

**Rejection of the Application  
by European Council for Theological Education e.V. (ECTE)  
for Inclusion on the Register**

**Register Committee**  
28 June 2022

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<b>Application of:</b>	2020-09-11
<b>External review report of:</b>	2021-08-06
<b>Review coordinated by:</b>	Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (ASIIN)
<b>Review panel members:</b>	Anne Herman Flierman (chair), Patrick Becker, Anna Klampfer, Martin Prchal, Iring Wasser (secretary)
<b>Decision of:</b>	2022-06-28
<b>Absented themselves from decision-making:</b>	n/a
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. External Review Report, 2021-08-06 (separate file)</li> <li>2. <a href="#">Applicant's statement, 2021-09-09</a></li> <li>3. <a href="#">Request to the Review Panel, 2021-11-15</a></li> <li>4. <a href="#">Response by the Review Panel, 2021-12-06</a></li> <li>5. <a href="#">ECTE additional representation, 2022-05-18</a></li> </ol>

1. The application of 2020-09-11 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application (tripartite Terms of Reference) on 2020-11-23, having considered clarification received from the review coordinator on 2020-11-09.
3. The Register Committee considered the external review report of 2021-08-06 on the compliance of ECTE with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered the additional information and documentation concerning the changes introduced after the completion of the external review (Revised ECTE Operations and Organisation & Revised Standards and Guidelines).
5. The Register Committee sought and received clarification from the chair of the review panel.

6. In 2021, the Register Committee postponed the consideration of the application until March 2022 in light of an ongoing policy consultation of EQAR governmental members on questions related to alternative providers.

7. On 2022-03-16, the Register Committee invited ECTE to make additional representation on the grounds for possible rejection. The Register Committee considered ECTE's additional representation received on 2022-05-18.

### Analysis:

8. In considering ECTE's compliance with the ESG, the Register Committee took into account:

- *Institutional Accreditation*
- *Programme Accreditation*

9. The Committee noted that ECTE combined these two activities into a single, integrated review as of March 2022. While that change is considered with a view to ESG 2.1 as far as possible and relevant, it was not taken into account otherwise.

### Scope of the review

10. The external review panel noted that ECTE accredits institutions and programmes which belong to the “category of post-secondary courses/programmes” and which – in the panel's view – “are not covered by the ESG”. In particular, the panel refers to programmes such as Certificates<sup>1</sup> in Theology, Diploma<sup>2</sup> in Theology or the Postgraduate Certificate<sup>3</sup> in Theology according to Appendix A of ECTE's Standards and Guidelines (see p. 15 of the review report).

11. In its response to EQAR's clarification request, the panel noted that it was “obvious for the panel that both the ESG and EQAR registration only cover formal tertiary education at bachelor and master level (levels 6 and 7 EQF)”<sup>4</sup>.

12. ECTE – in its standards – portrayed a “Certificate” as a partial qualification at/within EQF level 5 and a “Diploma” as a short-cycle, EQF level 5 qualification. In principle, short-cycle qualifications at EQF level 5 can be considered as part of the QF-EHEA. Moreover, the ESG generally cover higher education in its broadest sense and can also be applied to provision that is not part of a programme leading to a formal degree.

13. When applying, ECTE deliberately chose *not* to distinguish between different types of accreditations, neither for different levels nor for different types of organisations or programmes, but submitted the entirety of its accreditations as one single activity to review against the ESG; in turn, ECTE

<sup>1</sup> These have been renamed since the review, now “EQF level 5 partial”.

<sup>2</sup> Now “EQF level 5”.

<sup>3</sup> Now “EQF level 7 partial”.

<sup>4</sup> The panel did not specify whether it saw a difference between the “research-orientation” vs the “practice-orientation” variety.

did not consider any of its activities as outside the scope of the ESG in its application.

14. Given that EQF level 5 and provision outside full formal degree programmes is not per se excluded from the scope of the ESG, the Register Committee confirmed this in the tripartite Terms of Reference.

15. The Register Committee considered that the distinction made by the panel between accreditation of higher education within the scope of the ESG and “post-secondary education” outside the scope of the ESG cannot be derived from the Terms of Reference, nor from ECTE’s own presentation of its work.

16. As a result, the Register Committee saw no grounds to revisit or adjust the scope of its analysis at this point; the Committee continued to analyse the entirety of ECTE’s activity – including accreditation of “Certificate” and “Diploma” programmes – against the ESG<sup>5</sup>.

17. The Register Committee found that the report provides sufficient evidence and analysis on ECTE’s level of compliance with the ESG in most areas, but considered that the panel’s unilateral decision to limit its analysis to Bachelor/Master programmes raises serious concerns whether the external review report actually pertains to the full scope of ECTE’s activities as defined in the Terms of Reference.

18. Given that the review did not cover ECTE’s full scope of activities while the Terms of Reference did not limit the scope in the same way, the review did not fully comply with §1.14 of the EQAR Procedures for Applications, which requires that all activities are covered in the external review as specified in the Terms of Reference.

19. In its additional representation, ECTE argued that the review de facto covered all its accreditation activities. The Register Committee acknowledged that the analysis as concerns ESG 2.2 – 2.7 applies also to the accreditation of the three types of programmes in question, given that the accreditation process is identical across the different types of programmes.

20. The Register Committee considered differently ESG 2.1. Despite ECTE quoting from its Certification Framework in the additional representation, this cannot replace a full and in-depth analysis by an external expert panel, considering both the Framework and its use in practice as seen in ECTE accreditation reports.

21. As a result, the Register Committee was able to concur that ECTE complies with ESG 2.2 – 2.7, but not with ESG 2.1 as discussed further below.

22. With regard to the specific European Standards, the Register Committee considered the following:

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<sup>5</sup> The Register Committee nevertheless had serious concerns about the transparency of different types of institution, and formally-recognised degrees vs. others; these are addressed under ESG 3.1 below.

## ESG 2.1 – Consideration of internal quality assurance

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23. The Register Committee noted that, in 2020, ECTE switched from a combined institutional and programme accreditation procedure to a new system in which ECTE member institutions can contract an institutional or a programme review separately. The panel commented that – while the combined accreditation procedure had effectively translated ESG Part 1 – only part of the ESG 1 are covered during an individual institutional or programme accreditation procedure. Provided that the new standards were adopted by ECTE’s General Assembly, the panel stated that it would reach a different judgment (of ‘full compliance’).

24. In the additional documentation provided, the Committee noted that ECTE revised its criteria in order to fully address ESG Part 1 in both institutional and programme accreditation procedures. The Committee, however, noted that the new revised standard will only be employed for reviews taking place from January 2022 onwards and were not operational yet.

25. In its response to the Register Committee’s clarification request the panel noted that it was confident for ECTE’s forthcoming criteria to close that gap, but reiterated that there was “no proof of procedure carried out under this new and revised standards” at the time of the review.

