Access to Higher Education

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Access

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Open College Network
East Midlands Region

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Foreword

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

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

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

- **unconditional confirmation** of renewal of licence for a specified period

- **conditional confirmation** of licence with conditions to be met by a specified date

- **provisional confirmation** of licence with conditions to be met and a further review visit by a specified date

- **withdrawal** of licence for operation as an AVA.

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

The review process

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

6   The review visit took place from 24 to 26 February 2009. The visit to OCNEMR consisted principally of meetings with representatives of OCNEMR, including AVA officers, members of the Board of Trustees, the Access to HE Committee, Access to HE receivers, providers and programme leaders.

7   The review team comprised Mr Steve Babbidge, Dr Philip Bentley and Ms Kathryn Powell. The review was coordinated for QAA by Professor Chris Clare, Assistant Director, Reviews Group.

The AVA context

8   OCNEMR was formed on 1 August 2005. The AVA serves Leicestershire, Rutland, Northamptonshire, Lincolnshire, Nottinghamshire, Derbyshire and Burton upon Trent. In 2007-08, providers of Access to HE programmes consisted of 19 further education institutions, one university and one small private training provider. The AVA recognises

the provision of all but two providers of Access to HE in the East Midlands Region.

AVA statistics

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

Total number of providers	21
Total number of Access to HE programmes available	91
Total number of Access to HE courses running	86
Total Access to HE learner registrations	1,808
Total Access to HE certifications	862

10   Recent developments have included the preparation for the implementation of the new Access to HE Diploma. All providers have now transferred to regional Diploma programmes which incorporate updated and rationalised subject unit banks and a common core. This is designed to promote flexible and economic delivery. In preparation for the new Diploma, amendments were made to the AVA's generic Diploma programme documents and were subject to full recognition panel approval. These amendments now apply to the three vocational, regional programmes.

11   A major unit review has led to the establishment of new unit banks (NUBs). In 2008, 11 subject review working parties were held in order to complete this process. All completed NUBs were presented to, and approved by, a panel. Over a two-year period 19 subject reviews have been undertaken and this process has enabled the AVA to bring together subject specialists from across the region. The AVA has been able to promote an increased understanding of the Diploma and ownership of pathway content as a result of the working parties.

12   The organisation was reassessed for Investors in People accreditation in May 2008. This was confirmed with no conditions and a small number of recommendations. The AVA continues to be represented in working groups for the two Lifelong Learning Networks for the

region: Skills for Sustainable Communities and Leap Ahead.

13   OCNEMR submitted its initial application for a licence in the spring of 2006. A restricted provisional licence was issued with conditions to be met; three of these conditions were met by July 2006 with a further three in October 2006. The final condition was met on 5 January 2007.

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

14   OCNEMR is a registered company limited by guarantee, incorporated in August 2005. It is also a registered charity. It was formed by a process of merger from two AVAs in the region: OCN South East Midlands and OCN North East Midlands and the subsequent change of name was registered with Companies House. The review team heard from the Board that legal advice had been taken at the time of merger and that the current structure was a reflection of a considered decision taken in 2005.

15   The AVA's Memorandum and Articles of Association are supplemented by a constitution, approved in June 2006, which together provide the formal statement of the legal identity of the organisation. These documents also establish the aims, structures and functions of the AVA, limiting the legal liability of members and their representatives and enabling the AVA to enter into legally binding agreements. Under its obligations as a limited and charitable company, the AVA maintains formally regulated and externally audited accounts that, subsequent to Board approval, are made available to QAA annually.

16   The aims of the AVA are congruent with those of the Recognition Scheme and are recorded in the company's objects as the 'advancement of learning, education and training of the public in or around the East

Midlands [the region] and elsewhere…by promoting and widening participation…[and] improving access to higher education'. The AVA also operates as an OCN as a licensed member of the National Open College Network (NOCN) and has a number of subsidiary objects that are complementary to, and supportive of, its work as an AVA. OCNEMR has a vision statement that is congruent with the aims of the Recognition Scheme in that it aspires 'to be at the forefront of a comprehensive national credit and accumulation transfer system, and recognised for promoting social inclusion, wider participation, and community transformation'.

Governance

17   The governance structure of the AVA is a Board of Trustees, elected via the annual general meetings (AGM), with three subcommittees: Staffing; a Quality Committee; and the Access to HE Committee. The Quality Committee's business is reserved for those activities undertaken as an OCN and it has no direct responsibility for activities undertaken under QAA licence. Each committee is chaired by a trustee and reports to the Board. The Board delegates day-to-day decision-making to its Chief Executive who is responsible for overall leadership and management. The Board and its committees are required to operate in accordance with the Nolan Principles.

18   The Board is the locus of authority for the AVA licence and draws its membership from the range of organisations it admits. Members are encouraged to contribute to the formulation of OCNEMR's policy, and play an active part in the work of its committees, through the nomination of individuals to sit on the Board. The Board's role and remit include setting strategic direction; establishing a framework for policy, planning and financial management to support the strategy; and monitoring all aspects of the organisation's performance, including that of the Chief Executive. The Board is also specifically charged with ensuring that the AVA maintains its legal identity and liability; is involved in the AVA's strategic planning; monitors the AVA's income and expenditure

and ensures resources are deployed to meet its obligations under QAA's licence. It also monitors and directs the activities of its Access to HE Committee.

19   Appointment as a member of the Board is open to all approved members through nomination at an AGM, with one third of the Board's members retiring on an annual basis while remaining eligible for re-election. The Board is also empowered to appoint additional trustees by ordinary resolution. A minimum of five and maximum of 15 trustees are permissible; 12 of the 15 positions on the Board were filled at the time of the review.

20   The composition of the Board is determined by the Articles of Association, which requires representation from the compulsory education sector, the post-compulsory education sector, and the HE sector. Additionally, the Board is required by its constitution to include in its membership the chairs of its Quality, and Access to HE Committees, both of whom are appointees of the Board. The Board's membership was consistent with these requirements and represented a broad range of organisational type and geographical spread.

21   From discussions with trustees and other stakeholders, the review team formed the view that the Board had sufficient and appropriate experience and expertise to ensure sound governance and informed decision-making in relation to Access to HE matters. There was a clear understanding by trustees and other stakeholders of the separate status and identity of the AVA function. Although the Board's membership did reflect representatives from the further and HE sectors and the criteria for election of these representatives are clear, the team noted that the Board did not, however, as part of its constitution, require the participation of organisations providing Access to HE programmes. It is therefore a condition of the licence that the AVA revise its Memorandum and Articles of Association to ensure that organisations providing Access to HE programmes are represented at appropriate levels in its constitutional structure.

