

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

Introduction

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.

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Respectfully submitted on behalf of the ECTE Council,



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1 – Response relative to the scope of the review

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.¹

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

- 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).

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

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

¹ 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.

² 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 1.³

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 1.⁴ 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).

³ 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.

⁴ 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).

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

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*, 2006⁵). 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).

⁵ 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*, 4th 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.5.1.⁶

‘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.⁷

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](#)⁸ 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

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

⁷ 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](#).

⁸ 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.

4 – Response relative to ESG 3.3 (Independence)

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.⁹ 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).

5 – Response relative to ESG 3.5 (Resources)

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](#).

⁹ <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"> • IBEI, Rome • TSA, Wolmersen • BI, Zagreb • CCIS, Beugen • HET-Pro, St Legier • EUNC, Linsengericht • ETS, Osijek 	<ul style="list-style-type: none"> • Bibelscule Brake, Lemgo 	
2018	<ul style="list-style-type: none"> • Union School of Theology • Tilsley College • TSA Adelshofen • Bethlehem Bible College • ISTL Zurich • Seminario Teologico Baptista 		
2019	<ul style="list-style-type: none"> • IBTS Amsterdam • BTA Bergneustadt • ICB Netanya • IBEI Rome 	<ul style="list-style-type: none"> • ABTS Beirut • ISTL Zurich 	
2020	<ul style="list-style-type: none"> • EUNC, Linsengericht • IBTS, Amsterdam 		
2021	<ul style="list-style-type: none"> • ETSC, Cairo • GBC, Pikermi • UETS, Kiev • JETS, Amman • TTS, Badhoevedorp 		<ul style="list-style-type: none"> • SBT, Beatenberg

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:

Questions	Results		
<i>What is your formal status?</i>	HEIs: 5	APs: 20	Atypical: 2 ¹⁰
<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.

¹⁰ 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.