
Dr. Kenneth Vall
President
The European Council on Chiropractic Education (ECCE)
Scharenkamp 22
38442 Wolfsburg, Germany

Bern, 3 May 2018

Subject: Membership of ECCE in ENQA

Dear Dr. Vall,

I am writing to inform you of the decision taken by the ENQA Board on 19 April 2018 regarding the membership of ECCE in ENQA.

After a consideration of the review report, the ENQA Board concluded that the overall level of compliance with the ESG is not sufficient to renew ECCE's membership at this stage. The agency has shown progress in certain areas, while there are still a number of areas of concern as detailed in the Annex to this letter. Furthermore, a judgement 'not compliant' is found in one of the standards – **ESG 3.4 Thematic analysis**. As stated in the Guidelines for ENQA Agency Reviews, the Board will conclude a negative decision when it considers non-compliance concerning any of the standards. The evidence brought forward in the panel's report confirms that no work on thematic analysis has been undertaken since the full review in 2015 when this standard was already flagged as a concern by the ENQA Board. This time the panel's report in fact raises a question on whether ECCE's interpretation of this standard is correct. The Board agrees with the panel that research publications comparing the various international standards of Chiropractic Education do not represent thematic analysis in the way it is understood in the ESG. To be in line with the requirements of the ESG, agencies should regularly publish reports that describe and analyse the general findings of their own external quality assurance activities - that would feed back to the stakeholders and society, and that would also strengthen the internal quality assurance of the agency.

In addition to this major concern, the Board would like to emphasise the following items:

- Concerning the mapping exercise addressed under the **ESG 2.1 Consideration of internal quality assurance**, the Board was hoping to see a more holistic integration of ECCE's professional standards with the ESG. In the Board's view, the current approach has remained somewhat superficial. At the same time, the Board acknowledges that ECCE is working in a specific professional setup where a holistic integration of the professional standards with the

requirements of the ESG can be challenging. ECCE is encouraged to put a specific focus on this issue in order to fully integrate the professional approach with the ESG.

- The Board shares the Review Committee’s concern whether the agency fully embraces the philosophy of the ESG as such. As pointed out by the review panel under several standards of the ESG (**2.1., 2.2, 2.4** among others), it seems that the background of ECCE as a professional accrediting body in a way hinders the agency to fully value the role of students in the teaching process and a student-centred approach of teaching. The review report under the ESG 2.2 reads as follows: *“ECCE standards focus solely on the professional skills of the chiropractor. Students report that they benefit from some of the wider contemporary learning that focusses on issues such as internationalisation, mobility opportunities, multidisciplinary learning, transversal skills and student centred learning. However, this learning is driven by institutions and national agencies rather than ECCE”*. The Board finds it questionable that the agency tends to focus almost solely on professional aspects and the student experience seems to be somewhat secondary, as described by the panel: *“students report mechanisms for ensuring student centred learning within their institutions. These would seem to be either institutionally led or driven by policies of the national agencies and differ from the ECCE approach of “patients first, students second”*.
- The Board would like to acknowledge the improvements as regards ECCE’s human and financial resources. At the same time, it is important to ensure a long term sustainability, as recommended by the panel.

Should ECCE wish to re-apply for ENQA membership in the future, it can do so in two years’ time from this decision. The ENQA Board advises ECCE to carefully follow up and implement the panel’s recommendations before re-applying. In the meantime, ECCE is welcome to seek for affiliation in ENQA, should it considers that being relevant. The details on how to apply for affiliation may be found here: <http://www.enqa.eu/index.php/enqa-agencies/affiliates/how-to-become-an-affiliate/>

In addition, ECCE can still avail of the voluntary progress visit – a new enhancement-led feature in the review process. The visit will not have the objective of checking the agency’s ESG compliance but might be helpful to determine if the agency has addressed the areas of concern. The visit would take place in about two years’ time from this decision. The ENQA Secretariat will be in touch with you in about a year’s time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the [Guidelines for ENQA Agency Reviews](#).

If ECCE is dissatisfied with the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 24 of ENQA's Rules of Procedure.

For any questions, do not hesitate to be in touch with the ENQA Secretariat.

Yours sincerely,



Christoph Grolimund
President

Annex 1: Areas for development

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As outlined by the review panel, ECCE is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

ESG 3.5 RESOURCES

ECCE is recommended to ensure that the positions of quality assurance consultant and executive secretary are sustainable (financially) in the long term.

ECCE is recommended to systematise the work processes of the executive secretary and the quality assurance consultant for the future of ECCE.

ECCE is recommended to make sure that the work plans of the employees are discussed and controlled by the executive.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

ECCE is recommended to further develop the internal quality assurance document to integrate all policies and procedures of ECCE including processes used by staff of ECCE and identifying responsible persons for monitoring and enhancing processes.

ECCE is recommended to develop the Equal Opportunities Policy to include procedures for implementation, monitoring and responsibility for ensuring compliance.

ECCE is recommended to develop a transparent and open nomination procedure by having open calls, not just within network.

ECCE is recommended to develop policies and procedures for the appropriate communication with the relevant authorities of those jurisdictions where ECCE operates.

ESG 3.4 THEMATIC ANALYSIS

ECCE is recommended to engage in structured analysis to describe and analyse the general findings of their quality assurance activities.

ECCE is recommended to learn from other ENQA members what kind of different activities could fall under this category and how analysis could be implemented utilising both internal capacities and in cooperation with HEIs and individuals.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

The mapping of ECCE standards against the ESG Part 1 has been performed, but this has not led to a revision of ECCE standards. ECCE is recommended to undertake a partial revision of its standards in order to achieve better coherence between these and the ESG Part 1 standards 1.1 – 1.10.

ECCE is recommended to ensure a greater clarity in how patient safety issues are balanced with student centred approaches.

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

ECCE is recommended to continue adaptation (and synergy) in time and content, with national QA procedures.

ECCE is recommended to better involve stakeholder representative organisations and other HE stakeholders within ECCE.

ECCE is recommended to consider expanding the current criteria to include contemporary issues in Higher Education such as internationalisation, mobility and multidisciplinary working.

ESG 2.4: PEER REVIEW EXPERTS

ECCE is recommended to make the criteria for selection of non-chiropractic panel members clear, identifying requirements for inclusion and exclusion.