

# **Access to Higher Education**

Open College Network  
South East Region

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**MAY 2009**

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## Foreword

1 The Quality Assurance Agency for Higher Education (QAA) is responsible for the recognition of Access to Higher Education (HE) courses. QAA exercises this responsibility through a national network of Access validating agencies (AVAs) which are licensed by QAA to recognise individual Access to HE courses, and to award Access to HE qualifications to students. The AVAs are responsible for implementing quality assurance arrangements in relation to the quality of Access to HE provision and the standards of student achievement. QAA has developed a scheme for the licensing and review of AVAs, the principles and processes of which are described in the *QAA Recognition Scheme for Access to HE in England, Wales and Northern Ireland*. The Recognition Scheme is regulated and administered by the Access Recognition and Licensing Committee (ARLC), a committee of QAA's Board of Directors.

2 The ARLC is responsible for overseeing the processes of AVA licensing and periodic review and relicensing. The criteria applied by the ARLC and by review teams operating on the Committee's behalf, in reaching judgements about whether and under what terms an AVA licence should be confirmed or renewed, are provided within the Recognition Scheme documentation. These criteria are grouped under the four principles that provide the main section headings of this report.

3 Following an AVA review, a member of the review team presents the team's report to the ARLC. The Committee then makes one of four decisions:

- **unconditional confirmation** of renewal of licence for a specified period
- **conditional confirmation** of licence with conditions to be met by a specified date
- **provisional confirmation** of licence with conditions to be met and a further review visit by a specified date
- **withdrawal** of licence for operation as an AVA.

4 This is a report on the review for Open College Network South East Region (OCNSER). QAA is grateful to OCNSER and to those who participated in the review for the willing cooperation provided to the review team.

## The review process

5 The review was conducted in accordance with the process detailed in the *QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland*. The preparation for the event included an initial meeting between OCNSER representatives and QAA's Assistant Director to discuss the requirements for the Overview Document (the Overview) and the process of the event; the preparation and submission by OCNSER of its Overview, together with a selection of supporting documentation; a meeting of the review team to discuss the Overview and supporting documentation and to establish the main themes and confirm the programme for the review; and negotiations between QAA and OCNSER to finalise other arrangements for the review.

6 The review visit took place on 12 to 14 May 2009. The visit to OCNSER consisted principally of meetings with representatives of OCNSER, including AVA officers; members of the Board; the Access Quality and Development Committee; and moderators for Access to HE programmes; and Access to HE coordinators.

7 The review team consisted of Professor Reginald Davis, Mrs Sally Powell and Mr Harvey Woolf. The review was coordinated for QAA by Mr Matthew Cott, Assistant Director.

## The AVA context

### Background and developments since the 2006 licence application

8 OCNSER came into existence on 1 August 2005 and is the product of a merger between Surrey and Region OCN (SROCN), Kent and Medway OCN (OCNKM), and OCN Hampshire, Isle of Wight and Sussex (OCNHIS). The three OCNs formally merged in July 2006. OCNKM and OCNHIS were AVAs and SROCN was not

an AVA. The new AVA's provisional licence was granted in January 2007.

9 The AVA's area of operation is coterminous with the Government Office for the South East. In the broader south-eastern area, OCNSER has three neighbouring AVAs. OCNSER has attracted members from all of these AVA regions and from an AVA that operates nationally.

10 The review team was informed that, since the granting of the provisional licence, resolving the OCNSER's financial problems and attending to the associated legal problems has occupied the AVA's attention. The Board of Trustees (the Board), working closely with the AVA's senior management, decided to implement a rigorous cost-cutting regime. The consequences of this decision included staff redundancies; reducing the number of offices from three to two (in Addlestone and Canterbury), and instituting home working for a number of staff. During 2007-08 OCNSER established the AVA as a separate cost centre in the organisation; created a dedicated Access Customer Support Team; and concentrated all of the Access to HE administration at the Canterbury office.

11 According to the AVA's January 2009 data, Access to HE represented 13.8 per cent of the OCN's total learner registrations.

### **Membership and provision**

12 At the time of the review, OCNSER's membership comprised 28 Access to HE providers and 11 HE institutions (HEIs). Providers are distributed across the region, with eight in Kent, seven in each of Hampshire and Sussex, two in each of Berkshire and Surrey, and one in each of London and Oxfordshire. The HEIs are drawn from Buckinghamshire, Kent, London, Oxfordshire, Surrey and Sussex.

13 As of 2008-09, the two largest subject categories covered by the AVA's Access to HE courses were health (31 per cent) and humanities and social sciences (30 per cent). The next largest subject category was education/teaching.

### **AVA statistics 2007-08**

14 The AVA reported the following statistics in its annual report to QAA for 2007-08:

Providers offering Access to HE awards	23
Access to HE awards available	89
Access to HE awards running	78
Access to HE student registrations	2,159
Access to HE certificates awarded	1,202

### **Principle 1**

**The organisation has governance structures which enable it to meet its legal and public obligations, to render it appropriately accountable, and to allow it to discharge its AVA responsibilities securely**

#### **Constitution and legal identity**

15 OCNSER is a fully independent, legally constituted company, which is responsible to its members. Its formal constitution and modus operandi are contained in its Memorandum and Articles of Association. These are supplemented by a very useful, user-friendly Company Handbook. The primary audience for the Handbook is the Chair and members of the Board of Trustees, members of the various committees established by the Board and the officers of the OCN. The above documents provide details of the legal identity, aims, function, structures, membership and liabilities of the OCN. It specifies that members are entitled to send a representative to the annual general meeting and to elect the Board of Trustees.

16 The OCN is a company limited by guarantee and has charitable status. The Memorandum and Articles of Association, and the status as a limited company, limit the legal liability of OCNSER's members and their representatives.

17 The governance structure ensures an appropriate level of accountability. The National Open College Network (NOCN) and QAA licences set the framework within which the OCN and the AVA operate. Apart from these,

since OCN SER is an independent company with its own Board of Trustees, there are no restrictions on its decision-making or on the operation of the AVA.

## Membership

18 The AVA is a membership organisation with all members having voting rights. At the time of the review, of the 39 members, 28 were Access to HE providers (these were made up of 22 further education colleges, four HEIs and two sixth-form colleges) and 11 were receiving HEIs. Membership is open to institutions and organisations based broadly within the geographical boundaries of the Government Office of the South East.

