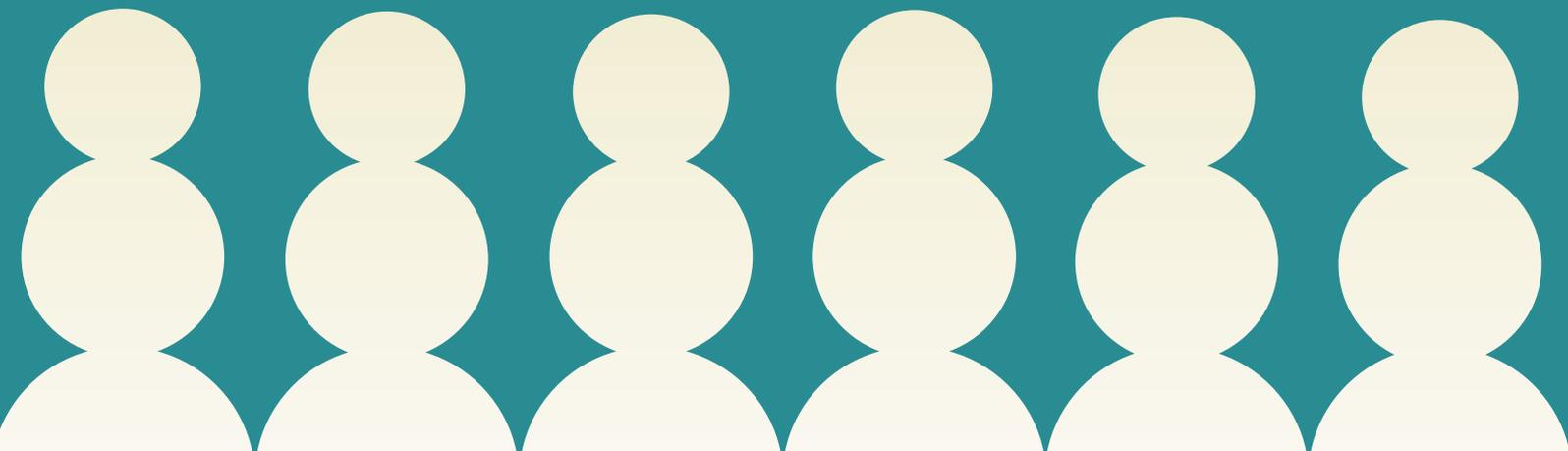




QAA

Learning from AVA review

2006-09



Sharing good practice

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Introduction

1 This report is based on an analysis of the reports of reviews of Access Validating Agencies (AVA) that took place between January 2006 and June 2009. AVAs are licensed by the Quality Assurance Agency for Higher Education (QAA) to recognise Access to HE courses, and to award Access to HE qualifications to students. A licensed AVA is responsible for assuring the quality of Access to HE courses and maintaining the academic standards of the Access to HE Diploma.

2 The current AVA licensing criteria, first introduced in 1999, and refined following the 1999-2004 cycle of reviews, are organised under four main principles in the areas of governance, management, quality and standards. The reviews covered by this report were assessed against those criteria. These criteria, used to reach judgements about whether, and under what terms, an AVA licence should be confirmed or renewed, are presented as Appendix B.

3 The process of AVA review (see paragraphs 8-28) is the mechanism QAA uses to assess an AVA's continuing fitness to hold the licence; where this is successfully demonstrated, the AVA licence is renewed.

4 The outcomes of AVA reviews are reported to QAA's Access Recognition and Licensing Committee (ARLC). Acting on behalf of the QAA Board, the ARLC is responsible for oversight of the processes of AVA licensing and review. Further details about QAA's responsibilities and work in this area are available from the Access to HE website at www.accesstohe.ac.uk.

5 A report titled *Learning from AVA review 1999-2004* was published in 2004. It provided an analysis of that round of reviews, which aimed to identify issues relating to the general development of the QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland; identify areas of good practice or areas for further development in the AVAs; and to reflect on the review process itself. The report was well received and contributed to both the development of the licensing principles and criteria, and to modification of the review method.

6 This report provides an updated analysis of both the review process and the licensing principles and criteria. As with the previous report, it aims to:

- reflect on the revised review process
- highlight areas of concern, identified through conditions attached to AVA licences
- suggest areas for further enhancement in the strategies and operations of the AVAs, identified through analysis of the recommendations made in reviews.

7 The analysis of review reports and their outcomes presented here also indicates those licensing criteria that are most likely to lead to conditions and recommendations; and considers whether the articulation of any of the criteria should be reconsidered.

The review process

8 The periodic review of AVAs contributes to the wider monitoring of AVAs by QAA. AVAs are also required to submit annual self-evaluation reports, providing an evaluation of their activities and achievements during the preceding year. The annual reports are closely scrutinised by the ARLC and feedback is provided, requiring a response from the AVA and action in any area where any significant shortcoming is identified. The ARLC may direct a review team to consider particular areas of concern highlighted by the annual reports. The two most recent annual reports from an AVA are central to the evidence base for the periodic review process. In these respects, the AVA review process and annual monitoring are interlinked.

The reviewers

9 QAA maintains a list of reviewers who have been trained in the AVA review method. The list is compiled on the basis of a formal recruitment process, with specified criteria, and appointments are approved by the ARLC. The reviewers are from a variety of backgrounds, and with different kinds of involvement in AVAs, higher education institutions (HEIs) and Access to HE providers.

10 One of the team members is nominated as a 'lead reviewer'. Wherever possible, the lead reviewer is a member of the ARLC and it is part of their role to present the draft review report to ARLC. Where this is not possible, another experienced reviewer is asked to take this role.

11 Each review is coordinated by an Assistant Director (AD) from QAA. The AD prepares the AVA and the review team, ensuring adequate and appropriate documentation is available; liaises with the AVA over review visit arrangements and the timetable of meetings; manages the review visit and takes notes of each meeting; and edits the report prior to its presentation to ARLC. The AD also manages any follow-up to the review that is required (see paragraphs 26-28).

Preliminary meeting

12 An AVA is notified of the planned timing for the review visit approximately nine months in advance of the visit itself, and a preliminary meeting is arranged, at which the AD meets AVA representatives at the AVA's premises. The purpose of the meeting is to explain the process and requirements of the review, including documentation to be submitted in advance (see below); the meetings that will take place during the review visit; potential Access to HE courses from which the audit trails will be selected, and likely implications for the AVA in terms of internal deadlines. The AD also discusses the accommodation and office services required for the review visit. This meeting takes place about six months before the review visit.

Documentation

13 The main documentation to be produced by the AVA prior to the review is the Overview Document (the Overview), which supplements the annual self-evaluation reports already submitted. The Overview is a self-analysis that is intended to show how the AVA meets the licensing criteria. It can be presented in various ways: it may appear as a narrative or in grid form, aligned with the licensing criteria to show how

the AVA meets the criteria and the evidence that demonstrates this. The detail of the documentation typically used at review is illustrated at Appendix C. The AVA's Overview and its appendices are received by QAA eight weeks before the review visit and forwarded to the review team.

Planning meeting

14 The planning meeting between the review team and the AD takes place three to four weeks before the review visit. A standard agenda is used for the meeting, which covers:

- key features of the Overview
- areas of enquiry for the review
- programme for the review visit
- key issues for the review meetings
- allocation of report-writing responsibilities
- post-review visit timetable.

Review visit

15 The review visit takes place over three days. On the evening before the visit, the reviewers meet to discuss any developments in their understanding of the AVA and any further issues or topics that have emerged as a result of further reading of the documentation, which may need to be covered in the meetings.

16 Day one of the visit is mainly used for scrutinising the audit trails and any new documentation, and clarifying understanding about the AVA's operations, through a short meeting with the CEO and/or the officer responsible for AVA operations. The remainder of the first day is taken up with planning the agendas for the meetings on day two.

17 The second day of the review consists of meetings with a variety of stakeholders. All AVA reviews include a standard set of meetings with:

- the CEO
- staff with responsibility for Access to HE
- the board of trustees or directors
- the committee having delegated responsibility for the AVA licence
- representatives of Access to HE providers (usually course leaders)
- moderators of Access to HE courses
- representatives of HEIs and other stakeholders.

18 The order of the meetings is determined by the AVA and may vary depending on the availability of participants but, whatever the order of the meetings, the review team is able to follow up agreed lines of enquiry with different stakeholders.

19 Day three of the review visit consists of further scrutiny of the documentation by the reviewers, followed by a short meeting with AVA staff to clarify any outstanding issues and to provide the opportunity for the AVA to make a final statement, if it

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wishes to do so. The final session is a review team meeting, coordinated by the AD, at which conclusions are reached on the recommendation to be made to the ARLC on the renewal of the licence; any conditions to be attached to the licence renewal; any commendations likely to be highlighted in the report, and any recommendations that the team wish to make.

Reporting and licensing

20 Each reviewer is responsible for drafting certain sections of the report, agreed at the planning meeting, and the AD edits the report prior to its presentation to the ARLC. Following editing, the AD returns a complete draft to the reviewers for comment, to answer any queries that the AD may have, and for clarification of any issues that the AD feels are not adequately reported. The final draft of the report is confirmed with the lead reviewer before it is presented to the ARLC.

21 The lead reviewer presents the team's report to the next meeting of the ARLC. Based on the conclusions of the report and the review team's recommendation, 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.

Feedback

22 All feedback relating to the outcome of the review is given to the AVA after the draft report, including recommendations, conditions and the recommended licensing judgement, has been considered and confirmed by the ARLC.

23 The report is then sent to the AVA and the AVA is invited to 'consider the report and to inform QAA if it contains any material errors of fact, or instances where comments or judgements have been based on a misconception of the facts'. Following consideration of any response from the AVA by the review team, any necessary amendments are made before the report is published.

24 If the AVA identifies inaccuracies that necessitate substantive amendment to the conditions or licensing judgement of the report, these amendments must be considered by the Chair of the ARLC, as well as by the review team. The Chair may recommend further consideration by a full meeting of the ARLC, if s/he considers it necessary.

25 The ARLC's licensing decision is then forwarded to the QAA Board, as a recommendation for the Board's renewal (or award) of AVA licence.

Follow-up

26 Where conditions are set, the AVA is given a deadline to submit evidence which demonstrates the conditions have been met. These dates are determined by the nature of the conditions, in terms of the urgency and extent of action required, and

the ARLC’s meetings schedule. The ARLC has to be satisfied that any conditions have been fully met before the licence is confirmed.

27 The AVA is required to address any recommendations made in the review report in a special section within its subsequent annual self-evaluation report.

28 A provisional licence renewal leads to a revisit to confirm that the conditions have been met in full, approximately one year after the review visit. The revisit is conducted by the AD, the lead reviewer and one other reviewer. The revisit is also an opportunity to discuss developments that have occurred since the review and the impact of the changes made by the AVA in order to address the conditions.

Review outcomes

Licence judgement

29 There were 15 AVA reviews (and confirmations of initial licence awards) that took place between 2006 and 2009. Of these, 10 were awarded a conditional renewal of their licence and five were awarded a provisional licence renewal. No AVA had its licence withdrawn and none was awarded an unconditional renewal of licence.

Conditions and recommendations

30 Where conditions are set, it indicates that an AVA is failing to meet the licensing criteria in one or more respects. In the 2006-09 review cycle, all AVAs had conditions attached to the renewal of their licences. Chart 1 sets out the number of conditions set for each AVA.

