

Access to Higher Education

Cambridge Access Validating Agency

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Foreword

1 The Quality Assurance Agency for Higher Education (QAA) is responsible to the Department for Innovation, Universities and Skills for the recognition of Access to Higher Education (Access to 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 for 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 (Recognition Scheme)*. The *Recognition Scheme* is regulated and administered by the Access Recognition and Licensing Committee (ARLC), a committee of the QAA 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:

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

4 This is a report on the review of Cambridge Access Validating Agency (CAVA). QAA is grateful to CAVA and to those who participated in the review for their willing cooperation in the review process.

The review process

5 The review was conducted in accordance with the process detailed in the *Recognition Scheme*. The preparation for the review visit included an initial meeting between CAVA representatives and QAA's officer to discuss the requirements for the Overview Document (the Overview) and the process of the visit; the preparation and submission by CAVA of its Overview, and a selection of supporting documentation; a meeting of the review team to discuss the AVA's documentation and to establish the main themes and confirm the programme for the review; and negotiations between QAA and CAVA to finalise other arrangements.

6 The review visit took place from 30 April to 2 May 2007. The visit to CAVA consisted principally of meetings with representatives of CAVA, including AVA officers; members of the Council, the Finance Committee, the Quality Assurance Committee and the Development Committee; moderators; representatives from higher education (HE) partners and Access to HE providers.

7 The review team comprised Dame Alexandra Burslem, former Vice-Chancellor at The Manchester Metropolitan University, ARLC member and lead reviewer; Mr Keith Fletcher, Director of Access, Open College Network South West Region; and Dr Stephen Hill, Director of Flexible Learning and Community Engagement and Head of Public Programmes Office, University of Bristol. The review was coordinated for QAA by Kath Dentith, Head of Access.

The AVA context

Background and developments since the previous AVA review

8 CAVA is a small organisation which operates solely as an AVA. It is based in Cambridge and the primary focus of its operation is, and has always been, Access to HE provision in Cambridgeshire, Norfolk and Suffolk.

9 CAVA was originally licensed as an AVA in 1991. The last review of the AVA, conducted by QAA in spring 2002, resulted in a provisional renewal of the licence with conditions in a number of areas including membership, governance arrangements, strategic planning, staffing, moderation and certification. All conditions were met and the full licence was confirmed in January 2004. The Overview for the current review detailed many of the changes which have taken place subsequent to the last review, particularly those which have been implemented since licence renewal in 2004.

10 CAVA has recently experienced further substantial change. In 2006, it moved from its premises in Anglia Ruskin University - where it had been based since the AVA was established - to separate, rented premises in Cambridge (see paragraphs 36-37). In addition, the introduction of the Access to HE Diploma (the Diploma) has necessitated major changes to the provision itself and to the AVA's own procedures and data systems to meet the requirements of the qualification and credit specifications, and considerable development work and a programme of course revalidations is taking place to ensure a smooth period of transition during 2007-08 and full implementation by 2008-09.

Members and provision

11 CAVA's procedures for admitting organisations into membership are provided in its Manual of Information for CAVA Member Institutions. This document sets out the AVA's criteria for membership and explains the membership application process. The Overview states that 'CAVA members include three Higher

Education (HE) institutions plus one associated HE institution'. No members were designated as 'associated' on the current list of members nor is 'associated HE institution' specified as a category of membership in the AVA's criteria for membership. Since the review, the AVA has informed QAA that the word 'associated' was used descriptively, rather than as an indication of formal status, with reference to an institution which, although it had paid a subscription, did not play a full role in the AVA. The institution in question is no longer a member of the AVA. There are, therefore, three HEIs currently in membership of CAVA.

12 In addition to the HEI members, there are 11 providers of Access to HE courses in membership of CAVA, mostly further education (FE) colleges, but also including a local authority adult education service and a private prison education provider. While the recent additions to providing institutions provide a slight change in the membership from that which pertained at the time of the previous AVA review, the review team recommends that the AVA continues its efforts to expand its membership further, specifically to include a broader range of organisations in the governance and activity of the AVA. Such action may require CAVA to review its categories of membership.

13 Under the heading 'Rights and responsibilities of members' of its membership procedures document, the AVA states that 'the full responsibilities of all Members are clearly stated in the Memorandum and Articles of Association'. The review team was of the view that this was not the case. While the Memorandum and Articles of Association provide details of the legal responsibilities of the directors who represent members on the CAVA Council (see paragraph 20, below), as they relate to CAVA's operation as a limited company, no detail is provided about the obligations of member institutions with respect to their involvement in the CAVA's work as an AVA.

14 As a condition of licence, CAVA is required to revise its formal statement of members' rights and responsibilities to provide a clear statement

of member organisations' responsibilities, with reference to their involvement in the AVA's work, and to be clear that the responsibilities of member organisations are distinct from responsibilities of individuals.

AVA statistics 2005-06

15 The AVA reported the following statistics in its annual AVA report in 2006.

Providers offering Access to HE programmes	11
Access to HE programmes available	52
Programmes running	43
New programmes recognised	3
Total learner registrations	1,555
Total learners registered to complete within the same academic year	1,191
Learner completions	801
Learners transferred	55
Learners withdrawn	364
Access to HE certificates awarded	783

16 There has been little change in the number of providers since the last review in 2002. After significant growth between 2001-02 and 2002-03, the number of programmes running has marginally declined in the last three years, as has the number of learners registered. This pattern is broadly consistent with national trends. Though CAVA recognises the importance of expanding the AVA's business, it has found it difficult to do so. The recent addition of one agricultural college and a prison education provider could be a welcome sign of some expansion into new kinds of provision although, as CAVA itself recognises, the latter is likely to be on a small scale.