19 There are defined processes for gaining and terminating membership. Members' rights and responsibilities are also clearly laid out. The review team met representatives of a range of members and recognised their commitment to Access to HE and to the work of the AVA. However, there did appear to be some lack of clarity about how membership may be achieved in practice. Indeed, it was suggested to the team that an invitation to an individual to join the Board automatically conferred membership on the organisation employing that individual. The team therefore recommends that the AVA ensures that there is clarity among all stakeholders regarding the processes for admitting new members to the organisation.

## Governance

20 The Board of Trustees is the locus of authority for operation of the AVA and for maintaining its approval by QAA. The Handbook contains a detailed code of conduct and duties of trustees. It is made clear to trustees that they must act in the best interests of the OCN and exercise independent judgement. On joining the Board, they are required to declare any relevant interests in the trustees' register of interests. The AVA acknowledged that currently the register is not updated on a regular basis, although trustees are expected to declare any conflict of interests

during Board meetings. The review team considered that annual updating of the register would be in the best interests of good governance. The team therefore recommends that the AVA puts in place a process by which conflicts of interest can be updated on an annual basis.

21 The terms of reference of the Board are clear and detailed. The Board consists of a maximum of 12 members, nominated by member organisations or by existing Board members. In seeking members, the aim is to look for those reflecting the geographical spread of the OCN, a cross-section of stakeholders in its activities and a balance of skills. The review team noted that the Board has strong involvement from higher education, including two vice-chancellors, one of whom is the Chair, and a deputy vice-chancellor. No more than 50 per cent of the membership can be drawn from any individual stakeholder or group of stakeholders, thereby avoiding undue influence or bias. However, it seemed to the team that with a quorum of four, this possibility is not entirely excluded and the Board may therefore wish to consider this matter further. Retiring trustees can be re-elected to the Board, without limit on the total number of terms they may serve. The team recognised that retaining trustees over a longer period can bring benefits of continuity and experience and that, on occasion, it may prove difficult to find suitable replacements. However, in the interests of effective governance, the team recommends the AVA limits the number of times a trustee may be re-elected.

22 During 2008-09, the Board and its committee concerned with AVA matters, the Access Quality and Development Committee (AQDC), have been carrying out a self-assessment of their functions. At the time of the review, the AVA was still in the process of receiving responses from members of the Board and AQDC. The AVA anticipated that analysis of the self-assessment would be available for the Board meeting to be held in June 2009, and that it would be considered alongside the draft strategic plan for the period 2009-10 to 2012-13.

23 The OCN is required by its articles to hold an annual general meeting (AGM). However, these have drawn limited attendance and proved of little value in engaging with the membership. As a result of this, and in line with new guidance from the Charities Commission and Companies House, at the time of the review, the Board was in the process of removing this requirement for an AGM. However, after discussions with officers and Board members, the review team did not gain the impression that a well formulated plan was evolving for protecting the rights of members in the absence of an AGM. In the team's view, the retention of the opportunity for members to convene an extraordinary general meeting (EGM) was insufficient. It is therefore a condition of licence that, as a consequence of the cessation of AGMs, the AVA establishes an effective mechanism for canvassing and responding to the views and opinions of member organisations in addition to the opportunity for members to convene an EGM.

### **Committee structure**

24 The Board delegates a number of key responsibilities to its committees. These are the Remuneration Committee, AQDC and the Quality Committee. The latter two committees function entirely separately, with the Quality Committee overseeing all elements of quality relating to activity undertaken under the NOCN licence, and AQDC overseeing all quality and development issues relating to Access to HE activity undertaken under the QAA licence.

25 AQDC is required to oversee production of the annual review to QAA, approve validations of programmes, monitor annual reports of providers, exercise delegated authority for the award of the Access to HE Diploma and monitor and give guidance to the work of the Access Practitioners Group (APG). It is also required to play a significant role in the strategic planning process and promote the exchange of good practice between providers. AQDC also has a role in the appointment of moderators (see paragraph 72).

26 The membership of AQDC, with a maximum of 12, consisted, at the time of the review, of eight members. The quorum for the Committee is five, including the Chair, and of these at least one must be from higher education and one from further education. Members come from a diverse profile of providers with extensive experience of Access to HE provision, together with representatives of Aimhigher and lifelong learning networks. The directors of admissions from two HEIs are also members. The Committee meets regularly and, in the early years of the AVA's existence, attendance by members was satisfactory. However, at the time of the review, two of the last three meetings had not reached quorum. In its Overview, the AVA signalled its concern with this and indicated that the self-assessment process (see paragraph 22) was expected to act as one element of a strategy to develop AQDC meetings. There is an intention to make the meetings more interesting and appealing to members, while ensuring that the key governance and oversight roles are properly discharged. During the visit, the review team did not gain an insight into how the AVA expected to achieve this. The team formed the view that this should be an important feature of the strategic review and planning process.

27 The agendas of AQDC are wide ranging and ensure that both strategic and operational issues are fully considered. The review team concurred with the view of Board members and members of AQDC that the Committee fully discharges its role in monitoring the quality and standards of the Access to HE provision. However, there was less evidence of activity relating to its developmental remit. The team agreed with Board members who believe this element needs strengthening. While the Committee receives feedback from officers on developmental aspects of the AVA's work such as sharing good practice among providers, the team found little evidence of initiatives originating with the Committee, or involvement of members in guiding the work of the Access Practitioners Group. The AVA is conscious of a number of areas where the operation of AQDC could be improved. The team agreed with this,

and also formed the view that increased engagement in areas of development could help with the attendance issues noted above. The team therefore recommends that the AVA reviews the remit and operation of AQDC.

28 The OCN has no specialist committee concerned with finance, business development or personnel matters. The review team queried this in discussion with senior officers and with Board members, particularly in light of the serious financial concerns the OCN had dealt with during 2006 to 2008 (see paragraph 10). Because of the importance of decisions relating to such matters to the entire future of the OCN, it was felt that the whole Board should remain fully engaged with all financial, business development and personnel issues. The team endorsed this approach and noted the view of Board members and officers that the establishment of a specialist committee might well be a natural consequence of governance and management of the restructured organisation, as it matured and grew.