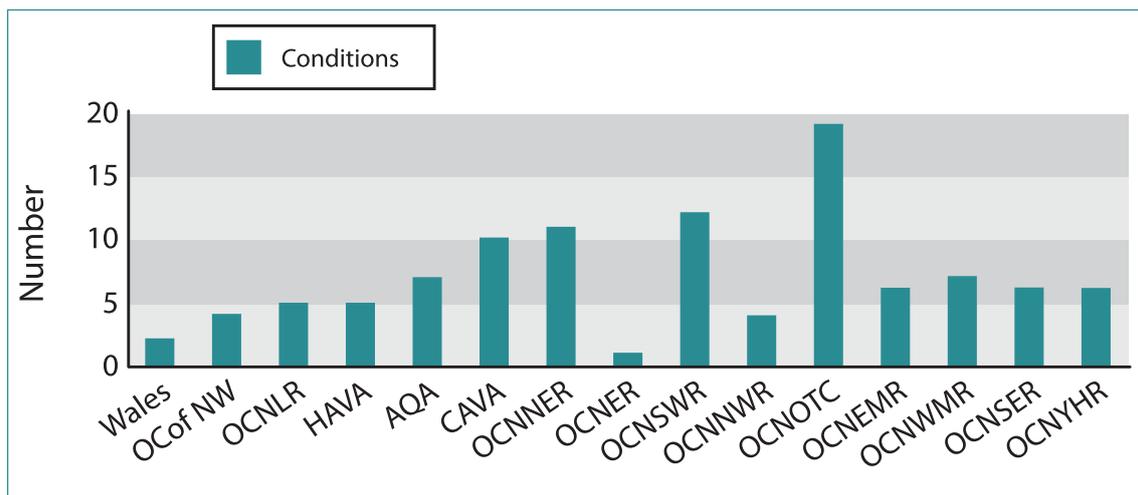


Chart 1 - number of conditions, by AVA

(Note: Charts 1 to 6 are presented by AVA in the order in which the reviews were undertaken. Full AVA names are given in Appendix A).

31 Recommendations may be less directly related to the licensing criteria, or concern the enhancement of systems and processes that are considered as meeting the

licensing criteria but that could be made more effective or efficient. All review reports from the 2006-09 cycle contained recommendations. Chart 2 sets out the number of recommendations made for each AVA.

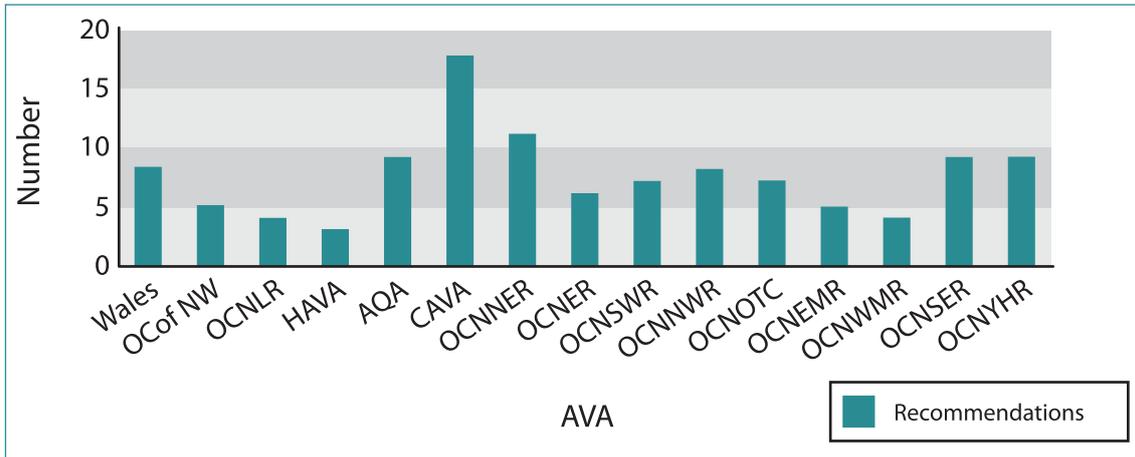


Chart 2 - number of recommendations, by AVA

32 As noted, the AVAs are set out in the Charts in the order in which they were reviewed. One concern with any review method is that of 'drift', in that, as the review cycle progresses, trends can develop in either increasing or decreasing the severity of the scrutiny of review, or that the organisations being reviewed are able to develop techniques for 'managing' reviewers and their areas of exploration. This would manifest itself in AVA reviews by a pattern of continuous increase (or decrease) in the number of conditions and recommendations set by reviewers. Inspection of Charts 1 and 2 indicates that this is probably not the case in that there are no clear consistent trends in the number of conditions or recommendations set. This suggests that there has been broad consistency in the way in which the review method has been conducted, licensing criteria have been applied and judgements have been reached.

33 An analysis of the areas of the licensing criteria where the conditions and recommendations fall is undertaken in the following section.

Commendations

34 The review reports often highlight areas of good practice or aspects of the AVA's strategy or operations that are particularly worthy of note. These are grouped together as commendations. Chart 3 shows the number of commendations made for each review.

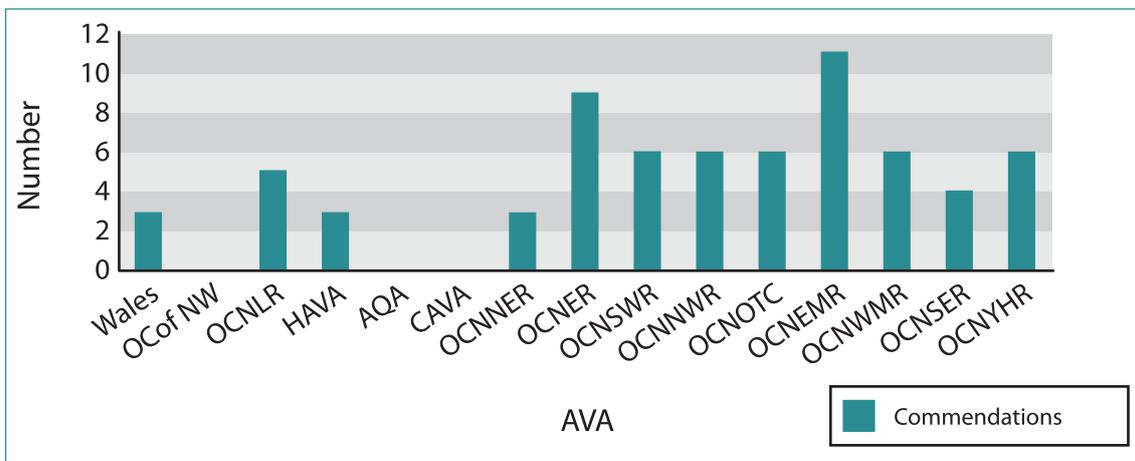


Chart 3 - number of commendations, by AVA

35 The number of commendations awarded varied between AVA reviews, and a greater number of commendations were made in the latter part of the cycle. (See also, paragraphs 39 and 80-87)

General observations on conditions, recommendations and commendations

36 Chart 4 shows that a greater number of conditions were set for AVAs with a provisional licence renewal (AQA, CAVA, OCNNER, OCNSWR and OCNOTC) than those with a conditional renewal.

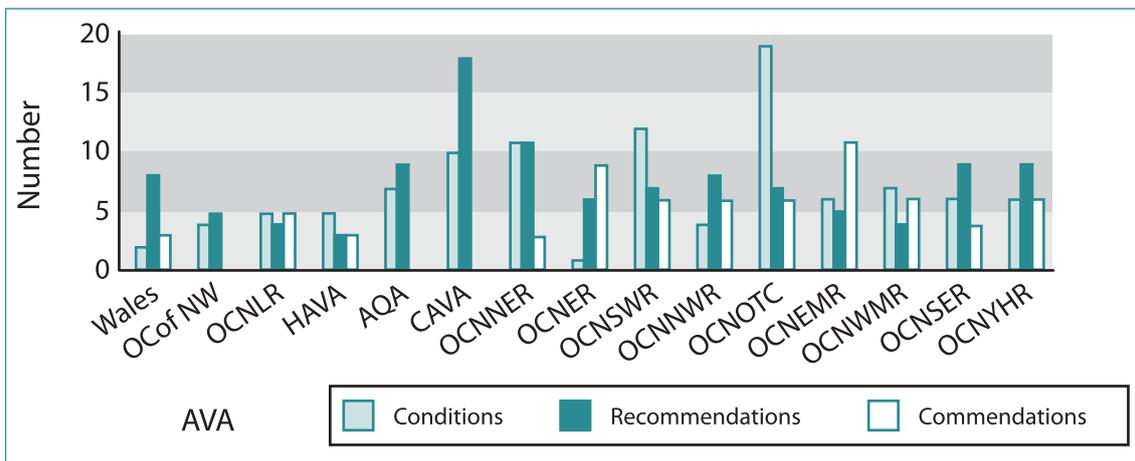


Chart 4 - conditions, recommendations and commendations, by AVA

37 As one would expect, there is a relationship between the number of conditions set and the overall licensing decision. However, the reality is, of course, much more complex than a simple numeric relationship, and reviewers do not make judgements about the licensing outcome according to the number of conditions. Some conditions indicate serious shortcomings in terms of meeting the licensing criteria, whereas others may relate to, for example, minor changes of wording in AVA documentation. The nature of the conditions is explored further in the next section.

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38 In terms of recommendations, there is not such a clear-cut numeric pattern. The number of recommendations seems to be fairly randomly spread across the AVAs, with only two of the provisional renewal AVAs having a clearly larger number of recommendations than the other AVAs. However, the nature of recommendations (see paragraph 31) would suggest that one would not necessarily expect a direct relationship.

39 Commendations appear to have been awarded more freely in the later stages of the review cycle. Unlike conditions and recommendations, commendations are not always clearly associated with specific licensing criteria (for example 'the levels of commitment of providers to learner support...'). Furthermore, there is no standard definition of 'good practice' in AVA review and this could lead to some inconsistency in identifying it.

40 The number of conditions and recommendations set could be affected by the size of an AVA in terms of the number of providers and/or courses. However, this is not borne out by Charts 5 and 6, which indicate that there is no direct relationship between the number of conditions and recommendations set following an AVA review and either the AVA's number of providers or the number of courses that are approved under its licence.

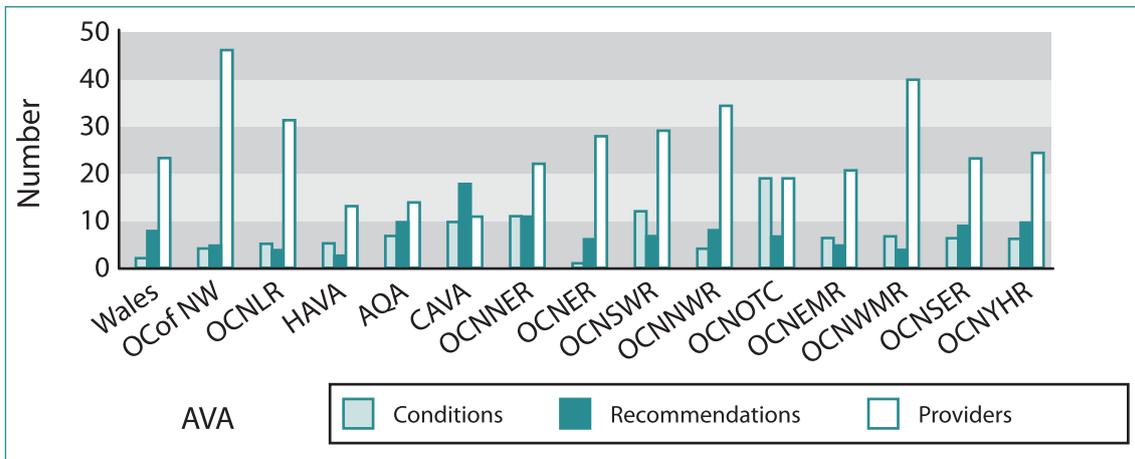


Chart 5 - AVA review outcomes by AVA's number of providers

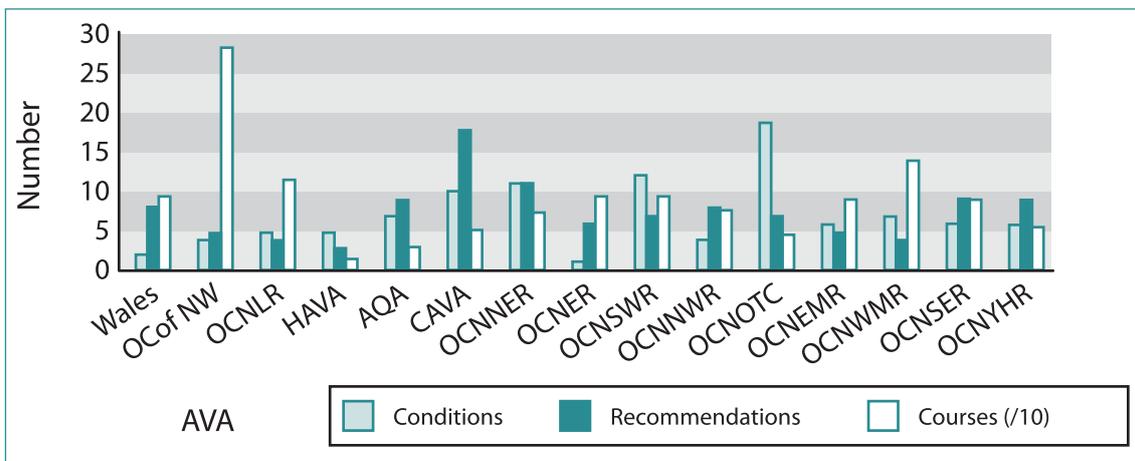


Chart 6 - AVA review outcomes by AVA's number of courses

(Note: for ease of interpretation, the number of courses has been divided by 10).

