

EUROPEAN COUNCIL ON CHIROPRACTIC EDUCATION

Self-Evaluation Report

September 2014

**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) (3rd edition 2009). 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.

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
CEN	Comité Européen de Normalisation
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 Chiropractic 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 Oxford, 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 Cristina and Barcelona College of Chiropractic) and Switzerland (University of Zurich). There are developments in other European countries to establish chiropractic education including Norway (University of 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 www.gcc-uk.org

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 OAQ (Organization 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 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. The ECCE is mentioned in CEN (European Committee for Standardization) Standard EN 16224:2012, "Healthcare provision by chiropractors" on page 10, 4.1 "Undergraduate chiropractic education", as providing "*a suitable framework for undergraduate chiropractic education*".

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.

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/>

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.

2.2 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 and candidate (for 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. Again, the fee in question is set at a level agreed by the membership of the ECCE. An institution making an application for accredited status (or candidate (for accredited) status) is charged an application fee, 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).

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.*
- *Organising 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.

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.

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 (apart from one new institution) have sought (or are currently seeking) accredited (or candidate (for 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 appointment of an Evaluation Secretary with significant higher education experience who also serves as a member of all site Evaluation teams.</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.</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 whose core purpose is 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>

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	2017
Durban University of Technology	2009	2012	2016
Institut Franco-Européen de Chiropraxie	1996	2009	2014
Syddansk Universitet Odense	1999	2013	2018
Welsh Institute of Chiropractic University of South Wales	2002	2010	2015
University of Johannesburg	2010	2013	2018
RCU Escorial Maria-Cristina	2012	2012	2015

33. The ECCE also reviews institutions applying for candidate (for accredited) status rather than full accredited status. These are normally new institutions that are in the process of developing chiropractic programmes. Two of the candidates for accredited status programmes (Barcelona College of Chiropractic and McTimoney College of Chiropractic) have submitted their first self-study reports which have been assessed by the CoA and both institutions will undergo ECCE site evaluation visits in the autumn of 2014.

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 institution meets the eligibility criteria as set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 2. 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 candidate (for accredited) status, the institution must make initial contact in writing, provide evidence for meeting the eligibility criteria and provide a self-study report. These procedures are set out in the ECCE Accreditation Procedures and Standards (appendix II) Part 4 Section 5. Normally an external review does not take place for this category of accreditation, and the decision by the CoA is based on evidence of meeting the eligibility criteria and on evidence presented in

⁷ www.cce-europe.org/downloads.html

the self-study report. The maximum period an institution can hold candidate (for accredited) status is five years. At the end of this period the expectation is that the institution will apply for full accredited status and undertake the same initial contact procedures as described in 4.1 (point 36) above. Candidate (for accredited) status is designed to enable new institutions that are 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 is not a pre-requisite for application for full accredited status (as was the case for Durban University of Technology in 2009).

39. Irrespective of the category of application, 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 40).

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 Commendations, Recommendations 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 September 2011 with 19 attendees). The next webinar will be held September 27, 2014. 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. 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.

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.

46. 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

47. 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 University of Johannesburg November 2013).

48. 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).

49. 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

50. 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 48 above. A copy of the last evaluation report compiled by an evaluation team (November 2013), which used this format, is given in appendix V. This practice will continue.

51. 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 The annual monitoring report includes a current SWOT analysis. It 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 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.

52. 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

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

53. Decisions to accredit, re-accredit or award candidate (for accredited) status 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.

54. 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 83 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

55. 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, 3rd edition, 2009.

5.1. Part 2. European standards and guidelines for the external quality assurance of higher education.

2.1 Use of internal quality assurance procedures

STANDARD:

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

GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

56. 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 Development of external quality assurance processes

STANDARD:

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

GUIDELINES:

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

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

57. 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. 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. All procedures, policies and the ECCE standards are documented and freely available on the ECCE website. 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.

2.3 Criteria for decisions

STANDARD:

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

GUIDELINES:

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

58. ECCE compliance: 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.

2.4 Processes fit for purpose

STANDARD:

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

GUIDELINES:

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

Amongst these elements the following are particularly noteworthy:

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

59. ECCE compliance: The ECCE bases all its procedures on a fit for purpose principle. 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. 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. 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 policies are recognised as essential in

the assurance of quality and explicitly referred to in the ECCE standards (i.e. Continuous renewal and improvement).

2.5 Reporting

STANDARD:

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

GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

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

60. ECCE compliance: Evaluation reports are produced in hard copy and also included on the ECCE website. 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.