26. In its additional representation, ECTE reported a further change made in March 2022: removing the separate processes of initial institutional and programme accreditation altogether, in favour of a single integrated review that covers both institutional and programme accreditation.

27. Given the crucial importance of the standard the Register Committee was unable to consider another level of compliance without a specific analysis of a review panel of the actual changes in practice.

28. In the case of an alternative provider, the quality assurance procedure carried out by an EQAR-registered agency might be the only occasion to externally verify whether the education offered by the alternative provider is indeed at higher education level in terms of its learning outcomes. Therefore, the Committee found that attention to ESG Part 1 and in particular ESG 1.2 with its requirement that the qualification resulting from a programme should refer to the correct level of the Qualifications Framework for the European Higher Education Area (QF-EHEA) are of crucial importance in the domain of alternative providers.

29. Given that ECTE accredits a large number of alternative providers (see also under ESG 3.1) the Register Committee underlined that ESG 2.1 was a particularly crucial standard; it sought to ascertain that criteria are robust, fully aligned with the QF-EHEA and applied stringently in all cases, so as to protect the label and designation of what will be perceived as “higher education”.

30. With a view to the discussion on scope above, the Register Committee understood that the review panel clearly did not confirm whether ECTE’s

criteria for Certificate in Theology, Diploma in Theology and Postgraduate Certificate in Theology are correctly aligned with the QF-EHEA. As noted above, the quotes provided by ECTE from its Certification Framework cannot replace an external panel's analysis of the alignment in theory and practice.

31. As the Register Committee considers the accreditation of such programmes fully pertinent to the application (see above), this necessarily leads to a conclusion of non-compliance with ESG 2.1 as well.

32. The QF-EHEA further expects that students “have demonstrated knowledge and understanding in a field of study” upon completion of their studies. In general, ECTE's standards state that “theology” was the field of study they refer to.

33. Considering the practice-oriented profile in ECTE's standards for Bachelor and Master programmes, the Register Committee wondered whether these ensured that accredited programmes can be regarded as academic programmes aligned with the QF-EHEA.

34. In its additional representation, ECTE referred to several elements in its Certification Framework to underpin the academic nature, and argued that also the descriptors for practice-oriented profiles were fully aligned to the EQF.

35. ECTE generally refers to the European Qualifications Framework for Lifelong Learning (EQF) in its framework and communication. While the Register Committee saw this as a legitimate choice, the Committee underlined that the analysis and formal assessment in respect of ESG 2.1 always need to refer to the QF-EHEA descriptors as a benchmark, given that the QF-EHEA is the framework adopted by the EHEA and referred to in ESG 1.2.

**36. Given the panel's conclusions and the material gaps as to whether ECTE's criteria for all levels/programmes fully correspond to higher education levels of the QF-EHEA and thus comply with ESG 1.2, the Register Committee concurred with the panel's conclusion that ECTE does not comply with ESG 2.1.**

**37. In case ECTE goes through a further review, this should analyse and validate all programmes/levels in ECTE's Certification Framework against the QF-EHEA in detail, considering both the standards and the practice as demonstrated in ECTE reports.**

### **ESG 3.1 – Activities, policy and processes for quality assurance**

38. The Register Committee established that a substantial number of institutions accredited by ECTE are not nationally recognised higher education institutions (hereinafter “alternative providers”); ECTE's own statistics, provided with the additional representation, confirmed that fact.

39. The ESG cover “higher education in its broadest sense, including that which is not part of a programme leading to a formal degree”. The ESG do

not specifically limit what "higher education" means and explicitly include education that does not lead to a "formal degree".

40. The Register Committee therefore considers that the scope of the ESG needs to be determined by the quality and level of the education provided, not the legal status of the provider. That is, if an alternative provider offers learning opportunities with learning outcomes at higher education level, as defined by the QF-EHEA descriptors (see discussion under 2.1 above), the ESG can be considered applicable as a framework for the provider's quality assurance.

41. As a result and given that ECTE did not sub-divide its accreditation work itself, the Register Committee considered the entirety of ECTE's accreditation activities to be within the scope of the ESG (see also above).

42. In general, the ESG are underpinned by an expectation of utmost transparency; in turn, information that could be misleading, in particular for (potential) students, should be avoided. EQAR's Policy on the Use and Interpretation further specifies that the Register Committee should be guided by EQAR's overall mission of ensuring transparency and trust when applying the standards.

43. Under ESG 3.1 it is expected that quality assurance agencies distinguish clearly and transparently between their external QA within the scope of the ESG and other activities. In line with the overall goal of transparency, the Register Committee applies the same principle to different types of accredited providers with a clearly different status and formal recognition; a lack of transparency about the status of different providers would bear the risk of confusing potential students as well as others, and might raise false expectations as to the status and recognition of credentials earned from those providers.

44. The guidelines to ESG 3.6 further reflect the expectation that an agency "establish the status and recognition of the institutions with which it conducts external quality assurance". In view of the overarching goal of transparency, the Register Committee expects that agencies not only establish, but also make clear publicly the status of the different types of providers they work with.

45. In the interest of avoiding confusion and upholding the credibility of the education system, the Register Committee thus expects that the difference between formally recognised higher education institutions, awarding formally (nationally) recognised qualifications, and alternative providers must be absolutely clear for stakeholders and the general public.

46. The possible "dichotomy of national versus international, professional accreditation", referred to by the panel in its clarification, cannot be a reason to accept unclarity or confusion about a provider's formal status. The Committee would consider it incompatible with the principles of the ESG if international, professional accreditation were to contribute to such unclarity or confusion.

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47. While the review panel advised the ECTE to clearly separate accreditations of higher education programmes on the level of Bachelor and Master programmes from those on the “post-secondary level” (p. 15), the Register Committee was primarily concerned about the clear separation between those institutions awarding *officially recognised* degrees and others. As it stood when ECTE applied, ECTE made no difference of any sort between recognised higher education institutions and alternative providers.

48. The Register Committee noted that a number of alternative providers accredited by ECTE used the terms “Bachelor” or “Master” for their education offer. The QF-EHEA employs these terms for officially recognised degrees. In the vast majority of EHEA jurisdictions, these terms are legally protected, similar to terms such as “university”, “university college” or “higher education institution”. Equally, in the public eye these terms are understood as implying formal recognition as a higher education institution.

49. The Register Committee therefore considers that the use of these terms by alternative providers is not acceptable unless it can be explicitly demonstrated that an alternative provider may legally use those terms.

50. ECTE's standards specified that “Programmes that are not recognized by national authorities should ensure that the qualification nomenclature that is used is appropriate and not in breach of protected terminology” (B.2.1, p. 27) and further that “If the qualification is not recognised by competent national authorities, this should be specified.” (B.5.1, p. 39)

51. It remained unclear to the Committee how stringently these provisions were verified or enforced in practice. In its response to the clarification request, the panel did not provide any further details. Given that the terms “Bachelor” and “Master” are typically legally protected, neither the fact that “ECTE's international experts from the field [...] are checking compliance with professional standards” (clarification by the panel) nor the fact that some of “ECTE's members cannot or do not want to obtain a national recognition” (idem) give clear reassurance that the institutions in question use those terms legally.

