Approval of the Application

by European Council for Theological Education e.V. (ECTE)

for Inclusion on the Register

Register Committee

30 June 2023

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Ver. 1.0
Date 2023-07-05
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Application of:	2022-09-13
External review report of:	2021-08-06 (full) and of 2022-12-27 (focused)
Review coordinated by:	ASIIN e.V. (ASIIN)
Review panel members:	Anne Herman Flierman (chair), Iring Wasser (secretary), Patrick Becker (academic), Stanimir Boyadzhiev (student)
Decision of:	2023-06-30
Registration until:	2026-08-30
Absented themselves from decision-making:	none
Attachments:	1. External Review Report, 2022-12-27 (separate file)
	2. Applicant's statement on the report, 2022-12-21
	3. ECTE Certification Framework, version of 2022-11-22[1]
	4. Additional Representation, 2023-05-02
	5. Addendum to the Review Report, 2023-05-02

1.   The application of 2022-09-13 adhered to the requirements of the EQAR Procedures for Applications.

2.   ECTE re-applied for inclusion on EQAR based on a focused review, addressing those standards that were not judged as compliant in the initial review of ECTE and the Register Committee's subsequent decision of 2022-06-28, namely standards 2.1, 3.1 and 3.3. The Register Committee confirmed eligibility of the application on 2022-11-03.

3.   The Register Committee considered the focused external review report of 2022-12-27 on the compliance of ECTE with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

4.   The Register Committee further considered the information on changes implemented by ECTE on 2022-12-21.

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[1] The version of the document published on the web has changed since the review report was submitted. This decision takes into account the version dated 2022-11-22 (file creation date), that was also followed by the panel.

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5. The Register Committee invited ECTE to make additional representation on the grounds for possible rejection on 2023-03-26. The Register Committee considered ECTE's additional representation on 2023-06-30.

6. The focused external review report and the present decision should be read in conjunction with the initial review report of 2021-08-06 and the resulting decision of 2022-06-28.

Analysis:

7. In considering ECTE's compliance with the ESG, the Register Committee took into account ECTE's integrated *institutional and programme accreditation*, covering programmes at QF-EHEA short cycle, first cycle and second cycle (EQF levels 5 – 7), including both full and intermediate qualifications. The Register Committee further noted that ECTE reviews practice-and research oriented programmes at QF-EHEA First Cycle and Second Cycle (EQF levels 6 and 7).

8. The Register Committee considered that ECTE accredits a large number of alternative providers, i.e. organisations that are not formally recognised higher education institutions but provide education programmes that ECTE certifies to be at higher education level.

9. As pointed out in its earlier decision, the Register Committee was mindful of the fact that the quality assurance procedure carried out by an EQAR-registered agency might be the only occasion to externally verify whether the education offered by the alternative provider is indeed at higher education level in terms of its learning outcomes. Therefore, in order to protect the label and designation of what will be perceived as "higher education", the Register Committee considered of crucial importance in the case of alternative providers that agencies pay adequate attention to ESG Part 1, in particular ESG 1.2 with its requirement that the qualification resulting from a programme should refer to the correct level of the Qualifications Framework for the European Higher Education Area (QF-EHEA).

10. The Register Committee found that the focused review report only partially provided sufficient evidence and analysis on ECTE's level of compliance with the ESG 2.1, 3.1 and 3.3. With regard to the specific European Standards, the Register Committee considered the following:

ESG 2.1 – Consideration of internal quality assurance

11. ECTE was found to be non-compliant with ESG 2.1 following its initial review (see report of 2021-08-06) and the following Register Committee decision of 2022-06-28.

12. The Register Committee's first concern was whether all ESG Part 1 were clearly enshrined in the ECTE standards for their new integrated review, covering both institutional and programme accreditation.

13. In its focused review, the panel analysed and confirmed that the integrated standards "cover all ESG I criteria", based also on an analysis of

the five accreditation procedures that took place since January 2022; these procedures featured programmes of various levels, profiles and types of providers. The Register Committee therefore found the issue addressed.

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14. The Register Committee's second concern was whether qualifications awarded by alternative providers refer to the correct level of the QF-EHEA.

15. The Register Committee found that the review panel's analysis was very generic containing no specific insights or findings on whether the concern was addressed. In particular, the Committee was not persuaded by the statement that ECTE Standards and Guidelines apply "uniformly to all ECTE programme levels (here 5-7), all types of providers (Higher Education Institutions as well as Alternative Providers) and all programme orientations (research and practice-oriented programmes)" given the fact that the learning outcomes in the Certification Framework *differ* between levels.

16. In its addendum to the report (submitted May 2, 2023) the panel clarified that all programmes accredited by the ECTE are classified as higher education and match the QF-EHEA descriptors, including practice-oriented programmes. The panel further explained that their formulation "of uniformly applied" meant to emphasise the use of one framework for different levels, in the way that programmes use one framework for evaluating different levels of programmes.

17. The Register Committee further found it hard to understand why the panel did not discuss the change of ECTE's descriptors given the significant reduction in its detail and specificity. The Committee thus requested a comprehensive assessment on how ECTE's subject-specific descriptors are considered in its new Certification Framework and on how the broad QF-EHEA descriptors themselves has impacted ECTE's accreditation in practice.