17 The percentage of students who were awarded an Access to HE certificate (783) out of total registrations (1,555) was just over 50 per cent (compared to a national average of 51 per cent). The completion rate, calculated as the number of learners completing the programme (801) as a proportion of learners registered to complete within that year (1,191),

was 67 per cent (compared to a national average of 66 per cent). In addition, the success rate, calculated as the number of learners awarded an Access to HE certificate (783) who were expected to complete within the same year and who did not transfer out (1,136) was also 67 per cent (compared to a national average of 60 per cent).

18 CAVA has achieved some notable successes with programmes in historically difficult areas: the Access to Medicine course achieves significant success in gaining admission to medical schools in and beyond CAVA's HE member institutions. Access to Science provision is also successful and well regarded. Representatives of CAVA's HE members were complimentary about the quality of the successful Access to HE students from CAVA whom they had encountered.

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

19 CAVA is a company limited by guarantee. Its Memorandum and Articles of Association formally describe the governance arrangements and aims of the organisation, which include reference to encouraging provision of Access to HE for groups under-represented in HE; facilitating entry to HE through the validation of appropriate programmes; and the quality assurance of programmes. The review team noted that these aims were appropriate, although the team would recommend that the AVA amends the explicit reference to provision for 'adult students' in the light of current legislation regarding age discrimination.

CAVA Council

20 CAVA is governed by its Council, which is regarded as the AVA's locus of authority. The Council comprises one representative from each member organisation, identified by heads of

those organisations, who together serve as the directors of the company. The Overview explained that 'most Council members (directors) hold senior positions with responsibilities for decision making and budgetary control within their own institutions', and it is clear that current Council members have a range of experience relevant to the AVA's business. However, it is not clear how CAVA's process for identifying Council members can ensure that the necessary range of expertise, including in matters of governance, strategic planning, and legal and financial affairs, can be maintained by this method of appointing members of Council, especially when, as is the case at CAVA, directors may nominate alternates to act on their behalf. The review team concluded that this position should be addressed as a condition of licence, and CAVA is required to review its processes for identifying Council members and criteria for Council membership, to ensure that the Council's membership provides the expertise required by CAVA in its governing body. The AVA may wish to consider whether it is necessary to have every member organisation represented on Council, and the implications of this model for effective decision-making if the membership of the AVA itself should increase or if the sectoral balance of membership changes. The team observed some confusion between the AVA's use of the term 'members' as used to relate to organisations and a looser use of 'members' when referring to individuals who are most closely involved in the AVA's work, particularly those individuals who act as directors on the CAVA Council. A clear distinction between these two will be important in the AVA's consideration of this matter.

21 In recent years, there have been difficulties in securing the appointment of the Chair of Council. These difficulties have been addressed by reducing the duties of the Chair, including removing the need for the Chair to sit on all committees, and extending the Chair's term of office to two years, rather than one. While the review team recognised the value of extending the term of office of the Chair of Council in order to secure continuity of leadership, it also

noted that almost half of the current Council members have served on the CAVA Council for seven or more years. While the AVA has, no doubt, benefited from the stability and accumulated experience of the Council's membership over many years, the review team considered that, in reviewing the criteria for membership of Council, the AVA could also benefit from a reconsideration of this position, and recommends that the AVA introduces a limit on the number of times that a director may be reappointed.

22 In general, Council meetings are attended by more than half of Council's members, although average attendance at Council meetings has declined over the last three years. The review team regarded the use of email to enable absent members to give responses to papers as a useful means of providing all members with the opportunity to contribute their views, but considered it an inadequate substitute for formal meetings, as required by the Constitution. The review team supports the AVA's expressed intention to keep arrangements for organising meetings under review, including the possibility of considering IT-supported approaches to virtual meetings and video-conferencing.

23 In the context of declining attendance at Council, the review team was concerned to note that the Council had a quorum of only two members. The team considered that such a low quorum was not consistent with ensuring sound decision-making and good governance of the AVA, and was concerned that this position could lead to the exercise of undue influence by a small minority of the AVA's members. The team further noted that, at approximately 14 per cent of the Council's total members, the current quorum was not in line with quorums for the AVA's other committees, for which quorums range between 33 and 40 per cent. Finance Committee also has a quorum of just two, although this is a much smaller committee. The team concluded that the AVA should review the quorums of its committees and the AVA is required, as a condition of licence, to increase the quorum of

Council. The team also recommends that the AVA considers how it might ensure that there is an appropriate balance of members at meetings, including representation from HEIs.

24 While the overall frequency of Council meetings is sufficient to allow it to carry out its responsibilities, the timetabling and sequencing of meetings has been such that decision-making and approval processes have not always been followed in correct sequence. As an example, it was clear that the AVA's annual report to QAA had not been given approval prior to its submission, as is required, but that the formal approval process had, in recent years, been effected by being circulated by email in draft form, and subsequently ratified at a Council meeting after its receipt by QAA. This practice does not meet the formal requirements. It is therefore a condition of licence that the AVA establishes processes which will ensure that the formal approval of the annual report takes place prior to its submission to QAA.

