



Promoting higher quality

**The Quality Assurance Agency
for Higher Education**



Consideration of
application for AVA licence:
South West Wales Open
College Network

NOVEMBER 2002

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Contents

Foreword	1
Background and previous experience	1
Principle 1	2
The organisation has a structure which is based on a partnership of members, including institutions which provide Access to HE programmes and institutions of higher education	
Principle 2	2
The organisation has governance structures which allow it to discharge its AVA responsibilities securely	
Principle 3	4
The organisation is aware of, and in position to meet, its legal and public obligations	
Principle 4	4
The organisation is able to manage effectively its AVA responsibilities and the structure which supports them	
Financial and operational management	5
Operational procedures and data collection and storage	5
Equal opportunities	6
Principle 5	6
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 recognition	
Validation	6
Principle 6	7
The organisation is able to safeguard the continuing quality of Access to HE programmes, and to secure the standards of achievement	
Principle 7	8
The organisation is underpinned by structures and processes which enable it to review, evaluate and develop the Access to HE provision for which it has responsibility	
Conclusions	9
The AVA licence	9
Outcome	9

Foreword

1 The Quality Assurance Agency for Higher Education (QAA) is responsible to the Department for Education and Skills (DfES) for the recognition of Access to Higher Education courses. QAA exercises this responsibility through a national network of authorised validating agencies (AVAs), which are responsible for the processes of individual course recognition and the award of Access to HE certificates to students on QAA's behalf. QAA has developed a scheme for the licensing and review of the 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 the QAA Board of Directors.

2 This is a report on the consideration of the application for an AVA licence made to QAA by the South West Wales Open College Network (SWWOCN). The licensing team appointed by the ARLC to consider this application consisted of Dr Pete Johnston, formerly of the University of Essex, and Dr Andy Thompson, Vice-Principal, North East Surrey College of Technology. The licensing visit was coordinated for QAA by Ms Kath Dentith, Assistant Director (Access).

3 The procedure for the consideration of the application included an initial meeting between SWWOCN officers and the QAA Assistant Director to discuss the requirements for the application and the process of the licensing visit; the preparation and submission by SWWOCN of the *Licence Application* (the *Application*) together with a selection of supporting documentation; a meeting of the licensing team to discuss the *Application* and other documentation, and to establish a draft programme for the licensing visit; and negotiations between QAA and SWWOCN to finalise the programme and other arrangements for the visit.

4 The licensing visit took place on 5 November 2002 and consisted principally of meetings with representatives of SWWOCN including OCN officers, members of the Board of Directors, the Finance and General Purposes Committee, the Quality Assurance Committee and the Access to Higher Education Development Committee. The application was assessed by the licensing team against the seven principles for the award of an AVA licence, provided here as the headings for each of the main sections in this report. Judgements were made by the team on the basis of evidence provided by SWWOCN in its *Application* and other documentation submitted, and from further information gathered from discussions during the visit.

5 Following the consideration of an application for AVA licence, a member of the licensing team presents the team's report to the ARLC. The Committee then makes one of six decisions:

- i **unconditional** award* of licence;
- ii **conditional** award* of licence with conditions to be met by a specified date;
- iii **deferral** of judgement pending receipt of further information;
- iv **referral** of application for further development;
- v **rejection** of application.

**Where a licence is awarded, whether with or without conditions, it is awarded on a provisional basis, for one year only in the first instance.*

6 The Agency is grateful to SWWOCN and to those who participated in the licensing visit for the willing cooperation provided to the licensing team.

Background and previous experience

7 The South West Wales Open College and Access Consortium was established in 1990. The organisation formally adopted the name South West Wales Open College Network (SWWOCN) in January 2000, and was incorporated, and awarded a licence by the National Open College Network, under that name. The organisation held an AVA licence between 1990 and 2002 and, during 2001-02, SWWOCN was responsible for 23 QAA-recognised Access programmes, delivered by seven providers in the area.

8 Although the area of South West Wales served by SWWOCN is predominantly rural, the majority of the QAA-recognised Access provision in this area is managed by providers located in the urban areas of Swansea, Llanelli, Neath and Port Talbot. Rates of economic activity are lower in South West Wales than in the rest of the country, and the area served by SWWOCN is part of a designated area for European Union Objective 1 funding. SWWOCN also operates within an all-Wales context, primarily through the work of OCN Cymru (the Welsh Open College Networks), which has developed a joint strategy for the Open College Networks in Wales (see paragraph 35, below).