18. The panel explained that they have not been aware of a different version of ECTE Certification Framework (earlier version published in 2019, analysed version published in September 2022)[2], and thus only commented on the latest version.

19. In the view of the panel, ECTE's documentation is consistently clear in requiring the application of ECTE standard B.2.1 (that concerns the application of QF-EHEA).

20. In its addendum to the report, the panel further provided an analysis of 16 reviews covering Short Cycle, First Cycle and Second Cycle qualifications delivered by alternative providers. The panel's finding show that alternative providers have been specifically asked to link the learning outcomes of their programmes to the Dublin Descriptors and the associated higher education cycle.

21. The panel also checked whether ECTE evaluates the qualifications awarded by alternative providers at the correct QF-EHEA level and whether

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[2]See https://ecte.eu/wp-content/uploads/2022/09/ECTE-Certification-Framework.pdf

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the intended learning outcomes and qualifications were in conformity with nationally agreed standards for theological education.

22. Following the consideration of the additional documentation, the Register Committee could follow the panel's conclusion that ECTE is, in practice, examining whether qualifications at different levels match the QF-EHEA level.

23. Considering the effectiveness of how ECTE addresses these standards within its review reports (B2.1 and B5.1), the Committee found there's a wide variation in the level of detail and specificity, that may hinder the successful application and interpretation. The Committee thus found that this concern was only partially addressed.

24. **The Register Committee's third concern was whether the learning outcome descriptors for practice-oriented profile programmes indicate that these are scientific or purely vocational training programmes for jobs in evangelical communities.**

25. To further determine whether 'practice-oriented' qualifications accredited by the ECTE are effectively higher education programmes, the panel analysed in its addendum to the review report whether ECTE's reports accurately referenced the QF-EHEA level of practice-oriented qualifications. The panel noted that of the 20 practice-oriented programmes reviews, ECTE included the compliance ratings of standard B.2.1. The Committee further noted the examples of commendations and recommendations on the use of the QF-EHEA within ECTE's reports.

26. The Register Committee considered the clarification concerning the definition of "practice oriented qualifications" and also noted ECTE's recently published (May 2023) set of guidelines that distinguish between the research-oriented and practice-oriented programmes. The Register Committee therefore found that this concern has now been sufficiently addressed.

27. **Given the remaining concern in how ECTE's reports address the effectiveness of ESG Part 1 in some of its standards, the Committee concluded that ECTE remains partially compliant with ESG 2.1. The Committee nevertheless welcomes the clarifications and steps taken to address the above raised concerns.**

ESG 3.1 – Activities, policy and processes for quality assurance

28. The Register Committee found ECTE to be only partially compliant with the standard (see decision of 2022-06-28), given the lack of a clear and transparent distinction made between officially-recognised higher education institutions (HEIs) and alternative providers (APs).

29. The panel analysed ECTE's comprehensive measures introduced and how they have been implemented by both ECTE itself and the accredited providers.

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30.   The Register Committee commended ECTE for the steps taken and concurred with the panel that these address the earlier mentioned issues.

31.   The Register Committee considered that the panel's concerns regarding the Accreditation Commission's (AC) dominance by staff and the lack of other stakeholder representation (e.g. students and business) are an issue related to the requirement of stakeholder participation in ESG 3.1 rather than related to ESG 3.3.

32.   The Committee took note of ECTE's immediate steps to ensure the appointment of stakeholder members (see ECTE statement of 2022-12-21). The Committee further considered the analysis provided by the panel in its addendum to the review report, on the new composition of the Accreditation Commission, that now ensures a broader stakeholder representation.

33.   **Given that the issues related to the involvement of stakeholders' perspectives on the AC was addressed, Register Committee was now able to concur with the panel's conclusion of compliance.**.

ESG 3.3 – Independence

34.   The Register Committee considered ECTE partially compliant with the standards 3.3 (see decision of 2022-06-28), due to concerns with regard to ECTE's structure, the composition and overlapping functions of the ECTE Council and the possible conflict of interest in the role of some staff members; while steps to resolve this were taken, these had not been analysed by an external review panel.

35.   The Register Committee took note that the new governance structure of ECTE separates the governance role of the Council from the accreditation decision-making role of the Accreditation Commission (AC) and that members of the committee hold no other positions within ECTE. The Committee further noted that ECTE has put additional measures in place to remove all staff representation from the Accreditation Commission.

36.   The Committee however maintained that the practice whereby t**he Accreditation Commission nominates candidates for the same body** is problematic in terms of ensuring the agency's operational independence. Even if the candidates are nominated by the Board, the Register Committee found this approach may lead to conflict of interest scenarios and can affect the agency's operational independent and fair selection process.

