

Access to Higher Education

Open College Network
Yorkshire and Humber 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 Open College Network Yorkshire and Humber Region (OCNYHR). QAA is grateful to OCNYHR and to those who participated in the review for the willing cooperation provided to the team.

The review process

5 The review was conducted in accordance with the process detailed in the *Recognition Scheme*. The preparation for the event included an initial meeting between OCNYHR 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 OCNYHR 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 OCNYHR to finalise other arrangements for the review.

6 The review visit took place on 2 to 4 June 2009. The visit to OCNYHR consisted principally of meetings with representatives of OCNYHR, including AVA officers; members of the Board of Trustees; members of the Access to HE Committee; moderators for Access to HE programmes; Access to HE coordinators, and other stakeholders.

7 The review team consisted of Dr Dawn Edwards, Mr Michael Farmer and Mr Alan Smith. The review was coordinated for QAA by Professor Chris Clare, Assistant Director, Reviews Group.

The AVA context

8 OCNYHR has its office in Wakefield. It was formed by the merger of Open College Network (South Yorkshire and Humber), (OCNSYH), and Open College Network West and North Yorkshire (OCNWN) in August 2006. It was awarded a provisional licence in July 2007.

9 A number of conditions were attached to the awarding of the provisional licence: these included:

- the need to redefine its terms of membership or to establish a category of membership allowing higher education institutions (HEIs) to have full membership
- the revision of the terms of reference of the Access Committee to include reference to its role in the development of strategy for Access to HE
- the need for specific guidelines for the function, process and appropriate membership of the final assessment meeting.

10 These conditions were met in December 2007 and the provisional licence was confirmed by ARLC in April 2008.

11 OCNYHR is an Open College Network (OCN) and its OCN work is regulated by the Qualifications and Curriculum Authority through its licence from the National Open College Network (NOCN). At the time of the review the Chief Executive Officer had been in post for slightly over a month, the previous Chief Executive having recently retired; however, the new Chief Executive Officer had been a Board member prior to taking up his new post and was not, therefore, totally new to the work of the OCN/AVA.

Membership and provision

12 OCNYHR's AVA work involves Access to HE providers and HEIs within the Yorkshire and Humber region. After the merger, the organisation worked from two centres, Sheffield and Leeds. In 2007-08 the OCN rationalised its operations to have one centre based in Wakefield. At the same time a dedicated team was appointed to manage AVA activities, having separated them from the mainstream OCN work of the organisation.

13 Access to HE numbers have been declining over the three years since the merger. In that period they have dropped by over one-third from 3,070 in 2005-06, to 2,607 in 2006-07,

and to 2,009 in 2007-08. The statistics provided by the AVA indicate that provision in 2007-08 was a mix of one and two year full-time and part-time. Successful completion rates were 1,347 (51.66 per cent) in 2006-07 and 1,156 (57.54 per cent) in 2007-08. The age range, gender balance and student profile of learners within the OCNYHR AVA are comparable with those of other AVAs.

14 Of the 24 providers currently offering Access to HE programmes there is one teaching hospital, one National Health Trust, two specialist further education colleges (art and dance) with the remainder being colleges of further education.

15 The learner balance on the range of pathways/programmes available within the AVA showed more than 40 per cent of learners were studying general and combined studies; 25 per cent were studying on nursing and other health-related programmes; 10 per cent on arts and media-related courses; and 12 per cent on combined social sciences. The balance were studying within the following subject areas: IT, education, business, law and sociology.

AVA Statistics 2007-08

Providers offering Access to HE programmes	24
Access to HE programmes available	55
Access to HE programmes running	52
Access to HE Learner registrations	2,009
Access to HE certificates awarded	1,156

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

Legal basis, objects and membership

16 OCNYHR is a company limited by guarantee and a registered charity. Its Memorandum of Association sets out those

matters required under the various Companies Acts, including objects, powers, benefits of, and liability of membership and trustees. The objects of OCNYHR state that it is a body that accredits programmes and awards credits and credit-based qualifications. Its objects include 'improving the quality...of...provision for the public benefit' and make explicit reference to 'operating as an authorised validating agency'. The review team noted that this would need to be updated to 'access validating agency' to reflect current QAA terminology. It is therefore a condition of the licence that the AVA revises its Memorandum and Articles of Association to refer to Access Validating Agency.

17 The Articles of Association set out appropriate matters including rights and duties of members, general meetings of members, the establishment of a Board of Trustees and its committees, and their meetings, records and accounts, and indemnification of trustees. Legal advice was taken before incorporation. Membership is open to any appropriate organisation. Providers of Access to HE programmes are full members, and HEIs which are not providers of such programmes are, generally, associate members, which provides an entitlement to participate fully in the deliberative structures. At the time of the review there were 24 Access to HE providers and six HEIs in membership.

Governance arrangements

18 Trustees are drawn from different sectors, including further education (FE), higher education (HE), local authorities, employers or trades unions, and the voluntary sector. There is a requirement for at least seven, and not more than 15 trustees and, at the time of the review, there were 11 trustees of whom three were from the FE sector and five from HE. The Board is responsible for finding new trustees, and the review team was informed that it had taken steps to ensure representation from across the whole region. The powers of the trustees include those suitable for company and charity including entering into contracts and the employment of staff. The powers do not

include the power to offer programmes of study, and thus preclude any potential conflict of interest with the AVA role as a validating agency for Access to HE programmes. The annual accounts of the company are externally audited and presented to the annual general meeting. There are no relationships with other organisations which restrict its independence as an AVA.

Committee structure

19 The Articles provide for the establishment of committees accountable to the Board of Trustees, and to which the trustees may delegate any of their functions. Three committees are explicitly required: Quality and Audit; Access to Higher Education; Finance and Staffing; although the trustees may establish others. Each committee is chaired by a trustee and membership must include at least two members and, at the same time, reflect the sectors represented among the membership. Minutes of committees are considered by the Board and the recommendations are acted upon.