9 In March 2000, SWWOCN was reviewed by QAA as part of its cycle of AVA reviews. The report on that review expressed serious concerns about the AVA's governance and quality assurance procedures and, following a period of monitoring by QAA, SWWOCN's Board of Directors decided in March 2002 to relinquish the AVA licence and to apply for consideration for a new licence in September 2002.

Since the 2000 review of the AVA, the OCN has undergone substantial organisational change, which is reflected elsewhere in this report.

Principle 1

The organisation has a structure which is based on a partnership of members, including institutions which provide Access to HE programmes and institutions of higher education

10 SWWOCN is a company limited by guarantee, and it operates as an independent organisation (see paragraphs 30 and 31, below).

11 SWWOCN is a consortium of members which includes institutions providing Access programmes and higher education institutions. Currently, the OCN has five members in the higher education (HE) sector and six in the further education (FE) sector. There are also five local education authority (LEA) members and a large number of voluntary sector members, one of which offers an Access programme. All of the FE sector members have currently valid Access provision.

12 The *Application* records that 'during 2001-2002, SWWOCN re-examined the process by which members are admitted'. An initial draft document specifying the criteria by which members are admitted was considered by the Quality Assurance Committee (QAC) in October 2002. This document is headed 'SWWOCN Membership Approval (Draft)'. It specifies criteria under the categories of equal opportunities; admissions policy and procedures; staff development policy; internal quality assurance; structure of organisation; learner support; Welsh language policy; funding and financial resources; and commitment to Open College Network principles. The licensing team noted the appropriateness of specific criteria in this draft document for the assessment of the suitability of organisations as potential member providers. However, the team observed that the document was elsewhere described as the 'Member Approval Submission Document (Section A)' and, as indicated by the 'Section A' designation, the document is focused towards intending providers of SWWOCN programmes. As a result, some of the criteria and, indeed, some of the main categories, may be less appropriate for assessing the suitability of organisations wishing to apply for membership but not wishing to be involved in programme delivery. The team heard from representatives of the Board of Directors that they recognised further work was required on the document.

13 Applications for membership are considered by the Board of Directors. Once accepted, the member enters into a formal agreement with SWWOCN in

which members' rights and obligations are expressed. While the licensing team considered that the current expression of these was comprehensive and largely appropriate for members providing programmes, it was noted that the obligations, like the criteria for membership, may not be wholly appropriate for potential members who were not involved in the delivery of programmes, such as most HE members, and for the particular nature of their involvement in the organisation.

14 The *Membership Agreement* specifies grounds for refusal or withdrawal of membership and an appropriate procedure for such refusal or withdrawal, whereby any recommendation from the Board for such action would be subject to a vote of the Council of Members, requiring a two-thirds majority of those voting.

15 Noting that SWWOCN's review of membership criteria had not yet been concluded, and further noting that review's potential impact on the expression of rights and obligations in the *Membership Agreement* document, the team concluded that SWWOCN was not yet in a position to demonstrate that it met the criteria under Principle 1 in full.

Principle 2

The organisation has governance structures which allow it to discharge its AVA responsibilities securely

16 As a company limited by guarantee, SWWOCN's governing document is its *Memorandum and Articles of Association*.

17 In considering SWWOCN's constitutional arrangements and governance structures, the licensing team took particular notice of the following statement in the *Application*: 'The governance of SWWOCN has been carefully examined by the Board, and revisions have been made. Some constitutional documents were examined in 2001-2002 to amend inconsistencies between terms of reference, and the *Memorandum and Articles of Association* of SWWOCN as a company limited by guarantee. For 2002-2003 SWWOCN took advice from experienced clerks of other governing bodies, and a root and branch review of Governance in SWWOCN began in August 2002. Proposals will be taken to the Board with a view to presenting to the AGM of members on 7th November 2002'. The team noted that this review covers a wide range of company rules and procedures.

18 The licensing team was informed that the OCN had hoped that this review would be complete, and proposals for any changes would have been clear, by

the time of the licensing visit. However, because of the scale of the review, and as a consequence of other events which had put the OCN under pressure of time, at the time of the visit the review had not been completed, and the company AGM had been postponed to December 2002.