37.   The Register Committee also found the appointment period of the AC confusing and ill-designed as it did not provide a limited term or a clear period for the mandate of the Commission i.e. ʿ*members of the Accreditation Commission are appointed by the Board for a period of two-four years, re-appointments are possible.*ʺ[3]

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[3]See Accreditation Commission Policies and Procedures.pdf (Published December 2022) p.4. https://ecte.eu/wp-content/uploads/2022/02/Accreditation-Commission-Policies-and-Procedures.pdf
See Introducing the ECTE (Published 21 February, 2023), p. 19 & p. 22. https://ecte.eu/wp-content/uploads/2022/10/Introducing-the-ECTE.pdf

38. **Given the above mentioned issues, the Register Committee found ECTE to be partially compliant with the standard as established previously.**

Conclusion:

39. Based on the external review report and the considerations above, the Register Committee concluded that ECTE demonstrated compliance with the ESG (Parts 2 and 3) as follows:

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Standard	Previous decision (2022-06-28)	Review panel conclusion	Register Committee conclusion
2.1	Non-compliance	Full compliance	**Partial compliance**
2.2	Compliance	(inherited)	**Compliance**
2.3	Compliance	(inherited)	**Compliance**
2.4	Compliance	(inherited)	**Compliance**
2.5	Compliance	(inherited)	**Compliance**
2.6	Compliance	(inherited)	**Compliance**
2.7	Compliance	(inherited)	**Compliance**
3.1	Partial compliance	Full compliance	**Compliance**
3.2	Compliance	(inherited)	**Compliance**
3.3	Partial compliance	Non-compliance	**Partial compliance**
3.4	Compliance	(inherited)	**Compliance**
3.5	Compliance	(inherited)	**Compliance**
3.6	Compliance	(inherited)	**Compliance**
3.7	**Compliance**	(not expected)	**Compliance** (by virtue of applying)

40. **The Register Committee considered that ECTE only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that ECTE complies substantially with the ESG as a whole.**

41. **The Register Committee therefore approved the application for inclusion on the Register. ECTE's inclusion shall be valid until 2026-08-30** [4].

42. **The Register Committee further underlined that ECTE is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.**

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[4] Inclusion is valid for five years from the date of the initial (full) external review report, see §3.25 of the EQAR Procedures for Applications, notwithstanding §8.3..

ECTE Focused Review - Follow up Actions On ESG 3.3

The scope of this document is to respond to the recommendations of the focused review panel concerning ECTE compliance with ESG 3.3, specifically concerning the independence of the ECTE Accreditation Commission (AC).

1. Clarification on the transitional period (2022)

Since the establishment of the AC, plans have been regularly carried forward to enhance the composition of the AC.

Beginning in January 2022, the newly founded AC initially operated under a transitional period, with the appointment of three Council members (who resigned from the Council and were appointed to the AC). This was done to ensure a smooth transition, uninterrupted services to member institutions and dependable, high-quality decision making.

During the transitional period, ongoing discussions were held by the AC and the ECTE Council around potential additional AC members and a timeline for their appointments.

The transitional period also featured a first edition of the core document: *Accreditation Commission Policies and Procedures*.

2. Development of the Accreditation Commission (2022 and beyond)

On December 6 (2022), the ECTE Council made several decisions to develop the Accreditation Commission.

2.1 - Following the recomendations of the AC, the ECTE Council voted to enlarge the AC to 6-11 members. This included the re-appointment of the current 3AC members and the appointment of 3 new members from a broader stakeholder representation.

> The Council also approved the recommendation of the AC to appoint a Chairperson and Vicechairperson from among the AC members.

> The current AC members are:

> 1) Dr. Joachim Pomrehn (Chairperson), eduational expert and faculty
> 2) Dr. Hubert Jurgensen (Vicechairperson), faculty and QA expert
> 3) Mrs Rana Wazir, administrative leadership
> 4) Jieen Chen (new), student representative
> 5) Dr. Eric McCauley (new), employer representative
> 6) Dr. Paul Sanders (new), governance expert and international peer agency representative

2.2 - Following the reccomendations of the AC, the ECTE Council also voted to revise the *Accreditation Commission Policies and Procedures*.[1] The revised document now includes:

> a. The introduction of the roles of Chairperson and Vice-chairperson.
> b. Specification of number of AC-members to be between 6-11.

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[1] See http://ecte.eu/introducing/organisation/accreditation-commission/accreditation-commission-policies-and-procedures/

c. Further clarifications around conflict of interest, requiring that AC members will absent themselves from discussions and voting sessions involving decisions concerning providers with whom there may be shared interests.
d. Further clarification on selection criteria of AC members in terms of a broad representation of direct and indirect ECTE stakeholders. These will be used for further development of the AC moving forward.
e. Removal of reference to staff and to the Accreditation Director as 'members' of the AC. Staff members and VET leaders are not considered members of the AC but may be invited as guests by the Chairperson.

The revision also included clarification on items such as decision-making procedures, documentation and communication of decisions, accountability of AC-members and training and orientation of AC members.

CONCLUSION AND DOCUMENTATION

This additional representation provides a concise overview of ECTE's compliance to ESG 3.3 concerning the independence of the Accreditation Commission. All changes listed in this document have been formally approved and will be in operation from the next AC session onwards (Jan 24, 2023). Supporting evidence (e.g. minutes of AC and Council meetings) are available on request.

