

**EUROPEAN COUNCIL ON CHIROPRACTIC EDUCATION
QUALITY ASSURANCE AND ACCREDITATION COMMITTEE**

APPEALS PANEL APPOINTED EVALUATION TEAM REPORT

MChiro

**AECC UNIVERSITY COLLEGE
(AECC UC)**

SITE VIST - 6th October 2022

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1. EXECUTIVE SUMMARY

- 1.1 In March 2016 the Anglo-European College of Chiropractic was designated a direct HEFCE-funded institution. Subsequently, in May 2016, it was awarded its own Taught Degree Awarding Powers, initially for 5 years but now permanently, and in August 2017 it was granted University College status, with the new name of AECC University College. For the remainder of this report AECC University College will be referred to as the 'University College'.
- 1.2 The University College (<http://www.aecc.ac.uk/>) is now a Higher Education Institution (HEI) operating in accordance with the framework for Higher Education in England. The University College has been assessed by the Office for Students (OfS) as meeting the initial conditions of registration, without conditions, and is on the OfS Register <https://www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/>.
- 1.3 The University College is now made up of three academic schools; the School of Chiropractic, the School of Radiology and the School of Rehabilitation, Sport and Psychology. The School of Chiropractic (SoC) is the largest of the three schools. The SoC is organised into three frameworks for Foundation Studies, Pre-Registration Chiropractic and Postgraduate Studies.
- 1.4 The University College submitted its SSR for reaccreditation with ECCE on the 28th of January 2021.
- 1.5 An Evaluation Report (henceforth referred to as the Report) compiled by the Evaluation Team based on the evidence provided before and during the teleconference visit between the 21st and 23rd of June 2021.
- 1.6 The Chair of the QAAC, Dr. Maria Browning, informed the University College, via a letter dated the 28th of September 2021, that re-accreditation of the Masters in Chiropractic – MChiro (Hons) was confirmed. The accreditation was for a period of 5 years (until June 2026).
- 1.7 On the 13th of December 2021 the University College lodged an appeal against the decision of the ECCE QAAC to accredit their MChiro programme for five years.
- 1.8 A full Appeals Panel was constituted to hear the appeal. The Appeal was not upheld however, the Appeal panel recommended that the University College be given the opportunity to provide more data related to the period leading up to June of 2021.
- 1.9 The QAAC formed a new Evaluation Team. The team was asked to carry out a focused site visit aimed towards re-evaluating Standard 5.1. A date, the 6th of October 2022, and timetable for the related site visit was established (see Appendix I - AECC UC Virtual Site Visit Agenda - 6th of October 2022).
- 1.10 This Report addresses the compliance of the University College's chiropractic programme of study with the ECCE Standards related to issues raised in the Appeal hearing. The outcomes of the Report are as follows:

RECOMMENDATIONS

- That institutional expansion be carefully managed whilst taking into account the perspective of all key stakeholders.
- In the absence of a quantitative decline in academic and support staff, the team strongly recommend a qualitative analysis of the current drivers of student satisfaction be undertaken prior to further growth in student numbers..
- That the input and feedback of students be acknowledged as important in the accreditation process.

AREAS FOR CONCERN

- There were no concerns

2. INTRODUCTION

2. The University College was initially accredited in 1992 and with 2021 came the seventh time they sought accreditation from the ECCE.
- 2.2 The University College submitted its SSR for reaccreditation with ECCE on the 28th of January 2021. The QAAC reviewed the document and decided that an evaluation visit could and should proceed. Due to the COVID-19 pandemic the initial dates for an on-site evaluation visit had to be postponed, but under the circumstances it was agreed to proceed via online conferencing.
- 2.3 An Evaluation Report was compiled by the June 2021 Evaluation Team, based on the evidence provided beforehand and during the virtual on-site visit between the 21st and 23rd of June 2021. The Report was then sent in draft format to the University College for factual verification and its final version was sent to QAAC on the 27th of July 2021.
- 2.4 The Report addresses the compliance of the University College's chiropractic programme of study with each of the ECCE Standards in the provision of chiropractic education and training. The outcomes of the Report was as follows:

COMMENDATIONS

- The strong commitment to research and the continual investment in research outputs.
- The rapid adaption of the University College to COVID-19 related regulations including, the move to online teaching, the creation of student bubbles and the weekly briefing sheets for students.
- The provision of financial support and the use of the Hardship Fund to allow students to secure access to digital resources.
- The support of international students into the programme confers wide recognition of the University College.
- The support of elected student representatives as full members of boards and committees at all levels of the University College.
- The role of Friends of the Clinic enhances the patient voice, advocates for the profession and improves community connectedness.
- The leadership's proactive commitment to continuous staff development.
- The pioneering work in developing as a University College and pursuing RDAP status.