AVA responsibilities

20 The terms of reference for the Board and each of the committees have been approved by the Board. The list of the Board's responsibilities specifically includes maintaining the AVA licence on behalf of the organisation. Board members confirmed to the review team that the Board is the locus of authority for OCNYHR's AVA responsibilities. The team was assured that this is clearly understood across the organisation.

Access to HE Committee

21 The Board delegates a number of its AVA functions to the Access to HE Committee, and these are defined in the Committee's terms of reference. They include the provision of advice to the Board on such matters as the AVA annual report, the Access to HE strategy, and the withdrawal of approval for a centre. They also include delegated authority for key AVA functions in relation to quality and standards (see also paragraphs 63, 69). Membership of the Access to HE Committee is between six and

12 with up to six from HEIs and up to six from Access to HE providers. The quorum is 30 per cent of the members plus two specified officers. At the time of the review there were eight members, of whom five were from HEIs and three from Access to HE providers. The review team noted that, assuming the quorum to be two members, all meetings in the previous two years had met the requirements of the quorum and that in practice there had been representation from both sectors at all but one meeting. It also noted the practice of including officers in the list of those present. The team concluded that the current size of the Committee, the proportion of members drawn from each sector, combined with the current formulation for the definition of a quorum, may pose a potential risk to its effective operation. No clarification is provided about how in practice 30 per cent of eight members is to be interpreted and it would be possible for a quorum to be achieved with attendance of members from just one sector. Even with 100 per cent of Committee members present, the absence of one of the specified officers referred to might be deemed to invalidate a quorum. Trustees whom the team met acknowledged these points.

22 The review team concluded that the governance structures are generally sound and enable the AVA to meet its legal and public obligations and to discharge its AVA responsibilities securely. However, the AVA is recommended to reconsider the membership of the Access to HE Committee in terms of the actual number of members appointed, the balance of representation and expertise, and the definition of quorum, including the practice of including officers as part of the quorum, to better secure fully representative and quorate meetings.

Principle 2

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

Strategic and operational planning

23 The OCN works within the framework of a three-year regional business plan mapped onto the national NOCN business plan. The AVA is coming to the end of its current three-year planning cycle and is starting to consider its strategic aims and objectives for 2009-12.

24 The current Business Plan contains five key business development priorities, one of which is to 'consolidate and develop the Access to HE portfolio in the region'. From this plan, an annual Strategic Operational Plan is developed with input from staff, the Senior Management Team and trustees. The plan is discussed and reviewed by the AVA's key committees and at an annual Strategic Planning Day for OCN staff and at the away-day for trustees. Responsibility for the Business Plan and Strategic Operating Plan lies with the Board.

25 A separate three-year Regional Access to HE Strategy focuses on the OCN's Access to HE work, the aim of which is to consolidate and develop the Access to HE portfolio in the region. For 2008-09, a separate AVA Strategic Operational Plan was developed, based around academic standards, learner opportunities and management. The objectives under these areas are to develop, further, Access to HE Diplomas across the region, to work with stakeholders, including HEIs to enhance progression opportunities and to widen participation, and to engage in continual development of the AVA function in line with QAA regulations and requirements. These are realised through the Annual Operating Plan for Access. Progress towards key performance indicators is monitored both by the Board and the Access to HE Committee. The Access Development Officer is responsible for leading on the action plan and reporting to the Access to HE

Committee, and through the Business Development Manager to the Chief Executive.

26 The review team concluded that the strategic and operational plans provided an appropriate framework for expressing the AVA's objectives in relation to Access to HE. It also noted the systematic approach adopted by the AVA to involving trustees, staff and stakeholders from across the region in the strategic planning process. While the AVA is commended for this level of involvement, it is recommended to review the strategic planning process in order to rationalise the number and interrelationship of individual plans and strategies relating to Access to HE, in order to simplify the strategic planning process and make it clearer for staff and stakeholders.

Operational efficiency and effectiveness, including self-assessment, risk management and use of data

27 The AVA operates a rigorous system of self assessment of its key areas of work. The Quality Manager is responsible for self-evaluation within the AVA which has a detailed schedule mapping key stages of the self-assessment process across the year. Self-evaluation reports are submitted to the Access to HE Committee for approval. The process is strengthened through the work of cross-organisational groups (see paragraph 32) under the leadership of the Chief Executive. In its annual report to the QAA, the AVA summarises its key strengths under each of the licensing criteria and suggests areas for improvement and continued development. The Board and its subcommittees use self-assessment as an ongoing process through the review of action plans and the monitoring of progress towards the attainment of strategic objectives. A formal performance review of the strategic and operational plan was undertaken in 2008, which considered the opportunities and threats facing the AVA, its business profile and budget planning. In its meetings with a range of staff, the review team noted that staff at all levels within the organisation are involved in the strategic planning process and feel they have ownership of the plans.

28 The AVA has an effective and appropriate risk management policy, making specific reference through their risk policy and risk register. The risk register records the key business risks ranked and prioritised according to severity. A more detailed analysis is provided through a risk pro forma which provides a full description of each risk; those responsible for its control and monitoring; the risk 'scores'; and details of any further action required. The register is reviewed by the Finance Manager and the Finance and Staffing Committee at each of its meetings and is also reviewed by the Board. The AVA expressed in its 2007-08 report to QAA that it considered that there was a need to develop a separate risk policy specifically for the AVA function within the OCN. However, rather than developing a separate policy, risk relating to Access to HE has been embedded within the OCN YHR risk policy. The review team examined the risk assessment and key risk register and was satisfied that the risks facing the Access to HE work of the AVA had been properly assessed and mitigated against.