Submitted to the ASIIN Review Coordinator on 21 December 2023

ECTE CERTIFICATION FRAMEWORK

This document is a copy of Appendix A in the *Standards and Guidelines*[1] for ECTE accreditation, providing the certification framework within which the ECTE provides accreditation of programmes offered by higher education institutions (HEIs) and alternative providers of higher education (APs).[2]

The definitions of levels and synopses of standards are mainly based on the *European Qualifications Framework* for Higher Education (EQF)[3] that provides a comprehensive map of all types and levels of qualifications in Europe. The EQF is a learning outcomes-based framework that serves as a translation tool between different frameworks. To ensure that qualifications are aligned with the typical expectations of achievements and abilities associated with higher education qualifications, the *Overarching Qualifications Framework for the European Higher Education Area* (QF-EHEA) is also referenced and the outcomes for each level match the typical expectations of the Short Cycle, First Cycle and Second Cycle in the QF-EHEA (formerly Dublin Descriptors).[4]

ECTE qualification	ECTS Credits	EQF level	QF-EHEA Cycle
EQF 5 (Short Cycle)	90-120	5	Short Cycle
EQF 5-Partial (Short Cycle-Partial)	60		
EQF 6 (First Cycle)	180-240	6	First Cycle
EQF 7 (Second Cycle)	60-120	7	Second cycle
EQF 7-Partial (Second Cycle-Partial)	Less than 60		

The ECTE accredits programmes that signify the completion each level/cycle as well as partial qualifications that operate at the level of the relevant cycle but are not end-of-level/cycle qualifications (these are denoted in the table above by the boxes shaded in grey).[5]

In order to provide comparability to contexts outside of Europe, references are included in the tables below to the UNESCO *International Standard Classification of Education* (ISCED 2011)[6] and to the English nomenclature used in the *ICETE Qualification Comparability Framework*[7].

Within national legal frameworks, each accredited institution should identify and use further qualification nomenclatures in the language of delivery. The Diploma Supplement should be used to fully describe the qualification within the accredited EQF/QF-EHEA level.

RESOURCES[8]

- *Guidelines for Programme Design and Using ECTS*
- *Guidelines in Distinguishing Research and Practice Oriented Programmes*
- *Descriptors defining levels in the European Qualifications Framework* (EQF)
- *Guidelines for Alternative Providers and Qualification Nomenclature*

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[1] http://ecte.eu/qa/standards/
[2] See more about ECTE Accreditation and institutional status http://ecte.eu/ecte-accreditation/ecte-accreditation-and-institutional-status/
[3] https://europa.eu/europass/en/european-qualifications-framework-eqf
[4] http://www.ehea.info/Upload/document/ministerial_declarations/EHEAParis2018_Communique_AppendixIII_952778.pdfs
[5] The *Framework for Qualifications of the EHEA* envisions a 'range of qualifications, partial qualifications and levels' (p. 33) http://www.ehea.info/media.ehea.info/file/WG_Frameworks_qualification/71/0/050218_QF_EHEA_580710.pdf. These are sometimes also referred to as 'intermediate' qualifications.
[6] http://uis.unesco.org/sites/default/files/documents/international-standard-classification-of-education-isced-2011-en.pdf
[7] https://icete.info/icete-qualification-comparability-framework/
[8] See www.ecte.eu/qa/guidelines

1. EQF 5 (Short Cycle)

DEFINITION

At EQF Level 5 (QF-EHEA Short Cycle), the ECTE certifies basic, short programmes of higher education aimed at building comprehensive, specialised, factual and theoretical knowledge as well as a range of cognitive and practical skills in the field of theology. These programmes can give transfer into EQF Level 6/First Cycle programmes. They can consist in 10-120 ECTS credits and up to two full-time academic years (or equivalent).

For programmes of 120 ECTS, comparability can be established at EQF Level 5 and as 'Short Cycle' qualifications in the QF-EHEA. In the ICETE Framework these programmes are referred to as 'Diplomas'.

For programmes of 60 ECTS, comparability can be established as partial EQF Level 5 and partial Short Cycle qualifications. In the ICETE Framework 60 ECTS, one year programmes are referred to as 'Certificates'.

SYNOPSIS

Description	Programmes of foundational theological education aimed at providing a comprehensive knowledge in the field of theology and a selection of skills.
EQF	Level 5 (120 ECTS) Partial Level 5 (60 ECTS)
QF-EHEA	Short cycle (120 ECTS). Partial Short Cycle (60 ECTS)
ECTS Credits	120 (60 for partial qualification)>
Learning Outcomes (QF-EHEA)	Demonstrated knowledge and understanding in a field of study that builds upon general secondary education and is typically at a level supported by advanced textbooks; such knowledge provides an underpinning for a field of work or vocation, personal development, and further studies to complete the first cycle; application of knowledge and understanding in occupational contexts; ability to identify and use data to formulate responses to well-defined concrete and abstract problems; communication about understanding, skills and activities, with peers, supervisors and clients; learning skills to undertake further studies with some autonomy.
Duration	Flexibility for shorter programmes For 60 credits = one-year For 120 credits = two years
ISCED level	Level 5, category 544 60 ECTS = category 541
ICETE level	The level of these programmes is described as 'Certificate' for 60 ECTS programmes and as 'Diploma' for 120 ECTS programmes.

2. EQF 6 (First Cycle)

DEFINITION

At EQF Level 6 (QF-EHEA First Cycle), the ECTE certifies programmes of advanced education aimed at building knowledge and critical understanding as well as advanced skills in the field of theology. These programmes can be oriented toward fields of work and/or of study. They should normally consist of 180-240 ECTS credits and last three-four years of full-time study (or equivalent).

For these programmes, ISCED comparability can be established at Level 6, and in the ICETE Framework, they are referred to as 'Bachelor' level programmes.