RECOMMENDATIONS

- An audit of staffing needs should be undertaken in the light of the rapid growth of the University College, and the restrictive regulations relating to the COVID-19 pandemic.
- Provide a comprehensive and timely response to student feedback.
- Improve communication channels between academic staff and the clinic team to ensure clear and timely communication to enable procedures to be conducted efficiently.

- Make careful use of peer-feedback to support the proper alignment between teaching activities, assessment and learning outcomes.
- Review the assessment methods to see if it is possible to reduce the weight of formal written summative assessments and augment continuous assessment approaches.
- Any reduction in clinic requirements due to the COVID-19 pandemic should be restored to normal levels as soon as permissible.
- Explore additional innovative ways for the students to gain collaborative competence through inter-professional learning opportunities.
- Provide an adequate and consistent level of case mix for students to ensure they all have a comparable experience.

AREAS FOR CONCERN

- There were no concerns

- 2.5 The Chair of the QAAC, Dr. Maria Browning, informed the University College, via a letter dated the 28th of September 2021, that re-accreditation of the Masters in Chiropractic – MChiro (Hons), was confirmed. The accreditation was for a period of 5 years (until June 2026).
- 2.6 On the 13th of December 2021 the University College lodged an appeal against the decision of the ECCE QAAC to accredit their MChiro programme for five years.
- 2.7 A full Appeals Panel was constituted to hear the appeal. The Chair of the Appeals Panel, Professor Christina Cunliffe, requested additional information from the Chair of the initial Evaluation Team, Philip Davies. Following the Appeal hearing the conclusions and recommendations of the Appeals Panel, made available on the 10th of January 2022, were as follows –

CONCLUSION

1. The specific appeal by AECC UC under 4.3 (b) is not upheld as the institution had a proper opportunity to dispute the facts contained in the draft Evaluation Team Report and did not do so.
 2. Grounds for appeal under 4.3 (a), although not requested by the institution, were considered and not upheld as the proper process was followed.
 3. Grounds for appeal 4.3 (c), although not requested by the institution, were considered and gave rise to sufficient potential mitigation to suggest that fairness would be served by referring the new information contained in the appeal letter from AECC UC to QAAC for them to determine whether or not this might change their decision with regard to the length of accreditation.
 4. The name of the institution should be changed throughout the Final Report to the correct designation, as requested by the institution.
- The Appeal Panel therefore determined that the new information that has come to light concerning staffing for the chiropractic programme should be considered by QAAC to decide whether it changes its previous decision in whole or part, or whether it now becomes a matter to resolve through the process of annual monitoring.

APPEAL PANEL RECOMMENDATIONS

- That institutions that have not been through accreditation or re-accreditation since the regulations were amended are reminded to take more seriously at the response stage any 'partially compliant' in the draft Evaluation Report.
- That institutions are reminded that the input of students has full weight in the accreditation process.

- 2.8 The University College was informed of the above conclusions and recommendations by way of a letter from the ECCE President dated the 13th of January 2022. Further dialogue led to the decision by QAAC to constitute a new Evaluation Team, which was charged with carrying out a site visit, via video conferencing, focused towards evaluating the relevant ECCE Standards and additional data to be supplied by the University College related to the same time frame as the initial Evaluation Report.
- 2.9 In a letter addressed to the ECCE President, dated the 18th of March 2022, the University College provided additional data.

3. COMPLIANCE WITH ECCE STANDARDS

3.1 The following section details the findings of the Evaluation Team with regard to the compliance of the University College with those ECCE Standards deemed relevant to this focused site visit in the provision of chiropractic education and training through the award of MChiro.

3.2 The following three Standards formed the focus of this Evaluation Team's work –

- **4.4.2 Student Intake**
- **4.5.1 Staff and Staff Recruitment**
- **4.9.3 Educational Budget and Resource Allocation**

3.3 The colour coded system outlined below was used by the Evaluation Team to indicate the level of compliance of Standard 5.1 -

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

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

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

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

4. ECCE STANDARDS

4.4.2 Student Intake

The size of student intake must be defined and related to the capacity of the chiropractic institution/programme to provide adequate resources at all stages of the programme.

4.4.2a Description

With the increase in student numbers, appropriate steps have been implemented to maximise staff efficiency using a workload model and systems for supervision for student clinical placement. At that time, June 2021, the University College was seeking to recruit new staff, both academic and clinical, to meet the needs of students.

The overall student population (Full-time Equivalent) had increased from 678.5 in 2019 to 750 in 2020 and then to 825.8 in 2021. Applications to the MChiro programme had increased by 58%, with 180 new enrolments to the course during 2020-21.