19 With the current arrangements, each member is entitled to send one representative to the biannual meetings of the Council of SWWOCN members, and to nominate members to the governing body, the Board of Directors. The Board is supported by a structure of five committees, each of which it appoints. These are: Quality Assurance (QAC); Finance and General Purposes (FGPC); Personnel; Welsh Language and Culture (WLCC); and Access to HE Development (AHEDC). Each committee is formally required to report to the Board. Additionally there is an Access Tutors' Forum which reports to the AHEDC but which is not part of the committee structure.

20 The detailed duties of the Board of Directors, which is required to meet at least six times per year, are set out in a document approved at the AGM of 1 November 2001. These include setting the strategic policy direction and financial and business management. Other responsibilities include approval of programmes; monitoring the performance of SWWOCN to set targets; authorisation of Access to HE qualifications; admission of new members; and approval of membership of all committees.

21 The size and balance of the Board's membership are set out in the *Articles* and in its detailed terms of reference. The team noted that whereas the *Articles* (and current *Membership Agreement*) specified a membership of not less than three, the terms of reference specified not less than four. The rules on the balance of membership, together with an appropriate quorum requirement, ensure representation from each of the HE, FE and 'other' sectors ('other' including providers from community and voluntary bodies, LEAs and employers), and also make provision for co-options. As the *Application* records, 'in the past 12 months the Board has benefited from the addition of more senior staff from the FE sector, and the Principal of a major FE provider is now the chair'.

22 The terms of reference of the FGPC appropriately define its purpose 'to provide appropriate governance of the conduct of business and to monitor the financial probity and soundness of SWWOCN'. This is followed by a list of related, relevant duties covering formulation and monitoring of an annual financial plan, annual budgeting responsibilities, ensuring an appropriate contracting policy, recommending independent auditors, and ensuring assets are protected against loss. Although the quorum (more

than two members to include the chair or vice-chair of the committee) is specified there is no specification, in these terms of reference, 'accepted at the AGM of 1st November 2001', of the number of members nor of the frequency of meetings. The team observed from the minutes of meetings that, currently, the membership of the FGPC was drawn from the Board.

23 There is a similar need to specify membership for the other committees where terms of reference were accepted at the AGM of 1 November 2001, namely Personnel, QAC, and WLCC. Their purposes and duties are, however, appropriately specified.

24 The terms of reference of the QAC define its purpose as 'to act on behalf of the Board of Directors in assuring the quality and standards of all awards and qualifications recognised by and made through SWWOCN. It oversees the systems of recognition, moderation and certification and supports and monitors the quality assurance of all SWWOCN activities.' This purpose is accompanied by an appropriate and detailed specification of duties, including the appointment of moderators; receipt of reports from recognition panels and moderation processes, together with review of any issues arising; and action on behalf of the Board with regard to appeals arising from the recognition and moderation processes. The quorum is set at two members, but, as indicated previously, neither the number of members, nor the pattern of membership is specified.

25 In contrast, the terms of reference of the AHEDC, formally approved on 12 March 2002, specify the number of members (up to nine), as well as the Committee's quorum. The terms of reference require the Committee to have appropriately experienced representation from the Board (including the Chair), from those involved in the delivery of Access programmes and from higher education institutions.

26 The *Application* explicitly addresses the matter of the division of Access responsibilities between the QAC and the AHEDC in stating that 'the latter is responsible for driving forward the strategic development of Access provision but not for quality issues or programme validation. These are considered by the QAC which makes recommendations to the Board on validation.' The AHEDC's responsibilities are appropriately expressed in its detailed duties to report to the Board; make recommendations to the Board on the strategic planning needs of Access; identify issues arising out of annual reports received from Access providers to inform the strategic planning process; refer issues concerning the quality assurance of Access to the QAC; consider developments in Access to HE and make recommendations to the Board; oversee the Access Tutors' Forum; promote the exchange of good

practice in design and delivery of Access programmes between providers; and act as a source for consultation over any proposed changes to Access programmes arising out of national developments. The Committee is required to meet at least three times per year.