25 A further example of difficulties created by the current sequencing of meetings is the practice which has become standard of the meetings of Finance Committee occurring routinely directly before Council meetings. As a result, there are no up-to-date minutes of Finance Committee available at the Council. The review team therefore recommends that the AVA reconsiders the cycle of meetings through the year to address this position, which may help it to meet the condition stated in paragraph 24.

Committees

26 The CAVA Council is supported by three committees: the Finance Committee, the Development Committee and the Quality Assurance Committee (QA Committee). At the time of the last AVA review, in 2002, the AVA had only recently established this committee structure. It has become embedded over the last five years and the review team concluded that this overall structure provided for consideration to be given to important business in all areas relating to the effective oversight of the AVA's work, although there have been some operational difficulties.

27 The committees' terms of reference define their responsibilities and accountability to the Council, and communication between Council and its committees is secured by provision of all committee papers to Council members and cross-representation of Council members on committees, with 10 members of Council also serving on at least one other committee. While such dual membership can be helpful, and may be desirable for certain purposes, especially in relation to the composition of the Finance Committee, the extent of Council's representation on the Quality Assurance and Development committees is greater than is necessary, and evidently adds to the workload of individual Council members. The review team recommends that the AVA reviews the membership requirements of its committees to encourage the inclusion of a larger number of individuals and wider range of experience in the AVA's deliberative structures.

28 Membership of committees also includes Access to HE practitioners and members described as 'external' or 'outside CAVA'. In practice, committee members who were described as 'external' were all either currently serving, or recently retired, members of staff of member institutions. The team was not persuaded that a definition of externality which merely indicated that persons were not members of Council (as was explained to the team) was either clear or appropriate, and the team recommends that the AVA review its practices and documentation in this respect.

Self-assessment and evaluation

29 All committees, including Council, undergo an annual self-assessment process, based upon evaluative questionnaires completed by committee members. The findings are considered at subsequent meetings, and lead to proposals for changes in process which are either put into effect by the committees directly or are recommended to Council for action. While this process is appropriate for securing some self-evaluation of the effectiveness of the AVA's governance, and there is evidence that it has led to some change, the return rate of completed forms has been variable. The review

team would recommend that the AVA explores how it might achieve a higher response rate in order to provide a fuller evaluation of its processes.

30 In summary, the review team concluded that the AVA will need to review and revise a range of matters relating to its governance and deliberative structures, in order to meet all of the licensing criteria expressed under Principle 1.

Principle 2

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

31 CAVA asserted in its Overview that, as it operates only as an AVA, its 'sole business is the enhancement of the quality of Access to HE provision' and that, with a steadily increasing size over 15 years, the systems and procedures had all developed and improved. These assertions appear to give very limited acknowledgement to the changed role of AVAs over that period, including their responsibilities for the strategic development of Access to HE provision, and the need for AVAs to develop and implement new ways of working for these changed responsibilities. With its limited size, and consequently limited income, CAVA faces particular challenges in maintaining an appropriate structure to support both its traditional and its new responsibilities.

Strategic planning

32 The review team explored with the AVA its strategy for Access to HE and the effectiveness of the mechanisms used to pursue that strategy. The process for the preparation of the AVA's strategic plan is initiated by the Executive Officer who, using the previous year's plan as a template, updates the plan, and circulates it to the Council by email for discussion at its September meeting. Council members then add their own perspectives, from their experience and roles within their own organisations. Once approved, the plan is used

to formulate an action plan and submitted to QAA with the annual report, being updated during the year, as necessary. The team found that, while this process met the requirement for a regular planning process, the resulting plan was more operational than strategic, and the objectives indicated a limited engagement with higher level strategic considerations.

33 The AVA recognises that regional inputs are increasingly important, and relationships have been formed with East of England Development Agency, Aimhigher and MOVE (Maximising Opportunities through Vocational Education, a regional Lifelong Learning Network), as well as with the regional structures of the Learning and Skills Council. The Executive Officer placed particular emphasis on the AVA's membership of the Federation of Authorised Validating Agency (FAVA), and the Overview described the AVA's work with FAVA as a key development for enhancement activities. The review team also noted that CAVA had formed a relationship with the Open College of the North West, one of the other FAVA members, with a view to cooperation in the future, as a way of providing opportunities for developing the AVA.

34 The Overview noted that 'attendance at national and regional conferences' is included in staff training for AVA officers and the Overview indicates that it will be 'developed in the future'. The review team agreed that it would benefit the AVA to take advantage of such opportunities to inform officers' understanding of the development of national policies relating to Access to HE's strategic context, as well as making fuller and more systematic use of members' expertise in this area, in order to inform the preparation of the AVA's strategic plans.

Promotion and marketing

35 In relation to the promotion of Access to HE, the Overview referred to its website, and a widely circulated Directory of Courses. The Executive Officer reflected that CAVA needed to engage in more data analysis, especially trend analysis, and to have more direct engagement with learners. The review team concurs with

this view and recommends that plans are developed for both actions to be taken forward.