52. The Register Committee considered that the unrestricted use by ECTE of the terms “Bachelor” and “Master” for alternative providers significantly reduced transparency and blurred, rather than clarified these providers' status. The Register Committee initially concluded that ECTE's arrangements did not ensure an adequate level of transparency and clarity of the status of those institutions it accredits; the Committee could not follow the panel's conclusion, but initially considered that ECTE did not comply with the standard.

53. In its additional representation, ECTE presented a set of changes implemented with a view to the above, including a clarification about accreditation and institutional status on its website, the reflection of different providers' status in the Review Directory and a new set of Guidelines for Institutional Status and Qualification Nomenclature. ECTE also referred to its existing standards and provided statistics on the level of



compliance with them; ECTE further quoted from the panel's clarification that "the panel has no doubt that these provisions [...] are stringently enforced in practice, as the provisions mentioned above are part of the criteria used by the ECTE in its accreditation procedures". The panel's argument did not give the Register Committee confidence that the panel actually reviewed this in practice, i.e. how these provisions are actually assessed by expert panels and in ECTE reports in practice.

54. The Register Committee welcomed the policies developed by ECTE in this regard and the steps taken to introduce clarity of institutional status in its own website and communication. The Committee concluded that these steps address the concerns at the level of ECTE.

55. The fact that the majority of ECTE-accredited providers are alternative providers underpins the importance of ensuring that not only ECTE's own communication is clear, but also that ECTE ensures – through its respective standards and their stringent application – that the accredited providers themselves live up to the same level of clarity about their status.

56. **In light of the clear and demonstrable progress made by ECTE in its own communication the Register Committee concluded that ECTE now partially complies with the standard.** To demonstrate substantial compliance, the Committee considered that an in-depth analysis by an external panel into the implementation and impact of the new policies at the level of ECTE-accredited providers would be needed.

### ESG 3.3 – Independence

57. The Register Committee took note of the panel's concerns with regards to ECTE' structure, the composition and overlapping functions of ECTE Council and the possible conflict of interest in the role of some staff members.

58. The Committee considered the additional documentation provided by ECTE and welcomed the agency's intention to address its shortcomings by i.e. restructuring the functions and composition of the ECTE Council, creating a designated Accreditation Commission; redefining the role and function of staff to remove possible conflict of interest and revising the composition of the Visitation Evaluation Teams (VET) so they may not be members of the ECTE Accreditation Commission.

59. In its additional representations, ECTE noted that the Accreditation Commission has been fully operational since January 2022 and that its new policy was adopted and implemented.

60. **While the Register Committee welcomed these changes in response to the review panel's analysis and recommendation, it noted that the actual impact in practice could only be assessed in a future external review; the Committee therefore followed the review panel's conclusion that ECTE complies only partially with ESG 3.3.**



### ESG 3.5 – Resources

61. The Committee noted that ECTE relied to a considerable degree on the contributions of voluntary personnel and that its human resources amounted to a little over 1 full-time equivalent.

62. The review panel concluded that the transition from an organisation based largely on voluntary contributions to a professionally working accreditation body required further sustained professional support, i.e. increasing the staff capacities and further professionalisation and extension of ECTE’s accreditation services.

63. In its additional representation, ECTE reported that it had increased its staff budget and reviewed carefully the various roles and position in the organisation.

**64. The Register Committee concluded that ECTE seemed well on track to consolidate its financial and human resources equipment; the Committee therefore now concurred with the panel’s conclusion of (substantial) compliance.**

65. For the remaining standards, the Register Committee was able to concur with the review panel’s analysis and conclusion without further comments.

#### Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Non-compliance	<b>Non-compliance</b>
2.2	Substantial compliance	<b>Compliance</b>
2.3	Full compliance	<b>Compliance</b>
2.4	Substantial compliance	<b>Compliance</b>
2.5	Full compliance	<b>Compliance</b>
2.6	Substantial compliance	<b>Compliance</b>
2.7	Substantial compliance	<b>Compliance</b>
3.1	Substantial compliance	<b>Partial compliance</b>
3.2	Full compliance	<b>Compliance</b>
3.3	Partial compliance	<b>Partial compliance</b>
3.4	Full compliance	<b>Compliance</b>
3.5	Substantial compliance	<b>Compliance</b>
3.6	Substantial compliance	<b>Compliance</b>
3.7	(not expected)	<b>Compliance (by virtue of applying)</b>

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67. Also after duly considering ECTE's additional representation, the Register Committee concluded that ECTE does not comply with ESG 2.1, and only partially with ESG 3.1 and 3.3. A non-compliance generally prevents a positive overall conclusion and the Committee therefore remained unable to conclude that ECTE complies substantially with the ESG as a whole.

**68. The Register Committee therefore rejected the application.**

**69. ECTE has the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection (i.e. those mentioned under ESG 2.1, 3.1 and 3.3), and to reapply within 18 months based on that focused review.**

70. ECTE has the right to appeal this decision of the Register Committee in accordance with the [Appeals Procedure](#). An appeal must reach EQAR within 40 days from receipt of this decision.

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9 September, 2021

EQAR Register Committee  
Aarlenstraat 22 Rue d'Arlon  
1050 Brussels, Belgium

## **European Council for Theological Education (ECTE) – Submission of Review Documents and Completed Follow-up Work**

Following our external review process, we are pleased to submit the *External Review Report* together with the documents supporting our application for inclusion in the EQAR. Together with this letter, you will find the following files:

### **Main documents**

1. *ECTE Self-Evaluation Report (SAR)*
2. *External Review Report*  
(the CVs of Review Panel and Declaration of Honor have already been submitted to EQAR by ASIIN)

### **Additional documents**

3. *Additional Information on ECTE SAR* requested by review panel after Review Visit
4. *Revised Operations and Organization - 2021* in response to recommendation for ESG 3.3
5. *Revised Standards and Guidelines - 2021* in response to requirement to requirement for ESG 2.1
6. *Minutes ECTE General Assembly (September 2021)*, approving documents n.4 and n.5 above.

### **Completed follow up work**

Below is a summary of the follow-up work *already* completed by ECTE since the review visit with regards to requirements and recommendations found in the ASIIN report:

ESG 2.1 - Non-compliance: *Standards and Guidelines* have been revised and approved by the ECTE General Assembly to include ESG 1 in both institutional and programme accreditation (see documents n.5 and n.6 above)

ESG 3.3 - Partial compliance: A separate Accreditation Commission (AC) has been approved together with the revision of ECTE operations and organizational structures (see document n.4 and n.6 above). The revision includes the appointment of an AC Director, separation of roles, new procedures in the appointment of Visiting-Evaluation Team (VET) members, and the involvement of VETs in evaluating the fulfilment of requirements. This also covers the recommendation of ESG 2.2.