41 Chart 7 presents the conclusions and recommendations against the four licensing principles. (It is less easy to allocate commendations to particular principles and criteria.)

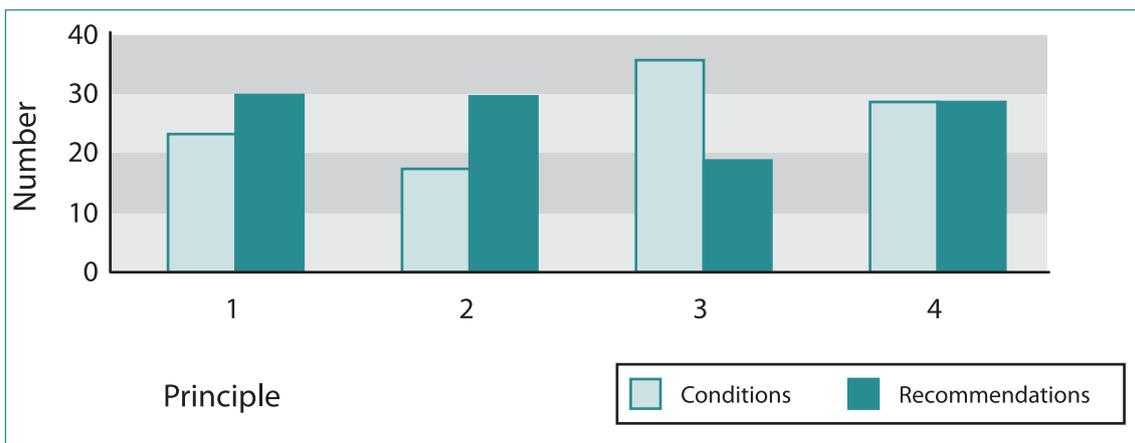


Chart 7 - number of conditions and recommendations, by licensing principle

42 It can be seen from Chart 7 that all the main areas of the licence attract both conditions and recommendations. However, the criteria under 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') and Principle 4 ('The organisation is able to secure the standards of achievement of students awarded the Access to HE Diploma') attract the greatest number of conditions. This is explored more fully in the following section.

Analysis of review conditions and recommendations

43 This section analyses the outcomes of the AVA reviews in the period 2006-09 in greater detail. It focuses on the conditions and recommendations set in relation to particular licensing criteria, organised under the four licensing principles (see Appendix B for full criteria details). In the following paragraphs, the actual wording of the conditions and recommendations is not reproduced as they often refer to terms or features that may be specific to that AVA. Consequently, a degree of paraphrasing has been used. In addition, where a number of different conditions or recommendations refer to essentially the same issue, a 'composite' is used.

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.

44 The pattern of conditions and recommendations relating to Principle 1 is shown in Chart 8. The chart shows the number of conditions and recommendations set for each of the licensing criteria.

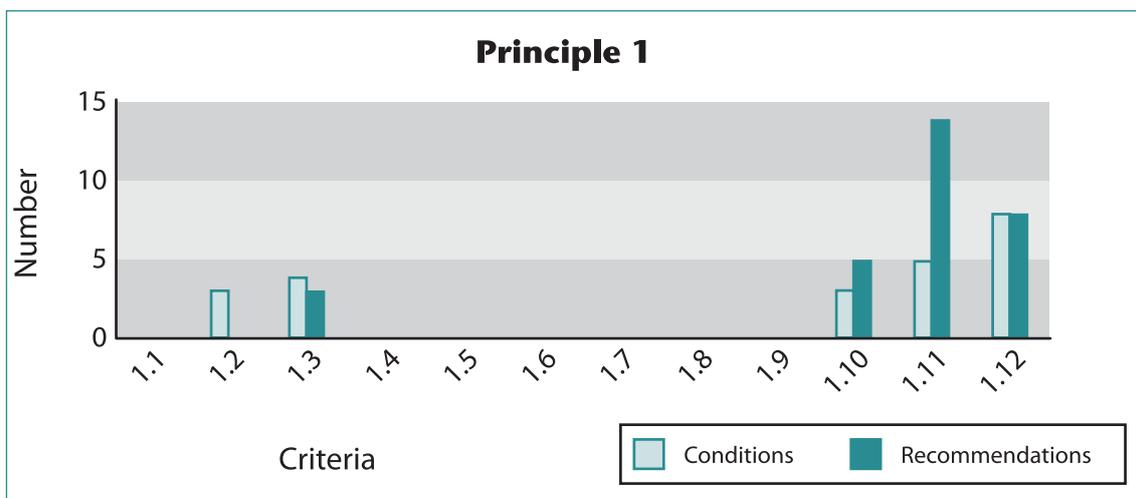


Chart 8 - number of conditions and recommendations set, by licensing criteria under Principle 1

45 The largest number of conditions and recommendations under this principle were set in relation to criterion 1.11 (requiring the governance structure to have sufficient and appropriate experience and expertise, from both further (FE) and higher education (HE), and for there to be clear and transparent appointment procedures) and criterion 1.12 (the requirement for a clearly identified locus of authority for the AVA licence within the governance structure, and clear descriptions of the roles of officers and the terms of reference of committees involved in the operation of the licence).

46 Conditions also occur in relation to criterion 1.2 (clear constitutional basis and documentation on legal identity, aims and structures), and both conditions and recommendations were set in relation to criterion 1.3 (protection within its

governance from undue influence by any stakeholders) and 1.10 (requiring the constitutional structure to involve a range of stakeholders).

47 The particular areas that the conditions and recommendations refer to within each of the criteria are outlined below.

Criterion	Conditions	Recommendations
1.2	<ul style="list-style-type: none"> ● provide a formal statement of members' rights and responsibilities ● amend wording of Memorandum and Articles of Association to refer to the Access Validating Agency (2) 	
1.3	<ul style="list-style-type: none"> ● revise quorum of governance committees (within constitutional documents) to avoid undue influence from a minority group of stakeholders (4) 	<ul style="list-style-type: none"> ● take steps to ensure further an appropriate balance of members at meetings (2)
1.10	<ul style="list-style-type: none"> ● review Memorandum and Articles of Association; role, remit and committee membership categories with respect to HE/ FE representation and expertise (including providers) ● ensure that quorate AGMs (or alternatives) take place (2) 	<ul style="list-style-type: none"> ● continue to expand membership to secure broader range of stakeholders (2) ● develop strategies to ensure greater attendance at meetings
1.11	<ul style="list-style-type: none"> ● review criteria and process for identifying Council members to ensure appropriate expertise (2) ● amend Memorandum and Articles of Association to be amended to specify categories of stakeholder and criteria for the Board and subcommittees (3) 	<ul style="list-style-type: none"> ● review/clarify requirements for Board membership in terms of size, maximum tenure and procedures for appointment (8) ● secure higher response rate to committees self-assessment (2) ● review use of the term 'externality'/use of external advice (3) ● publish formally the membership application and removal process (3) ● strengthen ongoing training/ development for the Board

Criterion	Conditions	Recommendations
1.12	<ul style="list-style-type: none"> ● review role/remit/membership of subcommittee (responsible for Access to HE) ● establish procedures for formal approval of AVA annual report (4) ● make explicit the locus of formal authority for Access to HE (3) 	<ul style="list-style-type: none"> ● clarify formal responsibility for approval of the annual report ● clarify rules for reappointment to...committee ● review cycle of meetings to ensure linkage between committees receiving information ● review monitoring of the Board's effectiveness ● institute a formal AGM.

Principle 1 conditions

48 As can be seen from the substance of the conditions listed above, the main areas of difficulty for AVAs within this principle concern the role, remit, membership and quora of the Board/Council and its subcommittees. Areas of concern to the reviewers were that the constitutional documentation lacked sufficient safeguards against the undue influence of a group of stakeholders; failed to ensure adequate balance in membership (for example, in terms of FE/HE representation); and did not clearly specify where the authority for the licence was located and how it was delegated. Where these concerns were raised, the reports often note that there were no problems foreseen with the current membership and operation of the committees, but that the documentation did not protect against possible future difficulties.

49 Two reviews found that the AVA was not holding Annual General Meetings (AGM). In one case, it was due to an inability to achieve a quorum and in the other the AGM had been replaced by alternative methods of gaining member views and enabling membership decisions to be made.

Principle 1 recommendations

50 The recommendations made against criteria under Principle 1 mainly concerned the spread of representation across the governance committees, in order to ensure that the Board and its subcommittees had representation from a variety of stakeholders. There were also concerns that there was insufficient 'turnover' in that there were few limits on terms of office and opportunities for reappointment. Furthermore, there were concerns that meetings were not coordinated so that information flowed sufficiently for committees to make appropriate decisions. In some cases, Board and subcommittee meetings were not being scheduled to allow scrutiny of the annual report to QAA to take place.

51 These are similar areas to those covered by the conditions set against Principle 1. In the case of the recommendations, however, the aim was to strengthen procedures that were already working, albeit inefficiently.

Principle 2

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

52 The pattern of conditions and recommendations relating to Principle 2 is shown in Chart 9. The chart shows the number of conditions and recommendations set during the review cycle for each of the licensing criteria.

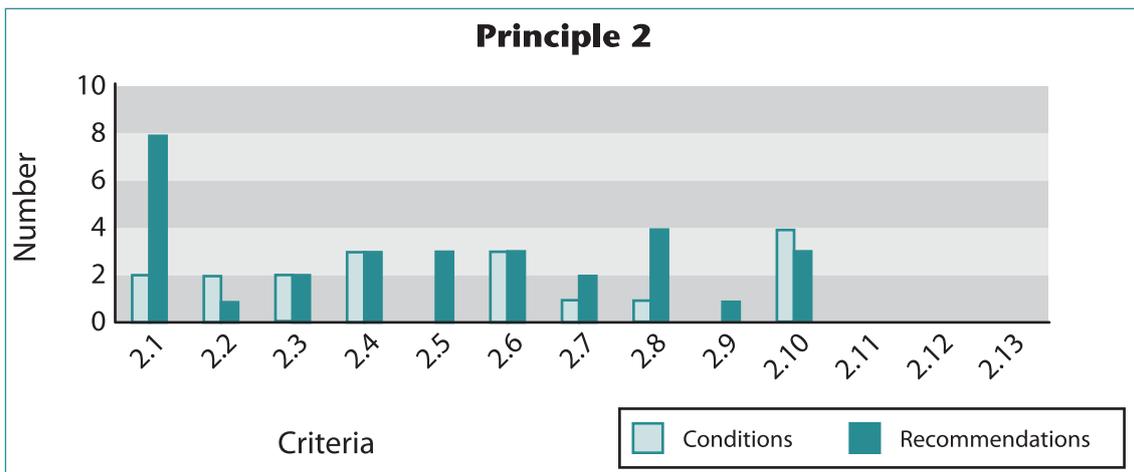


Chart 9 - number of conditions and recommendations set, by licensing criteria under Principle 2

53 Conditions were set against all criteria except 2.5, 2.9, 2.11, 2.12 and 2.13. These concern financial management, communication with stakeholders, policies on equal opportunities, complaints and grievances, and the production of an annual report. Although the production processes for the annual report seem to be appropriate, it was noted under Principle 1 that the report did not always get full and timely consideration and approval through the governance committees. The clear majority of the recommendations under Principle 2 are in 2.1 (strategic planning and strategy). However, the main areas that the conditions refer to within each of the criteria are outlined below.