27 The responsibilities of the Access Tutors' Forum (the Forum) include identifying and sharing good practice; identifying concerns and staff development needs; and identifying areas for development and possible improvements in operational practice, in all cases with respect to Access to HE provision. The Forum, which is required to meet at least three times a year, consists of up to twelve members, including a chair appointed by the Board and Access coordinators and tutors from providing institutions.

28 As indicated in the above, there are several instances where SWWOCN needs to review or devise detailed specifications regarding committees and their membership. The team noted that this issue was included in the very detailed and thorough listing of issues to be addressed in SWWOCN's ongoing corporate governance review process.

29 While noting that the committee structure now established by SWWOCN is well-considered and appropriate, given that the review of governance is yet to be completed, and given that details provided in the *Application* are therefore potentially subject to change, the licensing team concluded that SWWOCN was not yet in a position to demonstrate that it had fully defined governance structures which would enable it to discharge its AVA responsibilities securely. The team therefore concluded that, at this stage, the criteria under Principle 2 could not be considered to have been met.

Principle 3

The organisation is aware of, and in position to meet, its legal and public obligations

30 SWWOCN's legal status as a company limited by guarantee gives it a basis for entering into legally binding agreements. Its status as a charitable company ensures that its financial affairs are formally regulated.

31 SWWOCN occupies premises at Stebonheath Enterprise Centre, Llanelli, secured through formal licence agreements with Foothold Youth Enterprise Agency. The only external service utilised by SWWOCN is payroll services, which are provided on a commercial basis by the City and County of Swansea through a formal service level agreement.

32 The licensing team considered that the OCN met the criteria under Principle 3.

Principle 4

The organisation is able to manage effectively its AVA responsibilities and the structure which supports them

33 The objects of the organisation, as set out in the *Memorandum of Association* amended at its AGM of 2 November 2000, are congruent with the aims of the *QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland*.

34 Responsibility for SWWOCN's strategic direction rests with the Board and is explicitly expressed amongst its duties, which also include monitoring of the performance of SWWOCN against specific targets. As recorded above, the AHEDC has a central responsibility in the formulation of Access to HE strategy and is aided by the work of the Access Tutors' Forum.

35 In considering the process by which these duties might be discharged, the licensing team noted the 'All-Wales' context within which SWWOCN operates and the role of OCN Cymru. OCN Cymru's current (draft) strategy for 2002-03 features Access to HE as a major component and includes, in particular, a commitment that the Welsh AVAs will work together and 'will continue to raise the profile of Access to HE' by a series of mechanisms including 'ensuring that providers increase guidance and support for Access to HE learners'; 'encouraging...alternative modes of delivery...to bring opportunities "closer to home" particularly for those in rural areas or in employment'; 'building partnerships between Access Programme Co-ordinators and HE Admissions Tutors to increase collaboration and improve standards'; 'supporting specific targeting and alternative programme designs'; 'supporting liaison between industry and education providers'; 'providing guidance on the statistics required for monitoring purposes and the information needed to ensure comparisons are made and standards raised'; and 'offering staff development to ensure the provision meets quality assurance standards'.

36 In pursuit of its objects, SWWOCN's (draft) statement of 'strategic activities' for 2002-03 identifies five major priorities with accompanying objectives, performance indicators, targets for action, and financial implications. Although SWWOCN has no current formal role in relation to QAA-recognised Access provision, specific, detailed Access to HE elements are included, which are intended to apply to the Access programmes currently running in the area in which SWWOCN operates as an OCN and for which the OCN had responsibility in its former role as an AVA. Targets for action are included, such as, 'organise and run South Wales Access to HE event

Spring 2003' and 'standardisation events inter OCN and intra OCN for 5 main subjects/qualifications areas including Access to HE'.

37 The team concluded that SWWOCN had established systematic and effective procedures for the production and monitoring of a strategy for Access.

Financial and operational management

38 The Board is advised and informed about financial affairs by the FGPC (see paragraph 22, above), which receives regular budget monitoring reports; prepares a draft budget for approval by the Board; formulates membership and pricing policy; and prepares accounts to trial balance stage.

39 FGPC oversees the building of a contingency fund with decisions made quarterly as regards transfers to this fund. SWWOCN's aim is to establish the equivalent of three months' anticipated expenditure in this contingency fund from 2003 onwards. SWWOCN's draft revenue account for 2001-02 records a surplus for the year of £36,501 with an expenditure of £294,269. The *Application* records SWWOCN's steady progress in building the contingency fund, which stood at £50,400 in mid-August 2002.