Relating to recommendations evaluated as substantially compliant:

ESG 3.5: An AC Director will be hired effective January 1, 2022. This is a significant step in upgrading staff capacity. A staff development plan will be submitted to the Council for the November 2021 meeting. This includes a development plan to identify and recruit new peer experts.

ESG 3.6: The AC Director will be responsible for IQA processes.

ESG 2.4: Recommendation implemented as of September 2021.

ESG 2.6: Recommendation implemented during online visit in June of 2021.

ESG 2.7: Revision of the Appeals process, to include plans for an External Appeals Committee, will be submitted to the Council for the November 2021 meeting.

We trust this documentation is sufficient for the Register Committee as it evaluates our application. Should more documentation be needed we will do our best to provide it in a timely manner. We look forward to the outcome in due time.

Best regards,



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

Brussels, 15 November 2021

## Application by ECTE for Inclusion on EQAR

Dear Anne,

The ECTE - European Council for Theological Education e.V. has made an application for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 06/08/2021 on which ECTE's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of ECTE's application.

### Compliance with ESG 2.1

The panel judged ECTE non-compliant with ESG 2.1, rightly noting that the panel "has to evaluate what has been presented at the time of the audit" (p. 29). The panel further stated that – provided that the ECTE General Assembly of November 2021 amends the standards as proposed – "the panel sees full compliance" (p. 29).

In the proposal, standards A.7 and B.6 were added to assure ESG-alignment of both programme and institutional accreditation separately. While the existing standards enshrine some of ESG Part 1 organically, these standards cover the "missing" ESG almost verbally.

1. Did the panel gain confidence that these additions will receive a comparable level of attention in practice as standards A.1 – A.6 and B.1 – B.5, respectively?

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2. Does the panel consider that the separation of institutional and programme accreditation is underpinned by a clear understanding what each of these accreditations cover and stand for?
3. Could the panel gain a clear understanding why some institutions would seek programme accreditation only, some institutional accreditation only, and some both?

### **Status of the organisations/programmes accredited by ECTE (ESG 2.1, 3.1 and 3.6)**

The Register Committee noted that the vast majority of organisations accredited by ECTE – institutionally or at programme level – appear not to be officially (nationally) recognised higher education institutions. Only in a few cases, these organisations or their programmes are offered under the responsibility of an officially recognised higher education institution through a franchise, validation or similar arrangement.

We wish to emphasise that neither the ESG themselves nor EQAR policies rule out that the ESG are used in the quality assurance of other organisations that provide education at higher levels, but that are not officially recognised higher education providers. This might include various type of alternative providers, micro-credential providers, etc.

Following the ESG's strong focus on transparency and EQAR's clear expectation that distinctions between different types of agencies' activities are made clear and explicit (U&I ESG 3.1), we do, however, expect that clear distinctions are made between the quality assurance of officially recognised full degrees and of other types of education provision<sup>1</sup>.

4. How did the panel regard the fact that ECTE generally sanctions the use of the terms “Bachelor” and “Master” for programmes that are clearly not officially recognised higher education?
5. Did the panel consider this compatible with ESG 2.1, given that ESG 1.2 expects programmes to relate to a national qualifications framework?

The guidelines to ESG 3.6 indicate that QA agencies would usually have ways “to establish the status and recognition of the institutions with which it conducts external quality assurance”. In its standards, ECTE requires that:

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<sup>1</sup> Many agencies, for example, reserve the term “accreditation” for the former and use different for the latter, or find other ways to emphasise that distinction.

“Institutions have appropriate legal status within the country where they operate in accordance with local laws and as suitable for their purposes. Institutions [...] operate within national legal frameworks in their usage of academic terminologies and award nomenclatures.” (A.1.2, p. 7)

“The qualification resulting from a programme should be clearly specified and communicated and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area. Programmes that are not recognized by national authorities should ensure that the qualification nomenclature that is used is appropriate and not in breach of protected terminology.” (B.2.1, p. 27)

“If the qualification is not recognised by competent national authorities, this should be specified.” (B.5.1, p. 39)

6. Did the panel investigate how stringently these provisions are enforced in practice, especially given that the vast majority of ECTE-accredited programmes are not nationally recognised?
7. Was the panel convinced that the common use of the terms “Bachelor” and “Master” by many ECTE-accredited institutions for unrecognised programmes is indeed not in breach of protected terminology?

The agency repeatedly underlines that:

“accreditation by the ECTE certifies levels within a nomenclature framework and provides a statement of comparability to the standards published in this document, but **it is not a replacement for national accreditation**” (e.g. footnote 103, p. 27).

8. Did the panel consider that this status is made sufficiently clear by ECTE in its public communication?
9. Did the panel consider appropriate the absence of a formal distinction between nationally recognised institutions/programmes and others in ECTE’s list of accredited institutions/programmes?



10. Does ECTE take measures to ensure that the accredited organisations do not misrepresent ECTE accreditation in ways that could be construed as granting official recognition?

In your report, you noted that “a number of interviewees alluded to the fact that they could not obtain accreditation in their national context for various reasons” (p. 8) and that – for the organisations accredited by ECTE - “in some countries there is no other way of obtaining official recognition” (p. 16).

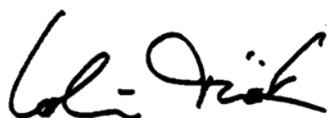
11. Could you please elaborate on the reasons for that, considering that most EHEA countries do offer a route for private higher education providers to apply for official recognition?

We would be grateful if it was possible for you to respond **by 4 December 2021**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ECTE’s application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: Iring Wasser, ASIIN (secretary and coordinator)  
ECTE



Düsseldorf (D)/Markelo (NL)  
December 6<sup>th</sup> 2021

Dear Colin,  
Dear Members of the EQAR register committee,

In response to your letter dating 15 November 2021, the ECTE review panel has studied your questions related to our Agency Review Report. Before commenting on the questions, we would like to point out that the ECTE essentially is a network of theological schools in Europe and the Middle East. Schools become members of the ECTE for different reasons: for networking, for developing themselves, and to obtain a form of external quality assurance. The ECTE now seeks EQAR registration to give its quality assurance an official status, and is in that sense comparable to other Europe wide operating profession-based quality assurance organisations. However it is important to note that not all ECTE members provide only higher (tertiary) education as we understand it in the EHEA, but also other forms of post-secondary education. And those that provide tertiary education do not all seek accreditation from ECTE. It is obvious for the panel that both the ESG and EQAR registration only cover formal tertiary education at bachelor and master level (levels 6 and 7 EQF).