54 The substance of the conditions for each of these criteria is as follows.

Criterion	Conditions	Recommendations
2.1	<ul style="list-style-type: none"> ● develop a strategic plan for AVA activities ● review strategic planning process to ensure full involvement of governance committees 	<ul style="list-style-type: none"> ● continue to improve/simplify the strategic planning process (6) ● fully record discussions that influence planning decisions
2.2	<ul style="list-style-type: none"> ● clarify regional priorities and review the regional strategy (2) 	<ul style="list-style-type: none"> ● further increase/promote Access to HE among members (2)

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Criterion	Conditions	Recommendations
2.3	<ul style="list-style-type: none"> ● develop appropriate risk monitoring procedures (2) 	<ul style="list-style-type: none"> ● develop its use of statistical information in monitoring ● develop a more in-depth risk assessment procedure (2)
2.4	<ul style="list-style-type: none"> ● ensure AVA matters are fully and professionally reported in minutes (2) ● clarify terms of reference of committees especially as regards operational aspects of the licence 	<ul style="list-style-type: none"> ● adopt more informative/professional minuting of committees (3)
2.5		<ul style="list-style-type: none"> ● review appropriateness of having an elected treasurer ● develop a separate Access to HE budget (2)
2.6	<ul style="list-style-type: none"> ● clarify responsibility for management and leadership of AVA activities (2) 	<ul style="list-style-type: none"> ● conduct a risk assessment on various models for staffing ● further develop training for officers ● review job descriptions to clarify reporting lines
2.7	<ul style="list-style-type: none"> ● clarify and document procedures relating to registration and certification 	<ul style="list-style-type: none"> ● redevelop/ensure more consistent use of pro formas (3)
2.8	<ul style="list-style-type: none"> ● revise policies and practices with respect to data security 	<ul style="list-style-type: none"> ● continue to develop its data systems (OPUS database issue) ● consider more detailed data analysis (2) ● explore alternative storage and retrieval of data
2.9	<ul style="list-style-type: none"> ● review role/remit/membership of subcommittee (responsible for Access to HE) ● establish procedures for formal approval of AVA annual report (4) ● make explicit the locus of formal authority for Access to HE (3) 	<ul style="list-style-type: none"> ● develop a stakeholder communication strategy.
2.10	<ul style="list-style-type: none"> ● develop procedures for verifying correct use of QAA logo and accuracy of provider publications (4). 	<ul style="list-style-type: none"> ● review provider publicity material ● identify responsibility for checking the use of the QAA logo (3).

Principle 2 conditions

55 Principle 2 concerns strategic and operational management of AVA activities. The conditions reported against criteria 2.1 to 2.3 concern weaknesses identified by reviewers in the areas of strategic and risk management.

56 This principle attracted fewest conditions. Aside from the group of conditions which relate to strategic planning, the area most frequently identified in conditions (for four AVAs) was about having established and documented procedures for checking the accuracy of provider publications and use of the QAA logo.

Principle 2 recommendations

57 The clear majority of the recommendations under Principle 2 concerned the AVA strategic planning processes. Although strategic plans for Access to HE were being produced, these were often opaque because they were buried too far within the organisation’s overall plan; the strategic planning process did not allow adequate time for the full involvement of stakeholders and governance committees, or the planning processes were unnecessarily complex. There are also a large number of recommendations identified in the review reports to improve or enhance procedures in these areas.

58 There were also a number of recommendations made concerning criterion 2.8 (structures and systems for the collection, recording and holding of data). A number of AVAs were struggling with the use of the OPUS database which, although effective for the non-Access work of the Open College Networks, had some shortcomings when used for Access to HE. Some AVAs were transferring over to AVAD, a more purpose-built database, and the recommendations largely supported that move.

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.

59 The pattern of conditions and recommendations relating to Principle 3 is shown in Chart 10. The chart shows the number of conditions and recommendations set during the review cycle for each of the licensing criteria.

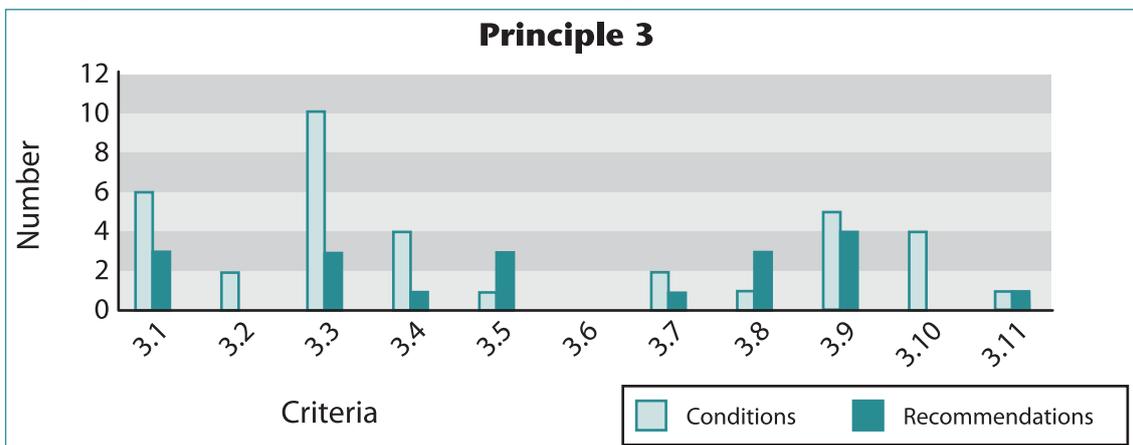


Chart 10 - number of conditions and recommendations set, by licensing criteria under Principle 3

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60 Conditions and recommendations were set across all criteria for Principle 3 except criterion 3.6, which requires students to be fully informed of, and given the opportunity to meet, any entry requirements of professional bodies. The criteria attracting most conditions were criterion 3.1 (concerning programme development processes) and criterion 3.3 (programme approval and validation).

61 The substance of the conditions for each of these criteria is as follows:

Criterion	Conditions	Recommendations
3.1	<ul style="list-style-type: none"> ● revise programme development processes: <ul style="list-style-type: none"> - general (4) - to ensure HE consultation (2) 	<ul style="list-style-type: none"> ● amend documentation to indicate the need for HE involvement in programme development (2) ● establish procedures to feedback to programme development groups
3.2	<ul style="list-style-type: none"> ● revise unit approval procedures (2) 	
3.3	<ul style="list-style-type: none"> ● general revision of validation procedures to meet criteria ● revise procedures to ensure committee approval, (and conditions signed off) for new programmes, is given prior to their commencement (2) ● revise procedures for recording validation outcomes (2) ● clarify membership, roles and terms of reference for validation panels (2) ● update validation documentation, to ensure that it specifies that programmes are only delivered in the UK (2) ● strengthen guidance for validation panel members 	<ul style="list-style-type: none"> ● review procedures to make more explicit the sign-off of conditions ● clarify representation/ membership of validation panels ● review procedures for ensuring externality on validation panels
3.4	<ul style="list-style-type: none"> ● develop a strategy for the implementation of the Access to HE Diploma (subsequently overtaken by events) (2) ● ensure that award titles are appropriately linked to rules of combination (2) 	<ul style="list-style-type: none"> ● ensure guidance to panels reflects the need to check the programme against the Access to HE Diploma and credit specifications

Criterion	Conditions	Recommendations
3.5	<ul style="list-style-type: none"> ● revise validation (and revalidation) processes in terms of sufficient and consistent scrutiny of submissions 	<ul style="list-style-type: none"> ● review assessment procedures to produce policy statement ● programme documentation should include information on aims ● programme documentation should include information on targeting/recruitment
3.7	<ul style="list-style-type: none"> ● develop protocols for transfer of programmes from other AVAs (2) 	<ul style="list-style-type: none"> ● reconsider use of the term 'ratification' in validation documentation
3.8	<ul style="list-style-type: none"> ● improve procedures (and definition) for minor/substantial modifications to programmes 	<ul style="list-style-type: none"> ● clarify minor modifications procedure (2) ● continue to rationalise units through a clear schedule
3.9	<ul style="list-style-type: none"> ● ensure all data and information required for the QAA annual report is included in provider annual reports (4) ● revise review processes to ensure regular review of subject (sectors) 	<ul style="list-style-type: none"> ● develop a systematic approach to the dissemination of good practice ● review mechanisms/consistency for following up action plans (2) ● develop strategies to ensure providers comply with the requirements for annual monitoring
3.10	<ul style="list-style-type: none"> ● develop, approve and publish procedures for periodic revalidation of programmes (2) ● revise revalidation procedures to include self-evaluation of programme (2) 	
3.11	<ul style="list-style-type: none"> ● review Access to HE strategy with a view to enabling the AVA to become a regional focus for the development of Access 	<ul style="list-style-type: none"> ● develop a more proactive approach to the promotion of Access to HE.

Principle 3 conditions

62 The majority of the conditions set under Principle 3 concern procedures for programme development and approval/re-approval. The conditions range in complexity, from some requiring a comprehensive revision of procedures to ensure that the detailed subsections of the licensing criteria are met, to others requiring certain aspects (such as UK-only delivery) to be given greater prominence.

63 Deficiencies in programme development were normally concerned with the involvement of stakeholders, especially representatives from HE. With programme validation, there were a few occasions where the role of validation panel members (and the guidance given to them) required clarification, in that it appeared that those presenting a programme for validation were also members of the panel making the decision on its approval. In addition, validation panels' decisions, and any conditions attached to them, were not always reported adequately to the committee responsible for approving new programmes, and there were shortcomings identified in the mechanisms through which the committee was able to sign-off approval (in the knowledge that the conditions had been met), prior to the commencement of the programme.

64 With criterion 3.4, there were some concerns expressed about inadequate preparation for the introduction of the Access to HE Diploma and credit specifications. These were with the earliest reviews and at that time it was, perhaps, not surprising that this problem occurred. In those AVAs, the Diploma was, subsequently, successfully introduced.

65 The other areas of concern identified were in annual monitoring and revalidation. With the former, a number of AVAs were experiencing difficulties in ensuring that their providers submitted required information for the annual report to QAA. The shortcomings were mainly in the area of provider self-evaluation and in forwarding information from students on the quality of their learning experience.

66 The AVAs attracting conditions on revalidation had yet to develop and codify procedures, noting that they would be largely based on the validation procedures. The reason often cited was that the AVA had very recently undertaken a major programme of validation of new programmes against the Access to HE Diploma specification and, as a consequence, revalidation would be some five years away. Looking at the text and recommendations associated with these conditions, the reviewers were noting that it would be sensible for AVAs to stagger revalidation timetables to avoid a similar 'bunching' in five years' time. To enable this to happen, revalidation procedures were necessary.

Principle 3 recommendations

67 Although the criteria under Principle 3 attracted a number of conditions, there were far fewer recommendations. This could mean that where AVAs had systems and procedures that were deemed appropriate in terms of meeting the licensing criteria, those systems and procedures were effective. Most recommendations made relating to the Principle 3 criteria reflected a view that procedures could be documented more clearly.