SYNOPSIS

Description	Programmes of advanced theological education aimed at building knowledge and critical understanding as well as advanced skills in the field of theology.
EQF	Level 6
QF-EHEA	First Cycle
ECTS Credits	180-240
Learning Outcomes (QF-EHEA)	Demonstrated knowledge and understanding in a field of study that builds upon general secondary education, and is typically at a level that, whilst supported by advanced textbooks, includes some aspects that will be informed by knowledge of the forefront of their field of study; application of knowledge and understanding in a manner that indicates a professional approach to work or vocation, and competences typically demonstrated through devising and sustaining arguments and solving problems within the field of study; ability to gather and interpret relevant data (usually within the field of study) to inform judgements that include reflection on relevant social, scientific or ethical issues; communication of information, ideas, problems and solutions to both specialist and non-specialist audiences; development of learning skills that are necessary to continue to undertake further study with a high degree of autonomy.
Duration	Three to four years (full-time).
Orientation	EQF Level 6/First Cycle higher education programmes may be oriented toward fields of practice and/or of research.[9]
ISCED level	Level 6 – Bachelor level or equivalent (research-oriented programmes: category 64; practice-oriented programmes: category 65).
ICETE level	The level of these programmes is described as 'Bachelor'.

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[9] See *Guidelines in Distinguishing Research and Practice Oriented Programmes*

3. EQF 7 (Second Cycle)

DEFINITION

At EQF Level 7 (QF-EHEA Second Cycle), the ECTE certifies highly specialised programmes of education aimed at building knowledge, critical understanding and specialised skills in the field of theology. These programmes can be oriented toward fields of work and/or of study. They can consist in 10-180 ECTS and may be consecutive or non-consecutive (i.e. designed for graduates of other fields of studies).

For programmes between 60-180 ECTS, EQF comparability can be established at Level 7, corresponding to a Second Cycle qualification in the QF-EHEA. In the ICETE Framework these programmes are referred to as 'Master' level programmes.

Programmes with less than 60 ECTS remain as partial EQF Level 7 and partial QF-EHEA Second Cycle qualifications. In the ICETE Framework, these shorter programmes are referred to as 'Postgraduate Certificates'.

SYNOPSIS

Description	Programmes of highly specialised theological education aimed at building knowledge, critical understanding and specialised skills in the field of theology.
EQF	Level 7 (60-180 ECTS) Partial Level 7 (<60 ECTS)
QF-EHEA	Second Cycle (typically, 60-120 ECTS with a minimum of 60 credits at the level of the 2nd cycle) Partial Second Cycle (< 60 ECTS)
ECTS Credits	10-180
Learning Outcomes (QF-EHEA)	Demonstrated knowledge and understanding that is founded upon and extends and/or enhances that typically associated with the first cycle, and that provides a basis or opportunity for originality in developing and/or applying ideas, often within a research context; application of knowledge and understanding, and problem solving abilities in new or unfamiliar environments within broader (or multidisciplinary) contexts related to field of study; integration of knowledge and handling of complexity, and formulating judgements with incomplete or limited information, but that include reflecting on social and ethical responsibilities linked to the application of their knowledge and judgements; communication of conclusions, and the knowledge and rationale underpinning these, to specialist and non- specialist audiences clearly and unambiguously; learning skills to allow to continue to study in a manner that may be largely self-directed or autonomous.
Duration	Flexibility for shorter programmes. Normally up to 2-3 years (full-time).
Orientation	EQF Level 7/Second Cycle higher education programmes may be oriented toward fields of practice and/or of research.[10]
ISCED level	Level 7 - Master level or equivalent (research-oriented programmes: category 74; practice-oriented programmes: category 75) < 60 ECTS = category 761

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[10] See *Guidelines in Distinguishing Research and Practice Oriented Programmes*

This Certification Framework was revised in 2022 and included in Appendix A of *Standards and Guidelines* for ECTE accreditation.

For additional information about the ECTE, contact:
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ADDITIONAL REPRESENTATION

FOLLOWING THE MARCH 2023 INVITATION
OF THE EQAR REGISTER COMMITTEE

BY THE

EUROPEAN COUNCIL FOR THEOLOGICAL EDUCATION

SUBMITTED 2 MAY 2023

TO THE EQAR REGISTER COMMITTEE

This document responds to the 26/03/2023 invitation of the EQAR President and Chair of the Register Committee to make additional representation relating to the deferral of ECTE's application for inclusion on EQAR. The document provides additional representation relative to the ESG standards in which the ECTE has been judged as partially compliant.

As requested by the Committee, substantive changes in the versions of key documents received by the panel (in particular the ECTE Certification Framework) are also described.

The ECTE has noted that the Committee is particularly concerned over compliance to ESG 2.1 and that further specific analysis is requested from the external review panel. We have therefore asked the external panel that conducted the review in November 2022 to produce and Addendum that features greater specificity and rigor in analysis, especially concerning ESG 2.1. We have also asked the external panel to formally comment on the changes implemented by the ECTE following the review related to ESG 3.1 and 3.3. This Addendum is to be considered an integral part of ECTE's additional representation.

