

EUROPEAN COUNCIL ON CHIROPRACTIC EDUCATION

Self-Evaluation Report

September 2015

**External Review for Re-Evaluation of Full Membership
of the European Association for Quality Assurance in Higher
Education**

ECCE | EUROPEAN
COUNCIL ON
CHIROPRACTIC
EDUCATION

INTRODUCTION

The European Council on Chiropractic Education (ECCE) is a quality assurance agency for the education and training of chiropractors primarily in Europe but also for countries outside of Europe where no other quality assurance agency for chiropractic education exists. Chiropractors are primary contact 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 and extremities. As primary contact practitioners, chiropractors must be proficient in the diagnosis of commonly presenting conditions, as well as safe and competent in treating those conditions 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 providing 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. The ECCE is an autonomous agency, established in 1986 and supported by the chiropractic profession and educational institutions, with its core purpose centred on assuring that chiropractic education and training produces safe and competent practitioners.

The ECCE received full membership of the European Association for Quality Assurance in Higher Education (ENQA) in 2010. The ECCE now seeks to renew its membership through this self-evaluation and peer review/site visit process in order to confirm that it continues to operate in line with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) (4th edition 2015). As an external quality assurance agency in a specialist area of higher education and training operating in Europe, the ECCE wishes to align itself with recognised standards of quality assurance in higher education (ESG) and to share best practice with other agencies undertaking similar roles and responsibilities. In seeking to renew its full membership of ENQA, the ECCE has consulted with its principal stakeholders (the European Chiropractic Union (ECU) and chiropractic educational institutions in Europe) and continues to receive unanimous support. Once again the ECCE has opted to submit to a 'type A' review as defined in the ENQA Guidelines for External Reviews of Quality Assurance Agencies in

the European Higher Education Area and, as such, is centred on compliance with the ENQA membership criteria and ESG.

This report was sent to the key ECCE stakeholders requesting their input prior to submission to ENQA including the heads of all ECCE accredited chiropractic programmes and the European Chiropractors' Union executive members. No changes or additions to the document were forthcoming.

Olivier Lanlo

ECCE President

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Abbreviations

AECC	Anglo-European College of Chiropractic
AMoR	Annual Monitoring Report
CCE	Council on Chiropractic Education
CCEI	Council on Chiropractic Education International
CHE	Council on Higher Education
CoA	Commission on Accreditation
DC	Doctor of Chiropractic
ECCE	European Council on Chiropractic Education
ECU	European Chiropractors Union
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
ESGs	European Standards and Guidelines
GCC	General Chiropractic Council (UK)
HEIs	Higher Education Institutions
IFEC	Institut Franco Européen de Chiropraxie
MChiro	Masters of Chiropractic degree
MChiroMed	Masters of Chiropractic Medicine degree
MSc	Masters of Science degree
QAA	Quality Assurance Agency
QAC	Quality Assurance Committee
UK	United Kingdom

WFC World Federation of Chiropractic
WIOK Welsh Institute of Chiropractic

1. BACKGROUND INFORMATION ON THE HIGHER EDUCATION SYSTEM IN CHIROPRACTIC

1.1 The size and shape of the system

1. The first higher education institution (HEI) for the education and training of chiropractors in Europe (Anglo-European College of Chiropractic (AECC)) was established in Bournemouth, UK in 1965 and currently offers an integrated Masters degree (MChiro) or MSc validated by Bournemouth University. Those students from the European Union (EU) who are eligible to receive direct funding from the Higher Education Funding Council for England (HEFCE) do so. Other students such as those from Norway, who are not eligible to receive HEFCE funding, receive direct funding from their own government to attend the AECC. The AECC has undergone an institutional review by the Quality Assurance Agency (QAA) (last review 2012) and in addition to being accredited by the ECCE, is also accredited by the General Chiropractic Council (GCC)¹ in line with UK national legislation.

2. In addition to the AECC, there are two other HEIs in the UK delivering chiropractic education and training. These are the Welsh Institute of Chiropractic (WIOC), operating as a Division within the Faculty of Health (University of South Wales), and where students receive public funding from the Higher Education Funding Council for Wales (HEFCW), and McTimoney College of Chiropractic, which is a private college in Abingdon, UK. WIOC and McTimoney College both deliver an integrated Masters degree, albeit with different delivery models, validated by the universities of South Wales and BPP University respectively. WIOC and McTimoney College are accredited by the GCC, and WIOC is also accredited by the ECCE.

3. Outside of the UK, chiropractic programmes are established in France (Institut Franco-Européen de Chiropraxie) (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).

¹ www.gcc-uk.org

There are developments in other European countries to establish chiropractic education including Norway (University of Oslo), Poland and Italy.

4. Reflecting the growing popularity of complementary healthcare alongside or integrated within 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 grow significantly in the future.

1.2 Structure of programmes and awards

5. Current chiropractic education institutions include both private colleges and departments within established universities. Even where the institutions are private and non-profit, there may be close associations with the university sector, as is the case with the AECC, and/or the programmes are validated by a university. For new chiropractic institutions it is obviously advisable to establish these within the university sector to facilitate and promote chiropractic education and training at the same level as other professional and vocational university degrees.

6. Irrespective of the status of an individual chiropractic institution, each will act autonomously and independently within the context of its setting and national legislation and requirements. There is no pre-determined curriculum in chiropractic and each institution has the intellectual and academic freedom to design and develop a curriculum that ensures a graduate is safe and competent to practise as a chiropractor.

7. Chiropractic programmes that are validated by a university (the majority) or national government conform to the European Higher Education Area (EHEA) qualifications framework. These programmes are either integrated undergraduate master's degrees or postgraduate MSc or MChiroMed degrees which range in length from 4 to 6 years of full-time study and practical experience. Outside of national statutory requirements, there is no pre-determined qualification for chiropractors in Europe, and for those programmes not validated by a university the norm is the Doctor of Chiropractic (DC).

1.3 Accreditation

8. 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 body. 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 following the Chiropractors Act 1994. In Switzerland, the chiropractic medicine programme is accredited by the AAQ (Agency for Accreditation and Quality Assurance) of the Swiss government. In contrast, the ECCE is an agency established by the chiropractic profession in Europe for accreditation of institutions across national boundaries.

9. Given the diversity of higher education in chiropractic, including the setting of the institution, university validation of the programme and the qualification required to practice chiropractic, it is essential that there is an overriding and uniform accreditation process that ensures the quality and standard of chiropractic education and training irrespective of these differences. In some countries in Europe there is statutory accreditation, but this is the exception rather than the rule. Where programmes are validated by a university, there will be systematic internal quality assurance processes such as periodic reviews, regular monitoring cycles and for some countries external examiners, but not all chiropractic programmes are university validated. The role of the ECCE is therefore that of an external quality assurance agency in the periodic review of institutions providing chiropractic education and training in Europe. The underlying assumption is that accreditation by the ECCE provides confidence to the chiropractic profession and to the public that chiropractic institutions are delivering an education and training that produces chiropractors who are safe and competent to practice. It also facilitates international mobility for graduates of ECCE accredited programmes.