40 Day-to-day financial and operational management is the responsibility of the Chief Officer, who took up her post in June 2001. Such responsibility is defined in her job description, which appropriately further specifies her responsibilities for ensuring that strategies and policies set by the Board are implemented. The *Application* records that 'since the arrival of this Chief Officer there has been a comprehensive review of staff roles and relationships and an increase in staffing levels from five full-time staff to one part-time and nine full-time staff. 1.5 posts are funded through ESF [European Social Fund] until April 2003'. The staffing structure is clear and appropriate. Clear expression of lines of responsibility can be seen, for example, in the job descriptions of those concerned with financial matters where the Administration Officer (Finance) reports to the Office and Finance Manager, who in turn reports to the Chief Officer. The operational team is led by the Office and Finance Manager, who also provides secretariat support to the Board of Directors. Her team consists of three administrative officers (Development, Finance and Operations) and two administrative assistants whose primary role is data entry and the printing of certificates.

41 The development team consists of the Quality Manager and two development officers. One development officer has nominated responsibility for Access to HE as well as for the larger further education colleges; the other is ESF funded with

responsibility for business and community providers. This development team is supported by an Administrative Officer (Development) who, as a member of the administrative team, reports to the Office and Finance Manager. Members of the development team report to the Chief Officer.

42 The licensing team noted evidence of substantial action by SWWOCN, since June 2001, in reviewing its personnel policies under a rolling programme overseen by the Personnel Committee. This covers an extensive range of relevant policies including pay scales, pension rights, holiday entitlement, grievance procedures and budgets for its staff development plans.

43 SWWOCN moved to its current premises in May 2001. Accommodation is spacious and opportunity exists for expansion.

44 The licensing team concluded that SWWOCN had established structures and procedures for sound operational and financial management as an AVA, and that staffing and physical resources were sufficient for the associated responsibilities.

Operational procedures and data collection and storage

45 In common with many other OCNs, SWWOCN currently uses A-Rev as its database for operational work of registration and award of certificates. These operational procedures are supported by associated documentation which is, in general, appropriately detailed and which incorporates appropriate quality checks. The licensing team noted, however, that although this documentation is subject to regular review, the document relating to the award of credit to students on Access programmes ('reviewed March 2002') made reference to the achievement of the 'kitemark', and lacked the same attention to detail as was apparent in other equivalent documents. In addition, the team was not able to identify documentation providing guidance to OCN staff about the operational procedures relating to the formal recognition and approval of programmes.

46 While the current data collection system would allow the OCN to produce the required data for AVA purposes, the *Application* records the limitations of the A-Rev system and the introduction of the replacement Opus system to be installed in late Spring 2003. The principal anticipated gains from the installation of the new system are 'the facility to import data directly from files, enabling direct electronic transfer from providers and enhanced report capabilities'.

Equal opportunities

47 SWWOCN's equal opportunities statement that it 'seeks to encourage positive action which leads to both equality of opportunity and equality of outcomes for all, and will endeavour to incorporate their action in all operations' accords with the relevant statement in its *Memorandum of Association* that 'in carrying out its objects the company shall promote equality of opportunity and oppose discrimination on the grounds of race, age, gender, religion, culture, wealth or disability'.

48 The detailed *Equal Opportunities Policy* document specifies the aim of the policy and its relationship to the Codes of Practice that underpin all aspects of the organisation's work, providing appropriate further detail on Codes which relate to membership of SWWOCN and its committees, promotion, information and advertising, interview and selection of staff, criteria applied to programmes and courses recognised, and curriculum.

49 Evidence of application of the policy can be seen, for example, in the extensive set of criteria accompanying the equal opportunities section of the (draft) member approval submission document (see paragraph 12, above) and amongst the terms of reference of the Personnel Committee which include the duty 'to ensure that the SWWOCN *Equal Opportunities Policy* in respect of the appointment, employment conditions and professional development of staff is adhered to'.

50 SWWOCN has explicit and appropriate statements relating to appeals against validation decisions, moderation outcomes and the moderation process.

51 The licensing team considered that, with one minor exception relating to the need to provide an approved statement of operational procedures in relation to the programme recognition process, the criteria under Principle 4 were met.