Respectfully submitted on behalf of the ECTE Council,

Marvin Oxenham (PhD)
ECTE General Secretary,
Rome, Italy

1 – Response relative to ESG 2.1

Related to the two concerns of Review Committee over compliance to ESG 2.1, the ECTE wishes to draw the attention to the documentary and factual evidence presented in its Focused Review SAR (FR-SAR).[1]

1.1 – Documentary evidence that qualifications awarded to alternative providers are at the correct QF-EHEA level, was presented in ECTE's Standards and Guidelines (standard B.2.1), in the ECTE Certification Framework and in the Guidelines for Programme Design and Use of ECTS (FR-SAR, p.6).

Factual evidence was provided through:

   a) a summary of review outcomes of 23 alternative providers related to standard B.2.1 (covering Short Cycle, First Cycle and Second Cycle) (FR-SAR, p.7);
   b) commendations, recommendations and requirements on the use of the QF-EHEA drawn from 16 review reports (mostly alternative providers) (FR-SAR, p.7-10);
   c) examples of evidence of implementation of the QF-EHEA outcomes by alternative providers across Short Cycle, First Cycle and Second Cycle qualifications (FR-SAR, Appendices D-I).

1.2 – Concerning 'practice-oriented' qualifications, ECTE has specified that its definition for this kind of programmes is based on the EHEA definition of an 'applied vocational' higher education profile (FR-SAR, p.10).

Documentary evidence that 'practice-oriented' programmes are accredited as higher education programmes, was provided in standard B.2.1 in Standards and Guidelines, in the Certification Framework and in the Guidelines for Distinguishing Research and Practice-Oriented Programmes (FR-SAR, p.10).

Factual evidence was provided in the three data sets described in point 1.1 above, which feature (mostly) practice-oriented programmes.

The ECTE has asked the review panel to further analyse and comment this evidence in its Addendum.

2 – Response relative to ESG 3.1

Concerning compliance to ESG 3.1, documented plans have been developed since early 2022 to broaden the stakeholder representation on Accreditation Commission. In December 2022 these plans were enacted, and as of January 2023 the Accreditation Commission functions with a broader range of stakeholders.

The ECTE has asked the review panel to comment these measures in its Addendum.

3 – Response relative to ESG 3.3

The ECTE Focused Review SAR addressed issues concerning structure, composition and functions of the ECTE in relation to independence (p. 13,14). In particular, policies and evidence of practice related to an independent Accreditation Commission were provided. In the initial external focused review report, the panel concluded that the 'responsibilities are now clearly separated' (2022-12-27 External review report, p.10).

Since the external review, additional measures have been put in place to remove all staff representation from the Accreditation Commission and further enhance its independence.

The ECTE has asked the review panel to comment these measures in its Addendum.

4 – Substantive changes to key documents

ECTE Certification Framework. The ECTE apologises for the confusion around the different versions of this document. This was determined by a website error that did not update all the links to current versions, hence an old version remained in circulation. Apparently, the Register Committee viewed a version that featured 'more detail and specificity', but this was never considered by the review panel. We are taking measures to avoid such confusion as we review documents in the future.

The Certification Framework has only had one substantive revision since the version that was examined by the external review panel in 2021. This revision consisted in replacing EQF levels and

descriptors (5,6 and 7) with QF-EHEA levels and descriptors (Short, First and Second cycle). To summarise:

- 2021 review: version with EQF levels
- 2022 focused review: version that replaced EQF with QF-EHEA levels (no other changes)

It should be noted, however, that the *practice* of ECTE accreditation is based on the consistent application of standard B.2.1 in the Standards and Guidelines which prescribes the use of the appropriate QF-EHEA level outcomes for all qualifications, levels and orientations. Although the Certification Framework is a helpful summary of this standard, it serves as an appendix in Standards and Guidelines.

Addendum to the report on the ECTE by the ASIIN expert panel
(submitted to the EQAR Review Committee April 2023)

INTRODUCTION

On November 23rd 2022, an expert panel composed by ASIIN conducted a site visit and discussed the Focused Self Evaluation Report drawn up by the ECTE in response to the deferred decision of the Registrar Committee (RC) of EQAR on the application of the ECTE for inclusion in the European Registrar for Quality Assurance. Subsequently, the panel composed a focused review report that was submitted to the EQAR Review Committee. In April 2023, the panel learned of the request of the committee for additional clarification and substantiation of certain findings and conclusions. In response to this request, the panel hereby further clarifies the following points:

1 - ESG 2.1 (FIRST CONCERN). The panel understands that the RC is looking for a more detailed analysis of whether the qualifications awarded by alternative providers at different levels correspond to the QF-EHEA levels.[1] In response, the panel wants to bring the following observations to the committee:

- 1.1 - The policies and documents of the ECTE were examined and found to consistently require that qualifications meet the outcomes of the QF-EHEA at the level of Short, First and Second cycle (both full and partial qualifications). In particular, the current ECTE Certification Framework was examined and found to be a correct summary of the outcomes required at each level of the QF-EHEA.

- 1.2 – It was noted that the Certification Framework (an appendix to the ECTE *Standards and Guidelines*) had undergone revision since the first review in 2021, and that the learning outcomes previously that used the EQF levels (5,6 and 7) had been replaced with the QF-EHEA levels (Short, First and Second cycle). Concerning the reference of the Committee to yet another version of the Certification Framework with 'more detail and specificity' around qualifications in the discipline of theology, this version was not submitted to or seen by the panel.