Membership

22   OCNEMR is responsible and accountable to its members. Membership is defined constitutionally via a rule in the Articles that permits the regulation of admission and classification of members, including the admission of organisations to membership. Providers of Access to HE wishing to become members are required to complete a Centre Approval Application produced by NOCN. Approval is contingent on adherence to a range of compliance statements that relate to OCNEMR's licence from NOCN. A risk assessment is undertaken by officers and approval granted subject to recommendations and/or conditions as appropriate. Monitoring membership compliance is undertaken in the first instance by the Quality Development Manager. Should concerns arise about any approved centre, quality improvement action plans are initiated. If a centre is unable to demonstrate its capacity to improve, the Board retains the right to withdraw membership.

23   Reference to planned Access to HE provision is incorporated in the centre approval document in various sections by providers, but the review team noted the absence of specific references to the requirements of, and compliance with, QAA licence criteria due to the use of a single membership process for two licences. The team recommends that the AVA reviews its procedures for admitting organisations offering Access to HE into membership, to ensure that they give due recognition to the requirements of QAA's licence and that they are fit for purpose for organisations wishing only to offer Access to HE programmes.

24   Members are drawn from across the East Midlands and include most colleges of further education in the region, eight HE institutions, and a wide variety of other statutory and non-statutory sector organisations.

The committee structure

25   Each of the three subcommittees has a clearly defined remit and membership and each is chaired by a trustee. There is a clearly defined separation between those responsibilities delegated by the Board to the two committees responsible for OCN and AVA licensed activities. The Access to HE Committee has full responsibility for all matters relating to the operation of QAA's licence. It has delegated authority from the Board for approving Access to HE provision and has primary responsibility for ensuring the quality assurance and enhancement of such approved Access to HE provision in the region. It reports to the Board through a standing agenda item and receives and considers the AVA's annual report for subsequent consideration by the Board.

26   In addition to the Board member appointed to chair it, membership of the Access to HE Committee includes a Deputy Chair who is the Lead Access Moderator appointed by the Board; eight representatives from HE institutions; and six representatives from further education. All are appointed triennially by the Board. In addition, the Access to HE Committee may co-opt up to four further members, also on a triennial basis. The Committee meets regularly and the agendas are wide ranging, giving good coverage to the responsibilities set out in its terms of reference.

27   The review team noted a low attendance pattern by some members of the Access to HE Committee, changes in its membership, and low levels of participation, in particular by some HE institutions. In discussion with Committee members and AVA officers, the team was reassured that steps were being taken to remedy these issues.

28   The business of the Committee in the recent past had involved active consideration of the AVA's strategic direction, including regular, well-planned small-group activities. The review team commends the Committee's enthusiastic approach to its responsibilities and its method of working, and noted the benefits this brought to advising the Board.

29   From its consideration of the evidence, the review team concluded that the Access to HE Committee was fully aware of, and exercised, the majority of its responsibilities for Access to HE effectively. The team noted, however, that neither the terms of reference for the Committee, nor its practice, included the approval of its moderators beyond the appointment of a Lead Moderator. It is therefore a condition of the licence that the AVA revise its terms of reference for its Access to HE Committee to ensure that it is involved appropriately in the appointment of moderators.

Authority for Access to HE responsibilities

30   Within OCNEMR's governance structures there is a clear understanding of the responsibilities and obligations of holding a QAA licence for Access to HE activities. The locus of authority for this resides unequivocally with the Board, which in turn delegates appropriate quality development and enhancement responsibilities to its Access to HE Committee. From discussions with Board and Committee members, and examination of minutes from both elements of the governance structure, the review team concluded that the AVA discharged its governance responsibilities under licence transparently, and satisfactorily.

Principle 2

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

Strategic planning

31   The AVA has a clear Access to HE strategy in place covering the period 2008 to 2011. Its development was described by AVA staff as being 'bottom up and top down' and providers and a variety of stakeholders confirmed that they had been consulted during its development. The process included away days with the participation of the Board of Trustees. The review team found that the AVA is very effective in using the range of expertise

represented on the Board to further its strategic aims, and the expertise of the Board of Trustees is used effectively when considering Access to HE issues. This strategy informs activities and the performance of the AVA is monitored against it, on a regular basis, by the Board through a standing agenda item at its meetings. The Strategic Plan has an annual operating statement that informs staff activities and management priorities, and targets are set by which performance is measured.

32   The AVA's strategy for Access to HE includes promotion of Access to HE generally, and it targets groups who are in need of greater access opportunities, including supporting a programme at a college in an area of multiple deprivation. It has effective links with more specific groups, for example, AVA staff were building close links with an HE institution offering health related programmes, and colleges offering health focused Access to HE programmes.

Strategic management

33   The Chief Executive is supported by a senior management team of five: a Director of Curriculum and Quality who manages the curriculum and quality teams; a Director of Corporate Services responsible for finance and human resources; a Quality Development Manager responsible for the internal and external quality assurance systems; a Manager of Corporate Services who supports the work of the Directors, Chief Executive and the Board; and an Access to HE Manager. Jointly with the Chief Executive, the Access to HE Manager is responsible for setting the strategic direction of the AVA, as well as the development and operations of the AVA. Providers and other stakeholders spoke warmly of the support and guidance provided by the post holder which had enhanced the service offered by the AVA. The review team noted the high workload associated with this post. The team heard encouraging reports of continually developing links with other stakeholders in the region, including a number of HE institutions. Examples of activities included the Access to HE Manager

making presentations to a group of admissions tutors in one HE institution and to the representatives from some HE institutions on various committees and the Board of Trustees. However, the AVA recognises that it needs to enhance links with all HE institutions in the region, and the review team would encourage the development of such links as a priority for the AVA.

34   The review team found that the AVA had established an effective and inclusive deliberative structure, both in its internal work and with providers and stakeholders. All committees have clear terms of reference and reporting relationships with written guidance provided, for example, in the Handbook for the Trustees. The role of the Access to HE Committee is set out in the Providers Handbook. Minutes are provided across committees, and reporting relationships between committees are clear. The minutes of the Quality Committee and the Access to HE Committee are received by each committee.

