

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

Register Committee

14 March 2022

Ref. RC34/A100

Ver. 1.0

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| Application of: | 2020-09-11 |
| External review report of: | 2021-08-06 |
| Review coordinated by: | Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (ASIIN) |
| Review panel members: | Patrick Becker, Anne Herman Flierman, Anna Klampfer, Martin Prchal, Iring Wasser |
| Decision of: | 2022-03-14 |
| Absented themselves from decision-making: | n/a |
| Attachments: | <ol style="list-style-type: none"> 1. External Review Report, 2021-08-06 (separate file) 2. Applicant's statement, 2021-09-09 3. Request to the Review Panel, 2021-11-15 4. Response by the Review Panel, 2021-12-06 5. Overview of ECTE-accredited institutions |

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 9/11/2020.
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.

Analysis:

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

- *Institutional Accreditation*
- *Programme Accreditation*

Scope of the review

8. 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 in Theology, Diploma in Theology or the Postgraduate Certificate in Theology according to Appendix A of ECTE's Standards and Guidelines (see p. 15 of the review report).

9. 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)”¹.

10. ECTE – in its standards – portrays 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.

11. When applying, ECTE deliberately chose *not* to distinguish between different types of accreditations for different types of organisations or programmes, but submitted the entirety of its accreditations as one single activity to review against the ESG; consistent with that, ECTE did not consider any of its activities as outside the scope of the ESG in its application.

12. 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.

13. 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.

¹ The panel did not specify whether it saw a difference between the “research-orientation” vs the “practice-orientation” variety.

14. 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.

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

16. 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.

17. 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 Register Committee concluded that the review did not 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.

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

ESG 2.1 – Consideration of internal quality assurance

19. 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').

20. 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.

21. 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.

22. 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 actually changed standards in practice.

23. Moreover, the Register Committee underlined that full and coherent attention to ESG Part 1 was particularly crucial given that ECTE accredits a large number of alternative providers (see further under ESG 3.1).

24. 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, in particular ESG 1.2 and the link to the Qualifications Framework for the European Higher Education Area (QF-EHEA) are of crucial importance in the domain of alternative providers.

25. The Register Committee needs 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”.

26. Given the discussion on scope above, the Register Committee has to assume that the review panel either did not analyse whether ECTE’s criteria for Certificate in Theology, Diploma in Theology and Postgraduate Certificate in Theology are correctly aligned with the QF-EHEA, or concluded that the criteria for these programmes do not align with the QF-EHEA and ESG Part 1.

27. As the Register Committee considers the accreditation of such programmes fully pertinent to the application (see above), either option would necessarily lead to a conclusion of non-compliance with ESG 2.1 as well.

28. Moreover, the QF-EHEA 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.

29. Considering the practice-oriented profile in ECTE’s standards for Bachelor and Master programmes, the Register Committee wondered whether these ensure that accredited programmes can be regarded as academic, however professionally-oriented, programmes in the scientific field of theology, or whether some programmes might be purely vocational training programmes for future jobs in evangelical communities.

30. The Register Committee would not consider programmes of a purely vocational nature as aligned to the QF-EHEA.

31. As the review panel did not discuss the different profiles specifically, this issue should also be addressed carefully in any future (focused) review of ECTE.

32. 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.

ESG 3.1 – Activities, policy and processes for quality assurance

33. The Register Committee established that a substantial number of institutions accredited by ECTE are not nationally recognised higher education institutions (hereinafter “alternative providers”); an overview of that analysis is annexed.

34. 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”.

35. 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 or EQF levels 5-8 (see discussion under 2.1 above), the ESG can be considered applicable as a framework for the provider’s quality assurance.

36. 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).

37. 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.

38. 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 other, and might raise false expectations as to the status and recognition of credentials earned from those providers.

39. 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”. Similarly, 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.

40. 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

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formally (nationally) recognised qualifications, and alternative providers must be absolutely clear for stakeholders and the general public.

41. 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 stands, ECTE makes no difference of any sort between recognised higher education institutions and alternative providers.

42. The Register Committee noted that a number of alternative providers accredited by ECTE use 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.

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

44. ECTE’s standards specify 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)

45. It remained unclear to the Committee how stringently these provisions are 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” nor the fact that some of “ECTE’s members cannot or do not want to obtain a national recognition” give clear reassurance that the institutions in question use those terms legally.