Having said this, we react to your questions as follows:

**Questions 1-3:**

**Did the panel gain confidence that these additions will receive a comparable level of attention in practice as standards A.1 – A.6 and B.1 – B.5, respectively?**

**Does the panel consider that the separation of institutional and programme accreditation is underpinned by a clear understanding what each of these accreditations cover and stand for?**

**Could the panel gain a clear understanding why some institutions would seek programme accreditation only, some institutional accreditation only, and some both?**

The answer to all three questions at hand is yes. The ECTE in our view understands the distinction between institutional and programme accreditation well. The panel has taken note of the fact, that prior to 2020 the combined institutional and programme accreditation procedures of ECTE covered comprehensively all European Standards and Guidelines. In an attempt to further strengthen both approaches, the ECTE decided to separate these two procedures in 2020 (thus far only one single institution has been submitted to these new set of standards) providing for the first time the opportunity for a member organization to ask either for an institutional accreditation or a programme accreditation separately. The panel found that in such a case, a group of standards was not covered as further elaborated on p. 28 of our Agency Review Report. In that sense the ECTE at first instance did not fully understand the scope of the ESG and the necessity to cover all standards.

The ECTE acknowledged this omission and very quickly provided a new mapping exercise filling this loop-hole, which it intends to submit for approval to their General Assembly. There is no reason to doubt that ECTE will not take the distinction seriously, given the highly professional and serious approach we met. However, at the time of our review, there was no proof of procedure carried out under this new and revised standards.

As regards the third question, it is very clear to the panel, that member organizations of the ECTE (only they can ask for accreditation) do that for different purposes. In frequent cases, their request is motivated by the fact that there is for their theological constituency no possibility to obtain national accreditation (e.g. in Greece, Egypt and other Arab countries e.g.). In others circumstances, the ECTE accreditation is contracted, because a theological school cherishes the possibility to obtain an international, cross-border accreditation of a disciplinary oriented professional network looking for compliance with field-specific competence frameworks and learning outcomes, sometimes in combination with a national accreditation like in the case of the Netherlands. There are also cases, where a member institution is not seeking accreditation at all, but becomes a member for the purpose of internal development and belonging to a professional network. The ECTE has a separate procedure for deciding on membership.

As we pointed out before, some ECTE members provide only or also other forms of theological education, such as short cycle diplomas or certificates in theology. The ECTE also accredits such programmes and the institutions providing it. Of course the ECTE and its members are free to do so, but it must be clear that such activities are not covered by ESG or registration on EQAR. The panel suggests to the ECTE to review the scope of the ESG with regard to the various levels and types of (higher) education, and improve its public information by making a distinction on its website between ECTE accredited institutions and programmes covered by ESG, and other institutions and programmes.

#### Questions 4 +5

**How did the panel regard the fact that ECTE generally sanctions the use of the terms “Bachelor” and “Master” for programmes that are clearly not officially recognised higher education?**

**Did the panel consider this compatible with ESG 2.1, given that ESG 1.2 expects programmes to relate to a national qualifications framework?**

The panel recognizes, that the ECTE accreditation documents clearly define the qualification level for a Bachelor and a Master programme and that the ECTE is closely monitoring the compliance level of these programmes with the European Qualification Framework and other international disciplinary benchmarks mentioned in our report. The fact that some of the programmes are not “officially (national state) recognized programmes” is as a matter of fact an important “raison d’être” of the ECTE, providing a much needed channel for institutions which for different reasons mentioned above cannot obtain national state recognition. The fact that the ECTE is undergoing the “EQAR” review with the purpose of being listed as an acknowledged international QA body in compliance with the ESG is part of this strategy.

As a cross-border international professional QA network, the ECTE is using the European Qualification Framework as overarching reference point for multiple national review procedures in Europe and beyond.

#### Questions 6. und 7.

**“Institutions have appropriate legal status within the country where they operate in accordance with local laws and as suitable for their purposes. Institutions [...] operate within national legal frameworks in their usage of academic terminologies and award nomenclatures.” (A.1.2, p. 7): “The qualification resulting from a programme should be clearly specified and communicated and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area. Programmes that are not recognized by national authorities should ensure that the qualification nomenclature that is used is appropriate and not in breach of protected terminology.” (B.2.1, p. 27) “If the qualification is not recognised by competent national authorities, this should be specified.” (B.5.1, p. 39)**

**Did the panel investigate how stringently these provisions are enforced in practice, especially given that the vast majority of ECTE-accredited programmes are not nationally recognised?**

**Was the panel convinced that the common use of the terms “Bachelor” and “Master” by many ECTE-accredited institutions for unrecognised programmes is indeed not in breach of protected terminology?**

The panel has no doubt that these provisions are stringently enforced in practice, as the provisions mentioned above are part of the criteria used by the ECTE in its accreditation procedures.

The panel also scanned through a sample of the accreditation reports to that regard, albeit under the “old accreditation rules and criteria” due to the transition phase described in its report. The panel has not noticed an abuse of the terms bachelor and master, while knowing that some ECTE members also offer other types of education.

The use of the terms of Bachelor and Master programmes is not in breach of protected terminology, as ECTE’s international experts from the field on the basis of predefined criteria are checking compliance with professional standards and the corresponding levels of the European qualification framework. ECTE’s approach to the qualification nomenclature is well described in Standards B.5 and the reference to the EQF in the ECTE Certification Framework (Appendix A of the Standards and Guidelines 2021). As we pointed out before, some of the ECTE’s members cannot or do not want to obtain a national recognition, and deliberately seek recognition from an international/European and professional perspective.

#### **Questions 8-9:**

**The agency repeatedly underlines that “accreditation by the ECTE certifies levels within a nomenclature framework and provides a statement of comparability to the standards published in this document, but it is not a replacement for national accreditation” (e.g. footnote 103, p. 27).**

**Did the panel consider that this status is made sufficiently clear by ECTE in its public communication?**

**Did the panel consider appropriate the absence of a formal distinction between nationally recognised institutions/programmes and others in ECTE's list of accredited institutions/programmes?**

Again the community of theological schools and everybody involved with ECTE, is aware of the fact, that an ECTE accreditation is not a replacement for national accreditation, as this is one of the reasons, why the ECTE is offering its services. In some instances, a theological institution can simply not ask for a national accreditation. On other cases institutions seek a combined accreditation from the ECTE and the competent

national authorities. As we observed before, the ECTE could improve its public information by explaining the official status of its members in terms of accreditation and type of programmes.

For the panel, the important point is that the ECTE as a European/international cross boarder Higher Education Quality Assurance Network is conducting its professional accreditation reviews according to the European Standard and Guidelines.