2. STRUCTURE AND ORGANISATION OF THE ECCE

2.1 ECCE in a world-wide context

10. 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, and then as the practice of chiropractic proliferated throughout America, so the number of chiropractic educational institutions grew. Today, there are fifteen 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.

11. As part of this world-wide network of chiropractic education and training, chiropractic colleges are accredited by the Councils on Chiropractic Education (CCEs) depending on their geographic distribution. There are four such accrediting bodies: CCEUS (USA),² CFCREAB (Canada),³ CCEA (Australasia)⁴ and ECCE (Europe).⁵ The latter is registered as the European Council on Chiropractic Education (ECCE) and is the (sole) subject of this self-evaluation.

12. To ensure parity of educational standards world-wide, the Council on Chiropractic Education International (CCEI)⁶ was established in 2001. CCEUS, CFCREAB, CCEA and ECCE are all member agencies of CCEI. CCEI publishes a set of 'model core standards' to which the standards set by the individual CCEs adhere. This reciprocity grants recognition to those chiropractors who have graduated from CCE-accredited institutions world-wide and facilitates the movement of chiropractors across national and international borders.

13. 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.

² <http://www.cce-usa.org/>

³ <http://www.chirofed.ca/>

⁴ <http://www.ccea.com.au/>

⁵ <http://www.cce-europe.org/>

⁶ <http://www.cceintl.org/>

2.2 Status of ECCE

14. The ECCE is an autonomous and independent, non-profit external quality assurance agency for (first qualification) chiropractic education and training in Europe. The agency's purpose and Constitution is registered in Aachen, Germany at the Register of Associations (*Vereinsregister 73 VR 2732*).

2.3 Establishment of ECCE

15. The ECCE was established in 1981 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 in Europe. The ECU is the union of the national chiropractic professional associations in Europe and represents the chiropractic profession in Europe. In 1986, the 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.

2.4 Mission and Purpose

16. ECCE's mission is to establish standards of safe and competent practice in the education and training of chiropractors. By periodically reviewing institutions against these standards, the ECCE safeguards the chiropractic profession's and the public's confidence in the competencies of chiropractors and their ability to carry out safe practice. The ECCE's mission is also to facilitate continuous improvement and sharing of best practice between providers of chiropractic education and training. The ECCE evaluates higher education in chiropractic in Europe across national borders and within a diverse framework of national requirements and legislation. In areas of the world where there is no CCE, applications can be made to the ECCE from chiropractic institutions outside Europe.

17. ECCE's purpose, as set out in its Constitution (appendix I), is:

- *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.*

2.5 Initiation of evaluations

18. The ECCE is not a statutory body, and is not instructed by government. ECCE initiates evaluations at the request of institutions, subject to the institution meeting the eligibility criteria for accreditation (as set out in the ECCE Accreditation Procedures and Standards) (appendix II). Although not initiated by government, the work of the ECCE is cited in official government documents in the UK, Norway, Finland and Denmark as reported and included in the original ENQA application.

2.6 Finances

19. The ECCE is funded from two principal sources: annual dues from institutions with accredited status, and from the chiropractic profession (through the ECU). Additional funding is also obtained from European countries that do not belong to the ECU as well as from South Africa. The ECCE publishes a

Financial Policy (appendix III) which is kept under regular review and agreed by the membership of the ECCE. Subscriptions from institutions are based on a per capita amount and calculated on the number of students graduating in that year. For an evaluation of an institution for accredited status, an evaluation fee is charged, and a fee for each re-accreditation thereafter. This fee is set at a level agreed by the membership of the ECCE.

20. Budgets for income and expenditure are set by the Executive of the ECCE and approved by the full membership of the ECCE. Any changes to the budget must be approved by the full membership of the ECCE. Audited accounts for the preceding year are presented to the full membership of the ECCE for information on an annual basis. Accounts for the previous 3 years are included in appendix III.

2.7 Membership of ECCE

21. Members of the Council (ECCE) must comply with the requirements as set out in the Constitution (appendix I). These ensure the independence of members and reduce the possibility of conflicts of interest with the autonomy of the ECCE. For example, members of Council must not be acting in an executive capacity in a chiropractic professional association. The 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. There are sixteen members of Council, including two student members added since the original ENQA application. In addition, all institutions that are accredited by the ECCE are each represented by one member, normally the Head or Principal of the institution. These 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. All members of the Council, with the exception of the institutional members, are nominated by a range of constituencies and elected by the Council. The full membership of the Council meets once a year at the 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. Minutes of Council meetings are not publicly available. Outside of the Council, the work of the ECCE is carried out by the Executive and by the Standing Committees of the ECCE, supported administratively by the Executive Secretary and the Evaluation Secretary. The Executive Secretary and Evaluation Secretary are employed by the ECCE and are not members of the ECCE, the Executive or the Standing Committees, but are in attendance at appropriate meetings of the bodies of the ECCE (i.e. Council, Executive and Standing Committees). Details of the above are set out in the Constitution (appendix I).

Critical reflection on the membership criteria of ECCE shows that there is broad international representation and a wide diversity of professional expertise. However, all members are voluntary with no paid positions, other than receiving reimbursement of expenses incurred for meetings and site visits. This means that the work of ECCE is done on top of the work required for each member's primary professional obligations which, depending on the individual, may include busy private chiropractic practices, managers and/or faculty members in chiropractic institutions or other colleges and universities, or full time students. Additionally, there is no central office as all members live in various countries in Europe or in South Africa. Therefore, all communication is primarily done through e-mail which is not always as efficient as desired. Furthermore, as the term for ECCE membership is 8 years (except for the Secretary/Treasurer position), there is continuous turnover of members with new members coming onto ECCE as experienced members leave at the end of their term of office. This occasionally creates challenges in finding sufficiently experienced people to take over positions of leadership while still having at least a few years remaining on their ECCE membership term.

2.8 Executive of ECCE

22. The Executive consists of the President, Vice-President, Secretary/Treasurer, and Chairs of the Standing Committees. All executive posts are elected by the full membership of the Council.

23. The Executive is responsible for the day-to-day running of the ECCE. As set out in the Constitution, the Executive is responsible for:

- *Day-to day administration of the Council.*
- *Appointment of Evaluation Teams.*
- *Organizing training sessions for Evaluation Team members*
- *Correspondence with CCEI and other CCEs.*
- *Appointment of a representative(s) to the CCEI (who may or may not be a member of the Council).*
- *Administering initial contacts with institutions prior to application for (candidate for) accredited status.*
- *Dealing with all queries (other than those under the jurisdiction of the Commission on Accreditation) directed to the Council.*
- *Invitation of Observers to meetings of the Council.*
- *Production of financial statements and budgets for approval by the Council.*
- *Production of the Financial Policy to include annual dues and accreditation fees for approval by the Council.*
- *Production of an annual report on the activities of the Council (ECCE).*

24. The Executive communicates principally by email and telephone, and holds on average three face-to-face meetings per year. Minutes of these meetings are recorded and submitted to the full membership of Council at its annual general meeting for information and discussion.