35   Data collection and management, including reporting to QAA, are improving with investment in new software and dedicated staff to undertake data management. OPUS and Business Objects allow data to be collected and manipulated, and reports are provided to the Board, the AVA management and to QAA as required. Problems had been highlighted by AVA staff of the late submission of data from providers that had impacted on the AVA's ability to make returns promptly. Members of staff have been proactive in clarifying deadlines to providers to minimise this difficulty. Moderators, especially the Lead Moderator and the Quality Manager, have visited providers to clarify requirements and expectations. The review team was informed that these individuals could raise concerns with provider senior management if staff workloads were affecting the meeting of AVA requirements, and the review team encourages the AVA to continue this process.

Change management

36   The AVA has undergone considerable change in its staffing since the merger of the two previous organisations. A clear management structure is in place, led by the Chief Executive Officer. The Board of Trustees confirmed that it had a good working relationship with the Chief Executive Officer and Senior Management Team, and the Chair of the Board of Trustees worked closely and effectively with the Chief Executive Officer, whose performance he monitored at regular meetings. The review team found that the approach taken provided a clear focus for AVA related work within the organisation.

37   The review team was told that staff felt that they had been kept informed of developments throughout a period of considerable change during and after the merger of the two previous organisations. A number of new staff are in post, and appropriate support arrangements have been put in place to support them in their roles. Existing staff received support and development to adapt to new roles. The staffing team of the AVA now includes individuals with specific AVA responsibilities and also other members of staff who have AVA related duties within a wider role. The team found that staff management structures appeared to be well thought out and clear to the staff themselves and to other stakeholders.

Staff development

38   There are appropriate staff development opportunities for AVA staff and members of staff employed by the AVA are motivated, well informed, proactive and committed to the aspirations of the AVA. Staff development activities for AVA staff are targeted and appropriate to the individual's role, and are reviewed in meetings with line managers. New members of staff had been provided with an effective induction, and members of staff employed before the merger generally felt that their roles within the current organisation were clear. The Investors in People (IIP) report (assessment date May 2008) noted the training

available and the fact that the costed Learning Plan was linked to strategic priorities.

39   Development opportunities are offered to providers, at both regular regionally organised fora and other meetings and, on request, at in-house sessions provided by AVA staff. These include Programme Manager and Practitioner fora that were well received by providers. The Learning Programme Plan (LPP) (see paragraph 46, 47) specifies the programme to be offered and includes a requirement that providers send at least one member of staff to such events. Such sessions are supplemented by information provided in handbooks and other documentation, including an electronic bulletin sent to all providers, available in hard copy and on the AVA website. More informal staff development and advice is provided by AVA staff who respond in a timely manner to any queries. The review team found that staff development activities are well received by providers and cover a range of issues of relevance to the performance and enhancement of AVA activities.

Operational management

40   The review team heard that members of AVA staff are well regarded by providers and other stakeholders who value the support received from AVA staff, the timely responses to queries and the open way in which business is conducted. Members of the AVA and providers informed the team that the new premises of the AVA have contributed to a better working relationship between AVA staff and stakeholders as meetings and other events can be held at its premises.

41   The review team was unable to clarify the procedure for the systematic and timely checking and approval of provider literature and use of the correct QAA logo and wording prior to it being made public. The team noted a range of provider literature which had an inconsistent approach to the use of the logo. The Overview Document (November 2008) states that the LPP requires providers to submit samples of all their marketing materials to the AVA for checking and approval post submission.

It also notes that some providers had not submitted drafts in a timely manner so checks had not been made at the time of writing (November 2008). The team was not able to discover any explicit requirements concerning submission of drafts in the Providers' Handbook, nor a shared understanding between providers and AVA staff of actions to be taken within the AVA, or any clear responsibility allocated to any staff for this activity. It was noted that an update on new QAA requirements had been circulated to providers in the November 2008 email bulletin. However, this did not include any information on approval or monitoring by the AVA of provider publications. It is a condition of the licence that the AVA articulate clearly and publish prominently the procedures for the timely checking of the use of QAA's logo and the accuracy of providers' literature.

42   The review team was provided with a copy of the AVA's equal opportunities policy that was available to staff and to stakeholders via the website. The most recent IIP report confirmed that the policy was operational.

43   The AVA has an explicit procedure for complaints, grievances and appeals which is available to staff and stakeholders. The review team found that the AVA can consider appeals or complaints from students against providers once the appeals or complaints processes of the provider have been completed.

44   The review team was provided with copies of the annual reports for the last three years that have been produced to meet QAA requirements. Prior to submission to QAA, the report is considered and approved by the Chief Executive, the Chair of the Access to HE Committee and the Board of Trustees. The reports are detailed and enable QAA to monitor the work of the AVA.

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

45   All organisations wishing to offer OCNEMR provision are subject to a process of centre recognition which considers the quality assurance arrangements, resources and general functioning of the organisation. The principles that inform centre approval are that an organisation has robust internal approval mechanisms; resources, systems and staffing that will be appropriate to support the proposed qualifications; valid and reliable mechanisms for the assessment of learners' achievements; an appeals and complaints procedure; a quality management system that is systematically reviewed to ensure that learners and staff needs are met; administrative systems that will enable requirements to be met promptly, accurately and securely; and have mechanisms in place to enable individual support needs of learners to be met. Meeting the requirements of centre recognition will determine whether the organisation is able to deliver provision to the standard required.

Programme development

46   The AVA has developed a number of regional programmes and these impact on the way providers now develop their courses. A number of documents support the development stages. At the outset the AVA requires the provider to discuss their proposed plans with the Access to HE Manager. There is an Access Provider Handbook to ensure understanding of AVA procedures. The programme submission process is comprehensive and requires the completion of the Learning Programme Plan (LPP), achievement specifications, unit summary and unit specifications. The Access to HE new

programme development form includes a requirement for the rationale for development, designated pathways, curriculum content and progression routes. The LPP explicitly states that to comply with QAA regulations the programme is only available in the UK.