4.4.2b Analysis

During the site visit the students expressed that there were difficulties accessing various facilities such as library services. Further, several students felt that they did not have sufficient access to academic staff in 2020/21. Whilst this subjective experience of the students can clearly affect learning, an objective evaluation of library utilization through the booking system at AECC UC demonstrated that facilities were not at capacity. There were clearly issues regarding student experience and a feeling of isolation from academic staff during the Covid-19 pandemic, however the student experience, i.e. insufficient staff relative to the student intake, does not appear to be supported by actual SSR numbers and other metrics.

Staff were able to provide quantitative data, related to academic, tutors and clinic-related staff, that suggested that staffing resources matched student's needs. In providing additional data the University College made reference to the AECC University College Annual Report and Financial Statements (Year ending 31st of July 2021) – (<https://www.aecc.ac.uk/media/10131/annual-report-and-financial-statements-year-ended-31-april-2021.pdf>). The Evaluation Team was provided with evidence and examples suggesting student intake was appropriate relative to staffing resources and that appropriate steps had been implemented to maximise staff efficiency using a workload model and systems for supervision for student clinical placement.

The University College Annual Report and Financial Statements (Year ending 31st of July 2021) stated that the overall undergraduate student satisfaction, one of the institution's non-financial KPI's, had fallen significantly from the year prior. In the year ending 31st of July 2020 the University College had set the target of 90% for

overall undergraduate student satisfaction and had achieved 82%. In 2021 the University College had set the target of 85% for overall undergraduate student satisfaction but had only achieved 54%. In the absence of a quantitative decline in academic and support staff, the team strongly recommend a qualitative analysis of the current drivers of student satisfaction be undertaken prior to further growth in student numbers.

This analysis is used to inform the conclusion for Standard 5.1

4.5.1 Faculty (Staff) Recruitment

The institution/programme must have a faculty recruitment policy which outlines the type, responsibilities and balance of faculty required to deliver the curriculum adequately, including the balance between chiropractic and non-chiropractic faculty, and between full-time and part-time faculty.

4.5.1a Description

The June 2021 Evaluation Team's final Report concluded that there was at that time pressures on all staff as the programme's management, coordination and delivery has had to adapt to rapid growth of the University College in other areas (School of Radiology and the School of Rehabilitation, Sport and Psychology) and to the shifting regulatory goal posts related to the COVID-19 pandemic. The Team Report expressed the hope that there would be fewer cyclical changes to the programme format going forward than there has been in the recent past.

Additionally, the June 2021 Evaluation Team's final report stated that students had expressed concern that the University College had grown rapidly, with the addition of two new schools, but that there had not been a commensurate increase in staff to support existing students and the increased student population. The overall student population had increased from 628 in 2019 to 686 in 2020 – an increase of 8.5% whereas the overall staffing has decreased by 16.8% to 191 from 230 in 2019 primarily in non-academic and clinical areas. The Risk Registry, listed in the Board of Governor's Annual Report and Financial Statement related to the year ending 31st of July 2020, acknowledged that one of its main area that could adversely affect the University College was 'Failure to recruit and maintain well qualified staff and plan for succession'.

As a result, the final Report of the June 2021 Evaluation Team judged that while not currently presenting serious risk, staffing levels present moderate risks which could lead to serious problems over time if not addressed as a priority. It was concluded that the University College partially complied with Standard 5.1

4.5.1b Analysis

Participants representing the University College during the 6th of October 2022 teleconference were the Head of School of Chiropractic and the Head of People and Development. The Evaluation team sort clarification on whether the decrease in Professional Service Staff was likely to have been, at least in part, due to a decrease in support staff that would have impacted and explained the student dissatisfaction documented in the June 2021 Site Visit Interviews and documented in the AECC UC Annual Report for the period ending 31st of July 2021.

The University College staff who participated in this videoconference were unable to provide data nor details concerning the change to Professional Service Staff. Nor were they able to answer whether the decreases were in areas likely to directly influence the student experience. As a result, the Chair of the Evaluation Team asked if the University College representatives could provide detailed data to try to clarify the situation subsequent to the teleconference. The participants agreed to do so and forwarded the requested data via a communication dated the 14th of October 2022. The data supplied suggested that the reduction in academic staffing, noted in the 2020 Annual Report, represented staff attrition in other areas of the institution. Specifically, the communication states –

In total during this period, the head count of staff reduced by 38. This reduction is largely attributable to a reduction in casual employees (24) and off pay-roll workers (4), a total of 28. These posts are often filled by student workers who would normally have roles ranging from catering support, library assistants, reception staff and ultrasound models. However, during the Covid-19 pandemic, these roles were not required and so with no work for casual employees, these contracts were terminated...

The reduction of 8 staff members grouped under professional services represents employees from across the institution who are not academic staff, researchers, or members of the executive group. During this time there was an increase in Registry staff (which includes Admissions, Course Administration, Timetabling, Quality Assurance, Student Records and Reporting and Access and Participation) from 12 in 2019 to 14 in 2020. There was an increase in Library, Learning Services and Student Services staff (which includes librarians, study support tutors, wellbeing advisors and counsellors) from 9 in 2019 to 11 in 2020...