As with the other ECCE members, with the exception of the Secretary/Treasurer, all have a maximum term of office of 8 years. The Secretary/Treasurer position is not limited to 8 years however. As noted in Section 2.7, it can be challenging to find suitably experienced ECCE members to take over executive positions. There is a rather steep learning curve at the beginning of ECCE membership in order to feel confident and effective in performing the necessary duties.

2.9 Standing Committees of ECCE

25. The ECCE has two standing committees: the Commission on Accreditation (CoA) and the Quality Assurance Committee (QAC). The Chair of the CoA is elected annually by and from its membership at the annual meeting of the CoA. The chair of the QAC committee is elected by the full membership of the Council, and the chairpersons of both committees are members of the ECCE Executive. Members of these committees, and their terms of reference, are set out in the Constitution (appendix I). Members of the CoA are required to sign a Declaration of Confidentiality.

26. The CoA is the body of the ECCE responsible for all matters pertaining to the accreditation (and re-accreditation) of institutions, including the final decision on accreditation (and re-accreditation) following receipt of the institution's self-study report and the evaluation report compiled by the evaluation team following an on-site visit to the institution. Minutes of CoA meetings are recorded and remain confidential.

27. The duties and responsibilities of the CoA, as set out in the Constitution, are:

- *The CoA is responsible for all matters (including all correspondence) pertaining to the accreditation of chiropractic institutions and providing a list of institutions with accredited status to the Council.*
- *The CoA shall apply and follow the standards and procedures set forth in the current Council's publication entitled "Accreditation Procedures and Standards for Chiropractic Education" and in such documents and regulations which may be adopted by the Council.*
- *The CoA shall be responsible for all decisions on granting, revoking or refusing of any status of accreditation to an institution.*

- *The CoA shall be responsible for receipt and approval of Annual Monitoring Reports from the institutions in line with relevant policies and procedures.*

28. The QAC is responsible for continual review and evaluation of the ECCE's policies and procedures, the Constitution and the ECCE Accreditation Procedures and Standards (appendix II). The QAC focuses on the internal quality assurance of the ECCE. The Chairperson of the QAC sends feedback questionnaires to all members of a site evaluation team as well as to the institution being evaluated after every accreditation evaluation. This information is then assessed and a formal written report produced which is shared with executive as well as the other members of the ECCE.

2.10 Activities of ECCE

29. This section (2) of the self-evaluation has focused on the structure and organisation of the ECCE in carrying out its principal activity, i.e. the external quality assurance of higher education in chiropractic and accreditation of institutions providing education and training at a standard that ensures students have the opportunity to attain the knowledge, skills and attitudes to be safe and competent chiropractors. The ECCE is strictly apolitical and does not enter into, or make comment on political issues that may face the profession from time to time. The ECCE operates a no fear or favour policy towards institutions, and conducts its procedures in a transparent and sensitive manner, and is only concerned with whether or not an institution provides chiropractic education and training that is in compliance with ECCE standards. A significant proportion (but not all) of the members of the ECCE are themselves members of staff at ECCE accredited chiropractic institutions. Quite properly, these are the people with the experience and expertise in chiropractic education and training, and who are in a position to judge the quality of education and training. As with the external examiner system in higher education, and review procedures in other disciplines such as medicine, the ECCE is fortunate to be able to rely on the professionalism of these people who give freely of their time to promote the standards of chiropractic education and training. At the same time, the ECCE is

cognisant that conflicts of interest may occur, and has put procedures and policies in place that ensure that these do not compromise the work of the ECCE.

30. The ECCE is a credible and recognised agency, which has earned a reputation for undertaking external review of institutions that is rigorous, transparent and fair. All of the chiropractic institutions in Europe have sought or are seeking accredited status with the ECCE. In 2009, the first institution outside of Europe (for reason of not having a CCE in its own geographic area) received ECCE-accredited status (Durban University of Technology, South Africa). This institution received re-accreditation in 2012. Additionally, the University of Johannesburg in South Africa applied for and received its first accreditation by the ECCE in 2010 followed by re-accreditation in 2013. Currently, all newly accredited chiropractic institutions undergo a re-accreditation process three years after their first accreditation. The following section includes the SWOT analysis of the ECCE (Strengths, Weaknesses, Opportunities, Threats) followed by details of the external quality assurance activities undertaken by ECCE.

SWOT Analysis

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>Experienced in international accreditations.</p> <p>Respected as an autonomous, independent QA agency.</p> <p>Graduates from ECCE accredited institutions can seek employment internationally.</p> <p>ECCE members bring experience from several different countries.</p> <p>ECCE members have a depth of higher education as well as clinical practice experience.</p> <p>Site evaluation team members are not subject to the maximum 8 year term of service and thus serve as highly experienced evaluators and mentors to new site evaluation team members.</p> <p>Some ECCE members have advanced degrees in medical education or related educational qualifications in addition to their professional qualifications.</p> <p>The addition of Student members to ECCE as well as site evaluation teams has been a very positive experience.</p> <p>The appointment of an excellent Executive Secretary.</p>	<p>The maximum 8 year term of membership means that those with the most experience are usually replaced by members with less experience.</p> <p>Limited ability to generate increased financial resources.</p> <p>All ECCE members volunteer their time and efforts with most having full-time jobs outside of the ECCE. Depending on the other professional requirements by ECCE members, this can, on occasion, delay communication in relatively important matters.</p> <p>Lack of a central location impedes day to day communication.</p> <p>As communication is primarily by e-mail, at times it is not as efficient as desired.</p>	<p>Potential to work with national accrediting agencies in some countries to conduct joint accreditation site visits.</p> <p>The opportunity to explore risk-based assessments and flexible re-accreditation time frames to align with national accreditation time frames.</p> <p>The opportunity to positively influence chiropractic education internationally, particularly in emerging countries.</p> <p>The opportunity to continue to explore and perfect web-based training for site evaluation team members.</p> <p>Mentoring new ECCE members by more experienced members</p>	<p>Currently the only agency with its' core purpose the external review of chiropractic education in Europe. If another agency took on this role it would be a threat.</p> <p>Financial limitations affect some desired activities (i.e. attending some ENQA and related agency workshops or meetings.)</p> <p>Some chiropractic institutions question the need for both ECCE and their own national accreditation.</p> <p>The future need for ECCE's services is predicated by the profession's desire for an independent, cross-border quality assurance agency for chiropractic education. As such a change in the political will of the profession to support ECCE would have dramatic consequences.</p>

The appointment of an Evaluation Secretary with significant higher education experience who also serves as a member of all site Evaluation teams.			
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3. EXTERNAL QUALITY ASSURANCE UNDERTAKEN BY ECCE

31. External review of an institution takes place on a systematic and regular basis. Once accredited, an institution must undergo re-accreditation once every three or five years. In addition, the institution is required to submit an annual monitoring report (AMoR) each year.