29 Members of both the Board and AQDC received comprehensive induction briefings when they took up their roles. Although ongoing training has not been considered a priority for either body, members expected the self-assessment process to identify any needs in this regard. The review team noted that AQDC had recently engaged in a valuable updating on the topic of plagiarism, led by one of its members.

30 Following separate meetings with senior officers, Board members and members of AQDC, the review team recognised their shared values and commitment to the work of the AVA. The desire of all three groups to support students in their efforts to gain entry to higher education, as well as their recognition of the importance of the standard of the Access to HE award and the enhancement of quality among providers was clearly evident. Board and AQDC members have been fully engaged in supporting the management of OCNSER during recent difficulties relating to the financial health of the organisation. The AVA is commended for the close coordination between the Board, AQDC and the management team.

## **Principle 2**

### **The organisation is able to manage its AVA responsibilities effectively, and to maintain an appropriate structure to support them**

#### **Financial regulation and management**

31 The financial regulations of Open College Network South East Region (OCNSER) are clearly laid down in the Memorandum and Articles of Association. These, together with the Company Handbook, provide the context within which trustees and officers operate to ensure sound financial management. An externally audited set of accounts is produced annually, and is made available to the members and lodged with Companies House and the Charity Commission.

32 OCNSER began by operating a unified budget for both Open College Network (OCN) and AVA work, and the accounts for 2006-07 showed a small surplus with a strong income stream from Access to HE activities. 2007-08 proved to be a difficult year for the OCN as learner registrations for OCN activity continued to decline. Registration of Access to HE students remained relatively stable, although income was less than had been budgeted. As a result of the financial position, the Board was required to approve a reduction in expenditure during the year as a response to the projected reduction in income. A redundancy programme was instituted in the latter part of the financial year which resulted in an overall reduction in expenditure of almost 25 per cent of the budget, despite which the company recorded a deficit for the year.

33 Maintaining the integrity of the AVA licence was viewed as a priority in this cost-cutting exercise and the AVA's operation was both secured and strengthened by creation of dedicated Access to HE functions. It is the view of the review team that the actions of the management and board were appropriate, given the circumstances. The team also agreed that the budget set for 2008-09 was a realistic response to historic out-turns and likely future patterns of activity. For the 2008-09 financial

year, AVA activities have been identified separately and recorded as a separate cost centre. This has allowed the financial performance of the Access to HE activity to be identified much more clearly.

34 Since 2007-08, OCNSER has improved the financial information it produces. A more sophisticated profiling of income and expenditure has provided the management team and the Board with a more accurate picture of financial performance. Officers' abilities to project and monitor cashflow have been improved and efforts are being made to reduce aged debtors and encourage prompt payments by customers. The finance team has been restructured, with one member now responsible for providing detailed financial information on a regular basis. The Director of Quality and Operations has responsibility for AVA finance at an operational level, with the Chief Executive taking on a close financial monitoring role. The AVA has purchased a new database dedicated to Access to HE activity and known as the Access Validating Agency Database (AVAD). This has improved flexibility, allowing the AVA to implement budgetary changes to meet changing requirements.

35 The Board and officers have engaged in a detailed consideration of the options available following the financial downturn of the OCN. The review team endorsed the view that a series of robust financial measures had been taken which should secure the financial stability of the OCN. The team also applauded the steps taken to identify separately the income and costs of the AVA, and recognised the realistic view of the senior officers that it would require up to two further years of development of this approach to definitively account separately for both expenditure and income.

### **Offices and staffing**

36 During 2007-08, it became apparent that the dispersal of administrative functions for Access to HE work between offices in Addlestone, Surrey and Canterbury was creating unnecessary difficulties. Moderation was administered from Addlestone and learner

registration and certification divided between the two offices based on the geographical distribution of providers. Communications and marketing for Access to HE and line management of the team of business development managers (BDM), supporting both AVA and OCN functions, were located in Canterbury. As part of the plan to deal with the financial downturn and in order to improve support for Access to HE activities, staffing structures and locations have been reorganised. This led to the creation of a dedicated Access Customer Support Team (ACST), which is located in Canterbury. This is the main point of contact for all Access to HE enquiries and functions.

37 The OCN continues to operate a team of BDMs, which contains one person acting as Lead BDM for Access to HE. The other five BDMs are assigned to providers on a geographical basis and provide local support for both AVA and OCN activities. The Director of Access acts as line manager for the ACST and the Lead BDM for Access to HE, while the other BDMs are accountable to him or her for their Access to HE work. Full-time equivalent (FTE) staff dedicated to Access to HE work amounts to 3.6, not including the contribution of the five BDMs. The post of Lead BDM for Access to HE has recently been increased from 0.6 to 0.8 FTE. This is, in part, a response to the recognition that grading of the Access to HE qualification will require the AVA to provide more support to both providers and receivers.

38 The core Access to HE team consisting of the Director of Access, the ACST and the Lead BDM for Access to HE meet regularly with the Chief Executive to monitor and develop support for Access to HE work. The review team viewed this as a sound administrative structure, furnishing a strong support base for providers, moderators and receivers. Indeed, the team was told by a range of stakeholders, including coordinators of Access to HE programmes and moderators, how much they valued the interaction with and support of the ACST, the Lead BDM for Access and the Director of Access. They have found that their queries and

concerns always received measured, supportive and helpful responses. The AVA is commended for the establishment of this dedicated Access to HE team that has clear leadership and which is providing a high level of service to providers, receivers and moderators.

39 OCNSER has formulated a staff training and development policy. All new staff receive induction training and all staff engage in the annual staff review system. The latter identifies development needs for individuals and these have been supported by the company. There have also been a number of development days for the whole staff team.

### **Strategic and operational planning**

40 Strategic planning for the AVA, covering the period 2006-07 to 2008-09, was undertaken as part of the creation of the wider OCNSER business and strategic plan. At the time of this review, the AVA was preparing to develop its new three-year plan, a draft of which was due to be presented to the Board in June 2009. In preparation for development of this plan, the AVA has engaged in a consultation process with stakeholders. This invited comments on the draft strategic aims and scoring of draft strategic priorities.