Principle 5

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 recognition

52 The *Application* records that SWWOCN is moving all its documentation from hard copy to its web site, with the intention that this 'will become an important and secure repository of current advice and guidance to providers, thus avoiding the situation where providers sometimes worked from different, and

therefore inconsistent, documents'. The licensing team considered the aim of this development entirely creditable, but noted that the process is not yet complete, and that, as SWWOCN does not currently hold an AVA licence, there is no need for documentation relating specifically to accreditation procedures for Access to HE to be placed on the web site. The team experienced some difficulty, in part resulting from this position, in identifying complete and definitive statements relating to the procedures which SWWOCN would apply as an AVA. While some documents presented had been prepared explicitly for the present AVA licence application, some recorded procedures and practice adopted while the OCN was operating in its former AVA role; some related to SWWOCN's broader OCN role, which would apparently also be applicable for Access to HE; and, in some instances, the status of the documentation presented was unclear, documents being in draft form or identified as in need of revision.

53 The *Application* included a number of the OCN's 'Codes' relating to procedures for Access to HE, which were described collectively in the *Application* as 'Access Guides'. These Codes are apparently subject to regular revision, most of the versions seen by the licensing team being dated '10/9/02'. Also presented was a single, undated, document *Draft Good Practice in Access to Higher Education Programmes* (which includes some of the material in the 'Codes'), intended as a 'guide to providers considering the development and delivery of a QAA-approved "Access to Higher Education" programme'. While this document has a potentially useful role in clarifying the AVA's specific requirements, the OCN may wish, in its further development of the document, to review the balance between information, guidance and direction; to clarify the document's relationship to the 'Codes'; and to consider the appropriateness of the adopted style for its intended purpose and audience.

Validation

54 The *Application* explains that the validation process itself is preceded by 'significant development work', including discussions with HE institutions; assessment of need for the programme; and consideration of appropriate target groups. The OCN's current involvement in a number of local projects and its growing capacity for evaluation and self-assessment are likely to be able to provide information to support this aspect of programme development.

55 The initial response to enquiries about the development of new Access programmes is the responsibility of the Development Officer (Access). It is then the Development Officer's responsibility to provide the necessary guidance for the process of

programme development, including the completion of the programme submission documentation, until the submission is judged to be 'panel-ready'. There was evidence of clear understanding by SWWOCN officers about their responsibilities in programme development, and the *Submission for Accreditation Guidelines* provides appropriate categories for comment, with generally clear indications of the kind of information that should be provided. However, there is currently no broader, approved guidance documentation which sets out the OCN's expectations of providers in relation to their roles and responsibilities at each of the stages of the validation process, which would enable a new applicant to understand SWWOCN's requirements, and through which consistency of the process might be enhanced.

56 In respect of the systems and procedures for the recognition of programmes, the *Application* stated that 'panel procedures are directed towards validating programmes to National standards' and made reference to a 'common submission document' to become standard for all OCNs which 'is expected to be agreed for use in 2002-03'. It was not clear how this might affect or differ from current SWWOCN procedures or documentation.

57 The validation panel process is described in one of the 'Codes'. This document describes an appropriate panel composition, although the team noted some discrepancies (in relation, for example, to the particular requirements for HE representation) with the outline of panel composition described in the *Draft Good Practice in Access to Higher Education Programmes* (see paragraph 52, above). The roles of different members of the panel are not specified in current documentation, although representatives from the QAC were clear that the presenting team did not have any authority with regard to the panel's recommendation to the QAC about a programme's approval.

58 The *Guidance for Chairs of Recognition Panels* makes clear that the submission document should be used as the agenda for the panel, thereby providing a mechanism to give some consistency to the process, and also refers to the particular requirements for the consideration of the Access to HE programme submissions, including the advice that 'Emphasis should be placed on the appropriateness of the Access programme as a foundation for study at Higher Education. Close scrutiny of academic standards, key skills, successful completion criteria and assessment should be the focus.' Given, in addition, the necessity for Access to HE panels to be chaired by members of the QAC or Board, the licensing team concluded that the process was essentially sound in its conception.