68 Recommendations relating to criterion 3.9 (a system for regular review and development of the Access to HE provision), focused on the need for systematic follow-up of actions identified as part of the monitoring processes, and developing systematic approaches to the dissemination of good practice.

Principle 4

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

69 The pattern of conditions and recommendations relating to Principle 4 is shown in Chart 11. The chart shows the number of conditions and recommendations set during the review cycle for each of the licensing criteria.

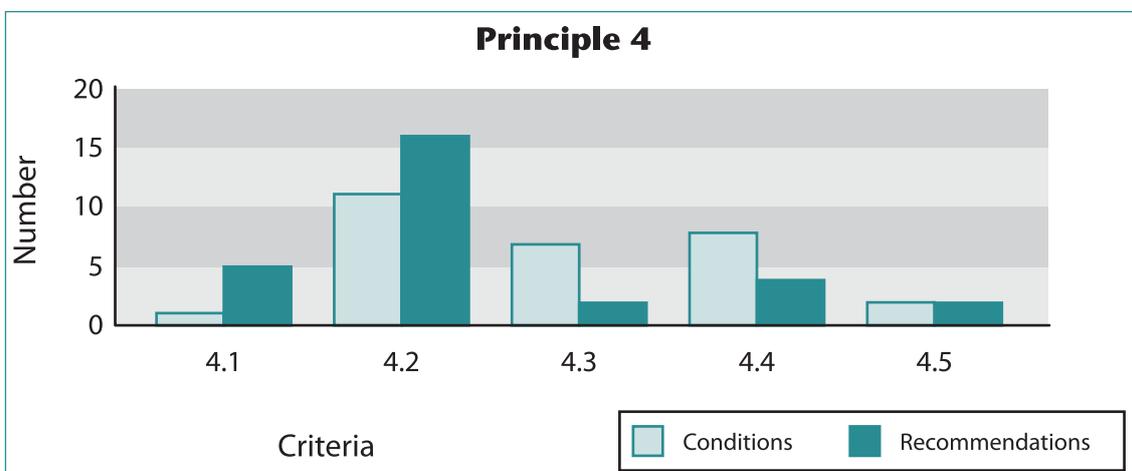


Chart 11 - number of conditions and recommendations set, by licensing criteria under Principle 4

70 The conditions and recommendations are spread across all of the licensing criteria under Principle 4. The substance of the conditions for each of these criteria is as follows.

Criterion	Conditions	Recommendations
4.1	<ul style="list-style-type: none"> ● ensure consistent and systematic provision of moderator subject expertise 	<ul style="list-style-type: none"> ● establish procedures for review of moderator guidance (3) ● ensure adequate subject coverage (2)
4.2	<ul style="list-style-type: none"> ● develop clear criteria for the appointment of moderators ● revise moderator contract to prohibit subcontracting (3) ● develop procedures for the induction and (compulsory) training of moderators (2) ● revise procedures and documentation to ensure that moderators serve a maximum of four years (3) ● establish mechanisms to ensure standardisation across providers (2) ● develop mechanisms for getting feedback from providers on moderators 	<ul style="list-style-type: none"> ● develop clearer criteria for the appointment of moderators (including period of appointment) (4) ● ensure moderator appointment letter prohibits subcontracting ● review process for avoiding reciprocity in moderation ● review moderator handbook with respect to payment ● develop guidelines for moderators on sampling of student work ● review oversight of standardisation (4) ● review scrutiny of moderator performance (3)
4.3	<ul style="list-style-type: none"> ● amend terms of reference for... committee to include the appointment of moderators (2) ● establish mechanisms for the follow-up of moderators' recommendations (2) ● strengthen the committee reporting procedures with respect to the outcomes of moderation (3) 	<ul style="list-style-type: none"> ● review process for developing the annual report (2)

Criterion	Conditions	Recommendations
4.4	<ul style="list-style-type: none"> ● specify clearly the location of authority for the award of the Diploma (2) ● revise terms of reference of the Access to HE award board with respect to function, roles of members, frequency of meeting, quorum (6) 	<ul style="list-style-type: none"> ● amend guidance notes to ensure award boards take place (2) ● clarify regulations on award boards with respect to award and credit decisions (2)
4.5	<ul style="list-style-type: none"> ● develop a robust system for the issue of certificates and their dispatch to students ● ensure correct wording and use of QAA logo on certificates 	<ul style="list-style-type: none"> ● review benchmarking and monitoring certification standards ● codify procedures on issuing certificates.

Principle 4 conditions

71 Although criterion 4.1 is multi-part (and lengthy), it is concerned with the general provision of a system of moderation; the subsections concern necessary features of that system. Most AVAs were judged to have met this criterion.

72 Criterion 4.2 concerns the appointment and monitoring of the activities of moderators. There were a number of instances where it was not clear within the AVA procedures how they enforced the maximum four-year term with any course, how they ensured that no subcontracting of moderator duties occurred, and how they ensured standardisation (across programmes and providers) was managed.

73 Criterion 4.3 seeks to ensure that the outputs of the moderation process are used effectively in the management and enhancement of courses. In a number of cases, reviewers had concerns about the extent of involvement of the appropriate governance committee in the appointment and monitoring of moderators, and in the analysis of the moderation reports and summaries and their follow-up.

74 A major problem identified in a number of AVAs concerned a lack of clarity in the operation of award boards, required by criterion 4.4. There were instances of formal boards not taking place, and a lack of clarity of who should be involved and the roles they fulfilled, including confusion over the involvement of students in assessment meetings. It was not always clear where responsibility lay within the governance structure for the award of the Access to HE Diploma.

75 There were no major concerns over criterion 4.5 which is concerned with the security and integrity of the certification and transcript processes. It is reassuring that this important area was effectively controlled by all but one AVA.

Principle 4 recommendations

76 The clear majority of the recommendations under Principle 4 are in 4.2 (appointment and monitoring of moderators). However, the main areas that the recommendations refer to within each of the criteria are outlined below.

Sharing good practice

77 The main areas where reviewers felt that recommendations were appropriate were the appointment procedures and the guidance for moderators. Some AVAs were encouraged to clarify the appointment procedures and documentation, such as the letter of appointment for moderators, particularly in terms of the maximum period of office. There were also instances where the guidance to moderators would benefit from review and revision, especially in the area of standardisation.

78 There were also some instances where the guidance to moderators and providers on the form and membership of award boards was deemed to be worthy of further development.

79 Under Principle 4, there were some instances where the form and content of conditions and recommendations were somewhat similar. In the area of standardisation, for example the 'review oversight of standardisation' recommendations for some AVAs were not very different to the 'establish mechanisms to ensure standardisation across providers' conditions for others. There is also a great deal of similarity between conditions and recommendations on the issue of prohibiting subcontracting in the moderator appointment documentation.

Commendations

80 On reading the review reports, it is difficult to tie commendations into specific licensing criteria as they are often too general in nature. However, this section attempts to group the commendations made by reviewers into the broad areas of the licensing principles.

81 For Principle 1, there were a number of commendations that related to the efficient and effective operation of the governance structure and the quality of the leadership shown. A number of AVAs had gone through recent periods of merger and had dealt with the rapid restructuring of governance particularly effectively. There were clearly defined delegated responsibility for Access to HE and good coordination in terms of meeting timetabling and documentation flow between committees having that responsibility. There were a number of instances where reviewers drew attention to the 'enthusiasm' of the Board and its committees.

82 Recent mergers also prompted commendations in relation to the criteria of Principle 2, with the successful management of change through the periods of uncertainty being commended. There were a number of commendations of particularly inclusive (of staff and of stakeholders) strategic planning procedures and of the quality of the documentation resulting from the plans and the subsequent operational procedures.

83 By far the largest areas for commendation were for the level of support given by the Access to HE manager and staff (to providers, to HEIs and to other stakeholders) and the effective communications with all stakeholders. Commendations in these areas were a feature of nine reviews. Although no doubt well deserved, it is difficult to see how these commendations could be turned easily into specific examples of good practice that could be disseminated further.

84 A number of AVAs were starting to develop courses based on regional frameworks for their Diplomas at the time of their review and the collaborative approaches taken

were the subject of reviewer commendations. There were commendations for the close working relationship with stakeholders and for the 'commitment' to widening participation and Access to HE. Promotion and development of the Diploma and communications with providers, HEIs and course development teams were also commended.

85 Again, it is difficult to see how these commendations could be taken further other than, perhaps, through case studies at Access to HE conferences and meetings. There are, however, some more specific instances of good practice, for example, the curriculum working parties noted in one report, which could be written up and disseminated to other AVAs.

86 Five AVAs were commended for their effective approach to moderation and three were singled out for praise on the thoroughness of their approach to standardisation. Although the reviewers were impressed, the AVAs were doing what was expected in both the letter and the spirit of the licensing criteria; albeit doing it extremely well. As with the commendations under Principle 3, some of these could be used on a case study basis, but it is difficult to determine specific parts of the process that go beyond the criteria and could be used as specific examples for dissemination.

87 There were also commendations for the development and support for moderators, for the guidance given to moderators, for a centre inspection system, and for the comprehensive minuting and follow-up procedures for award boards. The last two could be examples of good practice worthy of direct dissemination.

Evaluation

Evaluation of the review process

88 When compared to other methods of review and audit used by QAA, AVA review follows a more consistent pattern (see paragraphs 8-28). This is entirely appropriate, given that it is the only area where QAA awards a licence and consequently, the principles of, and criteria to be met for, that licence need to be clearly articulated. Moreover, AVAs have to demonstrate that they meet those criteria; this is very different to the notion of 'alignment' to a code of practice that applies in other methods.

89 All AVAs are invited to comment on their experience of review as part of the process. In general, AVAs were supportive of the process and its format, in terms of the preparation required, the visit itself, and the follow-up. However, there were some areas of comment and suggestion for improvement.

90 Some AVAs were concerned about the overall length of the process and, in particular, the delay between the end of the visit and the feedback (in the form of the draft report) presented to the AVA. There were also some concerns expressed about the short notice given for the provision of additional documentation, where reviewers asked for more documentation between the planning meeting and the visit, and that the review sometimes clashed with periods of intense work for the AVA.

91 Dependent upon the timing of the review, some AVAs also experienced what they perceived as a duplication of effort in the production of the Overview and the QAA annual self-evaluation report (as well as the environmental impact of the paperwork), where the AVA was preparing for both at the same time of year. There were also some concerns expressed with the clarity of conditions and the requirements for evidence in terms of meeting them.

92 Some comments from AVAs related to concerns about reviewer selection, either because some reviewers were thought to be lacking specific experience of certain types of AVA, or because some reviewers were from organisations which were perceived as competitors.

93 Many of these views align with informal feedback gathered from reviewers. Those reviewers who are also involved in other methods welcome the standardised procedure in terms of the timetable for the review and, in particular, the standardised set of meetings at the visit. This avoids the need to spend time determining which meetings are required and who should participate in them. This approach, introduced when the review method was last revised, appears to have been successful.

94 Questioning the participants of meetings is more straightforward, in that reviewers are looking, primarily, at whether licensing criteria are being met. This also leads to a greater focus for reviewers in writing their sections of the report. Now that there are three reviewers for each review (where, previously there were two), the workload before, during and after the review is more manageable.

95 Reviewers that were approached also expressed some lack of satisfaction with the feedback process. It is often a long period between the end of the visit and the point

at which the feedback is given to the AVA. While accepting that the decision on the outcome is that of ARLC, and the report needs ARLC approval before being shared with the AVA, it was suggested that a letter which indicated key findings of the review might be sent to the AVA after the visit, to give the AVA an idea of the overall themes of the outcome of the review.

96 As the reports of reviews are published and accessible to other AVAs and stakeholders, there is the opportunity for commendations to be read and considered for further adoption by the AVA community. However, there may be scope within a revised review process to consider, more precisely, the nature of good practice and potential enhancement. Commendations could be more targeted to specific parts of systems or procedures that are worthy of dissemination in that they can be seen as potential vehicles for enhancement.