32. The table shows the external review activities undertaken:

Institution	First accredited	Last accredited	Re-accreditation review date:
Anglo-European College of Chiropractic	1992	2012	2016 (requested early re-accreditation)
Durban University of Technology	2009	2012	2016
Institut Franco-Européen de Chiropraxie	1996	2015	2020
Syddansk Universitet Odense	1999	2013	2018
Welsh Institute of Chiropractic University of South Wales	2002	2015	2020
University of Johannesburg	2010	2013	2018
RCU Escorial Maria-Cristina	2012	2012	2015
Barcelona College of Chiropractic	Applied 2014	Not accredited	May reapply in 2015
McTimoney College of Chiropractic	Applied 2014	Not accredited	Has submitted an appeal

33. The ECCE has previously reviewed institutions applying for candidate (for accredited) status rather than full accredited status. These were normally new institutions that were in the process of developing chiropractic programmes. However, due to the confusion that this status caused both for the institutions and the chiropractic profession at large, the 'candidate status' has been discontinued as of January 2015. Candidate status was often misinterpreted to mean that the institution would achieve full accreditation once eligible to apply, which was not necessarily the case. The two most recent institutions to hold Candidate for Accreditation status (Barcelona College of Chiropractic and McTimoney College of Chiropractic) submitted their first self-study reports which were assessed by the CoA and both institutions underwent ECCE site evaluation visits during the second half of 2014. Neither institution was accredited. The McTimoney College of Chiropractic submitted an appeal to this decision based on the appeals process written in the ECCE standards in April 2015.

34. The following section details the procedures used by the ECCE as an external quality assurance agency.

4. EVALUATION PROCEDURES USED BY ECCE

35. The procedures used by ECCE in the external review of chiropractic higher education institutions are detailed in the handbooks: Accreditation Procedures and Standards in Undergraduate Chiropractic Education and Training (appendix II) and the Evaluation Team Manual (appendix IV). These handbooks, together with other documentation, are available for download from the ECCE website.⁷

4.1 Initial contact

36. For an institution seeking accreditation with ECCE, an initial application is made in writing (in English) to the ECCE from the Head/Principal with the signed approval of the institution's governing body, together with evidence of how the

⁷ www.cce-europe.org/downloads.html

institution meets the eligibility criteria as set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 2⁷. The CoA will make a decision on satisfactory compliance with the eligibility criteria, and if satisfied, will request an institutional self-evaluation. The self-study report is evidence of the institution's ability to comply with the ECCE standards; a detailed outline for the preparation of the self-study report is set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 3. The self-study report is submitted to the CoA, and a decision made as to whether it is satisfactory in detail and critical reflection. If so, the institution is contacted to put in place arrangements for an external review (evaluation visit). At this point all arrangements for the on-site visit, including proposed membership of the evaluation team and a draft timetable are made between the institution and the ECCE Evaluation Secretary in discussion with members of the evaluation team and the Chair CoA. The terms of reference for the evaluation visit are set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 3.1.4 and the Evaluation Team Manual (appendix IV). Once the team members and timetable have been agreed, an evaluation fee is paid by the institution. There is flexibility in scheduling on-site visits to allow institutions to hold reviews at times that are best suited to the institution, although all reviews must be carried out at a time when students are present.

37. Similar procedures occur for re-accreditation reviews (ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 3.2). Applications to extend an existing accreditation to an additional site are set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 3.2.1.1.

38. For applications for the recently discontinued option of candidate (for accredited) status, the institution made initial contact in writing, provided evidence for meeting the eligibility criteria and provided a self-study report. These procedures were set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 5 but have been deleted as of January 2015 for the reasons stated above. An external review did not take place for this category of accreditation, and the decision by the CoA was based on evidence of meeting the eligibility criteria and on evidence presented in the self-study report. The maximum period an institution could hold candidate (for accredited) status was five years. At the end of this period the expectation was that the institution would apply for full accredited status and undertake the same initial

contact procedures as described in 4.1 (point 36) above. Candidate (for accredited) status was designed to enable new institutions that were in the process of developing programmes and working towards compliance with ECCE standards to form a formal association with ECCE (ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 1.3.2). However, candidate (for accredited) status was not a pre-requisite for application for full accredited status (as was the case for Durban University of Technology in 2009 and the University of Zürich in 2015).

39. The ECCE standards (ECCE Accreditation Procedures and Standards (appendix II) Part 2) are the predefined criteria that inform all stages of the external review process.

4.2 ECCE standards

40. The ECCE standards comply with Part 1 ESG for internal quality assurance within HEIs. There are ten areas defined in the ECCE standards as set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 2 Section 2.2 These are:

- *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*

41. Within each of these ten areas, there are sub-areas which define specific performance indicators. These are the standards that must be met (either fully or substantially) by the institution to gain accredited status. In total there are thirty-six 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.

4.3 Evaluation Method

42. The ECCE uses a staged process for the evaluation of chiropractic education institutions. This is outlined in figure 1 (page 53).

43. Following the initial contact, and evidence of meeting the eligibility criteria and submitting a satisfactory self-study report as outlined in 4.1 above, the evaluation proceeds with an on-site visit to the institution by a group of experts (evaluation team) to verify the self-study report and attain further evidence through additional documentation made available by the institution and face-to-face meetings with staff and students. Following the visit, and subsequent to the institution's opportunity to make factual corrections, an evaluation report is finalized, which is submitted to the CoA outlining the team's recommendations and any Strengths, Weaknesses and Concerns that are of particular note. At the meeting of CoA to make the final decision, the Chair of the evaluation team presents the final report, and is available to answer any questions members of CoA may have. The decision, together with the period of accreditation, is communicated in writing to the institution, and placed on the ECCE website together with the final report.

The following sections detail this process:

4.4. Evaluation Team

44. The ECCE Executive seeks experts from education both within and outside of chiropractic, and where there is assumed to be no conflict of interest either perceived or real. All members of the Panel must have attended an ECCE training event. These events are held as one day seminars or more recently webinars at regular intervals (the last training day was held 27 September 2014 with 13 attendees). Training events are held to provide information on interpretation of the ECCE standards and the external review process so that all members of an evaluation team are fully conversant with the evaluation process. However, one member of the McTimoney College of Chiropractic site evaluation team had not attended and participated in a formal ECCE training event prior to the November 2014 site visit. This was not known by the other site team members until day 1 of the site visit. This is the first and only time that this breach of protocol has occurred. It did cause some problems with the site visit but measures have been taken to prevent recurrences. The requirements, and roles and responsibilities

for team members are set out in the ECCE Evaluation Team Manual (appendix IV) Sections 2 and 3 respectively. Members of ECCE site evaluation teams are not subject to the 8 year maximum ECCE membership requirement. This allows for the creation of a large pool of experienced site evaluation team members with many site team members being former ECCE members.