47   The LPP requires the inclusion of a rationale and objectives for the programme. Evidence to indicate appropriate resources must be provided and this includes staffing, rooming, additional support, information technology equipment and library resources. The intended target audience has to be specified, and the LPP states that Access to HE programmes are an important mechanism for widening participation from groups traditionally under-represented in HE. These groups must be indicated within the target audience and an explanation provided of how the course will be promoted to learners. Admission procedures are stated and details are provided of how learners will be supported and given impartial information, advice and guidance. The delivery mode of study is outlined and assessment guidance and assessment strategy explained. The review team concluded that there is a strong emphasis on quality assurance with clear systems for monitoring, review and evaluation, and internal moderation being described. Providers are also required to have internal standardisation systems in place as well as agreeing to participation in the AVA's annual standardisation events.

48   AVA Recognition Panels Policy and Procedure clearly states that a provider needs to demonstrate the quality and fitness for purpose of the programme at the point at which it is given formal approval and to have the effective means to develop, evaluate and review the provision. The validation process (see paragraph 51) also determines whether the programme submission meets the requirements of the *Access to Higher Education Diploma and credit specifications*. This requires an examination of the LPP, rules of combination and any units not previously approved.

49   The AVA undertook a major overhaul of its unit banks in July 2006 with the subject-by-subject review concluded in 2008. Each review

commenced with a working party of providers made up of subject specialists and led by the Access to HE Manager. The aims of this process were to ensure best practice while providing choice and flexibility along with increased standardisation. All the new unit banks were completed by May 2008 when they were subject to recognition panel approval. The intention is that unit banks approved after this date will be arranged with HE subject specialists. New units will only be developed following programme leader discussion with the Access to HE Manager to determine the specific need. Approval is required by at least two more centres delivering the subject.

50   All units are produced using the National Open College Network template consisting of the unit specification and assessment information. All units comply fully with the format requirements of the *Access to Higher Education Diploma and credit specifications* and are subject to a cycle of review. The review team noted the identification in the Overview that there has been limited involvement of HE subject specialists in new unit bank approval. It is therefore a condition of the licence that the AVA revise the procedures for programme development and programme approval to ensure the systematic involvement of HE institution representatives with relevant subject expertise.

Programme validation

51   The AVA Recognition Panels Policy and Procedure document provides procedures for the conduct of programme validation panels, and includes a requirement that the panel membership reflects the range of institutions and organisations involved with the AVA. This includes further education institutions, HE practitioners, receiving HE institutions and members of the AVA's curriculum development team not involved in the development of the submission. The roles and responsibilities of panel members are clearly articulated with an overall requirement of ensuring that the programme is fit for purpose as a preparation for study in HE or training. Panel members

scrutinise the documents outlined above to determine their clarity, coherence, consistency and fitness for purpose. The Access to HE Manager monitors any potential conflict of interest prior to panels meeting, and panel members are required to declare any conflicts.

52   The outcomes of panel meetings are clear and require statements of confirmation of conformity with QAA regulations; meeting the expressed aims with content and delivery suitable to the target group; and offering a coherent programme of study. Amendments and outcomes are recorded and only after final approval has been conferred can the programme be delivered by a provider. On full approval, the AVA sends a letter of formal confirmation enclosing definitive versions of the programme documents to the programme manager.

53   Panel reports are received by the Access to HE Committee which is responsible for reviewing the panel report and outcomes for the generic programme. The Access to HE Committee ratifies panel decisions, recommending approval or withholding of approval for Access to HE programmes. There is then a final approval panel made up of the Access to HE Manager, the Chair of the Access to HE Committee and the HE institution member of the Committee to examine the provider programme submission documents to determine if they meet the requirements of the generic programme and, thus, the *Access to Higher Education Diploma and credit specification*s. This examination includes scrutiny of the provider details in the LPP, achievement specification and unit summary.

54   Discussion with HE representatives indicated that they were confident that the current quality control mechanisms ensure that learners are well prepared for study at the required level and learners were said to progress well. Professional body entry requirements are addressed and the HE representatives were confident that the AVA would respond to any changes necessary in adapting units to meet any changes to requirements for specific programmes. Further discussion indicated a growing confidence in the performance of

learners on higher level courses. In the case of one HE institution, this included the willingness to adapt its courses to address the skills already developed during Access to HE study, by giving accredited prior learning to some work on a nursing degree as a consequence of studies already completed. The review team commends the AVA for its responsiveness to input by HE institutions to new unit and programme development, particularly in the area of nursing and midwifery.

55   The process to regulate modifications to programmes is outlined in the Provider Handbook which states that all changes must be discussed and agreed with the Access to HE Manager. Those changes could be to pathway achievement specifications and/or the unit summary. The agreed changes are tracked by the Access to HE Manager and subject to the Access to HE Committee for approval, and changes cannot be implemented until approval is conferred.

Review and development of Access to HE provision

56   An integral part of the quality assurance process is that Access to HE providers carry out a comprehensive annual review and evaluation of their courses, reporting their findings to the AVA. The Provider Review and Evaluation Access to HE Programmes (PRE) provides the template for this process and a PRE has to be completed for each pathway. Strengths and weaknesses are assessed against a set of criteria taken from the Ofsted common inspection framework. This is done to promote consistency with the provider's own self-assessment documentation and with an expectation of evaluation rather than description. The provider is required to comment on the standards of learners' work, the effectiveness of teaching and learning, the extent to which the programme meets the needs and interest of the learners, and the suitability and rigour of assessment. Data analysis requires comment on retention and achievement rates over a three-year period compared with national averages. Student feedback is a requirement to inform the analysis.

57   Action plans are created as part of the PRE and these are monitored by the external moderator. Moderation reports are scrutinised by the lead moderator and Quality Development Manager (see paragraph 77). Outcomes inform the provider profile (see paragraph 60) which impacts on the risk assessment status of the provider, and this draws together information from a variety of sources to create a full picture of the centre's performance. These recently adopted risk assessment procedures, and the involvement of the executive and the governance committees in their development and use, are commended.

58   There is a rolling programme to review and update programmes. Review of the regional programmes will be undertaken by the AVA, follow the procedure for new developments and involve all stakeholders. The process addresses the continuing appropriateness and fitness for purpose of programmes arising out of the Programme Review and Evaluation and Risk Assessment procedures. The AVA is committed to developing and extending its relationships with HE institutions and involving them fully in shaping the requirements and content of programmes and pathways.

59   There are a number of opportunities for providers to share best practice and these include the Programme Managers' Forum, a Practitioners' Forum, an annual conference and standardisation events as well as a range of training events. These events have covered a wide range of topics on all aspects of the AVA's activities, embracing curriculum and curriculum development as well as implementation of new initiatives and developments. Discussion with programme leaders and moderators highlighted the value of these events and the review team commends the AVA for its use of such fora to disseminate information and good practice. The rolling programme of standardisation events is comprehensive.