46. The Register Committee considered that the unrestricted use by ECTE of the terms “Bachelor” and “Master” for alternative providers significantly reduces transparency and blurs, rather than clarifies these providers’ status. The Register Committee would expect that ECTE standards only permit the use of these terms to providers that are explicitly authorised to use them and award qualifications so named in their jurisdiction, and that ECTE would enforce that stringently.

47. The Register Committee concluded that ECTE’s arrangements do not ensure an adequate level of transparency and clarity of the status of those institutions it accredits. The Register Committee therefore could not follow the panel’s conclusion, but considered that ECTE does not comply with the standard.

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ESG 3.3 – Independence

48. 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.

49. 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.

50. As these changes will only take effect in December 2021 (with the aims of completion by the Spring 2022 Council meeting) the Register Committee followed the review panel’s conclusion that ECTE complies only partially with ESG 3.3.

ESG 3.5 – Resources

51. The Committee noted that ECTE relies to a considerable degree on the contributions of voluntary personnel and that its current human resources amount to a little over 1 Full Time Equivalent.

52. The review panel concludes that the transition from an organization based largely on voluntary contributions to a professionally working accreditation body requires further sustained professional support i.e increasing the staff capacities and further professionalization and extension of ECTE’s accreditation services. the further increase of the ECTE’s expert pool and

53. Taking into account the aspirations and the challenges ahead in the realisation of the Strategic Plan (2021-2027), and the planned revision of ECTE’s structure (the addition of new committee’s and staff), the Register Committee is unable to follow the panel’s conclusion of (substantial) compliance but concludes that ECTE complies only partially with the standard.

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

Conclusion:

55. 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 | Non-compliance |

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|------------|------------------------|---|
| 2.2 | Substantial compliance | Compliance |
| 2.3 | Full compliance | Compliance |
| 2.4 | Substantial compliance | Compliance |
| 2.5 | Full compliance | Compliance |
| 2.6 | Substantial compliance | Compliance |
| 2.7 | Substantial compliance | Compliance |
| 3.1 | Substantial compliance | Non-compliance |
| 3.2 | Full compliance | Compliance |
| 3.3 | Partial compliance | Partial compliance |
| 3.4 | Full compliance | Compliance |
| 3.5 | Substantial compliance | Partial compliance |
| 3.6 | Substantial compliance | Compliance |
| 3.7 | (not expected) | Compliance (by virtue of applying) |

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56. The external review report does not fully correspond to the Tripartite Terms of Reference and therefore does not meet the requirements of §1.14 of the EQAR Procedures for Applications. Moreover, since ECTE does not comply with two standards, the Register Committee was unable to conclude that ECTE complies substantially with the ESG as a whole.

57. The Register Committee therefore intends to reject the application. In accordance with §3.10 of the Procedures for Applications, the Committee deferred the consideration of ECTE's application for registration, pending additional representation by ECTE on the grounds for possible rejection, set out in the present decision.

58. In case of rejection, ECTE would have the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review.

59. ECTE is requested to make additional representation by 20 May 2022 at the latest. ECTE may also withdraw the application before that date according to §3.10 of the Procedures for Applications. If no additional representation is made by that date, ECTE will be deemed to have withdrawn the application.

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 provision¹.

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:

¹ 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 6th 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

Providers accredited by ECTE

This list is illustrative; the important fact is that ECTE accredits both formally, nationally recognised HEIs and alternative providers, the status of individual institutions does not directly affect the decision on ECTE.