**Questions 10-11:**

**Does ECTE take measures to ensure that the accredited organisations do not misrepresent ECTE accreditation in ways that could be construed as granting official recognition?**

**Could you please elaborate on the reasons for that, considering that most EHEA countries do offer a route for private higher education providers to apply for official recognition?**

The panel considers the notion “construed as granting official recognition” misleading. In the field of international accreditation, there has always been the dichotomy of national versus international, professional accreditation. There are several professional accreditation organisations, working on a European scale, who are also registered in EQAR, and the ECTE seeks to be one of them. In the case of ECTE, a vast international network of HE stakeholders in the field have agreed on international/global standards for the field of theological education which in due process in line with the ESG requirements are executed. The ECTE has implemented a best practice approach of closely monitoring changes and developments in each accredited programme and institutions on an annual level, making sure that its members are providing adequate educational offerings to its constituents.

We hope that this information will help you to reach a decision on the ECTE’s application for listing in the European Quality assurance register.

With sincere regards,

(w.g. A.Flierman)

Dr. A.H. Flierman

Chair of the review panel

# ADDITIONAL REPRESENTATION

RELATIVE TO THE APPLICATION OF 2020-09-11 FOR  
INCLUSION IN THE EUROPEAN QUALITY ASSURANCE  
REGISTER (EQAR)

BY THE  
EUROPEAN COUNCIL FOR THEOLOGICAL  
EDUCATION

SUBMITTED 18 MAY 2022  
TO THE EQAR REGISTER COMMITTEE

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## Introduction

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This document responds to the invitation on 30/03/2022 of the EQAR President and Chair of the Register committee to make additional representation relating to the deferral of ECTE's application for inclusion on EQAR. The document provides additional representation that is: a) relative to the scope of the review, b) relative to the ESG standards where the ECTE has been judged as either non-compliant or partially compliant.

Supporting evidence is provided through links, footnotes and in appendices. All are integral components of the additional representation.

Should the additional representation contained in this document be insufficient to make compliance judgements, the ECTE is willing to follow further instructions from the Committee to conduct a focused review.

The document is outlined as follows:

<b>Introduction</b>	<b>2</b>
<b>1 – Response relative to the scope of the review</b>	<b>3</b>
<b>2 – Response relative to ESG 2.1 (Consideration of internal QA)</b>	<b>3</b>
<b>3 – Response relative to ESG 3.1 (Activities, policies and QA processes)</b>	<b>5</b>
<b>4 – Response relative to ESG 3.3 (Independence)</b>	<b>7</b>
<b>5 – Response relative to ESG 3.5 (Resources)</b>	<b>7</b>
<b>Appendices</b>	<b>8</b>

Respectfully submitted on behalf of the ECTE Council,



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

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## 1 – Response relative to the scope of the review

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The ECTE recognises that the external review did not explicitly focus on our accreditation activities in relation to our Certificate, Diploma and Postgraduate Certificate programmes. However, given that we submitted the entirety of our accreditations as a single activity to review against the ESG, it can be claimed that *de facto*, the external review report did cover the full scope of our activities as defined in the Terms of Reference and that all programmes were equally reviewed against ESG 2.

With specific reference to ESG 2.1, for example, published review reports demonstrate that the full scope of ESG 1 is equally covered in all our review activities at all programme levels.<sup>1</sup>

Concerning the alignment of these programmes to EQF learning outcomes, they are copied below from the [ECTE Certification Framework](#).<sup>2</sup>

- EQF level 5 partial (formerly Certificate): Factual and theoretical knowledge within the field of theology (work or study) and an awareness of the boundaries of that knowledge; a range of cognitive and practical skills in theology required to develop creative solutions to abstract problems; responsibility and autonomy in contexts of work or study activities where there is unpredictable change; review and develop performance of self and others.
- EQF level 5 (formerly Diploma): Comprehensive, specialised, factual and theoretical knowledge within the field of theology (work or study) and an awareness of the boundaries of that knowledge; a comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems; responsibility and autonomy to exercise management and supervision in contexts of work or study activities where there is unpredictable change; review and develop performance of self and others.
- EQF level 7 partial (formerly Postgraduate Certificate): Highly specialised knowledge of theology, some of which is at the forefront of knowledge in the field of work or study, as the basis for original thinking and/or research; critical awareness of knowledge issues in theology and at the interface between different fields; specialised problem-solving skills required in research and/or innovation in order to develop new knowledge and procedures and to integrate knowledge from different fields; responsibility and autonomy to manage and transform work or study contexts in theology that are complex, unpredictable and require new strategic approaches; take responsibility for contributing to professional knowledge and practice in theology and/or for reviewing the strategic performance of teams.

On the basis of this documentary evidence, we respectfully request that compliance to ESG 2 of our programme accreditation of EQF level 5/partial, level 5 and level 7/partial (formerly referred to as Certificate, Diploma and Postgraduate Certificate programmes), be reconsidered within the existing evaluation of our EQF level 6 and 7 (formerly referred to Bachelor and Master programmes).

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## 2 – Response relative to ESG 2.1 (Consideration of internal QA)

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Concerning compliance to ESG 2.1, the following additional representation relates to the three issues that were raised.

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<sup>1</sup> See, for example the [2021 Cyclical Review Report of the Jordan Evangelical Theological Seminary](#), where Certificate, Diploma, Bachelor and Master level programmes were reviewed in the same review event.

<sup>2</sup> The ECTE Certification Framework has been revised to discontinue the use of the English nomenclature 'Certificate', 'Diploma', 'Bachelor', 'Master' and 'Postgraduate Certificate' in favour of EQF levels that describe outcomes and learning opportunities. See 3.4 below.

**2.1 - Concerning the lack of inclusion of the entirety of ESG 1 in both institutional and programme accreditation**, we propose that, even before the addition of standards A7 and B6 in 2021, the full ESG 1 was *already covered* within the two-phase process. Even if the full ESG 1 was not covered in *each* initial institutional and programme review, it was covered by the two combined reviews.

It can also be noted that, in actual fact, separate reviews have never happened. The separation of institutional and programme accreditation in 2019 coincided with the COVID pandemic and no initial reviews have taken place. Between 2020 and April 2022, only cyclical reviews have taken place, and these have covered both institutional and programme standards. This is evidence that, before January 2022 and since then, ECTE reviews have covered the entire ESG 1.<sup>3</sup>

Furthermore, in March 2022, the ECTE Council consolidated compliance to ESG 2.1 by removing the two-phase process of initial institutional and programme accreditation in favour of a *single* integrated review that covers both institutional and programme accreditation, and hence the full ESG 1.<sup>4</sup> Evidence of this change can be seen in the published [Criteria and Procedures](#) for ECTE accreditation (p.7).

This may seem like a hurried turnaround, but the following narrative suggests otherwise:

- Since the beginning of its operations in 1979, the ECTE has used a two-phase accreditation procedure entailing an initial Candidacy review followed by an Accreditation review.
- When, in 2019, the distinction between institutional and programme accreditation was made, it seemed natural to continue with the two-phase process, replacing the Candidacy phase with the Institutional review and the Accreditation phase with the Programme review.
- As indicated above, we never implemented the two-phase process for an initial review, and the success of integrated cyclical reviews, that included both institutional and programme accreditation, led us to reflect on whether this simplified procedure might be applied to all our reviews.
- In January 2021 the new Accreditation Director made an explicit request to the Council to remove the two-phase accreditation process that was unduly slow. A study of QA agencies in Europe suggested that most agencies had such an integrated review procedure.
- In March 2022 the ECTE Council approved this request and revised its procedures.