41 The AVA has broadly met the key strategic aims of the 2006-09 plan. Based on its strategic aims, the OCN produces an annual operational plan. The most recent completed planning period is 2007-08. Most of the objectives set for the AVA had been achieved, with the remainder being carried forward. Both the Board and AQDC monitor the annual operational plan.

42 The AVA also produces a second annual plan, the Access to HE Quality Action Plan. The contents of this plan are derived from actions identified during preparation of the annual self-evaluation report for QAA, and a variety of other sources including, external moderation reports, feedback from BDMs and other staff, and feedback from providers and other stakeholders. This plan is monitored by AQDC. The AVA has recognised that there are elements

of overlap between these two annual plans. AQDC has considered whether to continue with this approach or to merge the two plans. A third possibility was to define actions in the plans more strictly, such that only issues with a specific quality dimension are contained in the Access to HE quality action plan, with others residing in the operational plan. AQDC expects to receive officers' recommendations at its meeting in June 2009. The review team came to the view that the AVA's planning and monitoring processes are sound. The team also considers the AVA to be committed to its own development and to be largely successful in achieving its planning targets. However, the team considered that the AVA's agenda might be somewhat over-ambitious and that there is a need to focus on key priorities.

### **Self-assessment and risk assessment**

43 The AVA currently carries out its self-assessment as an ongoing process, which both prepares for, and subsequently follows up, the outcomes of the annual self-evaluation report for QAA. In doing so, it uses the OCN's annual operational plan, which is monitored using a three-component 'traffic-light' risk assessment of each aim. This highlights whether any aim is on-target or complete (green), facing some slippage but under control (amber) or unlikely to be met (red). As a consequence of the move to separate operation of the AVA and NOCN licences, it became evident to the officers and the Board that it was necessary to identify specific components of the self-assessment process relating to the AVA, and to carry out a separate risk assessment. Accordingly, the Board has required the officers to produce a risk-assessment methodology in order to secure the operation of the QAA licence. It is intended that risk criteria will be developed covering physical and human resources; financial health; quality of the provision; and standard of the award. At the time of the review, the review team was not convinced that there had been progress in establishing the risk-assessment methodology of choice. The team was unconvinced that a proposal would be developed within the planned timescale for the Board meeting to be

held in June 2009. In the light of the recent financial concerns, the OCNSER has faced and the move to separately account for the operation of the AVA, the team recommends that the AVA creates an explicit system of risk assessment and monitoring for its AVA business, as a matter of urgency.

### **Published operational procedures**

44 The AVA provides clear procedures and guidelines for staff, providers and moderators, covering learner registration, programme development, certification, moderation, accreditation of prior learning, appeals, complaints and the mitigation process.

45 The Centre Handbook is a useful, succinct document, which outlines the areas that a provider needs to be aware of when operating an Access to HE programme. There is separate guidance on centre recognition and detailed guidelines to support the completion of the centre recognition document. The Quality and Moderation Handbook is comprehensive. Although primarily aimed at supporting moderation, it is also useful to providers. Again it is succinct and contains useful appendices that provide annual checklists for both moderators and centres, a list of key quality and moderation documents and a summary of the external moderation processes. Documentation supporting validation is also comprehensive. As well as providing a guide to designing Access to HE courses, there are comprehensive guidelines for the AVA's business development managers to guide them in supporting a centre's validation submission. The criteria and guidance for validation panels for approval of programmes are also comprehensive and user-friendly.

46 OCNSER has a clear equal opportunities policy. It also has separate complaints and appeals procedures for staff, consultants and others employed by the company and for customers of the AVA (including students). The AVA is commended for its clear and readable documentation, including its guidance for quality assurance procedures.

### **Data recording**

47 The AVA has recently been engaged in a key development in replacing the functions of its OPUS database with a database dedicated to Access provision, AVAD. The new database is owned by OCNSER, is based upon a widely available commercial database platform and comes complete with its source code. This allows AVA staff to update the system if required. The functionality of AVAD is currently meeting all the core requirements of the QAA licence. The AVA is engaged in enhancement of the system which will, for example, allow tracking of students after they have completed their Access to HE qualification, thereby yielding enhanced feedback on their experiences, and progress both as Access to HE students and during their HE programmes. This additional means of accessing the 'student voice' will supplement information made available to the AVA from providers' student satisfaction surveys.

### **Communications with stakeholders**

48 OCNSER covers eight counties in south-east England and this encompasses a number of major population centres including Milton Keynes in the north, Portsmouth and Southampton in the south-west, Oxford in the west and the Medway towns and Brighton in the east. As a result, face-to-face meetings are extremely resource-intensive and can be poorly attended. Cross-country transport links in the south-east also exacerbate the situation. For this reason, essential meetings of, for example, the Board and AQDC are usually held in central London. Furthermore, the AVA's offices are located in Surrey and Kent and a number of the officers, particularly the BDM's, work from home. For these reasons, the AVA is developing an information and communications technology-based communications strategy.

49 The dispersed officer team and office bases now make extensive use of Skype video and audio contact. They, as well as a range of other stakeholders, also make use of BT Workspace and email to carry out much of the AVA's business. BT Workspace for OCNSER

Access to HE centres is structured so that each provider has access to an exclusive secure online area, where they can access copies of their definitive course documentation, upload draft validation papers, learner registrations, and so forth. They can also communicate and share information with their external moderator. Use of this facility is still developing and it is expected that it will support calendars, events, project tasks and conversations. In discussions with stakeholders, the review team found that programme coordinators and moderators were all familiar with it and while some complained of its current slowness, all believed it should develop into a useful communication tool. The AVA was planning a full evaluation of BT Workspace before the end of the 2008-09 academic year.

50 The AVA also provides much material for stakeholders on its Access to HE web pages, such as policies, templates and news bulletins. This is accessible to all staff, tutors, moderators and others. There is also an online repository containing example units to support the development of new provision and an area solely for the use of external moderators.

51 The AVA hosts an annual conference, which coordinators reported to be a useful mix of training and discussion of wider issues. Additionally, Access Practitioner Group (APG) meetings are now held on a subregional basis and this has led to an increase in attendance among programme coordinators and moderators, who find them useful forums. The AVA and the Association of South-East Colleges also co-facilitate regular meetings of the Access Managers' Forum.