| Country | EHEA | Organisation | Inst. Accr. | Cert., Dipl. | Voc. Ba | Ac. Ba | Voc. Ma | Ac. Ma | In DEQAR reference list | Remarks |
|---------------------------------------|------|---|-------------|--------------|---------|--------|---------|--------|-------------------------|---|
| AT | yes | Evangelikale Akademie Osterreich, Vienna (AT) | | X | X | | | | no | applying for accreditation as private HEI |
| CH | yes | Forum Emmaus/Haute Ecole de Théologie, St Legier | | | X | | | | no | |
| CH | yes | International Seminary of Theology and Leadership, Zurich | | | X | | | | no | |
| CH | yes | Seminar für Biblische Theologie Beatenberg, Beatenberg | | | X | | | | no | |
| DE | yes | Akademie für WeltMission, Korntal (DE) | | | | | | | no | |
| DE | yes | BibelStudienKolleg, Ostfildern (DE) | | | X | | | | no | |
| DE | yes | Bible Studien Kolleg, Königsfeld (Ostfildern) (DE) | | | | | | | no | |
| DE | yes | Biblich-Theologische Akademie Wiedenest, Bergneustadt (DE) | X | X | | | | | no, validation | degrees validated by University of South Africa (UNISA) or University of Pretoria |
| DE | yes | Brake Bibelschule, Lemgo (DE) | | | X | | | | no | |
| DE (+ AL, AM, HU, IT, KZ, PT, NL, UA) | yes | European Nazarene College, Linsengericht (DE) | | X | | | | | no | |
| DE | yes | European Theological Seminary, Kniebis (DE) | X | | X | | | | no, validation partial | franchised Masters (Lee University) seem legal, own Bachelor degrees unclear |
| DE | yes | Interkulturelle Theologische Akademie Liebenzeller Mission (DE) | | | | | | | no | |
| DE | yes | Neues Leben Seminar, Wolmersen (DE) – | | | | | | | no | |
| DE | yes | Theologisches Seminar Adelschhofen, Eppingen (DE) | | | X | | | | no, validation | degrees validated by University of South Africa (UNISA) or University of Pretoria |
| DE | yes | Theologisches Seminar Bienenberg, Liestal (DE) | | | | | | | no | |
| DE | yes | Theologisches Seminar Rheinland, Wolmersen | X | X | | X | | | no, validation | degree validated by/franchised from Baptist Theological College of Southern Africa |
| FR | yes | Institut de Theologie Biblique, Bordeaux (FR) | | | | | | | no | |
| GB | yes | Tilsley College, Motherwell (UK) | | X | X | | | | no | accredited by BAC as "small college" (= not HE), but misrepresented on college website |
| GB | yes | Union School of Theology, Bridgend | | X | X | | X | | no, but recognised | reviewed by QAA: https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports/Union-Foundation |
| GR | yes | Greek Bible College, Athens (GR) | | | X | | | | no | |
| HR | yes | Biblijski Institut, Zagreb (HR) | | | X | | | | no | |
| HR | yes | Evangelical Theological Seminar, Osijek | | | | X | | X | yes | https://data.deqar.eu/institution/3947/ |
| IT | yes | Istituto Biblico Evangelico Italiano, Rome | | X | X | | | | no | |
| IT | yes | Istituto Biblico Italiano, Rome | | | | | | | no | |
| NL | yes | Cornerstone Centre for Intercultural Studies, Beugen (NL) | | X | | | | | no | |

| | | | | | | | |
|----------|-----|---|---|---|--|------------------------|--|
| NL | yes | International Baptist Theological Study Centre, Amsterdam | X | | | no, validation partial | some programmes in cooperation with Vrije Universiteit (VU) Amsterdam |
| NL | yes | Tyndale Theological Seminary, Badhoevedorp (NL) | | X | | no, but recognised | accredited by NVAO: https://www.nvao.net/nl/bsluiten/tyndale-theological-seminary |
| PT | yes | Istituto Biblico Portugueseno, Lisbon (PT) | | | | no | |
| PT | yes | Seminário Teológico Baptista, Lisbon | | X | | no | |
| RO (+RU) | yes | Eastern European Bible College, Oradea | | X | | no | |
| SE | yes | Lutheran School of Theology, Götheborg (SE) | | X | | no | |
| SE | yes | Örebro School of Theology, Örebro (SE) | | | | no, but recognised | accredited by UKÄ: https://english.uka.se/facts-about-higher-education-in-sweden/universities-university-colleges-and-other-education-providers/higher-education-institutions-heis.html |
| UA | yes | Ukrainian Evangelical Theological Seminary, Kiev (UA) | X | X | | no | |
| EG | no | Evangelical Theological Seminary in Cairo, Cairo (EG) | | | | | |
| IL | no | Israel College of the Bible, Jerusalem (IL) | | | | | |
| JO | no | Jordan Evangelical Theological Seminary, Amman (JO) | | | | | |
| LB | no | Arab Baptist Theological Seminary, Beirut (LB) | | | | | |
| PS | no | Bethlehem Bible College, Bethlehem (PS) | | | | | |

highlighted: providers accredited under the most recent ECTE accreditation framework