**2.2 – Concerning evidence of application of ESG 1.2 to alternative providers**, see a fuller response relative to ESG 3.1 below. At this point, it can be noted that the [ECTE Certification Framework](#) is based on EQF levels and learning outcomes and that these are equally applied to learning opportunities offered by both higher education institutions and alternative providers.

**2.3 - Concerning the alignment of practice-oriented theology programmes to the EQF**, the following additional representation is submitted.

1. Standard B.2 in the ECTE [Standards and Guidelines](#) requires that programmes at *all* ECTE accreditation levels (including practice-oriented programmes) include provision of academic knowledge (B.2.2), development of a broad, advanced knowledge base that stimulates research and innovation (B.2.2), definition of academic learning outcomes (B.2.2) and robust engagement with theological and biblical studies (B.2.5).

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<sup>3</sup> See <http://ecte.eu/ga/reports/>. There is one exception, which is an institution in Zurich that had applied for institutional accreditation in 2021 and is currently undergoing review.

<sup>4</sup> Distinct institutional and programme accreditation procedures still remain as a possible option, and standards A7 and B6 will apply to these reviews to ensure full ESG1 coverage.

2. The [ECTE Certification Framework](#) aligns the learning outcomes of *all* ECTE accreditation levels and orientations with the EQF descriptors of higher education (including practice-oriented programmes).
3. The ECTE [Guidelines for Programme Design and Using ECTS](#) prescribe conformity to the EQF including ‘demonstrated knowledge and understanding in a field of study’ (p.4,5).
4. Evidence of implementation can be found in ECTE published programme review reports. For example, the [2021 Cyclical Review Report of the Ukrainian Evangelical Theological Seminary](#) for a practice-oriented ‘bachelor’ level programme, reports that: ‘Appropriate learning outcomes are used for the academic level that is expected for the degrees being offered, and students’ accounts of their experiences indicate they are growing in their ability to think critically, find information, and apply knowledge’ (p. 29).

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### 3 – Response relative to ESG 3.1 (Activities, policies and QA processes)

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Concerning compliance to ESG 3.1, the following additional representation relates to the issues of **public representation of the formal status of ECTE institutions in their respective contexts** and to the use of the **terms ‘Bachelor’ and ‘Master’ by alternative providers**.

- 3.1 - Public statements. The revised [ECTE Accreditation](#) section of our website provides further clarification about [Accreditation and institutional status](#), making a clear distinction between higher education institutions and alternative providers. Explanations are also provided concerning ECTE’s [Certification framework and qualification nomenclature](#) (see more in 3.4 below).
- 3.2 - Stringent implementation. ECTE accreditation standards A.1.2, B.2.1 and B.5.1 relate directly to issues of institutional status and nomenclature. Concerning their stringent implementation, the external review panel reports that:

‘... the community of theological schools and everybody involved with ECTE, is aware of the fact, that an ECTE accreditation is not a replacement for national accreditation’ (*Agency Review Report ECTE 2021*, p.3)... ‘The panel has no doubt that these provisions (i.e. related to legal status and nomenclature) are stringently enforced in practice, as the provisions mentioned above are part of the criteria used by the ECTE in its accreditation procedures... (clarification letter by A.H. Flierman, 6 December 2021 p.3).

‘...the panel has not noticed an abuse of the terms bachelor and master ... (ibid, p.3)  
... The use of the terms of Bachelor and Master programmes is not in breach of protected terminology, as ECTE’s international experts from the field on the basis of predefined criteria are checking compliance with professional standards and the corresponding levels of the European qualification framework’ (ibid, p.3).

In preparation for this additional representation, the ECTE has performed an analysis of review reports in the last 5 years concerning compliance to standards A.1.2, B.2.1 and B.5.1 (and to the equivalent standard 3.2.14 in the previous *EEAA Manual*, 2006<sup>5</sup>). Of 28 institutions analysed, 24 were judged as compliant, 3 were judged as partially compliant, and 1 was judged as non-compliant (see Appendix A).

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<sup>5</sup> Pre 2019 standards required ‘...that the school ... operate within the boundaries of legality. In some European countries, for example, certain nomenclatures like “university”, “bachelor” or “master” are protected by the law and are the exclusive domain of state-recognized institutions of higher education’ (Standard 3.2.14 in the *EEAA Manual*, 4<sup>th</sup> Edition 2006, p. 37).

Also, in preparation for this additional representation, the ECTE has conducted an [Institutional Status and Qualification Nomenclature Enquiry](#) amongst accredited institutions to clarify their status in their national contexts and their use of appropriate nomenclature (results summarised in Appendix B). Each institution will report further on these issues in the [2022 Annual Progress Report](#) and be followed up individually by the Accreditation Director within 2022 to ensure compliance to standards A.1.2, B.2.1 and B.5.1. Peer reviewers (VETs) have also been specifically briefed on these issues, with instructions to pay special attention to standards A.1.2, B.2.1 and B.5.1 in upcoming reviews (see [instructional video](#) circulated to all VETs).

A recent example of the stringent application of these standards is found in the February 2022 [Accreditation Commission Decision](#) for the 2022 *Cyclical Review Report of Seminar für biblische Theologie* that resulted in a requirement related to standard B.5.1.<sup>6</sup>

‘The graduation certificate must clearly reflect ECTE’s claims that its accreditation does not serve national degree recognition purposes but is for the purposes of international comparability and quality assurance and development: ECTE does not award academic degrees. The ECTE certificate clearly specifies that “This certificate is not equivalent to an academic degree’ (p.1).

3.3 – Clarified policy. To enhance transparency and compliance to ESG 3.1 for alternative providers, a policy document has been written that provides [Guidelines for Institutional Status and Qualification Nomenclature](#). This policy defines alternative providers, outlines ECTE policy and the duties of alternative providers, prescribes core wording for publicity, provides guidance on the use of qualification nomenclature and defines measures for monitoring transparency. These guidelines have been published, distributed to ECTE accredited institutions and to ECTE VETs.<sup>7</sup>

3.4 – Nomenclature in the ECTE framework. In response to the Committee’s notations, the [ECTE Certification Framework](#) has been reformulated to give prominence to EQF learning opportunity levels 5, 6 and 7 rather than the English nomenclatures ‘certificate’, ‘diploma’, ‘bachelor’ and ‘master’.