59 The licensing team was informed that, in spite of the statement in the Access Code on validation that there were four possible outcomes to a recognition panel, the actual position was that stated in the *Application* itself that five were possible. The team was informed, however, that the omitted fifth possibility, included in the *Application* as 'recommended for approval with recommendations to be met within an agreed timescale' should have read 'recommended for approval with recommendations to be addressed within an agreed timescale'. The team was not able to identify any documentary statement in which the OCN's intention with regard to possible panel outcomes was stated completely and accurately.

60 The OCN is clear about the process for the formal approval of a new Access to HE programme, that responsibility lying with the Board on advice from the QAC, following a recommendation from the recognition panel.

61 Despite a high level of understanding by the QAC of the process as a whole and of its own responsibilities within that process, and while recognising the OCN's intentions regarding the operation of the process, the licensing team considered that the documentation used to support the process was not sufficiently clear or consistent for the operation of a rigorous process for programme recognition to be assured.

Principle 6

The organisation is able to safeguard the continuing quality of Access to HE programmes, and to secure the standards of achievement

62 The Board of Directors has ultimate responsibility for approving the appointment of moderators, while the QAC has responsibility for oversight of the appointments process. At an operational level, it is the Quality Manager who has responsibility for moderator appointments, induction and training. The *Application* notes that, from autumn 2002, all moderators will be included in the staff development and training programme 'developed jointly with South East Wales Open College Network (SEWOCN) using the NOCN External Verifier qualification'.

63 The OCN makes use of an appropriate Moderator's Agreement, providing a formal contract between SWWOCN and the moderator. This stipulates, in broad terms, a moderator's obligations and the circumstances under which the contract may be terminated. The term of the contract is not specified in this document, although the *Application* explains that contracts are for the moderation of a particular programme and that they expire 'when the

programme finishes'. However, it was not clear whether there was a limit to the number of times that a moderator's contract for a particular programme could be renewed.

64 The *Draft Good Practice in Higher Education programmes* explains that moderators may be 'either a tutor from a similar Access provision, or someone from an HE background with appropriate experience in the relevant area of the curriculum', although the *Application* itself indicates that there are three categories from which moderators might be drawn. While the different categories provided did not suggest that markedly different groups of individuals might be considered, it was not clear to the licensing team which of these sets of categories would be used by the Quality Manager, Board of Directors and Quality Committee in carrying out their responsibilities in this area.

65 The recently developed moderation process for Access to HE involves three visits by the appointed moderator to the programme, with a specified purpose for each visit. The moderator is required to complete a report form designed for each visit, the purpose of the different visits being reflected in the particular questions posed by the three different forms. In their totality, these questions suggest that moderators of Access programmes would be required to consider a comprehensive range of relevant matters, the results of which would provide important information to the AVA in relation to its responsibilities as the awarding body for the Access to HE certificate.

66 There is currently, however, no accompanying guidance which would be provided to moderators to explain their role and the OCN's expectations. Although SWWOCN does have a *Moderator Guide* which might fulfil such a role, including advice and direction to moderators about their responsibilities, this document is no longer current, being in need of substantial revision to reflect the development of the moderation process. While the team noted that plans to develop a replacement document were in hand, at the time of the visit, there was no clear indication of the guidance that would be provided to moderators about their key role in overseeing quality and standards on Access programmes. The team was therefore not able to reach a judgement about the adequacy of guidance that would be provided to moderators to ensure that the role was undertaken competently and consistently.

67 The OCN has developed a code relating to requirements for final assessment boards on Access programmes, which provides guidance in relation to the documentation needed, the composition of boards and the process itself. The completed Recommendation for Award of Credit (RAC) form is confirmed at this meeting, and the Code provides the advice that

'the crux of the issue is - has the learner met the successful completion criteria for the Access certificate as specified in the submission document?' Following this meeting, the RAC is forwarded to the OCN for the issue of Access to HE certificates.

68 Individual moderator reports are scrutinised by OCN officers, and issues arising are addressed directly with the provider. Moderator reports and annual programme reports are then analysed in a summative report, which is received and considered by both the QAC and the AHEDC for their different purposes. This process may be able to give the necessary detailed consideration to individual programmes to allow the QAC to exercise its responsibility to 'review issues arising from' the moderation process. It is also able to provide the basis for broader development and enhancement, by allowing the AHEDC to exercise its responsibility 'to identify issues arising out of annual reports received from Access providers to inform the strategic planning process'. However, there are no approved procedures or sanctions in place that might be applied in the event of a provider failing to take the action identified as necessary by the moderation process. Though the circumstance might be an unlikely one, the licensing team considered that existence of such sanctions would be essential if the AVA were to identify that the quality or standards on a QAA-recognised Access programme were at risk.