Principle 4

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

External moderation

60   OCNEMR has adopted an approach to the moderation of Access to HE programmes that it describes as based on best practice from its two merged AVAs. This incorporates a Lead Moderator appointed by the Board, individual moderators appointed by the AVA's Quality Development Manager, and a requirement for internal verification systems to be in place in its Access to HE providers. The process is as follows: moderators scrutinise samples of students' work and internal verification systems at provider level; they then report to the Lead Moderator and Quality Development Manager; the Lead Moderator produces a summative report that is received by the Access to HE Committee on behalf of the AVA, and the AVA sends individual moderator reports to providers for the attention of Access Coordinators and Quality Managers; the AVA officers consider the Lead Moderator's report and proposed actions, and produce an AVA response for the Access to HE Committee; and the outcomes of this process are then considered by the Board. More recently, a provider profile has been developed that allows the various strands of the moderation model to be evaluated jointly, and a risk assessment made of individual providers' adherence to the AVA's requirements.

61   The moderation system is designed to ensure regular monitoring and reporting of standards at provider level in the first instance. Access to HE providers opt in to one or more regional vocational programmes, and/or the regional Diploma programme as appropriate to their needs. The AVA appoints moderators to one or more providers and they may be attached to one or more pathways. All pathways have an achievement specification as set out in the Learning Programme Plan (LPP). Moderators visit providers as directed by the AVA, culminating in a final meeting that confirms those learners that have achieved the

Access to HE Diploma. This judgement is reached through a combination of sampling student work, and reviewing assessor and internal verification records. Checks are also undertaken to ensure that achievement specifications have been adhered to.

62   In addition to the moderation of pathways by individual moderators, the AVA employs the services of a Lead Moderator who provides an 'independent and external view of the effectiveness of provision'. This post brings with it the constitutionally determined position of Deputy Chair of the Access to HE Committee and, as well as contributing to training and standardisation events, ensures that the management, organisation and delivery of Access to HE programmes is monitored and reported on across the region. The Lead Moderator also receives and reviews all pathway moderator reports to produce a summative report that proposes action points for the AVA's consideration.

63   Pathway moderators are guided clearly in the number and purpose of their visits which are effective in their incremental focus. This enables logistical and operational issues to be dealt with in the early parts of the delivery of the programme and, by the final visit, verification of the standards of student achievement based on appropriate evidence, including internal verification records. All student work is made available to the moderator for inspection. However, from its meeting with moderators, the review team heard that different approaches were taken to sampling student work. The team therefore recommends that the AVA reviews its moderation training and guidance to ensure a consistent approach to sampling student work.

64   The Lead Moderator role is clearly differentiated from that of pathway moderator, but in its scrutiny of AVA guidance and discussions with the Lead Moderator and AVA officers, the review team noted the potential conflict of interest in that the specification for the role of Lead Moderator also requires the post holder to undertake pathway moderation. The team noted the conundrum the post

holder is presented with in maintaining an 'independent and external view' of pathway reports s/he has written. The team therefore recommends that the AVA reviews its Lead Moderator specification to ensure that no conflicts of interest can arise between the production of a pathway moderation report and an independent summary moderation report to the AVA.

65   The review team also noted from the documentary evidence that the AVA's moderation pool drew on members of its governance structure, with both members of the Board and the Access to HE Committee appointed as moderators. The team noted the potential for conflicts of interest to arise in this approach. The team therefore recommends that the AVA review the practice of appointing moderators who are part of the governance structure to ensure that the AVA pays due regard to objectivity, impartiality, fairness and equity.

66   From its scrutiny of records of moderator appointments, and in discussions with moderators and members of the Access to HE Committee, the review team noted that the AVA deployed some pathway moderators across a range of academic subject areas. This was as wide ranging as business with pharmacy, engineering with humanities, and art and design with nursing. The team heard that the AVA appointed moderators on the basis of their experience and qualifications; that individual moderators could opt out of areas they did not feel qualified to moderate; providers could request of the AVA an additional moderator if they were unsure of an appointed moderator's depth of knowledge; and appointed moderators themselves could request such additional moderation. The team noted the benefits to the AVA of a small pool of moderators in terms of consistency of approach, but could find no evidence of a systematic approach in the moderation process that ensures expert moderation at the subject level. It is therefore a condition of the licence that the AVA revise its moderation procedures to ensure the systematic provision of expert

moderation at subject level, and that sufficient moderators are appointed to cover the range and number of Access to HE programmes.

Standardisation

67   The AVA recently reviewed its approach to ensuring that the standard of all Access to HE awards is consistent within the AVA, leading to a paper at the June 2008 meeting of the Access to HE Committee. The AVA had noted that standardisation events had previously involved practitioners from colleges and had tended to focus on the content and delivery aspects of the curriculum, rather than on establishing a standard and judging assessed work against it. The AVA recognised that these events were, however, valued by practitioners and will continue to provide opportunities for practitioners to meet and share good practice. In its review of the standardisation model, AVA officers and stakeholders concluded that the process would be better undertaken by the external moderators. The AVA produced revised documentation and guidance for the standardisation process and embarked on a schedule for standardisation of Access to HE units over a two-year period.

68   The review team scrutinised the evidence of standardisation events that had taken place and, in discussion with AVA officers, moderators and members of the Access to HE Committee, concluded that the review of its processes has resulted in a timely and well structured process that would, over time, allow the AVA to assure itself of the consistency of judgement reached regarding student achievement. The AVA is to be commended for its well structured, clear and inclusive approach to standardisation.

Appointment and training of moderators

69   Individuals wishing to become a moderator for the AVA undergo a formal one-to-one application and interview process, which takes into account the applicant's qualifications; experience of assessing, verifying or examining with other awarding bodies; and their relevant experience in further or HE. The interview, selection and initial induction process falls

within the roles of the Quality and Development Manager and Lead Moderator.

70   Moderators receive a job description explaining their role and responsibilities and are assigned to one or more providers for a maximum of four years. Annual contracts are issued, enabling the AVA to review moderators' performance and, where necessary, terminate their employment. The initial contract is described as a one-year trial period. The review team noted in the guidance issued to moderators relating to their payment, that there was an ambiguity regarding payment by the AVA and 'duties agreed by their employing organisation'. In discussions with AVA officers and moderators, the team was assured that moderators were only contracted and paid by the AVA, but recommends that the AVA revise the moderator handbook to ensure that the ambiguity over payment of moderators is removed.