3.5 – Review Directory. The ECTE [Review Directory](#)<sup>8</sup> has been updated to include a classification of each provider as either ‘Higher education institution’ or ‘Alternative provider’. The Directory also gives prominence to EQF learning opportunity levels and clarifies the status of national recognition (or not) of qualifications. [Explanatory notes](#) are published with further clarifications.

### 3.3 – General comments

In providing additional representation of our agency’s compliance to ESG 3.1, we wish to respectfully call the attention of the Committee to the comment of the external review panel concerning ‘official recognition’:

‘The panel considers the notion “construed as granting official recognition” misleading. In the field of international accreditation, there has always been the dichotomy of national versus international, professional accreditation. There are several professional accreditation organisations, working on a

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<sup>6</sup> The accreditation of this institution is currently ‘under review’ pending the resolution of this recommendation.

<sup>7</sup> Clarifications about the status of institutions and qualification nomenclature appear in key documents such as [Criteria and Procedures](#), [Guidelines for Site Visits and VETs and Review Report Template](#), [Guidelines for Diploma Supplement](#), and [Guidelines for Programme Design and Using ECTS](#).

<sup>8</sup> The link leads directly to an example in the directory. For the top-level listing of the Review Directory see <http://ecte.eu/reviewdirectory/>

European scale, who are also registered in EQAR, and the ECTE seeks to be one of them.’ (clarification letter by A.H. Flierman, 6 December 2021, p.5).

While not wishing to confuse national accreditation of HEIs with international professional accreditation, this might be an opportunity to consider a broader space and status for educational opportunities arising from cross-border professional accreditation, such that contribute to meeting the Council of Europe’s agenda for widening tertiary or equivalent level qualifications, increasing and widening participation, and improving the quality and relevance of higher education.

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## 4 – Response relative to ESG 3.3 (Independence)

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Concerning compliance to ESG 3.3 the following additional representation is submitted:

- 4.1 - An [Accreditation Commission](#) has been fully functional since January 2022. At the date of writing, the Accreditation Commission has met four times and made accreditation decisions for six reviews.<sup>9</sup> As of January 2022, the ECTE Council has not been involved in any accreditation decisions.
- 4.2 – [Accreditation Commission Policies and Procedures](#) have been produced, approved by the Council and published. These indicate that Accreditation Commission members may not be Visiting Evaluation Team (VET) members (p.4).

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## 5 – Response relative to ESG 3.5 (Resources)

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Concerning compliance to ESG 3.5 the following additional representation is submitted:

- 5.1 – At our General Assembly in March 2022, the budget for staff honoraria was approved to increase from €43.000 (2021) to €88,000 (2022) and €90,600 (2023). This more than doubles our staffing capacity.
- 5.2 – In January 2022 an Accreditation Director was hired to lead the Accreditation Commission. This new position triples the capacity for leadership and management of ECTE accreditation.
- 5.3 - In January 2022 we contracted a Review Secretary Assistant, to aid the current Review Secretary and increase the capacity of handling reviews and site visits. This contracting position doubles our capacity for reviews.
- 5.4 - We no longer rely on volunteer VET-members. As of 2021, all our peer experts receive an honorarium.
- 5.5 - Staff roles have been realigned to match ESG tasks. An overview can be seen in the 2022 [Staff Policy](#).

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<sup>9</sup> <http://ecte.eu/qa/reports/>

## Appendices

### APPENDIX A: SURVEY OF COMPLIANCE TO STATUS AND NOMENCLATURE STANDARDS

A survey of reviews in the last 5 years of compliance to standards A.1.2, B.2.1 and B.5.1 (and matching standard 3.2.14 in the *EEAA Manual*, 2006) produced the following results:

	Compliant	Partially compliant (with recommendation)	Non-compliant (with requirement)
2017	<ul style="list-style-type: none"> <li>• IBEI, Rome</li> <li>• TSA, Wolmersen</li> <li>• BI, Zagreb</li> <li>• CCIS, Beugen</li> <li>• HET-Pro, St Legier</li> <li>• EUNC, Linsengericht</li> <li>• ETS, Osijek</li> </ul>	<ul style="list-style-type: none"> <li>• Bibelscule Brake, Lemgo</li> </ul>	
2018	<ul style="list-style-type: none"> <li>• Union School of Theology</li> <li>• Tilsley College</li> <li>• TSA Adelshofen</li> <li>• Bethlehem Bible College</li> <li>• ISTL Zurich</li> <li>• Seminario Teologico Baptista</li> </ul>		
2019	<ul style="list-style-type: none"> <li>• IBTS Amsterdam</li> <li>• BTA Bergneustadt</li> <li>• ICB Netanya</li> <li>• IBEI Rome</li> </ul>	<ul style="list-style-type: none"> <li>• ABTS Beirut</li> <li>• ISTL Zurich</li> </ul>	
2020	<ul style="list-style-type: none"> <li>• EUNC, Linsengericht</li> <li>• IBTS, Amsterdam</li> </ul>		
2021	<ul style="list-style-type: none"> <li>• ETSC, Cairo</li> <li>• GBC, Pikermi</li> <li>• UETS, Kiev</li> <li>• JETS, Amman</li> <li>• TTS, Badhoevedorp</li> </ul>		<ul style="list-style-type: none"> <li>• SBT, Beatenberg</li> </ul>



## APPENDIX B: RESULTS OF INSTITUTIONAL STATUS AND QUALIFICATION NOMENCLATURE ENQUIRY

An [Institutional Status and Qualification Nomenclature Enquiry](#) was conducted in April-May 2022. Of 33 institutions in the ECTE accreditation processes, information was gathered from 27 institutions within the given time frame. The following table summarises some of the main results:

<b>Questions</b>	<b>Results</b>		
<i>What is your formal status?</i>	HEIs: 5	APs: 20	Atypical: 2 <sup>10</sup>
<i>Have you had other reviews and recognition in addition to ECTE?</i>	Yes: 11	No: 14 (currently applying for HEI status: 2)	
<i>Have you sought local legal advice on status and degree nomenclature?</i>	Yes:8	No:18	Not replied: 1
<i>As alternative providers do you publicly state that ECTE accreditation does not equate with a degree?</i>	Yes: 10	No: 9	Not yet: 1
<i>Are 'bachelor' and 'master' protected terms in your context?</i>	Yes: 16	No: 3	Other: 7

Further information was collected on:

- *What formal wording is used by the local authorities to describe the status of the institution?*
- *What wording is used in publicity?*
- *Links to description of ECTE accreditation and wording used*

### Conclusion

Given the outcomes of this enquiry, the ECTE has defined additional policies and guidelines for the application of standards A.1.2, B.2.1 and B.5.1., and the ECTE Accreditation Commission will follow up with institutions that may be partially compliant to these standards.

All institutions have also been encouraged to further pursue legal advice locally on the use of appropriate nomenclature.

<sup>10</sup> Institutions in contexts with Muslim governments where Christian theology is not considered as a discipline that can be overseen by the government's higher education authorities.