97 Where an AVA is unable to satisfy a review team that they meet licensing criteria, the difficulty could either be due to the fact that the AVA does not understand the criteria (in that the wording is unclear or ambiguous) or that the AVA's systems and procedures simply do not meet the criteria. In the former case, there would be a need to revise and clarify the licensing criteria. In the latter, however, the AVA would be required to revise the systems and procedures considered inadequate by the reviewers.

98 Scrutiny of the AVA review reports did not indicate that there were any major problems of interpretation of the criteria under any of the four principles. The problem was that the AVA systems and procedures simply did not meet the criteria. A review of the licensing criteria should, in any case, reconsider their form and wording, but this report cannot point to any major deficiencies.

99 There is an area where the review process and its use of the licensing criteria may be enhanced. Although the process of review involves consideration of whether the AVA is meeting each of the criteria, this is not reflected in the way conditions are presented in most reports. If all conditions (and, possibly, recommendations) directly referenced the licensing criterion that was not being met, this would be of benefit to both the ARLC and to the AVA in their responses.

100 From the above analysis, some preliminary conclusions can be drawn. First, there is a high degree of overall satisfaction with the current review methodology and process of AVA review: there is no great desire for change in terms of the structure, number of reviewers, length and content of the review visit, or the report contents.

101 However, the operation of the review process might be improved in a number of areas identified in this section. In particular, the review method could be enhanced by further consideration being given to:

- the timing of feedback on the results of the review to the AVA
- the relationship between annual reports and review
- the requirements for, and presentation of, documentation
- greater clarity and consistency in the specification of conditions
- the definition and use made of commendations.

Progress since 2004 and areas for further AVA improvement

102 *Learning from AVA review 1999-2004* recommended a review of the licensing principles and criteria, and it is probably the case that the current four principles are easier to deal with in terms of review than the seven that were in place at the time of the last report.

103 That report also made a number of recommendations for 'areas for further development', categorised under each of the (then) seven principles. These recommendations have largely been addressed or have been overtaken by events, such as the introduction of the Access to HE Diploma specifications, which has brought greater consistency to provision; the development of the AVA annual monitoring process, which has required more systematic self-assessment; and the adoption of company status by most AVAs which did not previously have it, which has clarified AVAs' legal identity, security and independence.

104 The 15 reviews in the most recent cycle resulted in most AVAs being awarded a conditional licence, and the number of conditions, overall, did not seem excessive when viewed against the many multi-part criteria under the licensing principles. While progress has clearly been made since 2004, the analysis of outcomes of the recent round of reviews indicates that some of the suggestions made in the previous report remain, for some AVAs, areas for development, including:

- increasing the diversity and range of stakeholders, in particular HEIs
- adopting professional standards in the production of clear and complete committee documentation (terms of reference, minutes)
- clarifying the locus of responsibility for Access to HE within the governance structure
- achieving an appropriate balance in representation within the governance structure
- improving processes for the verification of provider promotional literature
- ensuring adequate staffing levels for AVA activities
- making more evaluative use of data in monitoring performance
- undertaking more specific and transparent strategic planning of AVA activities
- greater targeting of Access to HE
- ensuring that the final approval for new courses is appropriately located within the governance structure
- ensuring that systems are in place to ensure that the designated committee approves courses prior to their commencement
- ensuring that moderators have limited fixed terms of appointment to courses and that they were given appropriate training
- ensuring that providers had adequate internal moderation systems integrated with external moderation
- ensuring that the appointment of moderators and monitoring moderation was located appropriately within the governance structure.

Conclusion

Learning about AVAs

105 This report has analysed the results of the 15 reviews of Access Validating Agencies (AVAs) that took place in the 2006-09 review cycle.

106 The analysis suggests that AVAs have governance structures that enable them to meet their legal and public obligations, ensure they are accountable, and allow them to discharge their AVA responsibilities securely. Although some AVAs' constitutional documentation needed amendment, most amendments related to matters that could be addressed easily, often concerning details of the accuracy and currency of particular statements. However, a number of conditions, and many recommendations, related to the membership of AVAs' governing bodies or committees and reflected some broader concerns about the engagement and the balance of FE and HE representation on AVAs' committees.

107 In general, AVAs manage their AVA responsibilities effectively, and maintain appropriate organisational and operational structures. The area identified most frequently as being in need of attention was strategic planning. While all AVAs maintained broadly appropriate strategic plans, in some instances the planning process itself was unclear or underdeveloped (with too little use made of the evidence base that might be provided by analysis of AVAs' statistical data); in other places, the weakness related more to insufficient specific attention being given to Access to HE within wider organisational strategic planning processes or outcomes.

108 The majority of AVAs meet most requirements relating to course development, approval, monitoring and review, but review teams identified concerns across a wider spread of licensing criteria in these areas. In relation to course development, some concerns about stakeholder involvement were again expressed, especially the involvement of representatives from HE. The location and process for formal course approval following a validation panel, particularly where follow-up to conditions was required, was sometimes considered unclear, and was the subject of several conditions and recommendations.

109 Annual course monitoring was found to be variable. A number of AVAs were experiencing difficulties in ensuring that their providers submitted required information for the annual report to QAA. There were also shortcomings in relation to provider self-evaluation and information from students on the quality of their learning experience.

110 Most AVAs' moderation systems are appropriate and effective, with many conditions and recommendations in this area relating to the detail of moderator appointment procedures. With the introduction of a common qualification specification for the Access to HE Diploma, and the introduction of a standard model for grading the Diploma during the course of this review cycle, changes have been made to the regulatory framework and guidance in the areas of assessment, moderation and award. This has brought an increased focus on the principles and criteria that relate to assessment, moderation, progression, and the award of credit and the Access to HE Diploma.

Sharing good practice

111 In considering the outcomes of these reviews, account should be taken of the very many requirements that are made of AVAs through the licensing criteria, and the small number of conditions that are set for most AVAs as a result of a rigorous review process. In addition, it should be borne in mind that, subsequent to the review, an AVA is required to meet the conditions set, and the AVA's actions are monitored until the conditions have been met. This report does not, therefore, describe AVAs as they currently are, so much as describe them as they were found to be during the review cycle.

112 The hard work and commitment of those working for, and with, AVAs is evident from the review reports. This continues to be a marked characteristic and notable strength of AVAs.

Learning about the review method

113 The analysis of review reports indicates that the review method has operated effectively over the 2006-09 cycle and is, in general, fit for purpose. There are, however, a number of areas that emerge from this analysis and through the evaluation provided by AVAs, that might be considered in the development of the review method:

- how to identify, more precisely, the nature of good practice by AVAs
- how to target commendations to specific parts of systems or procedures that are worthy of dissemination, so that they can provide a focus for enhancement by AVAs
- how to minimise the amount of documentation that is required, and how to reduce the amount of paper generated
- how to take more account of the outcomes of the annual reporting process in the review process, and of the timing of the preparation of the annual reports in scheduling AVA reviews
- how to provide more immediate feedback to the AVA, while recognising that it is the ARLC that is responsible for confirming review conditions and that it is the QAA Board that makes and renews AVA licences
- how to provide clarity in the wording of, and distinction between, conditions and recommendations, and ensure that conditions are clearly referenced to licensing criteria within reports.

114 Finally, it will be important to consider how the concerns most frequently identified by AVA reviewers in the 2006-09 review cycle are given an appropriate focus in a revised review method, so that the process of AVA review can support the continuing development of AVAs and quality assurance of Access to HE courses.

Glossary of terms

Access to HE Diploma

The Access to HE Diploma is a nationally recognised qualification which is credit-based and graded in accordance with the terms of The Access to HE Diploma and credit specification, and the standard grading system. Each Access to HE Diploma has its own approved set of units of assessment, governed by rules of combination.

ARLC

The Access Recognition and Licensing Committee. Appointed by the QAA Board to have responsibility for the operation of the Recognition Scheme (see below), the ARLC monitors AVAs via their annual reports and the process of periodic review.

AVA

Access Validating Agency. An organisation licensed by QAA to undertake the development, validation, monitoring and review of individual Access to HE Diploma programmes. An AVA is also responsible for the award of credit and Access to HE Diplomas.

Grading

The process of applying the common system of unit grading to successfully completed level 3 units within the Access to HE Diploma, using a standard set of grade descriptors and adhering to standard assessment regulations, to produce a profile of grades.

Licensing criteria

The four principles and their related criteria for the licensing and review of AVAs. Part of the Recognition Scheme (see below), the licensing criteria set out criteria that must be met by an organisation that wishes to hold an AVA licence (see Appendix B).

QAA

The Quality Assurance Agency for Higher Education. QAA is responsible for the national recognition and regulation of Access to HE courses. QAA is also responsible for review and audit of standards and quality of higher education in the UK.

Recognition Scheme

The *QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland*. The Recognition Scheme was established by QAA and includes the structures and means by which QAA meets its responsibilities for Access to HE (www.accesstohe.ac.uk/home/publications/recognition/recog_intro.asp).

Appendix A - Review outcomes 2006-09 (in chronological order)

Name of organisation	Review type	Date of review	Outcome
Open College Network Wales (now Agored Cymru)	Licence confirmation	Jan-06	Award of licence confirmed (conditional)
OCN East Midlands Region	Licence	Feb-06	Restricted provisional licence awarded
Open College Network Eastern Region	Initial licence	Mar-06	Provisional licence awarded
Open College Network South West Region	Initial licence	May-06	Provisional licence awarded
Open College Network North West Region	Initial licence	Jun-06	Provisional licence awarded
Open College of the North West (now Ascentis)	Review	Jun-06	Licence renewed (conditional)
Open College Network London Region	Review	Sep-06	Licence renewed (conditional)
Open College Network Oxford, Thames and Chiltern Region	Initial licence	Oct-06	Provisional licence awarded
Open College Network West Midlands Region	Initial licence	Nov-06	Provisional licence awarded
Open College Network South East Region	Initial licence	Nov-06	Provisional licence awarded
Open College Network Yorkshire and Humber Region	Initial licence	Nov-06	Provisional licence awarded
Hampshire Access Validating Agency (now Southern Area Access Validating Agency)	Review	Feb-07	Licence renewed (conditional)
Assessment and Qualifications Alliance	Review	Mar-07	Licence renewed (provisional)
Cambridgeshire Access Validating Agency	Review	May-07	Licence renewed (provisional)
Open College Network North East Region	Review	May-07	Licence renewed (provisional)
Open College Network Eastern Region	Licence confirmation	Nov-07	Award of licence confirmed (conditional)
Open College Network South West Region	Licence confirmation	Feb-08	Award of licence confirmed (provisional)
Assessment and Qualifications Alliance	Revisit	Mar-08	Licence renewal confirmed

Name of organisation	Review type	Date of review	Outcome
Cambridgeshire Access Validating Agency	Revisit	May-08	Licence renewal confirmed
Open College Network North East Region	Revisit	May-08	Licence renewal confirmed
Open College Network North West Region	Licence confirmation	May-08	Award of licence confirmed (conditional)
Open College Network South East Region	Licence confirmation	Jun-08	Award of licence confirmed (conditional)
Open College Network Oxford, Thames and Chiltern Region	Licence confirmation	Oct-08	Award of licence confirmed (provisional)
OCN East Midlands Region	Licence confirmation	Feb-09	Award of licence confirmed (conditional)
Open College Network West Midlands Region	Licence confirmation	Mar-09	Award of licence confirmed (conditional)
Open College Network South West Region	Revisit	Jun-09	Licence renewal confirmed
Open College Network Yorkshire and Humber Region	Licence confirmation	Jun-09	Award of licence confirmed (conditional)

Appendix B - The criteria for the licensing and relicensing of AVAs

Principle 1: Governance

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.