71   From its scrutiny of the evidence and in discussions with AVA officers and moderators, the review team was assured that the process for appointment and development of moderators was supportive and designed to ensure a suitable match between individuals' experience and the curriculum needs of Access to HE programmes. However, as noted in paragraph 66, the team formed the view that further exploration of the current curriculum knowledge of potential moderators would benefit the allocation process, enable the AVA to ensure expert moderation at subject level, and ensure that there are sufficient moderators appointed in response to the number and range of subject areas in the Access programme.

72   The AVA's moderators are communicated with via email, Access bulletins and training events. Both the Quality Development Manager and Lead Moderator are involved in overseeing and supporting the pool of moderators. Induction sessions are offered for all new moderators and regular updating sessions occur each year. New moderators are also assigned a 'buddy' from the moderator pool to act as a critical mentor. Supporting the moderator role

is a comprehensive and annually updated Access to HE moderator handbook. This confirms the external moderation process as being designed to verify the achievement of learners leading to the award of the Access to HE Diploma. Moderators also provide support to Access to HE providers' delivery teams, and participate in standardisation events.

73   From its scrutiny of the guidance for moderators, and in discussions with moderators and AVA officers, the review team formed the view that the training and support for moderators was well managed.

Internal moderation

74   The AVA requires its providers to operate internal verification systems against a set of standards established in the LPP. These standards require internal moderation to be undertaken by suitably qualified and experienced personnel, in accordance with established practices and 'regulatory requirements'. Providers are required to ensure that their internal moderation process samples, across all the units for the programme, the decisions of all assessors in the team and work from 'a number' of students. The outcomes of internal moderation are required to be formally recorded on standard documentation used within each providing institution, and be part of the provider's overall quality assurance and review procedures. The internal moderator is required to provide formal written feedback to the unit tutor, which will be available to the Programme Manager and the AVA's external moderator.

75   External moderators are required to scrutinise the internal verification records and, as part of their first visit to a provider, report on these arrangements. From its scrutiny of moderator reports, providers' LPPs and in discussions with AVA officers and moderators, the review team was assured that the AVA's system for approving and monitoring internal moderation and managing its relationship to external moderation, was clear and thorough.

Action and feedback to providers on the outcomes of the moderation process

76   The AVA's moderation model provides feedback to providers in three ways: individual moderator reports at programme level; action points derived from the summative Lead Moderator's report; and a provider profile. This uses a risk assessment methodology that combines output from the external moderation process, the internal provider self-assessment report and an assessment of the need for interventions taken by the Quality Development Manager, Lead Moderator, or Access to HE Manager.

77   The Lead Moderator's report provides a comprehensive summary of all issues arising from individual external moderators' reports. There is a clear set of actions identified that combine compliance and quality enhancement, as appropriate. The report is formally received by the AVA's Quality Development Manager and a response to the actions is produced. Both report and response are subsequently considered by the Access to HE Committee and the actions endorsed as appropriate.

78   In reviewing a range of documents that included a sample of provider profiles, and in discussions with moderators and members of the Access to HE Committee, the review team noted the benefits to the AVA of a cumulative series of external moderator reports that were scrutinised by AVA staff and summarised in one overview report. When evaluated in conjunction with providers' own annual reporting to the AVA and assessed in the context of actions and interventions that may be needed to monitor and mitigate risk, the team formed the view that the AVA had developed a thorough and well-managed system that enabled it to provide good quality feedback in a timely fashion, and be proactive in ensuring compliance and enhancing quality. The team commends the AVA for its integrated approach to quality assurance, enhancement, and the management of risk.

Award and issue of certificates and diplomas

79   The AVA produces extensive and annually updated guidance to its providers explaining the procedures necessary for the registration and eventual certification of students. This has been comprehensively reviewed to ensure that the requirements of the Access to HE Diploma can be met. Providers are guided in their compilation of the LPP of their need to either adopt an achievement specification where it is predetermined in one of the regional vocational pathways, or to confirm one at provider level that is compliant with the AVA's generic achievement specification. The agreed LPP is then available to moderators and AVA staff as the evidence source that defines successful achievement of the award.

80   The final visit by the external moderator requires the agreement of the achievement specification. All student portfolios are available at this final meeting. There is a separate form specific to the requirements of the Access to HE Diploma that is signed by the course tutor and the external moderator. Both signatures confirm that the achievement specification has been met. The recommendation for the award of an Access to HE Diploma form also requires the recording of any achievements contributing to successful completion that have resulted from credit transfer or exemption.

81   Once the Diploma award form is received by the AVA, staff cross-check it against the achievement specification to ensure that the rules of combination have been adhered to, before certificates are printed and sent to providers for onward distribution to learners. All students that have met the award specification are issued the Diploma, and those achieving credits that fall short of the requirements for the award of the Diploma are issued with a credit transcript.

82   In its scrutiny of the evidence supporting the certification process and in discussions with AVA officers, providers and moderators, the review team concluded that the AVA's procedures for the award of the Access to HE

Diploma were generally thorough and extensively supported by clear documentation. The team commends the AVA for the thorough and proactive approach to incorporating mechanisms to support credit exemption through the use of accreditation of prior learning/accreditation of prior experiential learning, and its monitoring via the recommendation for the award of an Access Diploma form.

Final assessment meetings

83   The AVA's guidance to moderators is clear in its expectation of a 'final visit' at which the moderator is involved in the determination of successful achievement of the Access to HE Diploma by individual students.

84   In discussions with moderators and providers, the review team noted, however, that moderation practice was inconsistent with regard to the nature and size of sampling student work in the period leading to, and at, the final meeting. Such guidance is provided by the AVA in the LPP. The review team also noted that the function, conduct and membership of these final meetings varied. The team concluded that this inconsistency, variable approaches to sampling and the lack of a clear understanding about the formal authority for the award of the Access to HE Diploma, was a direct product of the absence of explicit guidance regarding assessment boards. It is therefore a condition of the licence that the AVA produce and publish explicit guidance for providers and moderators about the function, process and appropriate membership of final assessment boards or meetings, that clarifies the formal authority for the award of the Access to HE Diploma and that the AVA monitors its implementation.