29 The AVA has maintained its Access to HE data on the Online Publication Store (OPUS) system, which is also used for its other OCN data. From 2008-09, however, the AVA has been transferring its Access to HE data from OPUS to a separate dedicated system, called AVAD, in order to enable them to gain more information from the data collected and to allow the AVA to retain ownership of its Access to HE data. Learner registrations for year-one students have been put directly into AVAD for 2008-09 and year two learners remain registered in OPUS. From 2009-10 all learner registrations will be in AVAD for Access to HE work. From discussions with staff, it became apparent that the AVA does not register its students until the spring of each academic year which could result in students withdrawing with partial achievement and not being awarded credits for units taken. It was also noted from the data in the annual self-evaluation that in the region of 60 per cent of students are returned as 'unknown intended destination' in data returned to QAA. This data is available on the provider Recommendations for the Award of Credit and

this information is not being transferred into OPUS/AVAD.

30 The review team found the AVA's overview to be reflective and self-critical. It also found the AVA has sound systems in place to evaluate and mitigate against risk specific to Access to HE. With respect to data management, it was noted that the AVA is in the process of transferring from OPUS to AVAD for the collection of data on learner registrations. There are two areas with respect to data that the AVA is recommended to consider strengthening. The review team recommends that the AVA continue the initiatives on data collection to ensure that there are fewer nil returns on learner intended destinations and that partial accreditation for students withdrawing from their programme is recorded.

Committees and support for committees

31 The AVA has three committees which report to the Board of Trustees (see paragraph 19), two of which relate directly to the AVA work of the OCN: the Access to HE Committee and the Finance and Staffing Committee. The minutes from the Board and each committee are clear and well documented. The style of numbering each minute enables speedy cross-referencing and action tracking.

32 The AVA also supports an Access Advisory Group (AAG) and a Cross Organisational Group (COG). The AAG consists of providers and some HEI representatives and is a forum for discussion on key issues affecting the AVA, providing an effective route for communication with providers (see also paragraphs 48, 56). The COG is a task and finish group for internal staff to work on specific topics and initiatives relevant to the AVA. Both report to the Access to HE Committee.

Financial regulation, scrutiny and management

33 The Finance and Staffing Committee reports to the Board on the financial management and status of the OCN. The AVA work is not considered separately to that of the

OCN but is contained within the OCN's overall three-year financial forecast. The Finance and Staffing Committee at each of its meetings reviews the annual budget and receives a detailed report from the Finance Manager which includes a review of the balance sheet and an analysis of income and expenditure and considers the draft budget for the coming year. External auditors have been appointed and final accounts, which are received and approved by the Board and the Council of Members at the Annual General Meeting, are forwarded to QAA, Companies House and the Charities Commission.

34 Scrutiny of the OCN's accounts revealed a substantial deficit in their budget in 2007-08 with a similar deficit being predicted for 2008-09. Part of this has been attributed to a significant drop in Access to HE student numbers in 2008-09, some of which is due to the transfer of some of the AVA's provision to the East Midlands region and the replacement of some Access to HE provision with Foundation Degrees. In a meeting with the Board, the Chair stated that the OCN is 'cautiously optimistic in an uptake of Access provision in the coming year' with an upturn being predicted in learner numbers through the course of the next planning cycle. With respect to the budget deficit, the Board is predicting a break-even budget in the first year of the new 2009-12 planning cycle with a surplus in the following two years. The Chair of the Board also reported that over the course of the next planning cycle the AVA will take a new approach to increasing business through more proactive promotion and marketing of Access to HE courses. Board members who met the review team provided assurances that they were confident that the Access to HE work will remain viable within the OCN and increase gradually over the course of the forthcoming planning cycle.

35 The review team concluded that appropriate financial regulation, management and scrutiny were in place and that it was confident in the AVA's ability to respond to the challenges facing Access to HE provision at the current time.

Management, staffing and physical resources

36 The AVA has recently moved to spacious new office premises in Wakefield and appointed a new Chief Executive Officer. It has also appointed a full-time Access Development Officer (ADO) and Access Administrator to support and make more efficient the work of the AVA. The ADO's role is to provide strategic accreditation advice in support of Access to HE provision and has responsibility for ensuring that the AVA meets the criteria for licence. The AVA's Chief Executive is supported by a quality manager, business development manager, operations manager and finance manager, all of whom are full-time. Regional Business Development Officers work with Access to HE providers within their geographical area to develop or revalidate Access to HE Diplomas. All members of staff have clear reporting lines and job descriptions.

37 The review team found the management, staffing arrangements and physical resources to be appropriate for the AVA functions of the organisation. The responsiveness of management to staff development needs was also found to be highly thought of by the staff (see paragraph 43).

Operational procedures

38 The AVA has a comprehensive Access to HE handbook relating to the development, validation and moderation of Access to HE programmes. It has also produced an Access to HE programme panel process flowchart with hyperlinks to all the relevant forms and procedure documents required for programme approval. These are comprehensive and valued by providers and the review team commends this documentation. However, the review team saw some instances of forms in the handbook being out-of-date, with old versions of logos and reference to out-of-date documents, for example in the learning programme plan. The AVA is therefore recommended to review its Access to HE handbook to ensure all forms are up-to-date and to continue, with urgency, the plans to redesign the learning programme plan template.

39 The AVA has transparent and well documented policies and procedures relating to financial management, grievance, discipline and conduct, equal opportunities and complaints and appeals. Details of these policies and procedures are contained in the staff handbook. In all of its work, it is clear that the AVA is aware of the equal opportunity issues and gives due consideration to this when planning programmes and developing strategic plans.