- The panel has observed however, that in the current version of the ECTE Certification Framework a clear distinction between the levels 5, 6 and 7 is maintained. Without citing the entire text, it is obvious that the focus ranges from 'application of knowledge and understanding in occupational context (…) and ability to formulate (…) responses to well defined concrete and abstract problems' (at level 5) to 'knowledge at the forefront of the field of study (…) and application of knowledge and understanding in a manner that indicate its professional approach (….), and competences typically demonstrated through devising and sustaining arguments and solving problems within the field of study' (at level 6). Finally, at level 7 the corresponding definitions are 'knowledge and understanding (…) that provides a basis for originality in developing and/or applying ideas, often within a research context, and application of knowledge and understanding and problem solving abilities in new or unfamiliar environments (..) and formulating judgements with incomplete or limited information'.

- As regards the formulation of the panel´s finding that the relevant ECTE framework is 'uniformly' applied to all levels'', the panel acknowledges that this potentially may have caused confusion or a misunderstanding. By using this expression, the panel wanted to

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[1] See paragraphs 13-18 in EQAR Deferral decision

emphasize that one framework is used for different levels while of course at the same time allowing to take into account the difference between the levels and corresponding intended learning outcomes. In this sense, many other agencies also use one framework for evaluating different levels of programmes.

Notwithstanding the changes in this particular appendix that might have created some confusion, the actual practice of accreditation of the ECTE in requiring adherence to the appropriate QF-EHEA outcomes for each level of qualification have remained consistent with the requirement of standard B.2.1 in the *Standards and Guidelines* (that concerns application of the QF-EHEA at the appropriate programme level) [2]. It also is consistent with the guidelines expressed in the document *Guidelines for Programme Design and Use of ECTS.* This consistency in practice is substantiated by the examination of the review reports (see below).

- 1.3 - The ECTE in its documentation presented a table of 23 reviews (from 2019-2022) [3], summarising compliance to ECTE standard B.2.1. The table featured reviews of Short Cycle, First Cycle and Second Cycle qualifications (both full and partial), all of which were delivered by alternative providers. This table was analysed by the expert panel, and it concluded that the ECTE has consistently examined compliance to the QF-EHEA outcomes at each of the qualification levels being delivered by alternative providers. It is obvious also that this practice was in place well before the latest version of the Certification Framework was adopted.

- 1.4 - Further analysis was conducted of 16 ECTE review reports concerning the application of standard B.2.1 to different levels.[4] These reviews covered Short Cycle, First Cycle and Second Cycle qualifications (both full and partial) delivered by alternative providers (with the exception of one higher education institution). A set of direct quotations from the review reports (with direct links to each report) was also analysed. As an example, an alternative provider delivering Short Cycle qualifications was required to '… look again at the Dublin Descriptors and make sure that the learning outcomes reflect the respective academic level'.

In another case, the panel observed that the intended learning outcomes and qualifications of the programme (Second Cycle) were in conformity with the standards agreed for theological education by the national organisation for applied higher education and accepted by the relevant national quality agency NVAO (Tyndale, Netherlands, pp. 20-21). In yet another case the panel noted that the required level (Second Cycle) was observed in the design of all individual modules, whereas at the same time the panel required the institution to elaborate the module description more in detail (CBEE, Romania, pp23-25). In this same report, the expert team commented on the need for additional training for students, entering without a First Cycle education in theology. The panel sees this as an additional proof that ECTE panels are aware of the necessity for reviewed institutions to develop and run programmes in accordance with the relevant standards (CBEE, pp26). In almost all reports, explicit reference to learning outcomes, geared to the EHEA QF is made.

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[2] Standard B.2.1 reads: 'The qualification resulting from a programme should be clearly specified and communicated and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area' (ECTE Standards and Guidelines)
[3] Table 2 in the ECTE FR-SAR (p.7)
[4] Table 3 in the ECTE FR-SAR (p.7-10)

In some cases, it was noted that the reports indicated compliance, whereas in other cases recommendations or requirements (as in the case of CBEE) were put in place (and followed up on). The latter suggests rigor in implementation.

This data supports the conclusion that ECTE is, in practice, examining whether qualifications at different levels are designed to match the QF-EHEA outcomes (also referred to as Dublin Descriptors in the reviews).

- 1.5 – Further analysis was conducted of five granular examples meant to demonstrate in practice how alternative providers are implementing QF-EHEA outcomes at the appropriate qualification level. [5] These included, for example, an excerpt from a SAR featuring appropriate level-specific QF-EHEA outcomes for Short and First Cycle qualifications and a set of curriculum maps with QF-EHEA outcomes for Second Cycle programmes. The analysis of these appendices further confirms the opinion that the ECTE is compliant to ESG 2.1 in evaluating qualifications awarded by alternative providers at the correct QF-EHEA levels.

- 1.6 – In conversation with the ECTE leadership and management during the site visit, it was also noted that the ECTE is enacting plans to further strengthen level-appropriate focus on the QF-EHEA in all accreditation reviews (e.g. specific VET training schedule for March 2023).

2 - ESG 2.1 (SECOND CONCERN). The panel understands that the RC is looking for a more detailed analysis of whether practice-oriented qualifications awarded by alternative providers are higher education programmes and not vocational training.[6] In response to this concern, the panel brings the following observations to the attention of the RC.