52 The AVA regularly produces an Access bulletin in both paper and electronic versions. These focus on specific Access to HE issues, news and events. Access to HE coordinators reported to the review team that they found the bulletins a useful means of alerting teaching teams to Access to HE issues.

53 The AVA reported that it has not yet put in place a system for regular monitoring of providers' promotional material and

programme handbooks. The review team noted inaccuracies in some providers' publicity materials. Given the importance of this material to potential applicants, those following Access to HE courses and the reputation of the wider Access to HE provision, it is a condition of licence that the AVA puts in place a process by which it can verify the accuracy of providers' promotional literature and information and guidance to students.

### **Principle 3**

**The organisation is able to assure the quality and fitness for purpose of Access to HE programmes at the point at which they are granted formal approval, and to have effective means to develop, evaluate and review the Access to HE provision for which it has responsibility**

#### **Programme development and validation**

54 Providers informed the review team that they valued the high degree of personal support available from AVA officers in respect of programme development and validation activity which had been sustained through the organisational changes of the AVA, the relocation of offices and transfer of some personnel to home working. This support complements the comprehensive set of guidance documents and templates available for providers. The principal document, required for validation and revalidation is the Access to HE Diploma Recognition document which includes a checklist for fulfilment of standard requirements, covering conditions such as programmes only being recognised if delivered in the UK. Publicity materials from providers are checked at validation but, as already noted (see paragraph 53), there was currently no mechanism in place for subsequent checking.

55 Revalidation only differs from validation in that a review of the provision to date is required, in addition to the standard validation documentation. It is customary for a revalidation to be undertaken before the expiry

of the usual five-year approval term, in order to allow continuation of the programme without interruption.

56 The Access Quality and Development Committee (AQDC) is the body responsible for approving the recommendations of validation panels and oversees the sign-off of validation conditions. The review team was satisfied that the Committee was fulfilling its responsibilities for overseeing validation activity but, as noted already (see paragraph 26), achieving quoracy had been challenging in the past year. Among the AVA's attempts to address this was the use of BT Workspace between, and in preparation for, meetings through circulation of papers relating to validations. Improvements were also being made to the written record of AQDC meetings.

57 Where programmes have transferred in from other AVAs, the documentation prepared for the original recognition process has been utilised, the reasons for which were appreciated by the review team. It was not, however, clear that all appropriate steps in the signing-off process had been undertaken by AQDC or the Board of Trustees or officers of the AVA. Evidence of the written record of some officers' approval visits to applicant centres was not available to the team. The team formed the view that a clear, auditable trail of the approval process undertaken for provision which has transferred from other AVAs should be available. It is therefore a condition of licence that the AVA develops a protocol for the transferral of programmes from other AVAs, to ensure appropriate scrutiny and formal reporting to AQDC.

58 The review team saw evidence of the careful scrutiny of materials at validation events, but noted variations in the conduct of panels and their composition. The team learnt that an evaluation of validation panels was currently in progress. The comments of some panel members canvassed in this review suggested that, in some cases, insufficient opportunity had been given to examine thoroughly the extensive programme documentation. The team noted the concerns of panel members regarding the exercise of their responsibilities

in the appropriate preparation for, and conduct of, validation events and formed the view that greater attention to the planning, conduct and administration of validation events would be helpful. It is therefore a condition of licence that the AVA revises its validation and revalidation procedures to ensure sufficient and consistent scrutiny of all submissions.

59 Additionally, the review team noted the AVA's requirement for representatives of the submitting provider to be members of validation panels. The role of these members in the decision-making processes of the panel was not clear to the team. It is therefore a condition of licence that the AVA revises its guidance for validation panels to make clear that representatives of the submitting provider are not involved in making the validation decision.

60 The procedure for making minor amendments to Access to HE Diplomas includes a recently introduced mechanism for introduction of new titles, where these can be shown to be an extension of, or closely associated with, an existing Diploma title already offered by the provider. The Overview stated that such incremental changes are monitored by the relevant BDM, but also acknowledged that there is presently the potential for a provider to make continuous changes to a programme. In agreeing with the AVA on this point, the review team recommends that the AVA specifies the criteria that lead to the requirement of full programme validation, following cumulative modifications.

### **Review of Access to HE provision**

61 The AVA has a systematic process for the annual review of courses, with guidance and a template available to providers. The review team saw some very positive examples of the use of this self-assessment tool, with effective action planning and year-on-year responses. Some examples available to the team were less well utilised and insightful. It was not clear from the documentation whether this inconsistency had been identified by the AVA as a matter requiring some specific attention, either for a given report or as an overarching issue.

The AVA has commented on variability in its annual report to QAA and is working to achieve greater consistency, for example through its use of guidance notes for providers. The team recommends that the AVA ensures the consistent quality of, and effective action planning arising from, annual self-assessment reports and related documentation.

62 Appropriate data and accompanying analysis are included in annual review reports. The quality of available data has improved since the introduction of the Access Validating Agency Database system. The AVA expects that this should resolve some of the difficulties experienced by providers in previous years.

63 The AVA has sought to protect the interests of continuing students during the transfer of responsibilities from one AVA to another. The findings of providers' student feedback mechanisms are included in the annual review template and the AVA is considering ways in which to improve its awareness of the student voice.

64 The review team was informed by representatives of receiving HE institutions that the students awarded OCN SER Access to higher education Diplomas were well thought of and appropriately equipped for study within higher education.

### **Promotion and further development of Access to HE provision**

65 The AVA has established a series of networks with providers in the region, to maximise the opportunities for exchange of ideas and information in the promotion and further development of Access to HE. These include regional and subregional meetings of Access Practitioner Groups and the more recently established Access Managers' Forum. The AVA is also establishing a Higher Education Access Network South East, open to staff from all higher education institutions (HEIs) in the region. It was too early for the review team to assess the likely impact of this new network. There are currently strong links with HEIs in the region and, presently, discussions include the

implementation of grading and consequent implications for admission to higher education. Providers and representatives of receiving HEIs told the team that they had been offered the opportunity to comment on the AVA's draft strategic plan.

66 The AVA has taken a pragmatic view to the regional development of Access to HE programmes, with the intention of allowing 'organic' growth to suit local needs in this large geographical region. This has led to the establishment of a bank of common units. Further work in this area is expected to accompany the introduction of grading. The AVA is actively seeking new avenues of Access to HE provision through its links within and on the borders of the region, exploring, for example, the development of Access to HE programmes with a specific vocational focus.

