

**Deferral of the Application**  
**by the European Council on Chiropractic Education (ECCE)**  
**for Renewal of inclusion on the Register**

Register Committee

Ref. RC18/2016

Ver. 1.0

Date 3/12/2016

Page 1 / 4

1. The application of ECCE adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 19/10/2015.
3. The Register Committee considered the external review report of April 2016 on the compliance of ECCE with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought (letter of 3/11/2016) and received clarification from the chair of the review panel (letter of 15/11/2016).

**Analysis:**

5. In considering ECCE's compliance with the ESG, the Register Committee took into account: *accreditation of chiropractic educational institutions in the UK and France* and *accreditation of chiropractic programmes in the UK, Denmark, Spain, South Africa and Switzerland*.
6. The Register Committee found that the External Review Report provides sufficient evidence and analysis on ECCE's level of compliance with the ESG.
7. The Register Committee concurred with the review panel's analysis and conclusions regarding the individual European Standards and Guidelines, unless otherwise noted in the following specific comments:

**ESG 2.1: Consideration of internal quality assurance**

8. The Register Committee took note of the panel's analysis concerning the inconsistency in the use of terminology within the standards (i.e. the use of learning outcomes, student outcomes, exit outcomes, programme outcomes and competences were not differentiated). The Committee underlined the panel's recommendation to ECCE for the review of such terminology to ensure consistency with the ESG.
9. The Register Committee further noted that the standards have not been amended following publication of the revised ESG and that no mapping was carried out on how ECCE's criteria and procedures address ESG Part

## Register Committee

Ref. RC18/2016

Ver. 1.0

Date 3/12/2016

Page 2 / 4

1. Based on the analysis and interviews carried out the panel concluded that Part 1 of the ESG is transversally reflected within ECCE's standards, i.e. ESG 1.3 is addressed in ECCE's standards 1.2, 2.1, 4.4, 4.3 and 8.2 (review report, p. 27).
10. The Register Committee was unclear on the extent to which ECCE's standards address ESG Part 1 and has therefore asked the panel to further elaborate on this matter (see clarification request of 03/11/2016).
11. In its response letter (of 15/11/2016) the panel stated that the focus of the analysis was the link between external and internal QA and that this was well established. The panel further added that "*whilst it could not be demonstrated on a one to one basis that the standards 1.1 -10 were addressed, the panel satisfied itself that the link existed*".
12. **Given the absence of any sort of mapping or other clear demonstration that standards 1.1 – 1.10 are addressed in the agency's criteria, the Register Committee was unable to concur with the panel's conclusion of substantial compliance and considered that ECCE is only partially compliant with ESG 2.1.**

### ESG 2.4: Peer review experts

13. In its decision of inclusion (of 07/05/2013) the Register Committee noted [ESG 2005: standard 3.6] that it should receive attention how effective ECCE's mechanisms to eliminate conflicts of interest within its accreditation procedures are in practice (see also 2.4).
14. The panel stated that the agency's conflict of interest procedure was an issue of concern since the agency's initial external review and that it has not been addressed. The analysis of the panel show that ECCE's procedure lack clear criteria with regards to the areas of possible conflict of interest and that this has led to unsatisfactory choices of experts in a number of reviews carried out by ECCE.
15. The panel further expressed concern regarding the presence of an evaluation secretary from ECCE's staff within each expert panel.
16. The review panel recommended that ECCE should develop its conflict of interest procedure and rely more on non-chiropractic experts as panel members.
17. **Considering the panel's analysis the Register Committee was unable to concur with the conclusion of (substantial) compliance and considered that ECCE is only partially compliant with ESG 2.4.**

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

18. The panel noted that while the goals and objectives of ECCE are clearly described that ECCE has not taken active steps to work on them, i.e. *'the*

*strategic planning work seems to be underdeveloped and lagging behind 'and 'there is no clear evidence of robust yearly work planning and how it ties to the long or medium term strategies' (review report, p. 56).*

19. The panel further stated that stakeholder involvement has not been fully ensured and recommended the involvement of students in the governance structures of ECCE.
20. **Considering the analysis of the panel the Register Committee was unable to concur with the review panel's conclusion and considered that ECCE only partially complies with standard 3.1.**

### ESG 3.3: Independence

21. Referring to the issues highlighted under independence in ECCE's previous external review, the panel noted that they remained unchanged. Due to the small chiropractic community, the review team noted that experts from the field may lack independence.
22. The panel further stated that the move of experts, or committee members within ECCE's different organisational structures (panel experts, the Commission on Accreditation, Quality Assurance Committee, Executive) may pose questions to the effective independence of the agency.
23. **Considering the issues raised by the review panel Register Committee was unable to concur with the panel's conclusion of compliance and considered that ECCE only partially complies with ESG 3.3.**

### ESG 3.4: Thematic Analysis

24. In its decision of inclusion the Register the Committee noted that attention should be given to whether ECCE regularly and systematically publishes overarching analyses from its accreditation activity.
25. The review panel's finding showed that ECCE had not undertaken an analysis into its external quality assurance activities although the agency had committed to a *series of research of pedagogic papers* it in its Draft Strategic Plan 2016-2020.
26. The Register Committee underlined the view of the panel that while the need to undertake such analysis had increased (as a result of the rise in the number of reviews) that ECCE lacked the human resources and capacity to undertake such a structured analysis.
27. **The Register Committee was therefore unable to concur with the panel's view of substantial compliance and considered that ECCE only partially complies with 3.4.**

**Conclusion:**

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantially compliant	Partial compliance
2.2	Substantially compliant	Compliance
2.3	Fully compliant	Compliance
2.4	Substantially compliant	Partial compliance
2.5	Partially compliant	Partial compliance
2.6	Fully compliant	Compliance
2.7	Partially compliant	Partial compliance
3.1	Substantially compliant	Partial compliance
3.2	Fully compliant	Compliance
3.3	Substantially compliant	Partial compliance
3.4	Substantially compliant	Partial compliance
3.5	Partially compliant	Partial compliance
3.6	Partially compliant	Partial compliance
3.7	Irrelevant	Compliance (by virtue of applying)

**Register Committee**

Ref. RC18/2016

Ver. 1.0

Date 3/12/2016

Page 4 / 4

29. Since ECCE only achieved partial compliance with a number of standards and thus failed to meet some key requirements of the ESG, in its holistic judgement on the basis of the documentation available and the considerations above, the Register Committee was unable to conclude that ECCE complies substantially with the ESG as a whole.

30. In accordance with §3.19 of the Procedures for Applications, the Register Committee therefore deferred the consideration of ECCE's renewal of registration, pending additional representation by ECCE on the reasons grounds for possible rejection, set out in the present decision.

31. ECCE is requested to make additional representation by 31 March 2017 at the latest. ECCE may also withdraw the application before that date according to §3.19 of the Procedures for Applications. If no additional representation is made by that date, ECCE will be deemed to have withdrawn the application.