has looked at, ECCE is observing good practice and has readily embraced the need to adopt new approaches and procedures. Because it is small its lines of communication tend to be short, and agreed changes can be implemented relatively quickly.

With these benefits of smallness come some potential disadvantages. ECCE's available resources, while adequate for its current level of activity, are very limited and this could represent a potential risk to its sustainability, were it to come under any kind of prolonged financial pressure. As an accreditor within a small professional world, it is potentially open to criticism of 'inbreeding' or lack of independence; but it has taken steps to minimise the effects of these. Linked to its constraints of human and financial resources is ECCE's limited capacity to analyse and disseminate the lessons learnt from its (albeit small) number of accreditation activities.

APPENDIX 1

Programme for site visit to ECCE 26 – 28 April 2010

(Hosted by the Anglo-European College of Chiropractic (AECC), Bournemouth)

| Key to institutions | |
|---------------------|--|
| AECC | Anglo-European College of Chiropractic |
| IFEC | Institute Franco-Européen de Chiropratique |
| SDU | Syddansk Universitet Odense (University of Southern Denmark) |
| WIOC | Welsh Institute of Chiropractic |

| Time | Event | Person(s) for interview | Venue |
|-----------|---|-------------------------|-------|
| Afternoon | Panel members arrive at Hotel | - | Hotel |
| 17.00 | Panel meets for discussion/planning, followed by dinner | - | Hotel |

| Day 2 Tuesday 27 April | | | | |
|-----------------------------------|---|---|-----------------|---|
| | Breakfast in hotel | | | |
| 09.30 | Taxis from hotel to AECC | | | College Reception: met by Ken Vall, AECC Principal David Burtenshaw, ECCE Executive Secretary |
| 10.00 - 10.15 | Meeting with ECCE President and Past President | President and Past President | Boardroom, AECC | Tim Raven, President Jennifer Bolton, Past President |
| 10.20 - 11.20 | Meeting with ECCE Executive and Executive Secretary | President, Past President, Executive Secretary, Treasurer, Chair of COA, Chair of QAC | " | Tim Raven, President, Acting Chair of QAC Jennifer Bolton, Past President David Burtenshaw, Executive Secretary Markus Fechler, Treasurer Arvid Thorkeldsen, Chair of COA |
| 11.20 - 11.35 | Private meeting of panel | | | |
| 11.35 - 12.35 | Meeting with Chair and Vice-Chair of Commission on Accreditation | Chair and Vice-Chair | " | Arvid Thorkeldsen, Chair of COA Bernie Masters, Vice-Chair of COA |
| 12.35 - 12.50 | Private meeting of panel | | " | |
| 1.00- 2.00 | Sandwich lunch meeting with range of current u/g students | Panel and u/g students | Boardroom, AECC | AECC – Shawn Smith AECC – Daniella Colores WIOC – David Pudney IFEC - Louis-Marie Tinthoin SDU - Jacob Toft Vestergaard |
| 2.00 - 3.00 | Tour of AECC | | | Haymo Thiel, AECC Vice Principal |
| 3.00 - 4.00 | Meeting with heads (or their nominees) of Colleges with management responsibility for and experience of their College's engagement with the ECCE accreditation and annual reporting (AMoR) processes. | (Reps of AECC, IFEC, WIOC and Odense) | | AECC – Ken Vall, AECC Principal AECC – Haymo Thiel, AECC Vice Principal WIOC – Susan King IFEC – Olivier Lanlo, Président AFEFC-IFEC SDU – Lotte O'Neill, SDU Faculty |
| 4.00 - 4.30 | Private meeting of panel and close | | Boardroom, AECC | |
| | Dinner and panel discussion | | Hotel | |

| Day 3 Wednesday 28 April | | | | |
|-------------------------------------|--|--|-----------------|---|
| | Breakfast in hotel | | | |
| 09.30 | Taxis from hotel to AECC | | | |
| 10.00 – 10.45 | Meeting with selection of colleagues who have acted for ECCE as members of evaluation teams | | Boardroom, AECC | Peter Bon, Genève, Switzerland Graham Heale, UK Philippe Moneger, France Robert Cliquet, Belgium |
| 10.45 – 11.00 | Private meeting of panel | | " | |
| 11.00 – 11.45 | Meeting with colleagues responsible for the planning and delivery of training to evaluation team members | | " | Jennifer Bolton Arvid Thorkeldsen David Burtenshaw |
| 11.45 – 12.00 | Private meeting of Panel | | " | |
| 12.00 – 12.45 | Meeting with Chair or Vice-Chair of QAC and Executive Secretary | | " | Tim Raven David Burtenshaw |
| 12.45 – 1.00 | Private meeting of Panel | | " | |
| 1.00 – 2.00 | Sandwich lunch meeting with range of graduates and employers | | Boardroom, AECC | Markus Fehler, employer Gilbert Méal, employer, AECC graduate Philip Hume, WIOC graduate Daniel Heritage, AECC recent graduate Colleen Prendergast, IFEC graduate Anna Franklin, AECC graduate, employer Sandi Thorkeldsen, AECC graduate, employer |
| 2.00 – 2.30 | Private meeting of Panel | | Boardroom, AECC | |
| 2.30 – 3.15 | Meeting with ECCE President and Past President to clarify any outstanding issues | | " | Tim Raven, President Jennifer Bolton, Past President |
| 3.00 – 4- 30 | Private meeting of Panel | | " | |

APPENDIX 2

| DOCUMENTATION | |
|---|--|
| 1 Documents submitted in advance | |
| ECCE Self evaluation report dated February 2010 | http://www.cce-europe.org/downloads_enqa.php |
| APPENDIX I | ECCE CONSTITUTION (Version 2.2 November 2009) |
| APPENDIX II | ECCE ACCREDITATION PROCEDURES and STANDARDS (Version 3 November 2009) |
| APPENDIX III | APPLICATION for MEMBERSHIP of ENQA (OCTOBER 2007) |
| APPENDIX IV | ECCE FINANCIAL POLICY (Version 4.0 November 2009) |
| APPENDIX V | ECCE AUDITED ACCOUNTS 2006, 2007, 2008 |
| APPENDIX VI | ECCE EVALUATION TEAM MANUAL (Version 2.1 November 2009)(with minor amendment to Annex G submitted on 19.3.10) |
| APPENDIX VII | EVALUATION REPORT INCLUDING TIMETABLE (DURBAN UNIVERSITY of TECHNOLOGY November 2009) |
| APPENDIX VIII | LETTER GRANTING CANDIDATE MEMBERSHIP of ENQA (DATED 25 January 2008) |
| Additional page | Additional page 31a (added 1 April 2010) |
| 2 ECCE website | |
| | http://www.cce-europe.com/ |
| 3 Documents made available during visit | |
| | CHE evaluation report (August 2006) |
| | Minutes of ECCE Council |
| | Minutes of ECCE's Commission on Accreditation |
| | Minutes of ECCE's Executive: 2007-present |
| | Correspondence with McTimoney College |