67 A limited amount of staff development for providers, in the form of key conferences and training sessions, has been provided by the AVA, but resource constraints have meant that this aspect of the promotion of Access to HE has, of necessity, had to be limited in recent months.

## **Principle 4**

### **The organisation is able to secure the standards of achievement of students awarded the Access to HE Diploma**

#### **The moderation process**

68 Until the current academic year, the AVA has operated a single external moderation system for all its provision. However, with the recruitment of a provider from another AVA that uses a different model and the introduction of grading in 2009-10, the AVA decided to run a pilot to explore the benefits and disadvantages of a two-tier system of lead and subject moderator. The pilot will be evaluated during 2009-10 and a decision taken in the light of the evaluation; whether to implement a new model across all centres, to have a mixed economy depending on local needs or to maintain the present process.

The review team endorsed this prudent, pragmatic approach to revising a well-established and well-understood system.

69 Under the existing system, individual moderators are allocated centres to moderate Diploma titles relevant to the moderator's expertise. Where there are a number of cognate titles, a single moderator is responsible for all the titles. Moderators' roles and responsibilities are specified in the comprehensive, lucid and accessible Access Quality & Moderation Handbook. The moderators the review team met were clear that their primary role was to confirm that standards were appropriate for the awards for which they were responsible. Complementing that role, moderators act as 'critical friends' who can 'bring the experience and requirements of higher education' to Access to HE courses.

70 The AVA readily acknowledged that more work was needed to 'develop consistent procedures for the standardisation of student achievement'. Based on the available evidence, including discussions with moderators, AVA officers and coordinators, the review team agreed with the AVA's judgement that, although moderators' reports suggested consistency of standards across all Diplomas, there is currently no systematic means by which that consistency can be assured or demonstrated. The review team heard of the AVA's plans for a series of standardisation activities and recommends that the AVA ensures that all moderators and tutors are actively engaged in its standardisation activities.

71 As part of the moderation process, moderators scrutinise centres' internal moderation (IM) systems. The AVA had identified variability in IM practice across providers as a concern and has asked moderators to report on this aspect of the assessment process in a special appendix to their 2008-09 final reports. The review team considered that the AVA had responded appropriately to this matter.

## Moderators

72 The AVA inherited a cadre of moderators from its predecessor AVAs. New moderators are recruited by advertisements on the OCNSER website and by mailings to centres. The AVA Quality and Moderation Officer checks applications for completeness; the Director of Access confirms the appropriateness of the applicant according to the published criteria, before submitting the nomination for the approval of AQDC. Applicants are required to have familiarity with the aims of Access to HE provision and the needs of students; an understanding of the subject area at an appropriate level, and be free of any conflicts of interest that may compromise their independence. As only appropriate nominees are presented to the Committee, AQDC has never had to reject an applicant. Although AQDC in practice receives recommendations for appointment, the AVA recognised that the Committee's terms of reference do not include the formal approval of moderators. The AVA intends to rectify this omission and to put in place a mechanism, using BT Workspace, by which AQDC members will have access to moderator application forms and will be required to log their decisions on the application. This will allow appointments to be made in real time, rather than having to wait for the next meeting of the Committee.

73 Moderators are appointed to a centre annually, for up to a maximum of four years at any one centre. Each year, moderators receive a detailed contract that sets out the terms and conditions of their employment, including the grounds on which the contract can be terminated. The present contract has, however, omitted the prohibition on the subcontracting of duties. It is therefore a condition of licence that the AVA explicitly prohibits any subcontracting of moderator duties in its moderator contract.

74 From its consideration of the AVA's recruitment and selection processes, the review team concluded that the AVA had a sufficient pool of experienced, expert and independent moderators to ensure that all its validated

programmes could be properly externally moderated.

### **Support and reporting arrangements**

75 The moderators who met the review team commented that they felt well supported by the AVA. In addition to the Handbook, they receive regular briefings and updates, all of which were described as 'personalised, friendly and engaging'. Moderators praised the informed and efficient way in which AVA staff dealt with their enquiries. All moderators have some form of induction, or if required, updating, from AVA officers and are expected to attend at least one moderator forum every three years. The AVA is conscious that its continuing support for moderators needs further development. In particular, it intends to introduce a self-study pack and to extend the pack to an e-version, using a virtual learning environment. The draft of the pack seen by the team is well conceived, challenging and thoughtfully presented. When expanding its support for moderators, the AVA may also wish to consider how it can best provide for those who moderate subjects that are offered at just one centre.

76 The annual Evaluative report of Access to HE moderation practice contains a brief evaluation of the overall quality of moderators' reports and providers can comment informally to the AVA on their moderators. However, there is no systematic process through which providers can evaluate moderators' performance and, in turn, the AVA can feed back to moderators about the quality of their service to the AVA. In order to develop this aspect of its provision, the review team recommends that the AVA introduces a formal process for providers to give feedback on moderators' performance.

77 Moderators are given detailed and well-designed information about their initial and final reporting responsibilities. AVA officers closely examine the reports and the Lead Business Development Manager for Access prepares an evaluative digest of issues, which is considered by AQDC. The officers carefully and systematically monitor centres' responses to

individual moderators' reports. The review team concluded that the AVA makes effective use of its moderators' reports to improve and enhance programmes. In preparing its annual evaluations, the AVA may also wish to consider expanding its analysis of the moderation system in general and the quality of reports in particular.

78 Based on its reading of the AVA's documentation and meetings with coordinators and moderators, the review team confirmed that the AVA's moderation processes pay due regard to objectivity, impartiality, fairness and equity.

### **Formal authority and the production of certificates**

79 The formal locus of authority for the award of the Access to HE Diploma is clearly documented in the AVA's Rules: AQDC 'exercise[s] on behalf of the Board the operational authority for the award of the Access to HE qualification and...delegate[s] this authority to the providers' Examination Boards where they are constituted in accordance with the AVA's regulations'. Detailed AVA regulations govern the conduct of examination boards and the minutes of the board have to be submitted to the AVA, in order for students' certificates to be printed. Moderators are required to attend examination boards and must sign-off recommendations for the award of credit. To check on consistency of examination board practice, members of AQDC or AVA officers visit a sample of boards each year. Officers read all the boards' minutes: the review team heard, from course coordinators, examples of both visits and follow-ups to minutes. The AVA is commended for the attention paid to the work of examination boards, including sample visits and the scrutiny and follow-up of minutes, in order to monitor the exercise of the examination boards' delegated authority.