2.6 Follow-up procedures

STANDARD:

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

GUIDELINES:

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

61. ECCE compliance: Following the accreditation (or re-accreditation) of an institution, the relationship between the institution and ECCE continues on a formal basis through the annual monitoring process. Institutions are required to complete an annual report that documents key outcomes for the year including student admissions and progression, completion of clinical requirements by students, the student/staff ratio, and documentation of any changes to staffing and other resources. In addition, progress made in addressing any weaknesses and concerns raised in the evaluation report is documented. Follow-up is assured by an annual meeting between CoA and the institution at which the institution speaks to its annual report (AMoR) (submitted to COA beforehand). As such, the external review undertaken by the ECCE does not end with the evaluation report but continues on a regular basis through meetings and documentary evidence, facilitating improvement and further enhancement of the institution.

2.7 Periodic reviews

STANDARD:

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

GUIDELINES:

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

62. ECCE compliance: 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.

2.8 System-wide analyses

STANDARD:

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

GUIDELINES:

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

63. ECCE compliance: The ECCE is represented on the Council on Chiropractic Education International (CCEI) and shares best practice with other external review agencies in chiropractic education on a world-wide basis. The ECCE also presents its work at relevant conferences such as the World Federal for Chiropractic – Education Conference, and writes a regular news item for a journal distributed three times a year to the chiropractic profession in Europe. A formal report by the President on the work of the ECCE is also submitted twice a year to the Council, a copy of which is submitted to the European Chiropractors Union (ECU). Much of the work of the ECCE is taken up with the core business of evaluation of institutions. This is reflected on internally at Executive and CoA meetings, and in extensive discussions with institutions and other stakeholders.

5.2. Part 3. European standards and guidelines for external quality assurance agencies

3.1 Use of external quality assurance procedures for higher education

STANDARD:

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

GUIDELINES:

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

64. ECCE compliance: As described in 5.1 above, the ECCE takes into account Part 2 of the ESG, and its standards form the basis for the external quality assessment process.

3.2 Official status

STANDARD:

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

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: ECCE Standards have been recognised by CEN (European Committee for Standardisation) in EN 16224:2012 Healthcare provision by chiropractors, as providing "*a suitable framework for undergraduate chiropractic education*". Further, Annex B in the CEN document provides a *Recommended programme curriculum*, based on ECCE Standards, version 3, 2009. CEN is one of three European Standardization Organizations (together with CENELEC and ETSI) that have been officially recognized by the European Union and by the European Free Trade Association (EFTA) as being responsible for developing and defining voluntary standards at European level.

67. 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 Activities

STANDARD:

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

GUIDELINES:

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

68. ECCE compliance: ECCE undertakes its external quality assurance activities at both institutional and programme level. Institutions undergo periodic review for re-accreditation currently on a three or five year cycle depending on the maturity of the institution and the findings from previous evaluations. Superimposed on this is an annual monitoring process of all accredited institutions/programmes. In this, institutions are required to systematically report on current activity including staff and student data, and to inform the COA of any changes in activities in the period since the previous annual report as well as how it is addressing any recommendations/concerns from the previous evaluation report. This information is provided in writing and also in an annual face-to-face meeting between the institution's representative (normally the Head/Principal) and the CoA.

3.4 Resources

STANDARD:

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

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 ECU⁹ is made up of the professional chiropractic associations in Europe, and in turn is a member of the World Federation of Chiropractic (WFC).¹⁰ In addition to

⁹ www.ecuunion.eu

¹⁰ www.wfc.org

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subscriptions, institutions applying for accredited and candidate (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 position with significant reserves. ECCE audited accounts for the previous three years are included in appendix VI.

3.5 Mission statement

STANDARD:

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

GUIDELINES:

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

71. ECCE compliance: 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.¹¹

72. ECCE compliance: The purpose of the ECCE is detailed in Part 1 of the ECCE Accreditation Procedures and Standards (appendix II) and in the Constitution (appendix I). Both are available in print format and in electronic format from the ECCE website.

Purpose:

- *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.*

¹¹ www.cce-europe.org

- *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.*

73. ECCE compliance: The ECCE is concerned first and foremost with the external quality assurance of institutions providing chiropractic education and training in Europe. In the ECCE Accreditation Procedures and Standards (appendix II), the ECCE is defined as:

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

74. ECCE compliance: The historical context of the ECCE is set out in Part 1, Section 1.1. Accreditation Procedures and Standards (appendix II).

75. ECCE compliance: All of the documents and the procedures operated by ECCE are based on the ECCE standards developed to ensure that chiropractic education and training provided by institutions assures that graduates achieve the competencies and learning outcomes consistent with safe and competent practice. These outcomes are detailed in Part 2, Section 2.1 of the ECCE Accreditation Procedures and Standards (appendix II).

3.6 Independence

STANDARD:

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

GUIDELINES:

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

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);

- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

76. ECCE compliance: The ECCE is an independent body, registered as a not for profit organisation. It has no formal links to any government authority, chiropractic professional organisation or individual chiropractic education institution. All decisions regarding all operations are taken by the ECCE alone or its delegated authority, i.e. the Commission on Accreditation (CoA). Decisions on accreditation (and re-accreditation) are taken solely by the CoA, without influence from the ECCE Council or any other body. In this respect, no (education) institutional member of the Council is eligible to be a member of CoA (as set out in 10.1.1 of the Constitution, appendix I).