Accommodation

36 Following the requirements of a condition of QAA's 2002 review, the AVA established a formal agreement with Anglia Ruskin University in relation to CAVA's accommodation in the University. This agreement was subject to annual renewal and, in 2006, the University gave CAVA notice that the agreement would not be renewed. The resulting move to separate rented premises in Cambridge led to completely independent operation for CAVA, with all services purchased at full commercial rates. Separately from the agreement relating to the office premises, the AVA also received certain services from the University covered by separate billing arrangements, including financial auditing and IT support.

37 The non-renewal of the agreement with the University had been previously identified as a risk by the AVA, and a financial reserve had been available to cover some of the associated immediate costs. The Executive Officer, in her report to Council in December 2006, reported that the move had been 'completed without large outgoings'. Nonetheless, the move has contributed to an anticipated deficit in 2006-07, although CAVA's financial forecasts assume a budget in surplus for the next two years.

Financial management

38 The Overview laid emphasis on the meetings of the Finance Committee, the production of three-year budget forecasts, the financial records, and the production of the annual accounts to provide a systematic and rigorous approach to the management of its financial affairs.

39 The Finance Committee members are all members of Council and all members have financial responsibility within their institutions, although the review team had some concerns about the low quorum of the Committee and the weakness in scheduling between Finance Committee and Council meetings (see

paragraphs 23 and 25, above). The team explored the basis on which the budgets had been drawn up; how they were being monitored; whether there were any variances from planned expenditure; and where the financial expertise behind the budgets and financial statements lay. The team also requested up-to-date budget forecasts and management accounts. It was explained that the Executive Officer was responsible for producing the budget statements, for financial planning, resource allocation, and resource monitoring; and that the Finance Committee received monthly management accounts, which they were able to interrogate between meetings by email if they wished. The team was unable to satisfy themselves that there was a clear, evidential base for budget forecasts or that the accounts presented were to a standard consistent with QAA's expectations for the professional management of an AVA's financial affairs. The review team therefore had limited confidence in this aspect of the AVA's management.

40 CAVA's 2005-06 accounts were audited by a professional accountant with Anglia Ruskin University, who had provided this service on an individual basis unconnected with CAVA's formal agreement with the University. The team was informed that the AVA expected the same arrangement to be available for the present year. However, at the time of the review visit, no arrangement was in place for the audit of the 2006-07 accounts. Although the review team was informed that CAVA was establishing an external agency arrangement for financial audit, arrangements had not been secured at the time of the review visit.

Staffing

41 The level and structure of CAVA's staffing resources is necessarily limited by its size and income base. Throughout most of 2006-07, CAVA operated with a staffing complement of 2.4 (full-time equivalent) staff, comprising an Executive Officer (currently full-time); an IT and Website Officer (0.43); an Administrative Officer (0.22); and a new 0.75 Quality Assurance and Development Officer (QA Officer), appointed in October 2006.

This last post provided the AVA with an additional member of staff to support the programme of development and revalidations associated with the implementation of the Access to HE Diploma. The QA officer also provides secretarial support for the AVA's QA Committee and Development Committee. In developing CAVA's practice in this area, the Officer will want to consider the importance of consistently professional committee minutes and papers.

42 The QA Officer's post was agreed as part of a staffing strategy which also includes an intended incremental reduction in the Executive Officer's contracted hours. The Executive Officer explained that she expected to be able to reduce her contract to 0.75 and then to 0.5, as circumstances allowed. Thus, the increase in staffing for 2006-07 was planned in order to take account of what was regarded as a 'blip' in the workload for that year created by the move to new premises; preparations for the QAA review; and the implementation of the Access to HE Diploma and credit specifications. The strategy was also designed to reduce the staffing again from 2007-08, which would allow a balanced budget to be produced. The review team asked whether the lower level of staffing would be adequate in the future, given the continuing workload associated with the new Diploma. The Executive Officer thought it might be possible to bring in temporary database operators, but had not calculated how long this may take, and therefore what the revenue implications might be. The team was concerned that the AVA may have underestimated the resource requirements involved in the implementation and continued development and quality assurance of the Diploma. These will be major challenges for CAVA to address if it does not at least maintain current staffing levels, especially if all the AVA's officers are working on a part-time basis.

43 The Executive Officer, as the most senior, and only full-time, AVA officer, necessarily plays a key role in directing and managing the AVA's operations. However, during discussions with the review team, Council members explained that the Executive Officer should not be

regarded as a 'chief executive' and that leadership was expected to come from the Council and its Chair. The Executive Officer pointed out the frequency and immediacy of contact that she had with members of Council, particularly the Chair. The team recognised the commitment and experience of the new Chair and welcomed her input to CAVA. However, in spite of CAVA's actions to reduce the workload of the Chair (see paragraph 21, above), the team was concerned about the level of responsibility which is placed upon the individual who serves as the Chair of Council and did not believe that operational leadership could be expected from her. The team formed the view that there was a lack of clarity about the location and exercise of effective leadership in the AVA.

44 The review team also considered that, while the commitment, hard work and personal style of management of the current Executive Officer had taken the organisation through many years, and 'kept the show on the road', the future may require more professional engagement with local and regional partners, a more proactive marketing strategy to raise profile, and increase learners, and a strengthened leadership and administrative base to achieve these things. The team concluded that the present situation potentially compromised strategic development, accountability, and effective governance and management within the AVA, and that the question of leadership needed to be addressed as a matter of high priority. It is therefore a condition of licence that the CAVA reviews responsibilities and establishes mechanisms for effective leadership in respect of strategic and business development within the AVA.