40 Procedures for appeals and complaints from both member organisations and learners are contained within the Access to HE handbook. The AVA checks that providers have processes in place to consider appeals and complaints at the programme approval stage through the learning programme plan. This is checked at provider level through the NOCN annual quality review and through the learner handbook. Access to HE tutors reported that appeals are very rare, and this was confirmed by moderators. It was also reported to the review team that the external moderator checks whether there have been any appeals at provider level but there is no formal mechanism for the AVA to be made aware of this. It is therefore recommended that the AVA revises the external moderator report form to ensure that appeals and complaints from learners are recorded and reported back to the AVA.

41 The review team concluded that the AVA has sound management systems in place and is well aware of the issues that needed to be addressed in taking the organisation forward.

Data collection and management

42 The AVA has fulfilled requirements for reporting to QAA in a timely manner. It has introduced improvements to data collection with a specific view to enhancing the quality of these reports through a move away from the use of OPUS to AVAD (see paragraph 29). It undertakes a comprehensive analysis of its data relating to students, looking at trends over previous years and the review team saw comprehensive documentation on learner registrations, learner profiles and programme providers and programmes. The AVA will,

however, face a challenge when reporting to QAA in 2008-09, as year one learner data will be in AVAD whereas data for year two learners will still be within OPUS. The AVA acknowledged this to the team and the Finance Manager reported that the AVA has processes in place to ensure that the appropriate data will be provided within the specified timescale for the 2008-09 self-evaluation report. Subsequent to the review, the AVA confirmed that all data for Access to HE has been transferred to AVAD and that AVAD is fully operational.

Support for and communications with members

43 The AVA views its staff as its greatest asset. It has a comprehensive staff handbook containing an extensive range of policies and procedures including the OCN's equal opportunities policy. It supports staff through encouraging full participation in strategic planning and review, regular staff meetings, encouraging staff to undertake further education and training and providing regular support and supervision. All members of staff take part in an annual review, and training and development needs are identified as part of this. Staff spoke extremely highly of the staff development opportunities available to them and commented on the responsiveness of the AVA's Senior Management Team.

44 Despite the geographical challenges of the region, Board and committee members, providers, stakeholders and moderators spoke highly of the efficient and effective communication which operates between themselves and the AVA. Emails, mobile communications, face-to-face meetings, tutor and moderator handbooks all enable the AVA to ensure awareness of responsibilities, current developments, regulatory matters and management issues. The AVA also publishes a comprehensive Access News: Access to HE Newsletter as well as quality updates on general AVA quality matters and its website contains a dedicated section on Access to HE. The website was praised as an effective communication tool

which had improved considerably and which was being further enhanced.

45 Staff and stakeholders clearly value the support provided by the AVA and its effective communication with them. The review team commends the AVA for the professional development opportunities for staff and stakeholders and for the proactive support and strong communication links that it has fostered with its providers and stakeholders.

Monitoring providers' information

46 Providers' information is monitored by the external moderators, the lead moderator and at the programme development stage through completion of the learning programme plan. External moderators are required by the AVA to view examples of course documentation including schemes of work and the guidance given to students in their handbooks. The external moderators also meet with students to discuss their experiences and views of the information provided. The Lead Moderator checks the appropriate use of the authorised QAA logo and the providers' promotional materials and examples of comments on this were evident in correspondence from the Lead Moderator to providers and the Lead Moderator's annual report form to the AVA which is considered by the Access to HE Committee. The review team was satisfied that the AVA fulfils its responsibilities in respect of monitoring the activities of providers to maintain the integrity of the Access to HE Diploma.

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

47 With the exception of one regional art and design programme, all pathways are individual to the submitting provider. However, the AVA does require that all pathways use a set of mandatory units relating to study skills. The review team was told that it is the wish of the AVA to move towards more standardised regional programmes over a period of time, with nursing and health pathways being the next to be developed.

Programme development

48 All programmes have been developed under the guidance of AVA staff, in consultation with appropriate HEI representatives and with input from the Access Advisory Group (see paragraphs 32, 56). In some cases, feedback from Access to HE learners who have progressed to HE has provided useful information to the AVA regarding new units to introduce to a pathway in order to strengthen the preparation for progression. Guidance to providers wishing to submit programmes for approval is available in the Access to HE handbook. This document has been developed and approved by the AVA and is available to all providers and external moderators.

49 Centres seeking approval for Access to HE programmes are required to complete a learning programme plan, from a template provided by the AVA, which has guidance notes accessed via hyperlinks (see paragraph 38). The document requires that the programme is specifically developed for those from under-represented groups, and for study within the UK. It specifies the programme design, entry requirements, forms and levels of support available for students, teaching and assessment

methods, lists of units included within the programme, and the rules of combination for successful completion and award of the Access to HE Diploma. The template for the learning programme plan, provided by the AVA, contained reference to a superseded QAA document and also reference to the work of another awarding body. The AVA staff recognised that this document required further review based on feedback from the recent round of validation panels (see paragraph 38).

50 During the completion of the learning programme plan by a provider, support is available from the Access Development Officer. Once the document is considered to be 'panel-ready' it is submitted for reading by the Business Development Officer to confirm that it is ready to be taken to a validation panel, this is known as the pre-panel approval process.

Programme validation

51 The QAA licensing criteria state that all new programmes and substantial modifications of existing programmes must be subject to a rigorous process of validation. The OCN YHR Access to HE handbook clearly states the criteria that the provider must meet for the validation process but gives no guidance on what constitutes 'substantial modification' to a programme. Although the review team was provided with this information during the period of the review, it had not been submitted to the Access to HE Committee for approval. Therefore, it is a condition of the licence that the AVA develops, approves, publishes and implements procedures to regulate the approval of modifications to programmes, including the development of an agreed definition of 'substantial', so that where modifications are deemed to be substantial, the programme is subject to a full validation.