45. Team members are appointed by the ECCE Executive, with particular note of any language requirements pertinent to the visit, and are required to sign a Conflict of Interest statement (ECCE Evaluation Team Manual (appendix IV) appendix 2) to the effect that there is (or is not) a declaration to be made. If a declaration is made, the Executive may still proceed with the appointment if it is considered that this will not compromise that member's role on the team. If such a declaration is made this is also made known to the institution. Irrespective of declarations of interest, once appointed all members of the team are disclosed to the institution. If the institution objects on reasonable grounds, then a replacement(s) is provided. All team members are agreed by the institution before the on-site visit proceeds.

46. The team normally consists of four or five members, one of whom is appointed as Chair of the team, and one of whom is the ECCE Evaluation Secretary. Members of the team are normally professionals with experience in higher education. Since 2012 the ECCE now includes one student on each evaluation team. Each student member must undergo the same training as other evaluation team members. The experience to date has been uniformly positive. All members of the team contribute to the final report, which is the responsibility of the team Chair. The ECCE Evaluation Secretary acts as secretary to the team, who is also a full member of the team with equal status to other members. The roles and responsibilities of the Chair and Secretary are set out in the ECCE Evaluation Team Manual (appendix IV) Sections 5 and 6 respectively.

47. The Evaluation Secretary is responsible for liaising between the Chair of the evaluation team, members of the team and the institution to ensure that everyone involved is fully briefed and all travel and accommodation arrangements are in place. A timetable for the visit is agreed beforehand with the institution so that there is as little disruption to the institution as possible, and staff and students who are required to meet with the team can make the necessary arrangements. The institution is also informed beforehand of all the

documentation that is likely to be required for scrutiny by the team. It is recognised that much of this documentation may not be in English.

4.5 Evaluation Visit

48. The on-site visit is conducted in English, and normally takes two to three days, with the final day concentrated on finalising a draft of the evaluation report. There is a preliminary private meeting of the team at the start, followed by meetings with staff and students as scheduled. Interspersed are private sessions for the team where team members can reflect on proceedings and start to prepare the report. Writing the report is an iterative process, and normally team members are allocated specified areas of the report depending on their subject expertise. A draft timetable for the last evaluation visit conducted by the ECCE showing allocation of responsibilities of the team is given in appendix V together with a copy of the final evaluation report (accreditation of The Welsh Institute of Chiropractic (WIOC) February 2015).

49. A detailed account of the evaluation visit is set out in the ECCE Evaluation Team Manual (appendix IV) Section 9. The Evaluation Team Manual (appendix IV) also includes a number of annexes (B to F) as aide memoires to the team. The level of compliance for each 'Standard' is determined using a colour code system as follows:

Green = This is on track and good (Fully compliant/no risk).

Light Green = Broadly on track with some areas which may be addressed (Substantially compliant/low risk).

Yellow = Some significant areas which could be detrimental if not addressed (Partially compliant/medium risk).

Red = Serious concerns threaten this area; high risk in the organisation's overall performance (Does not comply/high risk).

50. At the end of the on-site evaluation, the team finalises the draft report, and presents its main findings orally to senior staff of the institution. The key findings are structured as Commendations, Recommendations and Concerns, which are defined in the Glossary to the ECCE Accreditation Procedures and Standards (appendix II).

4.6 Evaluation Report

51. The reporting stage is outlined in the ECCE Evaluation Team Manual (appendix IV) Section 10. The report is finalised after the visit by the Chair of the evaluation team and agreed by all members of the team. It is then sent to the institution for correction of factual errors only. The ENQA reporting process has been very helpful in informing the ECCE reporting process, and the format of the final report follows that used by ENQA whereby the team refers to each standard and describes the evidence, an analysis of that evidence and based on this analysis, a judgment on compliance (fully, substantially or partially compliant as well as non-compliant) as described in 49 above. Based on these judgments on the thirty-six standards, the team arrives at a recommendation on overall compliance bearing in mind that an institution cannot be expected to be totally compliant with all standards. A copy of the last evaluation report compiled by an evaluation team (February 2015), which used this format, is given in appendix V. This practice will continue.

52. The final report, after factual corrections by the institution, is submitted to CoA, together with an oral report from the Chair of the evaluation team. The CoA is informed by the report, although it is not obliged to following the recommendation given therein. The decision of the CoA is communicated to the institution and the final report placed on the ECCE website. The institution is also informed on the date for the next external review and on the annual monitoring process in which all accredited institutions are required to participate and return an annual monitoring report (ECCE Accreditation Procedures and Standards (appendix II) Part 3 Section 3.2 and Part 4 Section 6).⁸ This process ensures that institutions keep the ECCE informed of its current status in terms of numbers of students and staff, student admissions and progression data, fulfillment of clinical training requirements and major changes in resources. The annual monitoring report also includes any areas of concern/weakness identified in the evaluation report, and provides information to CoA as to how the institution is addressing these. The annual monitoring report is submitted to CoA, and each institution, normally represented by the Head/Principal, is required to meet with the CoA along with other ECCE accredited institution representatives and discuss

⁸ The Annual Monitoring Report is a proforma that can be downloaded from the ECCE website.

this report in a round-table discussion. The purpose of this meeting is to share good practice and facilitate growth and improvement of new programmes.

53. Hence, institutional self-evaluation is a critical component of the external quality assurance process of the ECCE. As outlined above, this takes two formats:

- Self Study Report for accreditation and re-accreditation purposes
- Annual Monitoring Report

4.7 Decisions on Accreditation

54. Decisions to accredit or re-accredit an institution or programme are the sole responsibility of the CoA. The CoA can approve, defer a decision or refuse accredited status. The decisions available to the CoA, with their consequences, are set out in ECCE Accreditation Procedures and Standards (appendix II) Part 4 Sections 3.1.4, 3.2.4 and 5.2.2. Where a decision is deferred, further information is required. In cases of refusal, the CoA will make recommendations on areas of weaknesses and concerns to assist the institution to work towards a successful application.

55. The ECCE has an appeals process for an institution wishing to appeal a refusal to accredit (or re-accredit). The appeals procedure is outlined in greater detail since the original ENQA application and appears in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 4. The appellant institution must provide the grounds for appeal in writing before the date of the hearing, and has the right to be represented at the hearing by up to two persons (see 84 below). Additionally, a much expanded Part 4, Section 9 of the ECCE Standards (appendix II) entitled 'Complaints Procedures' has been added. This section specifies in detail the procedure for lodging a complaint related to the process of the accreditation.

5. COMPLIANCE WITH ESG

56. This section itemises the individual standards of Parts 2 and 3 of ESG, followed by the ECCE’s account of how it complies. The ESG standards (and reference numbering) are taken from Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015.

5.1. Part 2. European standards and guidelines for external quality assurance.

2.1 Consideration of internal quality assurance

STANDARD:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

GUIDELINES:

Quality assurance in higher education is based on the institutions’ responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognizes and supports institutional responsibility for quality assurance. To ensure the link between internal and external assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.

57. ECCE compliance: The ECCE standards as set out in ECCE Accreditation Procedures and Standards (appendix II) Part 2 cover the internal quality assurance processes as described in Part 1 ESG, and as described in 4.2 above.