Administrative and data management systems

45 The Overview foresaw a period of work to develop the AVA's database systems, in order to prepare for the future requirements of the Diploma. The IT and Website Officer is currently working on the new system, and much of the necessary work has already been completed. The effectiveness of the new system still needs to be evidenced, however.

46 The review team was concerned to discover that, although the AVA had a policy relating to storage, back-up and archiving of data relating to learners, such personal data were unencrypted and held on a computer which was used to access the internet as well as being backed up on a portable data stick. The team considered that there were a number of risks associated with these practices, and it is therefore a condition of licence that the AVA should review and revise its current policy and practices and ensure that data is held securely, and with reference to current best practice and the provisions of the Data Protection Act.

Communications

47 The Overview emphasised the closeness of the relationships and frequency of contact between CAVA officers, Council and committee members, providers and HE contacts. Email communication is widely used to ensure that information is disseminated and all those whom the review team met reiterated the frequency, immediacy and effectiveness of email interactions with the CAVA office. The team, while recognising the value of email communication and the satisfaction of those involved, was not confident that it amounted to a communications strategy. The team also had some concerns about record-keeping in the case of email communications as they related to formal exchanges of information (see also paragraph 58, below). The review team would recommend that the AVA develops a more formal communications strategy which takes account of the questions of record keeping raised in paragraph 58.

48 Overall, the review team was concerned for the longer term sustainability of CAVA. Having drawn heavily on its reserves in order to be able to respond to financial challenges in 2006-07, its financial position has been weakened. While AVA representatives were optimistic for the future, the team saw no substantial evidence to support the AVA's projections for growth to reverse recent downward trends and restore the security of its financial position.

Principle 3

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

Programme development and validation

49 Prior to the appointment of the QA Officer, support for programme development was provided by the Executive Officer. The Council expressed the view that the appointment of the QA officer had been a crucial development which had already started to produce benefits. This view was supported by HE representatives and course leaders, who considered that the new post had improved the support from an already high level. The QA Officer works across all centres and deals with a range of operations and processes. The Officer has supported the AVA's preparation for the introduction of the Diploma, and has already built close relationships with centres, giving advice on curriculum, course design and assessment, and providing examples of good practice.

50 The procedures for programme development and validation, together with the programme information that the AVA requires for submission to a validation panel, are set out in the AVA's Validation and Revalidation Guidelines. These guidelines are comprehensive and include a requirement to supply evidence of consultation with HE. The review team confirmed through its discussions with course leaders and the QA Committee that the guidelines are followed and work well in practice in both the development and the validation process. However, they do not include a specific requirement for the inclusion within the programme document of a description of the aims of the course. The review team recommends that the AVA should include this requirement within its guidelines for submission.

Programme validation

51 As CAVA is a mature AVA, with established programmes, and it is currently involved in implementing the specifications of the Access to HE Diploma for all CAVA programmes, the current focus is on revalidation of existing programmes rather than the validation of new provision. Criteria for validation, the role of panel members, and the function and possible outcomes of the panel are comprehensive and explicit within the Guidelines. Dates and arrangements for validation and revalidation panels are agreed in advance and monitored by Council, which also nominates one of its members to act as Chair. Evidence presented to the review team indicated that the inclusion of representation from HE on Access to HE validation and revalidation panels was standard practice, although the team heard that, increasingly, HE representation came from staff delivering HE in an FE context. It was not clear from the panel reports, however, where FE staff may have been acting in this role. The composition of panels is monitored regularly by the QA Committee, which considers a summary report submitted to them by the QA Officer. The team recommends that this aspect of panel membership is fully recorded and carefully monitored. From audit evidence and its discussions with AVA representatives, the review team determined that the panel process was thorough and appropriately focused.

52 The deliberations and decisions of the panel are set out in the validation or revalidation panel report, including any conditions, and recommendations. The Validation and Revalidation Procedures and Guidelines state that 'when agreed with the Chair (of the Panel) the report is circulated to the panel and the course leader'. Discussions with AVA staff and course leaders confirmed that it was current practice for the report to be accompanied by a covering letter that refers specifically to any conditions, together with the deadline dates for meeting them.

53 Discussions with officers, course leaders and the QA Committee confirmed that the QA Officer was responsible for checking that all

conditions had been met after the panel. If the condition involves anything other than straightforward amendments to the programme documentation, the QA Officer refers the evidence to the chair of the panel (a Council member), for further confirmation that the conditions have been met. A summary progress report for all relevant programmes is submitted to each QA Committee meeting, and the Committee considers and approves the AVA's action in relation to conditions set by panel. Members of the Council confirmed that it also checked that any conditions had been met through its consultation with the panel representative at the meeting at which the panel's approval decision was ratified. The team concluded that there was some uncertainty over the mechanism employed by the Council to ensure that all conditions had been met before granting final approval and that the AVA should review and revise this process to make it more explicit.

Final approval

54 The Validation and Revalidation Procedures and Guidelines explain that 'The report is also sent to the CAVA Council with the agenda papers for their next meeting' and that 'At the next Council meeting the chair of the validation panel or the QAO will give an oral presentation of the course (re)validation and answer any questions about the event. If the Council members are satisfied that all CAVA procedures have been carried out, the course is formally ratified and the College/Institution formally informed'. The Overview states that 'The validation panel recommends their verdict on the Course to the CAVA Council who must ratify their decision to give the course formal approval'. Discussions with members of the Council confirmed that this reference to ratification was always taken to mean the act of final and formal approval, and that only the Council had the authority to do this. The review team recommends that the AVA should reword this passage when the document is next reviewed to avoid ambiguity over where the authority lies within the organisation for the final, formal decision on course approval.