There was no reduction in staffing within the School of Chiropractic between 2019 and 2020 with 23 academic staff employed throughout. Academic staffing increased in the following academic year to 26 within the School. Therefore, the reduction in academic staffing noted in the 2020 Annual Report represents staff attrition in others areas of the institution.

4.5.1c Conclusion

The University College substantially complies with Standard 5.1

4.9.3 Educational Budget and Resource Allocation

The institution/programme must have a clear line of responsibility and authority for the curriculum and its' resourcing, including remuneration of teaching staff, in order to achieve the overall aims and objectives of the programme.

4.9.3a Description

The University College has a strategic risk management strategy and process, which aims to identify strategic and financial risks within the framework of governance, a defined risk management policy and an underlying control environment. As part of its five-year forecast, the University College has evaluated the minimum liquidity levels needed to ensure that financial and operational control is maintained, included the identification of any future borrowing requirement.

The University College plans to continue to expand and develop its educational portfolio at undergraduate and postgraduate level, focussing on highly relevant and demand-led courses.

4.9.3b Analysis

As stated in the Full Site Evaluation Report of 2021, the global COVID-19 pandemic impacted the University College's financial performance. External income was reduced as a result of clinical services having to close (March to July 2020) and some staff members were placed on furloughed leave and capital investments were delayed. Despite these challenges the University College continues to maintain a strong position with a key strength being that the University College has the financial liquidity to respond to challenges and opportunities.

The University College has a clear line of responsibility and authority for the curriculum and its resourcing, including remuneration of teaching staff, to achieve the overall aims and objectives of the chiropractic programme. The University College has adequate resources to continue in operational existence for the foreseeable future.

There was a question regarding the reduction in staff numbers as reflected in the University College Annual Report, related to the financial year ending 31st July 2020, from the Board of Governors. The document is publicly available on the University College website and on the internet. The Annual Report (pages 15-18), under point 3 titled 'Financial Review' states, quote,

"Total staff headcount for all staff reduced by 16.8%, from 230 in 2019 to 191 in 2020". The Evaluation team member related that the report also states, quote, **"The reduction in staffing costs reflect a fall in staff numbers, principally professional services staff".**

Therefore, one of the prominent questions in the current Evaluation Team's remit was,

'Were the student support services stretched too far as a result of the large expansion of the UC from 1 to 3 schools, which was underway at the time?'

It was clarified that the broad category of **'Professional Services Staff'** includes catering, cleaners and building staff as examples of staff in that category that do not have direct impact on the student learning experience. Further examples of staff included in the **'Professional Services Staff'** category included those involved in delivering material related to Continuing Professional Services (to non-UC students), and clinic receptionists. A request was made that the University College provide a more granular break down of the data pertaining to the staff category in question.

Subsequent to the Site Evaluation, the University College forwarded the requested data highlighting the areas from which staff reductions were made. The data supplied clarified that the reduction in staffing numbers, noted in the 2020 Annual Report, represented staff attrition in other areas of the institution that would not directly influence delivery of academic services. In particular this included students employed casually, post-graduate course delivery academic staff and catering. These were all positions not utilized during the Covid-19 pandemic.

This analysis is used to inform the conclusion for Standard 5.1

RECOMMENDATIONS

- That institutional expansion be carefully managed whilst taking into account the perspective of all key stakeholders.
- In the absence of a quantitative decline in academic and support staff, the team strongly recommend a qualitative analysis of the current drivers of student satisfaction be undertaken prior to further growth in student numbers.
- That the input and feedback of students be acknowledged as important in the accreditation process.

AREAS FOR CONCERN

- There were no concerns

APPENDIX I – VIRTUAL SITE VISIT AGENDA

AECC UC Virtual Site Visit Agenda

6th of October 2022

Thursday 6 th Oct 2022	Main Focus	Personnel Required	Lead Team member(s)	Standards
8:30-9:00	Prep meeting		AW, TR	
9:00-9:30	Programme Management	Senior managers	AW, TR	9. Governance and Administration 9.3 as it pertains to 4.2 and 5.1
9:35-10:05	Student support and representation	Admissions officer Student Support Services, student representation	TR, AW	4 Students 4.1, 4.2, 4.3 as they pertain to 5.1
10:05-10.30	Break			
10:30-11.00	Staff Recruitment and Development	HR representatives & HR manager,	AW, TR	5 Academic and Clinical Faculty 5.1
11:00-11:15	Close Site Visit meeting	Senior managers	TR, AW	
11:20-12:00	AW and TR Meet to finalize Report	N/A	TR & AW	