80 The AVA meets, and has fully documented how it meets, all the requirements relating to the format of the Access to HE Diploma certificate; the secure administration of the issue and re-issue of certificates, and the production of transcripts.

## **Audit trails**

81 The review team conducted six audit trails of OCNSER Access to HE providers. The purpose of the trails was to enable the team to assess the effectiveness and consistency of the AVA's quality assurance procedures across the provision.

82 The audit trails provided a sample covering a representative geographical spread and different types of providers. These included HEIs and colleges of varying size and specialism, and covered a number of different subject areas. The sample included providers from each of OCNSER's precursor AVAs, as well as from providers who had recently transferred from other AVAs.

83 Centre recognition documentation was seen for all sampled providers. The OCNSER form uses the NOCN format. While this is comprehensive, it does not clearly differentiate aspects of Access to HE provision. Some examples of these documents were incomplete, but generally paperwork was completed to a satisfactory standard. It was not clear in all cases that appropriate senior level sign-off of centre approval documentation by AQDC, the Board of Trustees or officers of the AVA had taken place. Additionally, the review team was unable to track documentation relating to some approval visits undertaken by AVA officers, and Access to HE programmes newly transferred to OCNSER for the current year were lacking appropriate documentary authorisation. The team considered that these examples of areas requiring attention were a consequence of the significant change experienced by the AVA during recent months, and that there was recognition by senior staff of the work to be done. Nonetheless, the need to address the written record for provision, which transfers from other AVAs, forms a condition of licence (see paragraph 57).

84 The review team found evidence that systems of programme development and approval were made clear and that the Business Development and Access Customer Support teams provided readily available and valuable support to providers in this connection.

The approval process checks the approaches to internal moderation. Where external moderators cover the work of more than one provider, as was seen to be the case across the audit trails, this contributes to the consistency and comparability of the AVA's provision. There was one example of a moderator report being extremely delayed, it was not clear that sufficiently timely action had been taken by the AVA in this instance.

85 The review team saw several examples of centre and programme revalidation, following transfer to OCNSER. The fulfilment and sign-off of conditions and recommendations is tracked and completed before commencement of the new validation term.

86 As described already (see paragraph 61), there is a system of annual reporting in place. The annual reports seen included centre data and a generally comprehensive summary of progress during the year. Although aspects of development and enhancement are identified in reports, there is no section in the pro forma for these to be collectively recorded. The review team noted that there were some examples of significant repetition within the reports for successive years and there was, in some cases, little or no action planning arising from the reports. From the written record, the team was not able to see whether the AVA had identified these issues, nor whether any resulting action had been instigated. This contrasted with the detailed and useful feedback provided by the AVA in other annual reports in the audit trails.

87 Annual review reports include a summary of student feedback and there was evidence of moderator comments on learning resources being acted upon. Both in approval, validation and review materials there was an indication that learning resources are assessed to be of good quality. Publicity for potential applicants and course handbooks for students provided appropriate information, although some required updating to reflect up-to-date requirements.

88 The audit trails provided evidence that recommendations for credit and award are checked by relevant parties, and the review team noted a trail of correspondence where rules of combination had not been followed appropriately, leading to robust action by the AVA.

89 The review team was not provided with examination board minutes in the audit files, but learnt that, as noted in paragraph 79, there is a system of spot-checking of practice by AVA officers, which had been found helpful by provider representatives.

90 In summary, the review team formed the view that OCNSER was working towards harmonisation of processes and documentation, and that most key activities were being undertaken to a satisfactory standard, with adherence to AVA's quality assurance systems across the provision. However, the written record of the assimilation of those centres and programmes more recently joining the AVA was somewhat lacking in detail. There was also general inconsistency in the management of reporting by centres, and action towards development of the provision, although, given the positive reports by providers of the personal support offered by officers of the AVA, any deficiencies may be confined to the written record.

## Conclusions

91 OCNSER was formed in August 2005 from three predecessor Open College Networks (OCNs): Surrey and Region OCN (SROCN), Kent and Medway OCN (OCNKM), and OCN Hampshire, Isle of Wight and Sussex (OCNHIS). Both OCNKM and OCNHIS had held AVA licences since the early 1990s. This long involvement in Access to HE has ensured that the AVA enjoys a wide range of links with providers, receiving higher education institutions and other agencies with interests in adult education and progression in the South-east region. Since its formation, the AVA has recruited new further and higher education members.

92 From its inception, the OCN was confronted by financial challenges that forced the Board of Trustees (the Board) to take a number of difficult decisions about the scale and scope of the OCN's operation. The resulting measures included reducing the organisation's staff base and concentrating its offices on two sites. Despite these challenges, the AVA has continued to meet its licence obligations. The review team concluded that the changes have strengthened the management of Access to HE. The Director of Access now devotes more than 80 per cent of his time to Access to HE; all the administration of Access to HE is undertaken by a single dedicated team based in Canterbury, rather than being spread across several teams in two offices, and the Lead Business Development Manager for Access has an oversight of all Access to HE curriculum developments. Student registrations for 2008-09 are close to the 2006-07 numbers after a modest decline in 2007-08.

93 The OCN has also taken steps to separate income and costs for AVA activities. From their analysis of the income and expenditure relating to Access to HE and from their projections about future registrations, the Board and officers believe that this has strengthened the future security of the AVA licence.

94 The Board and the senior management set themselves ambitious and wide-ranging short and medium-term targets. On occasions, the targets or timescales, or both, have subsequently been recognised as overambitious. The review team came to the view that the AVA might want to define its operational priorities more explicitly than it does currently.

95 There is clear leadership of the AVA from the Board, which takes responsibility for determining the AVA's strategic direction, and from the senior officers. The Chair and the Chief Executive work closely together, and the Chief Executive and the Director of Access have well-defined, complementary roles in the strategic and operational management of Access to HE. Members of committees and practitioners value the depth of knowledge and understanding of Access to HE, and good judgement of the Director of Access.