52 The constitution and duties of the validation panel are detailed in the Access to HE handbook, and the audit trail confirmed that the AVA followed these requirements, with appropriate higher and further education representatives present at the panels included within the sample looked at by the review

team. There are guidelines available for the Chair to ensure that the possible outcomes are made clear and that there are no conflicts of interest between the panel members and the providing organisation.

53 The standard agenda for the validation panel as set out in the Access to HE handbook was at variance with the requirements of the QAA specifications as identified in *Access to Higher Education Diploma and credit specifications*, March 2006. Because of this, it was unclear from the documentation available whether rules of combination and accreditation of prior learning had been fully considered by the validation panels. It is therefore recommended that the AVA should ensure that guidance and standard agenda provided for validation panels includes the requirement to check that the programme meets the standard requirements relating to the *Access to HE Diploma and credit specifications*.

Programme review

54 The AVA requires each provider to undertake an annual review of its Access to HE provision and supplies a template for this purpose. Those reviews which are received are analysed and used by the AVA to inform its end of year report to QAA. The team was concerned that the template did not allow a full response to QAA requirements of an end-of-year review as there was no requirement for an analysis of statistics by the provider, nor any evidence of student feedback. Moreover, of the audit sample of six colleges, only three had submitted the review document. Currently there are no sanctions for those providers not returning the end-of-year review, but, the Access to HE Committee is reviewing the situation. Consequently, the review team recommends that, as part of this consideration, the AVA develops strategies to ensure that all providers return appropriately completed end of year review documents to meet the deadline identified by the AVA and that the AVA revises its template for the provider end-of-year review to include a requirement for statistical analysis of data and inclusion of actual student feedback (see also paragraph 77).

55 OCNYHR has recently completed a validation of 85 programmes leading to the Access to HE Diploma. Providers were especially complimentary about the level of support that they received from the AVA staff during this process. Currently the AVA does not have a revalidation process and the Access to HE Committee members confirmed that they had not looked at this as a separate process to validation. However, as a provider may choose to have its programme revalidated prior to the end of the five-year period, it is necessary for the AVA to meet QAA's licence criterion, that it has a system for the periodic revalidation of programmes which assures their continuing quality and fitness for purpose. It is therefore a condition of the licence that the AVA develops, approves, and publishes procedures for the periodic revalidation of Access to HE Diploma programmes. The procedures should not only take into account the requirements of the original validation process, but also should require a critical review by the provider of the Access to HE programme.

56 The review team met Access to HE providers and stakeholders and were told of the many ways in which the AVA acted as a focus for the promotion and development of Access to HE within the region, including standardisation and other training events. The AVA has an AAG (see paragraph 32) which is open to anyone interested in Access to HE. This group meets termly and considers the practical issues relating to Access to HE and forwards to the Access to HE Committee any matters for adoption by the AVA or for further consideration.

57 The AVA team has recently run events in conjunction with Sheffield Hallam University admissions tutors, which promote elements of Access to HE. One event was on grading and another on GCSE equivalence. In that way, the Access Development Officer (ADO) remains in contact with other OCN AVAs and is able to share good practice and seeks answers to common issues. The ADO has also recently been invited to join the curriculum development groups of both South and West

Yorkshire Lifelong Learning Networks with a view to establishing firm progression agreements with local HEIs.

58 The review team was told that the AVA is anticipating that some Access programmes with providers currently validated by the Assessment and Qualifications Alliance, will transfer to OCNYHR when the Alliance relinquishes its licence. The AVA is considering the most effective practices to use to ensure that this process is carried out as sensitively as possible ensuring that learners are not disadvantaged and that providers are not deterred. The AVA will be looking for congruency with its existing programmes but existing validation periods will be honoured where programmes are transferred before the end of their period of validation. Consequently, it is a condition of the licence that the AVA develops, publishes and implements procedures for transferring and approving programmes from other AVAs.

Principle 4

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

59 The AVA has established a system to secure academic standards that integrates internal and external moderation within a single framework, details of which are set out in its Access to HE handbook and associated documents.

Internal moderation

60 The AVA places responsibility on centres to carry out internal moderation, and to ensure that all assessment is internally moderated and standardised with the centre, before scrutiny by the external moderator, appointed by the AVA. The Access to HE handbook provides extensive guidance on the AVA's requirements for internal moderation. This includes its purpose, the minimum requirements for the internal moderation system within a centre, the planning required and the processes and procedures to be followed, the roles and responsibilities of internal moderators, their

induction and training, their coordination, the rules about the sampling of assessment, and the maintenance of records. The guidance also provides advice about action planning for improvement. The AVA requires internal moderators to sign the Recommendations for the Award of Credit (RAC) for each student, which constitutes the official record of students' achievement, including the Access to HE Diploma, prior to their being confirmed and countersigned by the external moderator.

61 The review team saw evidence of the system working in the documentation provided as part of the audit trails, and heard evidence of its effectiveness from the external moderators whom they met. The team concluded that the internal moderation system is an important element in the AVA's processes for securing academic standards, and is well integrated with the external moderation system.

External moderation

62 The AVA appoints external moderators to Access to HE Diplomas and pathways in which they have curriculum expertise. At the time of the visit, for the 24 centres there were 27 external moderators, 13 currently or recently employed in the higher education sector, and 14 in the further or adult education sector. The review team concluded that the range of moderators and their expertise was appropriate for the current range of Access to HE programmes, and that there were no evident conflicts of interest. The AVA maintains a database of moderators with details of their expertise. Where the AVA considers that additional curriculum expertise is needed, the Access to HE handbook states that it may appoint advisers from HE to support the moderator. Representatives of the AVA confirmed that they had not yet considered the use of this provision necessary. The team considered this to be a potentially useful provision which the AVA should retain for possible use when it regularly reviews the range of subject expertise of moderators against the range of subjects available across its Access to HE Diploma pathways. An extensive range of

induction materials is provided by the AVA for new moderators and an annual staff development programme is provided which addresses their particular needs, for example around standardisation.