Rationale

This principle is designed to ensure the current and probable future security of the licence within an AVA as an organisation. It requires the AVA to be properly constituted, to ensure that there is an appropriate balance between its management and governance structures, to specify clearly responsibilities for its major operations, and to protect itself from inappropriate or undue influence. The criteria also ensure that an AVA cannot devolve its major responsibilities under the licence to other bodies or individuals. In the Recognition Scheme, these aspects of governance are seen as forming the secure foundation for an AVA's activities as a validating body.

It is also a fundamental aim of the Recognition Scheme to promote the Access to HE Diploma as a national award which is consistent and comparable across the range of licensed AVAs. It is thus in the interests of the Recognition Scheme, and the Access to HE provision which it regulates, to ensure that AVAs are independent bodies, that are able to respond to the requirements of the Recognition Scheme without being unduly restricted or controlled by any other body or organisation. The adoption of a clear legal identity is thus seen as a key element, as is the ability of an AVA to control its own staffing, finances and other resources.

Criteria

The organisation will be able to demonstrate that:

- 1.1 it has aims which are congruent with the overall purposes and aims of the Recognition Scheme
- 1.2 its constitutional basis is clear and readily identifiable, and that it has formal documentation which provides a description of its legal identity, functions, aims, and structures
- 1.3 its constitutional arrangements and governance structures ensure an appropriate level of formal accountability, and that the organisation is protected from the undue influence of any one of, or a minority group of, its stakeholders
- 1.4 its constitutional basis or relationship to any other organisation does not restrict the independent decision-making or operation of the AVA as specified under the terms of the AVA licence
- 1.5 it has taken legal advice about the appropriateness of its legal identity to meet its public obligations, and has taken a considered decision on the basis of the advice received

- 1.6 **either** its legal identity ensures that its liability exists separately from that of its individual stakeholders and their representatives, **and/or** it has taken steps to limit its liability and that of its individual stakeholders, so far as is possible, through insurance
- 1.7 **either** its legal status requires it to have formally regulated financial arrangements, **and/or** it has established an external agency arrangement through which its financial affairs are scrutinised
- 1.8 there is a clearly identified basis on which it is able to enter into formal legally binding agreements; and, where there are formal agreements between the organisation and the suppliers of any goods or services which are integral to the operation of the AVA (including where the supplier is otherwise involved in the operation of the AVA), such agreements define the separation of the responsibilities, liabilities and authority of each party
- 1.9 it is not itself a provider of Access to HE programmes or a receiver of Access to HE students
- 1.10 its constitutional structure includes the participation of organisations providing Access to HE programmes, HEIs which receive Access to HE students and are subscribers to QAA, and other organisations, agencies or public bodies with appropriate interests in Access to HE and the provision of educational opportunities for adults across its region
- 1.11 within its governance structure, it has sufficient and appropriate experience and expertise to ensure sound governance and informed decision-making in relation to Access to HE matters and, in particular, that:
 - a representatives from both the FE and HE sectors are present within the organisation's advisory and decision-making structures
 - b the criteria for the appointment or election of FE and HE representatives to decision-making bodies are clear and the process is transparent
- 1.12 the clearly identified locus of authority for AVA responsibilities within its governance structures is that body with ultimate controlling authority within the organisation; and that there are clear descriptions of the role and responsibilities of any executive officers or subcommittees which may be involved in the practical operation of the licence and, in particular, that:
 - a the extent and limits of authority of bodies holding devolved responsibilities are clearly defined in relation to AVA matters
 - b there are monitoring and reporting procedures in place which ensure that any delegated activities are properly undertaken
 - c responsibilities are clearly specified within the executive and governance structures for strategic direction, policy development, legal matters and the oversight and effective control of financial operations
 - d responsibilities are clearly specified within the executive and governance structures for the quality assurance and enhancement of the Access to HE provision approved by the AVA, and the academic standards achieved by students

- e the annual AVA report to QAA and the overview document required for AVA review are formally approved by the body which holds responsibility for the AVA licence.

Principle 2: Management

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

Rationale

This principle places a strong emphasis on the AVA's adoption of a formal strategy for Access to HE as part of its planning processes, and the establishment and development of a culture of quality and self-assessment within the AVA. It is also designed to ensure that the organisation has the administrative and management capacity to operate the AVA licence appropriately, and to sustain that management successfully into the future. There is a focus on areas such as systematic data collection, rigorous financial management, proper record-keeping and written procedures for key operations. This is designed to ensure that the work of the organisation is well-established, sustainable and not reliant on individual staff. The expectation that an AVA will engage in activities which promote Access to HE more generally is part of the Recognition Scheme's aim to extend the opportunities which are provided by Access to HE programmes locally, regionally and nationally.

Criteria

The organisation will be able to demonstrate that:

- 2.1 it has a strategy for Access to HE and has systematic and effective mechanisms which enable it to pursue that strategy and, in particular, that:
 - a it operates a regular strategic planning process
 - b it has strategic and operational objectives which address the development and enhancement of Access to HE provision and which take account of prevailing regional and national strategies, and issues relating to credit
 - c it has specific targets related to its declared objectives for Access to HE, and assigns responsibilities and resources for meeting those targets
 - d it has arrangements in place for monitoring, evaluating and reporting on the achievement of targets
 - e its policies and plans relating to Access to HE are systematically reviewed and revised, taking account of the outcomes of the monitoring process
 - f its arrangements make effective use of the views of Access to HE programme providers and receivers of Access to HE students
- 2.2 its strategy for Access to HE includes the promotion of Access to HE in general and, specifically, purposeful action to advise its providers and other stakeholders on the appropriate development and targeting of their programmes; and in particular that it identifies, as part of its overall strategy, those groups in its locality and region which have most need of further opportunities to progress

- to HE, communicates its analyses to its providers on a regular basis, and cooperates with other organisations and agencies in its region which have responsibilities or shared interests in educational opportunities for adults
- 2.3 it has established procedures for monitoring and assessing the continuing quality and effectiveness of its management and operation, including consideration of potential risks to its activities, and mechanisms to ensure that appropriate action is taken in response to the outcomes of such procedures and, in particular, that:
 - a it has in place a self-assessment mechanism designed to enhance organisational quality and leadership
 - b it makes use of statistical and other data to review its performance
 - c it keeps explicit records of the AVA's achievement in relation to its stated objectives for the year
 - 2.4 it establishes and maintains an effective deliberative structure with a clear statement on the membership, terms of reference and the mode of operation of each committee and, in terms of public accountability, ensures that all formal minutes and other records are produced to a professional standard
 - 2.5 it operates a systematic and rigorous approach to the management of its financial affairs and, in particular, that:
 - a it has forward planning in its financial management including budgeting mechanisms which take account of the AVA's objectives and specific targets for Access to HE
 - b there are clear processes and systems through which it records, controls and monitors financial decision-making and transactions
 - c it operates standard accounting procedures and is able to produce annual accounts appropriate to meet the requirements of the annual report to QAA
 - 2.6 there is a level and structure of staffing and physical resources capable of delivering the requirements involved in the holding of an AVA licence, and the AVA's staff are fully accountable to it through clear management lines and, in particular, that:
 - a its facilities and administrative systems are sufficient to manage its AVA responsibilities
 - b responsibility for the effective leadership and day-to-day management of the organisation is clearly located
 - c appropriate staff training and development is available
 - 2.7 it has published operational procedures related to Access to HE including those related to the registration of students with the AVA; the development, validation and moderation of Access to HE programmes; and the award of credit and Access to HE Diplomas and the issue to students of credit transcripts and diplomas, in keeping with the requirements of the common credit framework for Access to HE

- 2.8 it has effective structures and systems for the collection, recording and holding of data about Access to HE programmes and students and, in particular, that:
 - a it has systems which enable the organisation to track learner achievement and award and transfer credit, in keeping with the requirements of the common credit framework for Access to HE
 - b it maintains a current record of all units, in a standard format, which have been approved for use within the AVA's Access to HE programmes
 - c it is able to provide accurate and timely information to satisfy QAA's reporting requirements
- 2.9 it communicates to its stakeholders effectively about matters relating to Access to HE and, in particular, that:
 - a it has mechanisms to inform providers directly and promptly of regulatory matters relating to the design, delivery and management of Access to HE programmes
 - b AVA policies, procedures and activities, including its strategy for Access to HE, are made widely and regularly available to its stakeholders
- 2.10 it fulfils its responsibilities as an awarding body by monitoring the activities of its providers to maintain the integrity of the Access to HE Diploma and, in particular, that:
 - a it has in place processes by which it can verify the accuracy of providers' promotional literature related to approved Access to HE provision, and the proper use of the authorised QAA logo
 - b it monitors the information and guidance issued to students about their Access to HE programme
- 2.11 it has an approved equal opportunities policy, the implementation of which is evident in relation to its activities, processes and procedures
- 2.12 it has transparent and accessible procedures to enable complaints, grievances and appeals to be received, considered, and resolved fairly, including procedures to consider complaints from students and providers to the AVA in its role as an awarding body
- 2.13 it is able to produce an annual report on its activities, and the Access to HE provision for which it has responsibility, in accordance with QAA requirements.

Principle 3: Quality assurance, enhancement and development

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.

Rationale

The processes of the approval and review of individual Access to HE programmes are at the heart of the Recognition Scheme and are among its key quality assurance processes. This principle acknowledges the importance of thorough and transparent

development and validation processes, making appropriate reference to the requirements of the common Access to HE credit framework and Access to HE qualification specification, and requires that the act of approval is made with the full authority of the AVA as the holder of the licence. It also requires AVAs to establish mechanisms by which the Access to HE programmes they validate are subject to continuing review and enhancement.

Criteria

The organisation will be able to demonstrate that:

- 3.1 it operates an effective system of programme development, through which it clearly specifies its requirements and provides appropriate guidance relating to:
 - a the individual stages and procedures for the development of Access to HE programmes, including a requirement that the development process involves consultation with representatives from HE with relevant expertise
 - b the process and criteria for the validation of Access to HE programmes, including a statement that QAA recognition may be given only to programmes which are delivered in the UK¹
 - c Access to HE programme design, with reference to the structures and mechanisms of the common credit framework for Access to HE, and including a requirement that programmes should be explicitly designed to prepare adult students from under-represented groups for study in UK HE
 - d the award of an Access to HE Diploma, with reference to the common credit-based Access to HE qualification specification
 - e the form and content of documentation to be submitted for programme validation
 - f any other matters which are relevant to the successful validation of an Access to HE programme
- 3.2 there is a rigorous system for programme validation, including processes for unit approval and approval of rules of combination, that is designed to ensure consistency of outcome in relation to the quality and academic standards of Access to HE programmes
- 3.3 there are established procedures for the conduct of programme validation panels that ensures externality, objectivity and consistency of process in the consideration of Access to HE programme submissions and, in particular, that:
 - a there are established criteria for the membership and composition of validation panels, to include representatives from providers of Access to HE programmes (external to those applying to deliver the programme), receivers of Access to HE students in HE, and relevant curriculum expertise for the programme being considered
 - b validation panel members are made aware of the purpose, conduct and possible outcomes of the validation process

¹ Also including the Channel Islands and the Isle of Man.