96 The Board and the officers are well informed about local, regional and national issues that impact on Access to HE and the AVA's matrix of communications, which includes key agencies involved with the post-compulsory education sector in the region, such as the Lifelong Learning Network (LLNs) (an LLN Director is on the Board) and Aimhigher, has enabled it to work collaboratively in developing Access to HE into new areas, for example, Access to HE with a specific vocational focus.

97 There is strong involvement of higher education staff at all levels of the AVA, especially on the Board, where there is active participation from two vice chancellors, one of whom is the Chair, and a deputy vice-chancellor. The directors of admissions from two higher education institutions contribute significantly to the work of the Access Quality and Development Committee. Higher education staff play a full role in the AVA's moderation and validation processes.

98 The course coordinators and moderators the review team met spoke highly of the quality and efficiency of the service they received from the AVA, and higher education representatives noted the high standards achieved by Access to HE students. All the groups endorsed the AVA's pragmatic approach to the development of a regional Access framework which is 'to use the [AVA's] unit bank to encourage the common use of units but [to] avoid a more centralising route'.

99 The AVA has given considerable thought to how it can communicate effectively with all its stakeholders and contributors across a geographically dispersed region. In addition to the usual mechanisms of email, an informative and easily navigable website, and hard copy publications, the AVA has invested time and effort in developing BT Workspace to promote a virtual community and to facilitate communications among everyone involved with OCNSER. The AVA recognises that this is a new way of working for many of its stakeholders and that there are technical developments that can improve the

effectiveness of the model. There were varying degrees of enthusiasm for the model among the coordinators and moderators the review team met. The team would encourage the AVA to continue with its work on harnessing e-solutions to the logistical difficulties of spanning the south-east.

100 Openness and systematic self-evaluation were characteristic of the Overview submitted in advance of the review. These qualities were evident throughout all the meetings the review team held and have helped the AVA to respond to the challenges it has experienced.

101 The AVA's governance and operational structures and the support it receives from providers, higher education institutions and other agencies in the region, and from individuals in those organisations, ensure that, overall, OCNSER discharges its licence responsibilities fully and very effectively.

## Commendations

102 The AVA is commended for:

- i the close coordination between the Board, the Access Quality and Development Committee and the management team (paragraph 30)
- ii the establishment of a dedicated Access to HE team that has clear leadership and which is providing a high level of service to providers, receivers and moderators (paragraphs 38, 54, 75)
- iii its clear and readable documentation, including its guidance for quality assurance procedures (paragraphs 46, 69, 75)
- iv the attention paid to the work of examination boards, including sample visits and the scrutiny and follow-up of minutes, in order to monitor the exercise of examination boards' delegated authority (paragraph 79).

## The AVA licence

### Review outcome

103 The review team recommends that the Open College Network South East Region's AVA licence is confirmed, with conditions to be met by 30 September 2009.

### Conditions

104 The licence is awarded on condition that the AVA:

- i establishes an effective mechanism for canvassing and responding to the views and opinions of member organisations, in addition to the opportunity for members to convene an extraordinary general meeting (paragraph 23)
- ii puts in place a process by which it can verify the accuracy of providers' promotional literature and information and guidance to students (paragraph 53)
- iii develops a protocol for the transferral of programmes from other AVAs, to ensure appropriate scrutiny and formal reporting to the Access to HE Quality and Development Committee (paragraph 57)
- iv revises its validation and revalidation procedures to ensure sufficient and consistent scrutiny of all submissions (paragraph 58)
- v revises its guidance for validation panels, to make clear that representatives of the submitting provider are not involved in making the validation decision (paragraph 59)
- vi explicitly prohibits any subcontracting of moderator duties in its moderator contract (paragraph 73).

## Recommendations to the AVA

105 The review team recommends that the AVA:

- i ensures that there is clarity among all stakeholders regarding the processes for admitting new members to the organisation (paragraph 19)
- ii puts in place a process by which conflicts of interest can be updated on an annual basis (paragraph 20)
- iii limits the number of times a trustee may be re-elected (paragraph 21)
- iv reviews the remit and operation of the Access Quality and Development Committee (paragraph 27)
- v creates an explicit system of risk assessment and monitoring for its AVA business, as a matter of urgency (paragraph 43)
- vi specifies the criteria that lead to the requirement of full programme validation, following cumulative modifications (paragraph 60)
- vii ensures the consistent quality of, and effective action planning arising from, annual self-assessment reports and related documentation (paragraph 61)
- viii ensures that all moderators and tutors are actively engaged in its standardisation activities (paragraph 70)
- ix introduces a formal process for providers to give feedback on moderators' performance (paragraph 76).

## Appendix

### Aims and objectives of AVA review

106 The aims of the system of AVA review are:

- i to provide the basis for an informed judgement by the ARLC about the fitness of the AVA to continue as a licensed agency
- ii to promote public confidence in Access to HE as a properly regulated and respected route into higher education by assuring:
  - the quality and adequacy of AVAs' systems and procedures
  - the quality, comparability and range of AVAs' operations
  - the adequacy and comparability of AVAs' standards for approval, moderation and monitoring of programmes
  - consistency across AVAs in the operation of criteria for the granting of the Access to HE award
- iii to stimulate reflective and self-critical perspectives within AVAs, as an instrument to promote quality enhancement
- iv to provide an opportunity to identify and disseminate good practice of AVA operations
- v to provide a mechanism for ensuring necessary, and encouraging desirable, improvements and developments in AVAs.

107 The objectives of each AVA review are:

- i to examine, assess and report on:
  - the development of, and changes in, the AVA since its last review or initial licence, and its plans and targets for the future
  - the organisation's continuing viability and robustness and the ways in which the AVA demonstrates sound governance
  - the efficiency and effectiveness of the AVA's operational and quality assurance systems
  - the range and scope of the AVA's activities, and the appropriateness and value of these activities
  - the ways in which the AVA approves and monitors programmes and the ways in which these processes take account of the need for consistency and comparability
  - the ways in which the AVA satisfies itself of the adequacy and comparability of standards achieved by students gaining the Access to HE Diploma
  - the evidence available to indicate the AVA's success in achieving its aims and targets
- ii to identify and report on:
  - strengths and good practice in procedures and operations
  - areas which would benefit from further development
  - areas requiring attention.



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