2.2 Designing methodologies fit for purpose

STANDARD:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

GUIDELINES:

In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.

The aims, objectives and implementation of the processes will

- bear in mind the level of workload and cost that they will place on institutions;
- take into account the need to support institutions to improve quality:
- allow institutions to demonstrate this improvement;
- result in clear information on the outcomes and the follow-up.

The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

58. ECCE compliance: 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. These stakeholders include the European Chiropractors' Union, the heads of the programmes accredited by the ECCE, members of the ECCE itself which includes students as well as non-chiropractic educators from the higher education area and the Council on Chiropractic Education International (CCEI). There is flexibility to keep disruption to an institution to a minimum, and the ECCE is responsive to an institution's needs as much as is possible. For example, the ECCE has agreed to a joint evaluation with the University of Zürich for the new Chiropractic Medicine programme. This will take place in spring 2016 resulting in much less disruption to this programme. All procedures, policies and the ECCE standards are documented and freely available on the ECCE website. This includes information on the procedures for reporting the outcomes of an accreditation event as well as the follow-up. After each site evaluation visit, questionnaires are sent to the head of each institution as well as all members of the site evaluation team to obtain feedback on the entire accreditation process up to that point, including the impact on the normal work of the institution. The results of this information are included in a report submitted to the ECCE executive as well as to the ECCE general membership in order to identify areas that may need to be addressed in the future.

ECCE conducts external reviews of institutions on a cyclical basis, currently once every three or five years. The duration of an accreditation depends on the maturity of an institution and a judgment 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 time frame of the accreditation period. The ECCE is currently investigating the possibility of more flexible re-

accreditation time frames based on risk assessment and possibly coordinated with national accreditation requirements. If adopted, this should reduce the demands on institutions without compromising quality assessments.

2.3 Implementing processes

STANDARD:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

GUIDELINES:

External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarized in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).

External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

59. ECCE compliance: The processes used by ECCE are identical to those described in this Standard and were detailed in the first sections of this report including the self-study report, site visit by a group of experts, report generated by this group of experts and consistent follow-up. The ECCE bases all its procedures on a fit for purpose principle. The self-study report and an intensive on-site visit are considered sufficient to scrutinise the relevant evidence on which to base analyses and judgments. Institutional improvement and

enhancement polices are recognised as essential in the assurance of quality and explicitly referred to in the ECCE standards (i.e. Continuous renewal and improvement).

Criteria for reaching decisions on accreditation of institutions are clearly set out in the eligibility criteria and the ECCE Accreditation Procedures and Standards (appendix II) Part 4. 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. The final report must give the supporting evidence on which the analyses and judgments are based. The CoA provides full and frank feedback to institutions in the way in which its decisions are made. For a 2014 site evaluation visit and unknown to the other site evaluation team members prior to the visit, one member had not attended the mandatory training event. Measures have been taken to prohibit such a breach in the future.

Specific follow-up processes include the annual monitoring reports submitted as a written report to the CoA prior to the annual meeting and then discussed verbally with the CoA at the ECCE annual meeting in addition to the official re-accreditation procedures for those institutions achieving accreditation as described above. Recommendations and Concerns included in the site visit report from the experts are carefully considered and must be addressed in the annual monitoring reports as well as follow-up accreditation events.

2.4 Peer-review experts

STANDARD:

External quality assurance should be carried out by groups of external experts that include (a) student member (s).

GUIDELINES:

At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

In order to ensure the value and consistency of the work of the experts, they

- are carefully selected;
- have appropriate skills and are competent to perform their task;
- are supported by appropriate training and/or briefing.

The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.

The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

60. ECCE compliance: 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 be associated with the other institution(s) in that country. Due regard is given to language, and although self-study reports and evaluations are carried out in English, there will be at least one member whose native language is that in which the programme is delivered. All members of the site evaluation team must sign a 'no conflict of interest' statement and each institution is provided with the list of experts prior to the site evaluation with the opportunity for comment or rejection. Training events are held by ECCE and all members of evaluation teams must have attended at least one of these. Students are now included on all site evaluation teams and have proved to be a very valuable asset.

2.5 Criteria for outcomes

STANDARD:

Any outcomes or judgments made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

GUIDELINES:

External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgments or formal decisions.

61: ECCE compliance: Each of the 36 ECCE Standards is described in detail in appendix II and given a formal 'outcome' based on the evidence from the institution's self-study report and data collected during the site evaluation visit. These outcomes include 'fully compliant', 'substantially compliant' 'partially compliant' or 'non-compliant' as detailed in the evaluation team manual (appendix IV). The specific evidence supporting each outcome is written in the evaluation team report for each Standard. All members of the evaluation team must agree on the specific outcome given for each Standard. The evaluation team also provides each institution with a list of Commendations, Recommendations, and Concerns at the end of the site evaluation as well as in the site evaluation report. The final decision on accreditation comes from the CoA however, based on the evaluation team report. The accreditation decisions are published on the ECCE website along with the final reports.

2.6 Reporting

STANDARD:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

GUIDELINES:

The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover

- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;
- evidence, analysis and findings;
- conclusions;

- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalized.

62. ECCE compliance: The outline for the evaluation team reports is provided in the Evaluation Team Manual (appendix IV). Evaluation reports are produced in hard copy and also included on the ECCE website. For each of the 36 Standards the report includes ‘evidence’, ‘analysis’ and ‘conclusions’. The ‘conclusions’ section states the level of compliance as described above. The report concludes with Commendations, Recommendations and Concerns, which summarise the key findings of the evaluation team and enable the reader to easily find the conclusions of the team. The use of subheadings for each standard helps the team to describe and analyse the evidence, and based on this, make a judgment on the compliance of the institution. This is an improvement on previous formats and makes the findings of the team transparent to the institution and CoA. The institution is always provided with a copy of the team’s evaluation report to comment on factual errors prior to the final report being sent to the CoA.

2.7 Complaints and appeals

STANDARD:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

GUIDELINES:

In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.

Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

63. ECCE compliance: The specific criteria allowing for an appeal of an accreditation decision as well as time lines and the criteria for membership on an appeals panel have been elaborated in more detail in the ECCE Standards (part 4, section 4, appendix II)) since the last ENQA evaluation. The specific criteria and format for an official complaint are also outlined in part 4 of the ECCE Standards. The ECCE operates an appeals process, which is only permissible in cases of refusal of accredited (or re-accredited) status of an institution as determined by 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. These Standards are available on the ECCE website and are used by the institutions when preparing their self-study reports. Thus all of the institutions are aware of these procedures.

5.2. Part 3. Standards and guidelines for quality assurance agencies

3.1 Activities, policy and processes for quality assurance

STANDARD:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

GUIDELINES:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.

A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

64. ECCE compliance: The ECCE is a small, international accreditation agency with its sole focus on chiropractic education. Therefore the number of yearly accreditation site visits is currently small but growing. There were 3 accreditation site visits in 2014, two for first accreditation and one for re-accreditation. Two re-accreditation site visits are scheduled for 2015.