77. ECCE compliance: Membership of the ECCE is governed by strict eligibility criteria to ensure there is no influence from either professional organisations and/or institutions. These criteria are set out in Section 3 of the Constitution (appendix I).

78. ECCE compliance: The nomination and appointment of members of an evaluation team are determined by the ECCE Executive in consultation with the institution under review. The final decision on external reviewers remains with the ECCE Executive as set out in Part 4, Section 1.4 of the ECCE Accreditation Procedures and Standards (appendix ii).

3.7 External quality assurance criteria and processes used by the agencies

STANDARD:

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

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

Guidelines:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people. Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals

procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

79. ECCE compliance: A self-study report is required by every institution on application for accredited and candidate (for accredited) status, and for periodic re-accreditation. This report is based on the ECCE standards, and is set out in institutional self-evaluation (Part 3) of the ECCE Accreditation Procedures and Standards (appendix II).
80. ECCE compliance: An on-site evaluation is a required part of the accreditation process, and at each periodic re-accreditation thereafter. Full details of the on-site visit are set out in Section 9 of the Evaluation Team Manual (appendix IV), and in Part 4 Section 3.1.4 of the ECCE Accreditation Procedures and Standards (appendix II).
81. ECCE compliance: An evaluation report is produced at the end of every on-site visit, and used by CoA as part of its procedures in reaching a decision on accredited (or re-accredited) status of an institution. The evaluation report is detailed in section 10 of the Evaluation Team Manual (appendix IV), and in Part 4, Section 3.1.4 of the ECCE Accreditation Procedures and Standards (appendix II), and includes a summary of the Commendations, Recommendations and any Concerns as detailed by the evaluation team. The evaluation report is published in its entirety on the ECCE website.
82. ECCE compliance: A formal annual reporting (AMoR) process is in place, in which institutions must formally report on student and staff data, and address any weaknesses and/or concerns identified in the evaluation report. Each institution is required to participate on an annual basis in between periodic re-accreditation events (see also 67 above).
83. ECCE compliance: To ensure consistency, all external reviewers are required to attend formal training events held by the ECCE (see 44 above).
84. ECCE compliance: 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. Details of the appeals process is set out in Part 4, Section 4 of the ECCE Accreditation Procedures and Standards (appendix II).
85. ECCE compliance: The ECCE distinguishes between appeals and complaints. Complaints are dealt with by procedures set out in Part 4, Section 9 of the ECCE Accreditation procedures and Standards (appendix II).

3.8 Accountability procedures

STANDARD:

Agencies should have in place procedures for their own accountability.

GUIDELINES:

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years.

86. ECCE compliance: The ECCE has a formally constituted Quality Assurance Committee (QAC) that is responsible for continual review and evaluation of the agency's policies and procedures, and documentation. The last major review of the ECCE Accreditation Procedures and Standards was in 2011
87. ECCE compliance: The President of the ECCE submits a report on ECCE activities to the Council (and ECU) twice a year, which are published on the ECCE website. The ECU is represented on the ECCE Council (Section 3.1.2 of the Constitution (appendix I)). 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.
88. ECCE compliance: A formal system of feedback on the accreditation (and re-accreditation) is implemented, with feedback questionnaires distributed to the Chair and members of the evaluation team, and to the institution undergoing review. Any appropriate actions are notified to the Executive through the Chair of the QAC, who is a member of the Executive.
89. ECCE compliance: The appointment of members of evaluation teams is subject to eligibility criteria as set out in Section 2 of the Evaluation Team Manual (appendix IV), and all members sign a Conflict of Interest statement as set out in appendix 2 of the Evaluation Team Manual (appendix IV). The Executive

Secretary works closely with members of an evaluation team to ensure evaluation reports are of the required standard and fit for purpose. All 'Conflict of Interest' statements contained in official ECCE documents are posted on the ECCE website as a separate document.

90. As a full member of ENQA, ECCE is required to undergo a mandatory cyclical review of its activities every five years for continued membership.

6. APPLICATION FOR ENQA MEMBERSHIP (February 2010)

91. 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:

92. 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:

93. 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:

94. 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 an Evaluation Team visits in 2012 and 2013. 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.

95. 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).

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:

96. 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 and candidate 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.

97. 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 Conference in October 2010 in Madrid and Perth, Australia in 2012, and has been invited to present at the World Federation of Chiropractic Education Conference 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

98. The ECCE is an international autonomous organisation concerned with *accreditation (and re-accreditation) of institutions* offering chiropractic education and training. Accreditation (and re-accreditation) of institutions is determined by the quality of 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.

99. 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.

100. 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.

101. 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.