- 2.1 – 'Practice-oriented' qualifications accredited by the ECTE were investigated to determine whether they are effectively higher education programmes. The investigation was done by examining ECTE documentation and by observing whether the review reports of practice-oriented qualifications accurately referenced the QF-EHEA.

- 2.2 – Concerning the documentation, it was found that the ECTE is consistently clear in requiring the application of ECTE standard B.2.1 (that concerns application of the QF-EHEA) to all orientations, including practice-oriented qualifications. The specific *Guidelines for Distinguishing Research and Practice-Oriented Programmes* are even more explicit in indicating that '… the difference between research and practice orientation has nothing to do with levels, difficulty, status or the quality of a programme. Nor does it have to do with the distinction of higher education or vocational education. All programmes accredited by the ECTE are classified as higher education and match the QF-EHEA descriptors, including practice-oriented programmes'.[7]

- 2.3 – Concerning the analysis of ECTE review reports and the application therein of QF-EHEA to practice-oriented programmes (see above), it was noted that compliance ratings to ECTE standard B.2.1 (see 1.3 above) included 20 practice-oriented programmes.[8] It was also noted that the examples of QF-EHEA outcomes in reviews (see 1.4 above) featured 9 practice-oriented programmes.[9] This evidence supports

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[5] Appendices D-I in the ECTE FR-SAR (p.18-27)
[6] See paragraphs 19-21 in EQAR Deferral decision
[7] *Guidelines for Research and Practice Oriented Programmes* (p.1)
[8] Table 2 in the ECTE FR-SAR (p.7)
[9] Table 3 in the ECTE FR-SAR (p.7-10)

the conclusion that ECTE accredits practice-oriented qualifications as higher education qualifications matching the QF-EHEA outcomes.

- 2.4 – It should be also noted that ECTE's clarification of its use of the category 'practice-oriented' is found to be in line with the EHEA definition of 'profiles' of higher education qualifications that share 'a common emphasis or purpose (e.g. an applied vocational as opposed to more theoretical academic studies).' [10]

- 2.5 In this perspective it could be helpful to point as an example to a remark in the report on the theological school Rheinland, where the panel noted that the programme provides professional education at Short Cycle level with a practical orientation (TS Rheinland, p 46). It might be possible that in other cases the use of only the word 'practical' suggests too much of a vocational orientation. It is evident to the panel and demonstrated in the reports, however, that in the programmes reviewed by the ECTE, professional education at the intended level combines a focus on knowledge and understanding with a focus on application in a professional (or practical) situation. The panel thinks that this is no other situation than would be the case in programmes for teachers, nurses or other professions that require higher education.

3 - ESG 3.1. The panel understands that the RC is looking for a confirmation from the panel that the measures put in place by the ECTE after the site visit concerning stakeholder representation on the Accreditation Commission are deemed to be satisfactory. [11]

- 3.1 – At the time of the site visit (November 2022), it was noted that the composition of the Accreditation Commission needed more robust stakeholder representation. In the month that followed the site visit, the ECTE put its existent development plan into practice and enhanced the composition of the Accreditation Commission with three newly nominated members, with the possibility of further expansion. This new composition has now been analysed by the panel and found to be satisfactory, with a broad stakeholder representation that includes academics, educational experts, QA experts, administrative leadership, student representation, employer representation, governance experts. In this sense, the issue of stakeholder representation has properly been addressed by ECTE.

4. ESG 3.3. The concerns voiced by the panel regarding the Accreditation Committee were related on the one hand stakeholder to the issue of involvement (addressed above under ESG 3.1) and on the other hand to the independence of the committee.

- 4.1 – The new governance structure of the ECTE clearly separates the governance role of the Council from the accreditation decision-making role of the Accreditation Commission (AC). The members of the committee hold no other positions within ECTE. This new structure was analysed and found to satisfy the standard of independence. The panel notes that in follow up of the site visit in November the potential conflict of interest issues that might have involved the Accreditation Director, the General Secretary and the Review Secretaries in relation to the AC have been addressed by the ECTE Council. This was done by removing staff from the

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[10] http://ehea.info/cid102846/glossary-qualifications-frameworks-2005.html
[11] See paragraph 27 in EQAR Deferral decision

composition of the AC, by limiting meeting attendance of staff, i.e. only as guests at the invitation of the AC chair, and by establishing an AC Chairperson and Vice-Chairperson from within the AC itself.

- 4.2 - In its original report (July 2021) the panel also voiced concerns over other aspects of independence in view of the ECTE being a small organization, with a few, highly devoted collaborators. The issue of the position of the Accreditation Commission and double roles of some senior ECTE officials by now has been solved, which was the main concern of the panel. The panel is of the opinion, that as for the quality assurance aspect of the ECTE, a full compliance would now be an appropriate judgement. The governing structure of the other part of ECTE, its role as a branch organization for theological education, is irrelevant in this perspective.

Review Panel members

• Dr Anne Herman Flierman (Chair), former President of the Accreditation Organisation of the Netherlands and Flanders (NVAO).

• Prof Dr Patrick Becker (Panel Member), Professor for Catholic Theology (Professur für Fundamentaltheologie und Religionswissenschaf), University of Erfurt, Germany.

• Stanimir Boyadzhiev (Panel Member- Student Representative), University of Ruse "Angel Kanchev", Bulgaria.

• Dr Iring Wasser (Panel Member, Secretary), Managing Director of ASIIN, Germany.