Audit trails

85   The review team conducted six audit trails including centre recognition and centre approval process; action plans programme submission documents; course handbooks; unit summaries; validation panel reports including rules of combination; and letters of approval. File contents included:

- recognition and approval documentation
- approved programme documents including learning programme plans, achievement specification and pathway documentation, and unit summary and pathway outline
- moderation
- provider reports
- course handbook
- provider promotional material
- significant correspondence over 2007-08
- centres/programmes for audit.

86   In addition, the review team considered annual monitoring reports, lead moderator reports, moderation visit documentation, Access to HE Committee minutes, approval correspondence, sample certificates and transcripts and provider promotional literature. The purpose of these trails was to consider the consistency and effectiveness of the AVA's processes at provider level.

87   The providers selected for trails included an appropriate sample of Access to HE programmes validated by OCNEMR and an appropriate range of providers including four further education institutions, one university and a small private training enterprise. The programmes focused on the new diplomas and covered areas as diverse as teacher training, pharmacy, combined studies, social and social science, art and design, counselling, nursing, and business and computing. The principal pathways in the new regional framework were therefore addressed by the review team.

88   The documentation indicated a consistency across all processes. The centre approval documents were complete and

included centre rationale, learning opportunities, administration requirements, learning support, staffing, assessment and moderation details, a centre approval letter and centre approval decision form appropriately signed. Credit and qualification framework documentation were included as were Learning Programme Plans (LPPs). The evidence indicated correct completion of centre approval documentation with comprehensive information provided by institutions. There is a good standard expected for LPPs and there are clear provider responses. Where programmes are transferred from another AVA, the process is clear and there is specific documentation.

89   Moderation reports were complete and included reference to action points raised and date of receipt by the AVA. Good practice was also noted. There is a logical progression to visits conducted with specific themes reviewed. The first visit covers recruitment and learner numbers, initial advice and guidance. The second visit reviews retention, attendance and assessment scheduling. Internal moderation and feedback to learners are addressed through sampling, a review of support for learners is explored and the visit includes a meeting with the learners. The third visit follows up action points raised, checks retention and reviews the overall suitability of the programme as a preparation for HE. Tutorial guidance, organisation and standards of achievement are reviewed. Access to HE moderation visit report forms are completed for each visit and comments are detailed. There are action plans produced with responsibilities assigned.

90   The lead moderator completes a comprehensive review of issues raised in the individual moderator reports. The baseline criteria used to evaluate moderator annual reports are the use of statistical evidence, action points, recognition of good practice and overall consideration of the usefulness of the report in promoting quality improvements in the future. There is also a review of the outcomes of measures to monitor moderators' reports from the previous year. The report concludes with key issues raised by the moderator reports and

an action plan for the following year. This report is scrutinised by the Access to HE Committee.

91   Provider profiles are available for each institution and this covers information on enrolments, registrations, withdrawals, retention, achievement and numbers of learners progressing into HE. The reports reviewed tended to restrict data provided to registrations and awards. There are sections on moderation report key issues and the provider's programme review and evaluation key points. The effectiveness of communication with the AVA is reviewed and any provider problems are monitored. The report concludes with any actions to be carried forward. The review team also saw an example of a letter of congratulation sent to one provider on achieving 100 per cent success for learners in 2007-08. The AVA also monitors the efficiency of providers in meeting deadlines for programme review and evaluation, data returns and attendance at the various programme managers' forum and coordinator training events. This indicates that providers met the deadline for data returns but that the annual special data return was more problematical, an issue highlighted in the annual report 2007-08.

92   Each provider is required to complete a provider review and evaluation of Access to HE programme report, and this includes evaluative analysis of learners' success in achieving targets mapped against national averages, learner progress, including acquisition of skills and knowledge, and learners' feedback on satisfaction with the programme. In addition, there are sections on the effectiveness of teaching and learning, guidance and support and programme management. These reports were generally evaluative with evidence provided and improvement activities identified against set dates.

93   The review team saw an example of the AVA award certificate and credit transcript which were in accordance with QAA's requirements for the Access to HE Diploma.

Conclusions

94   The Open College Network East Midlands Region (OCNEMR) was formed from the merger of two previous OCNs, (OCN South East Midlands and OCN North East Midlands) and has undergone a period of considerable development since the merger. It operates across most of the East Midlands region, including Derbyshire, Leicestershire, Lincolnshire, Northamptonshire, Nottinghamshire, Rutland, and the area of Staffordshire around Burton on Trent. Providers of Access to Higher Education (HE) programmes include a university, 19 further education colleges and a private training provider. The legal structure of the AVA is appropriate.

95   Although the organisation is both an OCN and an Access validating agency (AVA), it is evident that the different responsibilities are sufficiently separate to enable the organisation to meet its different responsibilities. Individual members of staff have explicit responsibilities in relation to AVA requirements. One post is dedicated to Access to HE and providers and other stakeholders have a commendably close working relationship with the post holder.

96   The AVA has a clearly specified governance structure. Committee members are proactive and there is good communication between different committees. Currently, stakeholders, including providers, are well represented on committees. However, the review team noted providers are not guaranteed representation on the Board in the current constitution and that the Access to HE Committee does not undertake all of its obligations under licence.

97   Management structures are appropriate to support the work of the AVA, and the work of the senior management team is monitored in an appropriate way by the Board of Trustees. The Board itself has a clear understanding of its responsibilities and discharges them in a supportive and proactive way. Staff and stakeholders praised the management of change since the creation of the AVA and are very positive about the improved service offered by the AVA. Its move to new premises has been a positive development as it enables it to hold meetings and conduct other activities in a suitable venue and convenient location.

98   Finances are effectively managed and the Board of Trustees receives regular financial reports. Data collection and data management is being enhanced with improved software and staff with specific responsibilities in relation to data analysis and management. Problems have been identified with late reporting by some providers but the AVA staff are proactive in addressing issues, including providing detailed guidance on deadlines and meeting with senior managers in provider organisations to highlight concerns. The AVA provides reports to QAA in a timely manner as required by its licence, and the review team found that such reports had been given due consideration by the appropriate committees.

99   The AVA has an explicit Access to HE strategy and is working well with stakeholders to promote the strategy. The OCNEMR Strategic Plan supports the implementation of the strategy. Its development was inclusive and monitoring of progress against the plan, including by the Board of Trustees, is effective. It has also developed a sound risk assessment and management process that involves the executive and governance committees in its implementation.