63 The terms of reference of the Access to HE Committee include responsibility for monitoring the appointment and training of moderators, but not the actual appointment or the approval of moderators. An annual schedule provided by the AVA indicated that the actual moderator appointments are made by the Quality Manager (a senior member of staff of the AVA) although this responsibility does not explicitly appear in the job description for the post holder. Minutes of the Access to HE Committee record that the committee has, on occasion, approved the list of moderators when a set of moderator appointments has been made. Officers of the AVA acknowledged, however, that this approval had not necessarily taken place before letters of appointment were issued and moderators commenced their duties. The review team concluded that the delegated authority for the approval and appointment of moderators, and the role of the Access to HE Committee in that process should be clarified, particularly in the context of the role of moderators in the award of the Diploma. It is therefore a condition of the licence that the AVA revises the terms of reference of the Access to HE Committee to include the responsibility for the appointment of external moderators and ensure that they do not undertake their duties until the Committee has formally approved their appointment.

64 The document setting out the terms under which moderators are engaged makes no reference to any limit on the period of office that the moderator may have with any one Access to HE programme. The register of moderators maintained by the AVA states the number of years with a particular programme each moderator has been in office, but the actual date of appointment is not recorded on the same register. It was not clear how length of service is monitored. The review team found no evidence of moderators at the same centre

for more than four years, but came to the view that this requirement should be made explicit in the documentation. The team therefore recommends that the AVA amends the terms of moderation for Access to HE provision to include an explicit requirement that limits the normal period of office with any one Access to HE programme, or any one Access to HE centre to four years. The AVA might also find it helpful to include the date of appointment in its register of moderators to enable checks to be done more easily.

Moderation processes

65 Moderators have a range of duties, including the sampling of assessment, confirming internal moderation decisions, ensuring consistency of assessment, participation in standardisation activities, and providing information to the AVA on the quality of provision. They also have responsibility for confirming the academic standards of work at the centres for which they have responsibility, and for confirming the award of the Access to HE Diploma, which they formally signify by their countersignature of the RAC. They visit centres twice yearly and write a report for each visit. The AVA provides clear and extensive guidance on the nature, structure and content of moderators' reports and examples were provided as part of the material in the audit trails. Moderators are provided with full guidance on the sampling of assessment and are required to check on the validity, reliability and fitness for purpose of the assessment strategy, particularly in the light of the need to prepare students for assessment in higher education. The need to link with the internal moderation processes is made explicit.

66 The review team noted that the AVA guidance on reassessment allows centres to determine how many times a student may be reassessed on a particular piece of work. Access to HE tutors reported that most, but not all centres, limited this to one reassessment opportunity only. Moderators reported a similar position. However, the team concluded that, under the current guidance from the AVA, there

is scope for significant variation between centres. Further guidance on assessment is being produced and promulgated by QAA, and, in light of this, the AVA is recommended to review the guidance given in the Access to HE handbook concerning the number of permissible resits for learner assessments to ensure greater consistency across the AVA.

67 In addition to external moderators responsible for Access to HE Diplomas and pathways, the AVA has established the role of Lead Moderator. The Lead Moderator supports the AVA and its centres in ensuring that the Access to HE provision in the region is meeting the needs of the learners and the quality requirements of AVA. The post involves a range of duties in relation to both quality assurance and enhancement and to academic standards. With respect to the latter, the Lead Moderator is involved with the recruitment of, and support for, new moderators. The duties also include: analysing moderators' reports and producing a composite annual report based on that analysis for the Access to HE Committee; attendance at, and writing the reports of, all standardisation meetings; and advising on the agenda for the final moderation meeting. The Lead Moderator's annual report is a substantial document covering a range of issues in depth and in detail, enabling the Access to HE Committee to have an overview of the outcomes of moderation.

Standardisation

68 External moderators are responsible for ensuring that the standards applied within the centres for which they are responsible are consistently applied. The AVA runs annual standardisation events for moderators across the AVA where standards are compared between centres. Moderators described the process and gave examples of action being taken where concerns about standards arose as a result of this process. They confirmed that the process applied to current work during the academic year in question, and that actions can be taken by the AVA where necessary before the finalising of assessment results at the end of

the year. The team commended this practice and concluded that it was an important element in the processes whereby the AVA provides public assurance about the standards of the Access to HE Diplomas it awards.

Award of the Access to HE Diploma

69 The second visit of the external moderator includes attendance at a final moderation meeting at which students are considered for the award of the Diploma. The purpose of this meeting as stated by the AVA, includes the confirmation of the award of the Diploma. The review team came to the view that there was ambiguity about who has the formal authority for confirming the award of the Diploma, since both the external moderator and the final moderation meeting, chaired by a senior member of staff of the centre, appear to have that function. The team also noted that students attend the part of the final meeting at which confirmation of the award of the Diploma occurs, and came to the view that the term 'confirmation' appears to be being used in two different senses: (a) when defining the decisions of the external moderator, acting with the authority of the AVA; (b) when describing the reporting of the awards to interested parties, including students, immediately after the decisions had been taken. The team noted that, while the Access to HE Committee has delegated authority to confirm the outcomes of validation of Diploma programmes, it has no explicit commensurate authority for the award of the Diploma. Consequently, it is a condition of the licence that the AVA revises the terms of reference of the Access to HE Committee to include the formal authority for the award of the Access to HE Diploma and to clarify whether, and if so to whom, any delegation of this authority takes place.