The mission statement of the 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 the ECCE.⁹

⁹ www.cce-europe.org

The purpose or goals of the ECCE are 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.

Purpose/Goals:

- *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.*

Members of the two standing committees of ECCE are from a variety of European countries. The 3 members of the QAC come from Switzerland, the UK and Sweden. The CoA committee includes members from Norway, Italy, Sweden, Switzerland and the UK.

As noted previously, each accredited institution has 1 representative on the ECCE. One of the members comes from the executive of the ECU and other

members are appointed for their higher or medical education expertise. Since the last ENQA application the ECCE membership also includes 2 student members from accredited institutions. Therefore, the ECCE feels that there is good representation from the relevant stakeholders.

3.2 Official status

STANDARD:

Agencies should have an established legal basis and should be formally recognized as quality assurance agencies by competent public authorities.

GUIDELINES:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

65. ECCE compliance: Although ECCE is not a statutory organisation, it is recognised as an external quality assurance agency by public authorities in Europe (and in South Africa). As examples, the following are documented references to ECCE. The supporting documentary evidence can be found in appendices 1 to 4 of the application for ENQA membership submitted by ECCE (October 2007).

- In the UK, the ECCE was referred to when setting up the General Chiropractic Council following the Chiropractors Act 1994. The minimum standards of education are defined as equivalent to those of the 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'*. (appendix 1- ECCE application October 2007).
- 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)...'. (appendix 2 ECCE application October 2007)

- 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'* (appendix 3-translation, ECCE application October 2007).
- In South Africa, the national external quality assurance agency (Higher Education Quality Committee, CHE) evaluated the chiropractic programmes at Durban University of Technology and the University of Johannesburg. The CHE evaluation report (August 2006), specifically refers to the expectation that the institution would subsequently attain international accreditation with the ECCE.

66. ECCE compliance: The 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. The ECCE is legally registered on the Register of Associations (Vereinsregister VR 2732).

3.3 Independence

STANDARD:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

GUIDELINES:

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organization) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations.
- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;
- Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

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

Although the ECU executive has one member as a stakeholder, the ECCE is independent from the ECU. The ECCE, being an international accreditation agency is totally independent of all government influences, while taking into consideration the laws and regulations governing the chiropractic profession within the various countries where accredited institutions exist. External experts are appointed to site evaluation teams by the ECCE executive with consideration for real or perceived conflicts of interest and input from the respective institution. Although there are student members on ECCE as well as the site evaluation teams, it is the CoA that makes the final decision on whether or not an institution receives accreditation. There are no student members on the CoA and any CoA member involved with the institution being evaluated would be excluded from participating in the decision for that institution.

3.4 Thematic analysis

STANDARD:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

GUIDELINES:

- In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

- A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

68. ECCE compliance: The ECCE President’s annual report to the general council is published on the ECCE website each year. Additionally, the President prepares reports on ECCE’s activities for the general newsletter of the ECU (‘Backspace’). This report is also available on ECCE’s website.

3.5 Resources

STANDARD:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

GUIDELINES:

It is in the public interest that agencies are adequately and appropriately funded, given higher education’s important impact on the development of societies and individuals. The resources of the agencies enable them to organize and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

69. ECCE compliance: The Council and its sub-Committees are responsible for the strategic direction and conducting the business of the agency. The ECCE employs an Executive Secretary responsible for the administration of the Council as well as an Evaluation Secretary responsible for coordinating all site

evaluations and functioning as a member of all site evaluation teams. Members of the Council are elected as set out in the Constitution (appendix I). 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 the ECCE, i.e. 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. Much of the ECCE's work is carried out without remuneration to its members, who are committed to maintaining and improving the standards of chiropractic education and training in Europe. As the number of chiropractic educational institutions increases in Europe so the workload for ECCE will expand. ECCE membership and administrative support are thus areas that will be continually monitored to ensure they remain fit for purpose. Outside of membership, the ECCE is also able to draw on the experience and expertise of individuals in education (both in and outside of chiropractic) as part of evaluation teams that make on-site visits to institutions. Members of these teams are remunerated for their work.

70. ECCE compliance: The ECCE is funded from subscriptions and fees from the chiropractic education institutions as set out in the ECCE Financial Policy (appendix III), and an annual subscription from the ECU, which represents the chiropractic profession's interests in Europe. The professional associations in European countries who are not members of the ECU (France and Denmark) as well as South Africa now contribute to the ECCE funds as countries where the profession is deemed to benefit significantly from the ECCE accreditation of the institution in that country. The ECU¹⁰ is made up of the professional chiropractic associations in Europe, and in turn is a member of the World Federation of Chiropractic (WFC).¹¹ In addition to subscriptions, institutions applying for accredited status are charged a fee, as are all institutions undergoing a periodic re-accreditation (Financial Policy, appendix III). The ECCE is in a sound financial

¹⁰ www.ecuunion.eu

¹¹ www.wfc.org

position with significant reserves. ECCE audited accounts for the previous three years are included in appendix VI.

3.6 Internal quality assurance and professional conduct

STANDARD:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

GUIDELINES:

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency’s work are indispensable. The review and improvement of their activities are on-going so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy

- ensures that all persons involved in its activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;
- guards against intolerance of any kind or discrimination;
- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;
- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;
- allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

71. ECCE compliance: Throughout the various ECCE documents processes for internal quality assurance are described. The QAC’s sole purpose is to monitor the internal quality assurance processes of ECCE to ensure that all published documentation is up-to-date and accurate, reflecting any changes voted on by Council and consistent with the new ESGs (Constitution (appendix I), Standards (appendix II), Financial Policy and Dues (appendix III), Evaluation Team Manual (appendix IV). Additionally, the QAC has formal feedback questionnaires sent to all members of a site evaluation

team as well as to the evaluated institution shortly after an accreditation site visit. The results from these questionnaires are analysed by the QAC and a written report prepared which is distributed first to the ECCE executive members and then to the Council as a whole. Any issues arising from these feedback questionnaires are addressed. Additionally, the ECCE requires that all members of a site evaluation team sign Confidentially statements as noted previously. The Conflict of Interest policy for site evaluation team members as well as for ECCE council members is described in the official documentation.

The ECCE receives feedback from institutional members on an informal basis at the annual meetings with members of the CoA, and during the annual general meeting of the Council. There is also a formal mechanism for annual feedback from institutional members through the annual monitoring report process.

The composition of the membership of the ECCE is strictly defined in the Standards (appendix II) to ensure that specific criteria are met regarding education/qualifications, expertise, stakeholder representation (including student members) and a conscious effort is made to include members from as wide a variety of European countries as possible considering the other membership criteria. The needs of ECCE in terms of the breadth and scope of members is carefully considered when selecting applicants for upcoming vacant positions.

The ECCE does not use subcontractors for its activities.

The ECCE does not currently have a single document outlining all of its internal quality assurance procedures on the website as they are imbedded throughout the other relevant documents. This could be done in the future however.

3.7 Cyclical external review of agencies

STANDARD:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

GUIDELINES:

· A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.72.