- c the roles and responsibilities of validation panel members and any AVA officers attending a validation panel are made clear
 - d the chair and members of the validation panel have no real or apparent conflicts of interest in respect of the outcome of the validation event, and those responsible for developing the programme are not involved in the validation process
 - e validation panel outcomes are properly recorded with a clear indication of any subsequent action, the responsibility for taking such action, and the relevant timescales
 - f any conditions set as a result of the validation exercise are met prior to the commencement of the programme, and that their satisfactory fulfilment is formally recorded
 - g up-to-date records of all validation decisions and definitive programme documentation are maintained
- 3.4 the validation process must confirm that a programme meets the standard requirements relating to:
- the specifications of the common credit framework for Access to HE
 - the qualification specification for the Access to HE Diploma
 - methods of recording individual achievement
- 3.5 the validation process must ensure that a programme is fit for purpose as a preparation for study in HE in general, and with reference to the programme's main intended progression route(s) in particular, through its consideration and confirmation of:
- the programme's aims and objectives
 - the specified target groups, and mechanisms for targeting and recruiting individuals from those groups
 - arrangements and criteria for admission to the programme, including pre-course guidance
 - availability to students of academic and personal support
 - curriculum design and content, as demonstrated through the units available in the programme and the rules of combination for named awards, with reference to the acquisition of an appropriate balance of subject knowledge and academic skills (and with reference to any common Access to HE subject specifications, where they exist)
 - programme organisation and methods to assure the coherence of individual students' programmes of study
 - successful completion criteria, where these are additional to the requirements of the common Access to HE qualification specification
 - teaching strategies and methods of assessment
 - procedures and criteria relating to the accreditation of prior learning
 - programme management responsibilities and arrangements

- internal moderation or verification, where such a system exists, and its articulation with the AVA's moderation process
 - resources, facilities, staffing and staff development opportunities
 - the provider's arrangements for programme monitoring and evaluation, including methods for student evaluation and feedback
- 3.6 where an Access to HE programme is intended to lead to further study for a professional qualification, students are made aware of, and given the opportunity to meet, the entry requirements of the professional body concerned
- 3.7 the recommendations of a validation panel are referred to the designated body within the AVA's deliberative structure for formal approval, and that the approval of an Access to HE programme is made with the full authority of the AVA prior to its commencement
- 3.8 there are processes in place to regulate modifications to programmes to ensure programmes' continuing coherence and to ensure that, in cases where modifications are substantial, the programme is subject to a further full validation process
- 3.9 there is a rigorous system for the regular review and development of the Access to HE provision validated by the AVA, with reference to quality and comparability of programmes and consistency of student outcomes and, in particular, that:
- a the review of programmes is undertaken on an annual basis, or on some other regular timescale for which the AVA has a convincing rationale
 - b the process for review involves self-assessment of Access to HE programmes by providers which, itself, includes consideration of student feedback
 - c the review includes analysis of the effectiveness of targeting in relation to recruitment; the quality of the students' experience; the standards of student achievement; student retention, completion and progression; and appropriate responses to issues raised through the process of moderation
 - d there are mechanisms to identify matters of concern arising from review processes; to address the matters identified; to stipulate those responsible for taking action; and to indicate an appropriate timescale within which such action should be taken
 - e data on Access to HE programmes and students, including an appropriate cohort analysis, is formally considered within the review process
 - f there are mechanisms through which the AVA is able to identify and disseminate good practice, and to ensure that the outcomes of review procedures are fed into its own planning processes
- 3.10 it has a system for the periodic revalidation of programmes which assures their continuing quality and fitness for purpose; and in particular that:
- a it has a clear timescale for revalidation which should not normally be more than five years from initial validation
 - b the process of revalidation addresses the continuing appropriateness of the areas listed in 3.5 above

- c the process of revalidation takes into account the outcomes of annual programme monitoring and review procedures
 - d the process includes representation from HE
 - e the process includes a critical review prepared by the provider
- 3.11 it is a focus for the promotion and development of Access to HE provision within its government region or regions, and offers appropriate services and opportunities to support the processes for the quality assurance and enhancement of Access to HE and, in particular, that it:
- a provides opportunities to enable practitioners to discuss and share best practice in respect of Access to HE provision
 - b provides opportunities for the discussion of approaches to curriculum and curriculum development across the providers within the AVA
 - c facilitates events or initiatives designed to enhance the consistency and equivalence of assessment practices and academic standards
 - d promotes initiatives which focus on innovation and development in Access to HE provision
 - e provides leadership in the promotion of Access to HE at local and regional levels, and becomes involved in national projects which have the same purpose.

Principle 4: Academic standards

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

Rationale

This principle is designed to ensure that an AVA establishes and operates its systems for ensuring that the consistency and sufficiency of academic standards is maintained for the awards for which it has responsibility. The principle also incorporates the requirement for a regulated and secure process for the award of the Access to HE Diploma and the issue of Access to HE certification.

Criteria

The organisation will be able to demonstrate that:

- 4.1 it has established a system of regular external programme monitoring and assessment ('moderation') through which the quality, comparability and fitness for purpose of Access to HE programmes, and the consistency and sufficiency of standards of student achievement, are assured and, in particular, that:
- a there is a clearly specified definition of the function of moderation, to include the maintenance and enhancement of the quality and fitness for purpose of Access to HE programmes; monitoring the student experience on the programme; the verification of standards of student achievements leading to the granting of the Access to HE award; and an overview of the conduct of assessment, which ensures the approved programme is being delivered and that students are receiving fair and equitable treatment

- b moderation processes pay due regard to objectivity, impartiality, fairness and equity
 - c the moderation process ensures that the standard of all Access to HE awards is consistent within the AVA and meets the requirements of the common Access to HE qualification specification and appropriate subject specifications, where they exist
 - d there is a clear specification for the operation of the process of moderation, including the purpose and number of visits, the activities to be undertaken, criteria for the sampling of evidence of student achievement, and processes for verifying and monitoring the standards achieved by students
 - e where the AVA's own process of moderation makes use of providers' internal moderation or verification procedures, there is a system for approving and monitoring those procedures, and the articulation between the systems of internal and external moderation is set out
 - f where there is more than one moderator for a programme, or the organisation operates a system with different categories of moderators, the respective responsibilities of different moderators are identified, and the relationship between them is stated
 - g within the moderation process as a whole, there is provision for expert moderation at the subject level
- 4.2 it has procedures that will ensure that those who act on the AVA's behalf to monitor the quality of Access to HE programmes and the standards of student achievement ('moderators') are competent to do so and, in particular, that:
- a there are clear criteria for the selection of moderators, which include appropriate expertise, current curriculum knowledge and relevant experience in adult education, FE or HE
 - b moderators are external to the provider and have a sufficient degree of independence from the admissions process of related programmes within any receiving institution to ensure that there is no potential conflict of interest
 - c moderators are appointed by, and responsible to, the AVA and not a providing or receiving institution
 - d there are explicit contractual arrangements between the moderator and the AVA, which set out the moderator's duties and term of service, and prohibit any subcontracting of duties
 - e the period of office of a moderator for any one Access to HE programme, or any one Access to HE provider, is time-limited and, normally, no longer than four years
 - f there are sufficient moderators appointed in response to the number and range of subject areas on the Access to HE programme, and to ensure that the moderation of student achievement is thorough, rigorous and fair
 - g there is provision for the mandatory induction and training of new moderators that will enable them to carry out their role effectively, including guidelines which detail the nature of the AVA's moderation process; the roles

- and responsibilities of moderators; and the authority with which they are entitled to act
 - h there are established mechanisms to enable moderators to compare standards and judgements across the AVA's programmes
 - i there are mechanisms through which moderators are updated on any changes in the AVA's or other relevant body's policy and practice
 - j there are mechanisms through which the AVA monitors moderators' performance, and responds appropriately where their performance is deemed to be unsatisfactory
 - k there is a process through which the AVA can terminate a moderator's employment, if necessary
- 4.3 it makes use of the outcomes of the moderation process to improve and enhance approved Access to HE programmes and, in particular, that:
- a there is clear guidance for moderators on the nature, structure, content, frequency and submission of moderation reports
 - b there is an involvement of key AVA committees with responsibilities for quality and standards at appropriate points in the overall framework for moderation including the appointment of moderators and the receipt of, and response to, moderators' reports
 - c there are procedures for receiving and responding to moderation reports; processes for ensuring that appropriate staff of providing organisations receive copies of moderators' reports; and procedures for ensuring that recommendations and other matters arising from the reports are acted upon within an agreed timescale
 - d there are clear procedures for action to be taken in the event of providers failing to address issues raised in moderation or other reports to ensure that quality and standards of the programme are safeguarded, including procedures for the ultimate sanction of withdrawal of an Access to HE programme's approval
 - e the overall outcomes of the moderation process are analysed and reviewed on a periodic basis by the AVA
- 4.4 it has specified procedures and clear criteria for the award of an Access to HE Diploma to students and, in particular, that:
- a formal authority for the award of an Access to HE Diploma is clearly located within the AVA
 - b there is explicit guidance about the function, process and appropriate membership of final assessment boards or meetings
 - c there are effective systems and procedures to ensure consistent application of the programme specification of required learning achievement for the award of the Access to HE Diploma
 - d verified evidence of achievement is required before the award of credits or the Access to HE Diploma can be made

- e recommendations for the award of Access to HE Diplomas and credits are approved only after the process for moderation has been completed
 - f all students on Access to HE programmes who complete the required learning achievement, as specified in the approved programme documentation, are awarded an Access to HE Diploma or credits, as appropriate by the AVA
- 4.5 it has a regulated process for the issue of Access to HE Diplomas and credit transcripts to students and, in particular, that:
- a certificates have a standard format which include the specific title of the award in keeping with QAA's requirements for Access to HE award titles; the name of the AVA; and the authorised Access to HE logo, including the words 'recognised by the Quality Assurance Agency for Higher Education'
 - b there are secure administrative procedures for the issue of certificates, and for recording the issue and re-issue of Diplomas and credit transcripts
 - c the AVA provides credit transcripts to all those who have been awarded credits, which details their credit achievement on approved units of the programme.

Standard conditions of approval

The following standard conditions are attached to the award of licences to an AVA. An AVA is required to provide an explicit written statement, which indicates that:

- it will conform with, and abide by, the principles, criteria and operational guidance set out in the *QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland*, and in any other documents relating to Access to HE, as published from time to time by QAA
- it will follow the procedures set out in its licence application and/or those approved in subsequent submissions to QAA
- resources are available to it for implementing the procedures set out in its documentation
- information about it and its activities, and the Access to HE programmes which it approves, will be provided from time to time, as requested by QAA
- it will cooperate with, and participate in, QAA's procedures for the monitoring and review of AVAs
- it will not subsequently devolve to another agency any part of those responsibilities described in its submissions as approved by QAA.

Appendix C - Review documentation

The Overview will contain some basic contextual information on the AVA including:

- background and current context of AVA's operations
- developments since the last review or initial licensing
- membership
- providers and approved Access to HE programmes
- AVA mission statement/aims
- development and targeting policies and strategies within the AVA
- planned developments.

The Overview is supported by appendices and/or references to electronic documents that cover a number of areas including the following:

- governance and committee structures
- organisational structures
- minutes of all major committees relevant to the licence
- assessment, moderation and awards
- review and evaluation methods
- handbooks and guidance documents
- names, roles and responsibilities of AVA officers.

In addition to the Overview, the review team has access to profile information provided by QAA officers and copies of the previous two annual reports submitted by the AVA to QAA.

Following the planning meeting (see paragraph 16), there is likely to be requests to the AVA for further documentation to be supplied either in advance of, or at, the review visit. The nature of the documentation depends on any issues raised by the reviewers or any documentation referred to in the Overview but not supplied with it.

At the Planning meeting, the audit trails are selected and a subsequent request is made to the AVA to supply, for the visit, documentation supporting the audit trails. This documentation would typically consist of:

- Centre Recognition/Centre Approval documentation
- programme approval documentation including:
 - letter and guidance advising of revalidation process, panel dates, and so on
 - revalidation action plans or related correspondence
 - definitive programme submission documents
 - course handbook (where separate from above)
 - approval panel report
 - rules of combination approval pro forma
 - letter to provider confirming approval ratification of programme(s)
- annual monitoring/self-assessment reports

- moderator reports
- minutes of the relevant AVA committee relating to programme approval or programme amendment, or any other decisions relating to the programme or provider.
- correspondence related to any approval of programme amendments
- data submission letter and pro forma; data returns provided by Centre
- any other correspondence relating to the provider/programmes
- provider promotional literature.

The Quality Assurance Agency for Higher Education

Southgate House
Southgate Street
Gloucester
GL1 1UB

Tel 01452 557000
Fax 01452 557070
Email comms@qaa.ac.uk
www.qaa.ac.uk

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