Certification

70 The AVA has drawn up office procedures for issuing Access to HE Diplomas and credit transcripts, which includes a final check on the accuracy of the RACs, in particular, in relation to fulfilling the appropriate rules of combination.

AVA officers reported that they have secure arrangements for the storage and handling of Diploma certificates. Certificates are issued to centres for them to forward to students. The AVA is considering improved arrangements for informing HEIs of students' results.

71 The review team concluded that the procedures for issuing Access to HE Diploma certificates was satisfactory, and encourages the AVA to continue developing improved communication with HEIs about the results, for the benefit of students successfully completing the Access to HE Diploma.

Audit trails

72 During the course of the visit the review team conducted audit trails of six of the AVA's provider colleges. The purpose of these trails was to enable the team to consider the rigour, consistency and effectiveness of the AVA's processes at centre level and to identify issues and points that needed further investigation through the extended review process. The team considered a range of FE colleges of different sizes with different specialisms, and one teaching hospital. Of the five FE colleges, two were specialist colleges, one offered a wide range of programmes and the other a multipath programme.

73 The review team was presented with audit trail files which included centre recognition and validation documentation, rules of combination, panel reports, moderators' reports, and correspondence with the centre (including the letter of confirmation that the programme had been approved by the Access to HE Committee and could now be offered). Sample certificates and credit transcripts were also available for the review team to see. Final assessment meeting minutes were available for all providers and annual statistics received from providers were supplied to the review team filed separately from the audit trail statistics.

74 The centre approval and validation submission documents were both based on those used for OCN programmes and included information pertinent to that awarding body

and which was not relevant to the work of the AVA (see paragraph 38).

75 In all cases, centre recognition documentation submitted by the providers was appropriate and complete; learning programme plans and rules of combination were available for all centres and pathways. For each programme, there was a validation panel report. The rules of combination clearly indicated which units were mandatory and which optional and stated the overall tariff necessary to achieve the Access to HE Diploma. Confirmation of the validation panel's decisions was reported in the minutes of Access to HE Committee. The composition of validation panels matched those stated in the Access to HE handbook as being necessary for the panels.

76 While there was no written confirmation from HEIs that the programme and units were appropriate for progression, the review team was told that the Access Development Officer ensured that early liaison with HEIs took place and that they were represented at the final validation meeting. From the evidence provided, the team concluded that the development and the panel processes were comprehensive and allowed the appropriate decisions to be reached by the validation panels.

77 The review team found that only 50 per cent of the audit trails contained the providers' annual monitoring reports to the AVA. These are critical documents from which the AVA draws much of the evidence for its own annual self-evaluation report to QAA. The reports are based on a series of headings supplied by the AVA to which the provider is required to respond. Unfortunately the headings used by the AVA did not enable the providers to meet QAA's licensing criteria. These require the provider's annual review to include self-assessment of Access to HE programmes by providers. Such self-assessment should include consideration of student feedback, appropriate responses to issues raised through the process of moderation, and an appropriate cohort analysis. Most of the responses received from the providers were neither analytical nor

evaluative and none reviewed the pathway statistics for the year (see also paragraph 54). However, evaluations of targeting learners and evidence of widening participation were included in most reports.

78 Reports from final assessment boards were included in the data for five of the six centres. However, it was not always clear whether those staff required to be at the boards were actually present as only names were stated in the minutes with no reference to the positions of those listed.

79 The review team did not see any provider literature; external moderators are expected to collect samples from providers for the AVA to review. It was confirmed by the Access Lead Moderator that she had carried out a survey of all providers' literature and was addressing shortcomings by sending out guidelines to them.

80 The review team was confident that, with the exception of the variable end of year reviews from providers, the AVA was following the requisite procedures in all of its quality assurance dealings with providers; and that the processes were thorough and rigorous and met the relevant licensing criteria.

Conclusions

81 The Open College Network Yorkshire and Humberside Region (OCNYHR) was formed in August 2006 following the merger of the Open College Network West and North Yorkshire and Open College Network Yorkshire and Humber Region. Its provisional AVA licence was granted by QAA in July 2007.

82 Access to HE is an important part of OCNYHR's work, accounting for approximately 20 per cent of its overall business. The way it manages its work in this area is clearly valued by staff and stakeholders alike. The organisation has a newly appointed Chief Executive and a dedicated Access Development Officer and Access Administrator. Stakeholders have a high regard for OCNYHR with providers having a sense of mutual benefit and pride in their work, stressing the high priority they place on Access to HE work. The AVA has developed a

comprehensive regional Access to HE framework, which has entailed considerable work on the part of providers, AVA staff, members of the Access to HE Committee and others in a relatively short space of time. The role of the Access Development Officer has been pivotal in supporting providers throughout this process.

83 The governance and management structure facilitates successful operation of both the strategic and day-to-day business of OCNYHR, this also being a reflection of the energy and commitment of the staff and the way they work in close cooperation with their stakeholders. Communication is excellent between all parties and the AVA staff are regarded as being both accessible and responsive.

84 The AVA has a well-established committee structure with ultimate responsibility for Access to HE provision residing with the Board. There are, however, some areas of clarification required with respect to terms of reference of the Access to HE Committee to clarify where the authority for the award of the Access to HE Diploma resides and its role in the appointment of external moderators. The AVA is also asked to reconsider the membership of the Access to HE Committee to ensure adequate representation at meetings.

85 The AVA is now considering a new three-year planning cycle. The problems that have faced the AVA in the last year, particularly a significant decline in learner numbers and the resultant impact of this on its budget will inform the development of the new business plan and resultant strategic operational plan. Although a downturn in numbers has been seen, the Board is optimistic that this trend will be reversed in the coming years, partially due to their plans for a more focused and aggressive marketing and promotional strategy. The OCN's current strategic planning process is complex with a number of interrelated and similar strategies and plans. While it is commendable that all staff are actively engaged in the development of the new strategic operational plan, the AVA acknowledged the

need to simplify and rationalise its planning process in the forthcoming planning cycle.