72. ECCE compliance: The ECCE is currently a member of ENQA which requires an external review every 5 years. The purpose of this document is to participate in this process.

6. APPLICATION FOR ENQA MEMBERSHIP (February 2010)

73. The ECCE was successful in its application for ENQA membership in 2010 but several recommendations were forthcoming after the review. These recommendations are listed below along with ECCE’s actions to address these areas.

ENQA Criterion 3 – Resources (ESG 3.4)

The panel recommends that ECCE should “develop and put in place (in collaboration with funders) a more sustainable administrative staffing structure over the next two years”. The Panel thought this important in order to meet anticipated demand and to expand some current levels of activity (paragraph 49).

Response:

ECCE has undertaken a review of its staffing structure. In order to tackle the increasing demand for ECCE’s services and the subsequent increased workload for Executive, the ECCE deemed it necessary to re-organise its administrative structure and has now doubled its administrative support. ECCE has established the role of Evaluation Secretary, as outlined in the *Standards* (Part 4, Section

1.4.1) and in the *Evaluation Team Manual* (Section 6). The primary role of the Evaluation Secretary is to manage and coordinate evaluation visits. The Evaluation Secretary serves the Commission on Accreditation (CoA), and ultimately reports to Executive. From September 1, 2011 ECCE appointed a new Executive Secretary. The Executive Secretary role remains as before, however without the burden of coordinating evaluations and reporting to CoA. This has contributed to a streamlining of ECCE administrative activity with more demarcated roles while at the same time providing room for expansion of current roles as future demands require.

ENQA Criterion 5 – Independence (ESG 3.6)

ECCE operates within a small community and depends on a limited number of active participants, which makes the issue of independence difficult. Therefore, the Board recommends ECCE not to underestimate “the potentially increased risks to independence posed by the operation of ECCE within such a relatively small community” as stated by the panel.

Response:

In its role as an HEQA agency operating in the context of a relatively small and intimate profession ECCE recognises the importance of independence. In its endeavours to ensure independence, ECCE has had two main areas of focus. Firstly, it is of utmost importance that where possible, newly recruited Council members come from a diverse educational background. Such expertise is of significant value to both Council and CoA and provides the opportunity for alternative viewpoints on chiropractic education. Secondly, where possible, ECCE attempts to have diverse geographical representation on Council. Recent appointments to Council have included people from the University of Portsmouth in the UK, the Karolinska Institute in Sweden, and a medical education specialist from Switzerland. In addition to its efforts regarding the make-up of Council, ECCE Executive is at all times cognisant of the need to have Evaluation Teams comprised of experts from different backgrounds and geographical regions. All Evaluation Team members sign a “No Conflict of Interest” statement.

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

The panel considers that there is still room for improvement concerning the student participation and the definition of procedures with regard to the Appeal Committee. Student involvement is considered as a major issue for the Board. Therefore, ECCE is recommended to implement mechanisms fostering student participation.

Response:

Following consultation with Institutional Members, ECCE has implemented student participation in ECCE activities. Students are now considered full members of Evaluation Teams and are trained at the same level as all other Team members (Standards Part 4, Section 1.4.5). Students have already successfully participated in Evaluation Team visits in 2012, 2013, 2014 and 2015. In addition, ECCE has now amended its Constitution to allow for 2 students as full members of Council (Constitution section 3.1.9). The first students on Council were elected at the annual Council meeting in Autumn 2012 and this is an ongoing process as students graduate and new student members are elected.

ECCE recognises that an effective appeals procedure is paramount in establishing confidence and trust between a quality assurance agency and its stakeholders. ECCE has reflected upon the comments of the review panel and the recommendations of the Board concerning the current appeals procedures outlined in its Standards. Nevertheless ECCE feels that the Appeals procedures are adequately described and in sufficient detail to be fit for purpose (Standards Part 4, Section 4). This Appeals process has had the opportunity to be tested recently as the ECCE received its first official 'Appeal' after an accreditation decision. This process is currently on-going at the time of writing this report but thus far is working well according to the published Standards.

ENQA Criterion 7 – Accountability procedures (ESG 3.8)

ECCE is encouraged do an effort in increasing its resources in order to further enhance its processes for forward planning and monitoring its own performance at corporate level.

Response:

ECCE has reviewed its resourcing and budget. Whilst ECCE's financial framework is deemed sufficient to meet current needs it was felt necessary to both increase and diversify ECCE's income stream. To this end, a review of the methods utilised to determine dues payable by accredited institutions concluded that it was not feasible to alter the existing structure. Additionally, ECCE submitted to the European Chiropractors' Union (ECU) a request for an increase in the financial contribution from the chiropractic profession. The application was successful and ECCE was able to secure a 20% increase in the contribution from the ECU. Finally, ECCE is investigating the possibility for external funding of its operations. ECCE Executive will continue to monitor the availability of external monies and submit applications where feasible and appropriate. Additionally, the ECCE requested professional associations in those countries who are not members of the ECU (France and Denmark) as well as South Africa to contribute money to the ECCE. All 3 countries complied with this request.

The increased resources available to ECCE have permitted involvement at diverse forums pertaining to chiropractic education and training. Through such meetings ECCE is able to both stay up to date with the latest educational practices in the profession at the same time as disseminating its results and actively influencing the direction of chiropractic education. Amongst other activities, ECCE participated in the World Federation of Chiropractic Education Conferences in October 2010 in Madrid, in Perth, Australia in 2012, and in Miami at the end of October 2014. In addition, the ECCE was involved centrally in the planning and organisation of the WFC Education Conference in September 2012 in Perth Australia where chiropractic education in Europe was strongly represented.

7. SUMMARY

The ECCE is an international autonomous organization 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 their chiropractic education and training programmes judged against a set of educational *Standards*. ECCE's business includes the evaluation of chiropractic education and training programmes in Europe and South Africa where there has been a steady growth in the demand for chiropractic services in the last decade.

The initial application for membership to ENQA in October 2007, and the subsequent external review for full membership in 2010, including the compilation of the self-evaluation, proved an illuminating and informative experience. The feedback and recommendations from ECCE's self-evaluation have highlighted areas for improvement, as well as informing future strategic objectives for the organisation.

Undertaking the exercise of self-evaluation on a cyclical basis assures that the ECCE not only maintains its own quality and continuously improves, but in so doing will reassure stakeholders in chiropractic education and training in Europe that the ECCE is operating at a level that is in keeping with that of its peers.

Membership of ENQA has been an important and essential step in the on-going development of ECCE. Membership allows attendance at ENQA-sponsored seminars and conferences, which in turn has facilitated the exchange of best practice with quality assurance peers. It is important that a single-profession quality assurance agency maintains the primary focus on its core business and develops insight into the idiosyncrasies of the profession in question.

Nevertheless, many of the challenges facing HE in the field of chiropractic are also apparent in the broader EHEA, and it is through exposure to diverse QA agencies, HE institutions and stakeholder organisations that quality in ECCE's work continues to improve.

Figure 1