69 Although there are some strengths in the moderation process, the absence of definitive documentation in several areas, and particularly in relation to guidance to moderators, indicated that the OCN's development of this process in relation to Access to HE was not yet complete. As a result, the licensing team could not confirm that the criteria under Principle 6 had been met in full.

Principle 7

The organisation is underpinned by structures and processes which enable it to review, evaluate and develop the Access to HE provision for which it has responsibility

70 The summative report described above (see paragraph 68) provides a regular means by which the OCN's committees can review Access provision as a whole; and the structures provided by the AHEDC, in particular, provide formal mechanisms to encourage development of provision and AVA activities. The licensing team considered that the new committee structure should be able to provide adequate mechanisms for the review and development of AVA activities. The team also noted the progress which had been made by this organisation in creating appropriate

structures and procedures to allow it to undertake its responsibilities. The team noted, in particular, the recent substantial attention given by the OCN to the analysis of statistical and other data, and considered that there were potentially important outcomes from this work which merited continued attention.

71 SWWOCN's Code for the validation of Access programmes (see paragraph 57, above), which makes passing reference to revalidation, suggests that the procedures for revalidation are the same as those applied for validation. While the licensing team had some concerns that the use of an identical procedure would not allow sufficient opportunity for evaluation of the operation of the programme to be taken into account, for example, using evidence from the cycle of programme moderation and reporting, representatives of the QAC assured the team that the process did allow for such opportunities. However, there appears to be no separate guidance to indicate how revalidation differs from the validation process to assure the continuing fitness for purpose of the Access to HE provision.

72 In the light of the uncertainty about the particular nature of the revalidation process, the licensing team was unable to confirm the adequacy of the process to meet the licensing criterion relating to revalidation within Principle 7, and therefore, of the extent to which the Principle as a whole had been met.

Conclusions

73 South West Wales Open College Network (SWWOCN) serves an area in which Access to HE programmes are already established, and where there are opportunities for further development of this provision by a licensed AVA. SWWOCN has developed appropriate structures to be able to do this, in terms of its current committees and their relationships, its management and its organisation, and it is well supported by its members in higher and further education. Its experience and current practice as an OCN provides it with broadly appropriate operational practices, and its previous experience as an AVA has given it an understanding about the general requirements of this area of work.

74 SWWOCN's operational management and planning provide an appropriate framework within which an AVA's responsibilities can be appropriately and securely served. Similarly, its present deliberative and planning arrangements are fit for purpose in relation to AVA responsibilities, providing appropriate structures and clearly delineated responsibilities. In a number of instances, these are currently operational and can be seen to be working effectively in relation to

the OCN's continuing engagement in the Access work of providers with whom it worked as an AVA and with whom it has a continued involvement as an OCN. However, with a review of governance arrangements currently incomplete, and the outcome unknown, a definitive statement of structures and procedures is not available. It is therefore not possible to make a judgement about their adequacy or appropriateness.

75 The proposed procedures for the quality assurance of recognised Access provision are based on pre-existing arrangements, with modifications made to meet current requirements. While the modifications have, in general, made worthwhile improvements to SWWOCN's ability to assure and monitor the quality and standards of provision, there is further work to be done in order to ensure that the OCN has a coherent set of procedures which have been considered in detail and formally approved for presentation in a licence application.

76 In deciding to relinquish its AVA licence and make an application for a new licence almost immediately, SWWOCN anticipated that it would be able to make the necessary developments to meet the current requirements for the award of an AVA licence within a few months. At the time that this decision was made, SWWOCN may have underestimated the work necessary to prepare for this application and the delays and difficulties that might arise during its preparation. As a result, in a number of areas, the current application is incomplete, and information provided is insufficiently comprehensive and consistent to demonstrate that SWWOCN meets all AVA licensing criteria in full.

The AVA licence

Outcome

77 The application for AVA licence received from South West Wales Open College Network is referred for further development.