86 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 but the template is in need of review. Audit trail documentation confirms that validation panels are appropriately constituted. There are good examples of close working relationships with HEIs in some subject areas.

87 The systems and processes for securing standards are, with some exceptions, clearly described and defined and in most respects appear to be working well. The support and documentation provided on programme validation and the flowchart that has been developed for providers with hyperlinks to all key documents and forms are to be commended. Also to be commended is the quality and level of support provided by the AVA to providers, the processes for cross-provider standardisation and the ongoing training opportunities for staff and other stakeholders.

88 The AVA has adopted a two-part procedure for the final assessment board, the first part of which confirms the award of the Diploma. There is some confusion within the AVA's documentation as to where the formal authority for the award of the Access to HE Diploma lies and the AVA is therefore required to clarify this. It is also required to develop procedures for the periodic revalidation of Access to HE Diploma programmes and to regulate the approval of modifications to programmes to avoid substantive changes altering the inherent nature of a programme.

89 In conclusion, the AVA has progressed well since the granting of its provisional licence, and clearly has the capacity to develop further. It has a highly committed and enthusiastic team of staff and a new Chief Executive to take the AVA forward. Overall, the review team found

the AVA to be efficiently and effectively governed and managed and was successfully fulfilling its role as specified in its memorandum and articles of association.

Commendations

90 The AVA is commended for:

- i the way in which the strategic planning process fully involves the Board, the AVA staff and a variety of stakeholders (paragraph 26)
- ii the support and documentation made available to providers on programme validation, including the flowchart with embedded hyperlinks (paragraph 38)
- iii the continuing professional development opportunities for AVA staff and other stakeholders (paragraph 43)
- iv the close links between the AVA and HEIs as evidenced through effective communications and by joint events on key issues relating to Access to HE (paragraphs 44, 57)
- v the level and quality of support provided by the AVA to providers (paragraphs 45, 55)
- vi the processes employed by the AVA to ensure cross-provider standardisation (paragraph 68).

The AVA licence

Review outcome

91 The Open College Network Yorkshire and Humberside Region is awarded a conditional confirmation of its full AVA licence, with six conditions to be met by 1 December 2009.

Conditions

92 The licence is confirmed on condition that the AVA:

- i revises its Memorandum and Articles of Association to refer to Access Validating Agency (paragraph 16)
- ii develops, approves, publishes and implements procedures to regulate the

- approval of modifications to programmes, including the development of an agreed definition of 'substantial', so that where modifications are deemed to be substantial, the programme is subject to a full validation (paragraph 51)
- iii develops, approves, and publishes procedures for the periodic revalidation of Access to HE Diploma programmes. The procedures should not only take into account the requirements of the original validation process, but should also require a critical review by the provider of the Access to HE programme (paragraph 55)
 - iv develops, publishes and implements procedures for transferring and approving programmes from other AVAs (paragraph 58)
 - v revises the terms of reference of the Access to HE Committee to include the responsibility for the appointment of external moderators and ensures that they do not undertake their duties until the committee has formally approved their appointment (paragraph 63)
 - vi revises the terms of reference of the Access to HE Committee to include the formal authority for the award of the Access to HE Diploma and to clarify whether, and if so to whom, any delegation of this authority takes place (paragraph 69).
- Recommendations to the AVA**
- 93 The review team recommends that the AVA:
- i reconsiders the membership of the Access to HE Committee in terms of the number of members, balance of representation and expertise, and the definition of quorum to better secure fully representative and quorate meetings (paragraph 22)
 - ii reviews the strategic planning process in order to rationalise the number and interrelationship of individual plans and strategies relating to Access to HE (paragraph 26)
 - iii continues the initiatives on data collection to ensure that there are fewer nil returns on learner intended destinations and that partial accreditation for students withdrawing from their programme are recorded (paragraph 30)
 - iv reviews its Access to HE handbook to ensure all forms are up-to-date and to continue, with urgency, the plans to redesign the learning programme plan template (paragraph 38)
 - v revises the external moderator report form to ensure that appeals and complaints from learners are recorded and reported back to the AVA (paragraph 40)
 - vi ensures that guidance and standard agenda provided for validation panels includes the requirement to check that the programme meets the standard requirements relating to the *Access to Higher Education Diploma and credit specifications* (paragraph 53)
 - vii considers strategies to ensure that all providers return appropriately completed end of year review documents to meet the deadline identified by the AVA and that the AVA revises its template for the provider end of year review to include a requirement for statistical analysis of data and inclusion of actual student feedback (paragraph 54)
 - viii amends the terms of moderation for Access to HE provision to include an explicit requirement that limits the normal period of office with any one Access to HE programme, or any one Access to HE centre, to four years (paragraph 64)
 - ix reviews the guidance given in the Access to HE handbook concerning the number of permissible resits for learner assessments to ensure greater consistency across the AVA (paragraph 66).

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 higher education by assuring:
 - the quality and adequacy of AVAs' systems and procedures
 - the quality, comparability and range of AVAs' operations
 - the adequacy and comparability of AVAs' standards for approval, moderation and monitoring of programmes
 - consistency across AVAs in the operation of criteria for the granting of the Access to HE award
- iii to stimulate reflective and self-critical perspectives within AVAs, as an instrument to promote quality enhancement
- iv to provide an opportunity to identify and disseminate good practice of AVA operations
- v to provide a mechanism for ensuring necessary, and encouraging desirable, improvements and developments in AVAs.

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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