55 The AVA's mechanism for agreeing later modifications to validated programmes is indicated in its Guidelines for moderators, which refer moderators to a standard form to be completed. The procedure requires full details of all proposed changes to be agreed by the moderator and approved by the QA Committee. However, the AVA's process for establishing whether a proposed change should be considered as minor, or major and therefore requiring a validation panel, is unclear. The review team recommends that the AVA develops the procedure to clarify the distinction between minor and major changes to programmes. The team further recommends that the AVA considers whether responsibility for approving major changes, which currently lies with the QA Committee, and responsibility for approving new programmes, which currently lies with the Council, should both lie with the same body.

56 The process for revalidation is the same as that for initial programme validation and must take place within four years of the original validation date. The submitting tutor at a revalidation panel is always asked to give an 'evaluative analysis of the course since the original validation', outlining key developments since the previous validation.

57 In summary, the review team adjudged that the validation and revalidation processes were essentially sound. Nonetheless, in order to meet the licensing criteria in full, the AVA is required to review and revise its procedures for monitoring and acknowledging that conditions set by validation panels have been satisfied and for granting final programme approval.

Programme documentation

58 As noted previously (paragraph 47), the AVA relies extensively on electronic communication, and this includes communications relating to the validation and approval of programmes. Although CAVA staff stated that it was standard practice to maintain programme files in hard copy that contained all key documents, the team found that some key documents were not available or were difficult

to find or to access, and were occasionally confusing or misleading. It also became clear during the review visit that email communications were not necessarily archived or stored in an appropriately systematic way. The review team agreed that there was a need to improve the recording of key events and stages, in particular in relation to validation and revalidation and definitive programme documentation. It is therefore a condition of licence that the AVA reviews and revises its systems for a) formally recording the outcome of validation and revalidation panels and b) maintaining definitive programme documentation, to ensure that such records are readily available and continue to be maintained as complete, accurate and up to date.

Access to HE Diploma and credit framework

59 To date, the AVA has not operated a credit-based, unitised approach to course design, and it is in the process of revalidating all of its courses to meet the requirements of the Access to HE credit framework. The review team heard that the introduction of the Diploma was regarded as a positive development by HE representatives and course leaders and noted that the implementation process was progressing broadly to schedule. The team concluded from its examination of the documentation and its discussion with staff and others that course providers and receivers of Access to HE students continued to be well informed and supported in this process by the AVA through regular communication, meetings and a range of staff development events. CAVA's advice on course structure, delivery and assessment is comprehensive and accessible, and is regarded as valuable by course leaders. The validation process has been extended to include the checking by an external reader of additional unit details. On the basis of the information available at the time of the review visit, the team was confident that the current course of action would allow the AVA to comply with QAA requirements for the introduction of the Diploma by 2008-09.

Programme monitoring and review, and the development of Access to HE provision

60 The review team noted that the AVA operated mechanisms for a limited review of provision using information provided in moderators' reports. A summary report is submitted to the QA Committee by the QA Officer and is subsequently considered by Council. On occasions, the AVA uses this information to provide advice and support for centres. However, there was no evidence that there was a systematic approach to this process. In discussion with the review team, AVA staff and committee members agreed that the information would be a valuable tool for quality improvement, especially in relation to course design and delivery. The AVA plans to introduce a requirement for 2007-08 for moderators to include examples of good practice in their final moderation reports. The review team considered that, with a process in place to analyse this information fully, it could provide a valuable tool for quality enhancement.

61 In addition, course leaders are required to submit an annual report to CAVA. The requirements, set out in the Access Course Leader's Annual Report Form, concentrate on the statistical data required by QAA and providers' comments on this data. The review team considered that the AVA should request a wider range of information to support quality monitoring and enhancement, and to inform strategic planning and business development. The Overview notes that CAVA 'intends to investigate how [the] internal course reports could be used to...enhance CAVA reporting without putting an extra burden on the Access Course Leaders'. The team regarded this as a positive step and was of the view that the receipt and analysis of fuller reports would assist the AVA to develop and enhance Access to HE provision in the area. In order to achieve this, however, the AVA needs to expand its request for information to include the effectiveness of targeting; the quality of the students' experience; and responses to issues raised through moderation. It is therefore a condition

of licence that the AVA revises its requirements for course leaders' reports to ensure that the AVA is able to meet licensing criterion 3.9 in full.

Promotion and enhancement of Access to HE

62 The Development Committee has a remit 'to promote development activities, encompassing staff development, course development and the provision of assistance and support for members'. Members of the Committee confirmed that although it was part of their responsibility to identify opportunities for the development of new provision, the Committee had, to date, concentrated on developing advice for providers, a policy on plagiarism being a recent example. The Committee planned to expand its work to include the identification of new Access to HE pathways and work-based learning opportunities for Access to HE, with a view to making the results available to all providers.