100 Quality assurance processes are well developed and communicated to providers. Guidance is available, either in written form or from AVA staff. Evidence from the audit trails confirmed that processes operate effectively. The information contained in the Learning Programme Plan is appropriate. Audit trail documentation confirms that validation panels are appropriately constituted, although the extent of involvement of regional HE institutions in unit bank approvals appears rather limited. There are good examples of close working relationships with HE institutions in some subject areas, especially in health-related provision, which adds considerably to the value of the process for learners.

101 The AVA provides helpful written guidance to providers and other stakeholders, including a Providers Handbook and a Moderators Handbook. An electronic bulletin is issued on a regular basis with updated information. Development opportunities are provided at meetings, or can be arranged at bespoke sessions to address an identified need.

102 Providers noted the excellent and timely level of communication and support from AVA staff. While representatives of some of the region's HE institutions are involved with the AVA, there is scope for a greater involvement across all institutions in the region and the AVA staff are working to achieve this aim.

103 Providers confirmed that moderators are a valuable source of advice and support. There is considerable evidence of close and supportive working relationships between moderators and providers. Moderators receive training on appointment and ongoing support. It was not clear to the review team that all moderators provide full subject coverage in their appointments, nor have current subject knowledge for all their subject areas. The team noted that moderators do not receive guidance on sampling, and so equity of approaches cannot be guaranteed. No guidance is provided on final assessment processes and not all providers hold a final assessment board, which can also create the potential for inequitable approaches to final assessment.

104 Overall, the review team found the AVA to be efficiently and effectively governed and managed and that it was successfully fulfilling its role as specified in its memorandum and articles of association.

Commendations

105 The AVA is commended for:

i   the enthusiastic approach of Access to HE Committee members to their responsibilities and in particular the use of subgroup working as part of their meetings

ii   the full engagement of the Board with the strategic planning process including the use of Board members' contacts and expertise in developing the plan and in promoting Access to HE

iii   the input from a variety of stakeholders into the strategic planning process

iv   the excellent support provided by the AVA to providers and other stakeholders and the timely response to requests for information

v   the well-established procedures for the Board to monitor its own effectiveness and that of the Access to HE Committee and the executive

vi   the management of change folowing the merger leading to improved efficiency and effectiveness in the opertion of the AVA

vii   the effective use of the Programme Manager and Practitioner forums for the dissemination of information and good practice

viii   the responsiveness of the AVA to input from HE institutions to new programme and unit development in the area of nursing and midwifery

ix   the well-structured, clear and inclusive approach to standardisation

x   the integrated approach to quality assurance, enhancement, and the management of risk

xi   the robust procedures for the consideration of accreditation of prior learning/accreditation of prior experiential learning.

The AVA licence

Review outcome

106 The OCN East Midlands Region is awarded a conditional confirmation of its full AVA licence, with following conditions to be met by 30 September 2009.

Conditions

107 The licence is confirmed on condition that the AVA:

i   revise the Memorandum and Articles of Association to ensure the involvement of Access to HE provider representatives at appropriate levels in the governance structure (paragraph 21)

ii   revise its terms of reference for its Access to HE Committee to ensure that it is involved appropriately in the appointment of moderators (paragraph 29)

iii articulate clearly and publish prominently the procedures for the timely checking of the use of QAA's logo and the accuracy of providers' literature (paragraph 41)

iv   revise the procedures for programme development and programme approval to ensure the systematic involvement of HE institution representatives with relevant subject expertise (paragraph 50)

v   revise the moderation procedures to ensure systematic provision of expert moderation at subject level, and that sufficient moderators are appointed to cover the range and number of Access to HE programmes (paragraph 66)

vi   produce and publish explicit guidance for providers and moderators about the function, process and appropriate membership of final assessment boards or meetings, which clarifies the formal authority for the award of the Access to HE Diploma and that the AVA monitors its implementation (paragraph 84).

Recommendations to the AVA

108 The review team recommends that the AVA:

i   reviews its procedures for admitting organisations offering Access to HE into membership, to ensure that they give due recognition to the requirements of QAA's licence and that they are fit for purpose for organisations wishing only to offer Access to HE programmes (paragraph 23)

ii   reviews its moderation training and guidance to ensure a consistent approach to sampling student work (paragraph 63)

iii reviews its Lead Moderator specification to ensure that no conflicts of interest can arise between the production of a pathway moderation report and an independent summary moderation report to the AVA (paragraph 64)

iv   reviews the practice of appointing moderators who are part of the governance structure to ensure that the AVA pays due regard to objectivity, impartiality, fairness and equity (paragraph 65)

v   revises the moderator handbook to ensure that the ambiguity over payment of moderators is removed (paragraph 70).

Appendix

Aims and objectives of AVA review

The aims of the system of AVA review are:

i   to provide the basis for an informed judgement by the ARLC about the fitness of the AVA to continue as a licensed agency

ii   to promote public confidence in Access to HE as a properly regulated and respected route into HE by assuring:

- the quality and adequacy of AVAs' systems and procedures

- the quality, comparability and range of AVAs' operations

- the adequacy and comparability of AVAs' standards for approval, moderation and monitoring of programmes

- consistency across AVAs in the operation of criteria for the granting of the Access to HE award

iii   to stimulate reflective and self-critical perspectives within AVAs, as an instrument to promote quality enhancement

iv   to provide an opportunity to identify and disseminate good practice of AVA operations

v   to provide a mechanism for ensuring necessary, and encouraging desirable, improvements and developments in AVAs.

The objectives of each AVA review are:

i   to examine, assess and report on:

- the development of, and changes in, the AVA since its last review or initial licence, and its plans and targets for the future

- the organisation's continuing viability and robustness and the ways in which the AVA demonstrates sound governance

- the efficiency and effectiveness of the AVA's operational and quality assurance systems

- the range and scope of the AVA's activities, and the appropriateness and value of these activities

- the ways in which the AVA approves and monitors programmes and the ways in which these processes take account of the need for consistency and comparability

- the ways in which the AVA satisfies itself of the adequacy and comparability of standards achieved by students gaining the Access to HE Diploma

- the evidence available to indicate the AVA's success in achieving its aims and targets

ii   to identify and report on:

- strengths and good practice in procedures and operations

- areas which would benefit from further development

- areas requiring attention.

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