63 The Council has responsibility for the promotion of Access to HE, and it is identified as a strategic objective, with accompanying actions, specified in the current action plan. The AVA holds staff development events and training for moderators and assessors, and it acts as a focus and a link for the Access to HE community. However, the AVA acknowledges that there is more work to be done in the development of strategic relationships with key agencies (see also paragraph 33, above) and the use of statistics and analyses to raise the profile of Access to HE in the CAVA area and advise providers and others about potential areas for new developments. The appointment of the QA Officer has meant that CAVA has started to move forward with this process, and discussions with HE representatives suggested that further progress in this area would be welcomed by member HEIs.

Principle 4

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

64 The security of standards of the Access to HE programmes which are offered by CAVA providers relies on a system of external moderation, supported by procedures for following up moderators' recommendations for action. The oversight of the moderation process, as well as the appointment and performance of external moderators, falls within the remit of the QA Committee.

65 The process of external moderation is clearly and comprehensively set out in the AVA's Guidelines for External Moderators. Other processes which support the assurance and maintenance of standards are described and defined in a range of documents, many of which, at the time of the review visit, were being collected into a single document, the Manual of Information for CAVA Member Institutions (April 2007) which is of equal usefulness for committee members, CAVA staff, providing institutions and external moderators. The development of this manual as a single point of reference, together with the review of a suite of other standard AVA documents, is a welcome move, although the AVA should take care to ensure that all documents which are incorporated within the manual are fully up-to-date and reflect all changes to policy or process within the AVA. The review team would recommend that the AVA review the new document and establish an annual process of document review to ensure the currency and accuracy of its documentation.

66 CAVA has developed new guidelines on internal moderation which were awaiting Council ratification at the time of the review visit. The review team welcomes this development.

Selection and appointment of moderators

67 External moderators' contracts are made directly between the moderator and CAVA. Moderators are appointed for one year initially

and may be re-appointed for a period of up to three years for any one course. On completion of this three year period, moderators may be appointed to another centre, and this practice has proved a valuable device for disseminating good practice and promoting comparability of standards across the AVA.

68 The QA Committee nominates moderators and scrutinises their appointment, with reference to curricula vitae which must be provided by prospective moderators. The current criteria for appointment are provided in the Guidelines for External Moderators, which state that moderators must be 'suitably qualified, be committed to the philosophy of Access and, normally, have current or recent experience of Access practice and/or progression'. The review team recommends that CAVA develops a more explicit statement of criteria for appointment of external moderators, including clearer definition of 'recent experience' to limit the length of service which is permissible after moderators leave relevant employment. The criteria should also include a requirement for moderators to have relevant subject expertise for the course to which they are appointed.

Induction and training

69 There is clear guidance relating to the induction and mentoring of new moderators. Through discussions with moderators and CAVA staff, the review team established that induction procedures were implemented consistently and effectively. Moderators stated that they were well prepared for their work and appropriately supported by CAVA staff and through communication with experienced moderators.

70 The AVA is planning to hold a one-off event at which external moderators will have the opportunity to compare learners' achievement across different providers. The review team recommends that the AVA establishes the process as a regular event, in order to ensure that standards and judgements across providers are compared regularly and systematically.

Reporting by moderators

71 External moderators are required to visit the programme twice during the programme run and provide a report to the AVA after each visit. Each report provides an opportunity for the moderator to specify 'actions to be taken before the next visit' and an 'action plan by course leader'. Both sets of reports are summarised and presented and this collation of key points and areas for action is presented for consideration by the QA Committee. The review team formed the view that the process was thorough and appropriate and that the procedures were followed consistently by CAVA staff. However, while the forms themselves provide the opportunity for comprehensive comment, the review team noted considerable variability of reporting in the completed forms included in the files provided for the audit trails. The QA Committee is responsible for the monitoring of moderators' performance and the team would recommend that this aspect of moderators' performance is scrutinised carefully by the Committee, with a view to considering whether training or individual support might be required.

72 The files provided for the audit trails did not contain consistent evidence that the AVA's mechanisms for monitoring, recording and acknowledging that any actions recommended by moderators had been taken by providers. It was also unclear from the files how such actions could be properly monitored by the QA Committee, as the documentation recorded some actions as still being required, when, in discussion with the review team, external moderators and CAVA reported that they had been completed. CAVA staff explained that the mechanisms operated and were recorded through use of email messages, but that many such records had been lost when the AVA had been transferred to independent IT systems when it left Anglia Ruskin University's premises. In discussions, CAVA staff, external moderators and representatives of providing institutions all described instances of the monitoring process working effectively, but the team remained concerned that there was no consistent documented evidence to support these claims.

The team concluded that the effectiveness of the process for reviewing overall outcomes was limited because inconsistent records are kept of actions taken by providers in response to external moderators' recommendations. It is therefore a condition of licence that the AVA establishes robust monitoring mechanisms for moderation outcomes to ensure that recommendations made by external moderators for actions by providers are appropriately recorded and that the AVA keeps complete records to demonstrate when and how recommendations made by external moderators are addressed.

73 The AVA is making progress towards establishing appropriate procedures and clear criteria for the award of the Diploma, which is broadly in line with the timescale of its approved implementation plan. The AVA is developing its processes for the issue of Access to HE Diplomas and is engaged in timely trials of creating and issuing credit transcripts which should result in satisfactory arrangements being in place for 2008. However, the review team was concerned to note the AVA's statement that 'Assessment boards or meetings are run under individual College requirements'. This does not meet the requirements of the AVA licensing criteria. It is therefore a condition of licence that the AVA provides explicit guidance about the function, process and appropriate membership of final assessment boards or meetings for the award of the Diploma, as required by the AVA licensing criteria.

Audit trails

74 The review team conducted audit trails on seven of CAVA's member institutions. Programme documentation was considered from a sample of Access to HE programmes, including programmes delivered by a range of FE colleges of different sizes, a community education provider, and an Access to HE programme at a prison, in the process of transfer to another provider. The programmes represented a wide curriculum spread and were of varying sizes. The AVA also presented a number of other documents which had not

been available with its original submission. The purpose of the trails was to enable the team to consider the consistency and effectiveness of the AVA's processes at centre level, and to identify matters that needed further investigation through the AVA review process.

75 The amount and type of evidence in the programme files presented for audit was variable. In all cases, evidence included the report of the validation panel or revalidation panel, the definitive programme document, and moderators' reports for the previous three years, together with the Part 1 moderator's report for 2006-07. Most sets of documents also contained the centre's grievance and/or complaints policy. One set included a formal letter confirming validation, two contained limited student and certification records. None contained records of programme changes or any documentary evidence tracking the various stages of the administration and support processes. Three contained annual reviews from course teams for various periods of one, two or three years. The review team found no direct evidence within the programme files for the stages and details of the development process, nor any record of regular HE consultation to inform this process.

76 The panel reports indicated that the panels had considered all sections of the programme submission. Programme aims, or similar details, were included in files, although they are not required by the AVA. From the evidence examined, the team concluded that the validation and revalidation panel process was comprehensive and allowed panels to come to a reasoned and informed validation decision.

77 The panel reports set out all the conditions, recommendations and deadline dates agreed by the panel. The AVA's Validation and Revalidation Procedures and Guidelines state that 'when agreed with the Chair (of the Panel) the report is circulated to the panel and the course leader.' While panel reports may be circulated in this way, the review team found no examples in the files of how the AVA informs the submitting organisation formally of the panel outcome.

78 The QA Officer checks that the provider has made the required amendments to the programme documentation, and there was evidence that these changes had been made in all of the programme files. However, the files did not contain consistent evidence of the AVA's mechanism for monitoring, recording and acknowledging that any conditions set had been met by the provider. The AVA produced additional documents during the visit including formal approval letters for four programmes, course prospectuses for two centres, a summary analysis of panel membership for the past four years, and a snapshot summary report of Part 1 moderators' reports and action plans for 2006-07 received to date. It was unclear from the files how this summary was processed by the AVA's committees or how evidence of final programme approval, as given by the Council, is communicated to the provider.

79 CAVA requires annual programme reviews from providers, from which it collects statistics for its annual report to QAA. Two of the files contained completed reports from providers. It was not clear from the evidence how the AVA subsequently processes these forms, nor how the information within them is used to inform the AVA's strategic or business planning.

80 Moderators' reports include evidence of arrangements for the moderation visit, details of curriculum and assessment, programme structure and content, student feedback, programme delivery and assessment, internal moderation, and action points that the moderator specifies are to be addressed by the centre before his/her next visit. Subsequently, the centre is expected to incorporate its action plan into the report to address these points. Although moderators' reports were present in all of the files, the review team found that very few of these sections had been completed by the centre.

81 The AVA requires providers to have and use a system of internal moderation. External moderators are required to report on whether a centre is following CAVA internal moderation policies and the reports in the files contained this information.

82 Moderators also sometimes included details of good practice, although this is not explicitly requested by CAVA. It was unclear from the files how this information is used and disseminated by the AVA. It was not clear from the files what subsequent action CAVA had taken on moderation reports once they had been received.

83 From the evidence available for audit, the review team was unable to reach a conclusion about the sufficiency or appropriateness of information and data that the AVA collects and stores about programmes and students. While it would appear that most quality assurance procedures are followed as described in the AVA's formal documentation, evidence of this is not always available, nor are there clear internal procedures for keeping such records (see paragraph 58, above).

Conclusions

84 The Cambridge Access Validating Agency is a relatively small AVA, operating in Cambridgeshire, Norfolk and Suffolk, which has three HEIs and 11 Access to HE providers in membership. Its work is inevitably constrained by its size and related restricted income, and it will be important for the AVA to continue to develop its membership base and its links with other bodies and organisations in the region, not only to maintain its position as a key validating and awarding body for Access to HE but also to extend the contribution it is able to make to the wider development of Access to HE in the region.

85 In this context, the AVA's ability to recognise and respond positively to opportunities which arise from changing circumstances and policy priorities is critical. In part, this will come from its continuing close work with providers and HEIs through its own formal structures and through developing other kinds of engagement outside these structures. Currently, there is welcome involvement by, and support from, individuals from both FE colleges and HEIs at all levels of the AVA's formal structures. However, the AVA continues to rely particularly heavily on a relatively small number of individuals on its committees, who have given considerable time - some over many

years - to support and advise the AVA. The AVA will need to find ways to encourage new individuals to play a fuller part in the AVA's committee structures, both to secure planned succession on committees when current members retire, and to provide regular new perspectives on the AVA's work.

86 Overall, the committee structure is appropriate to the AVA's responsibilities, although there are a number of governance matters to be addressed, including a review of the responsibilities and membership of Council itself. The Council, CAVA's governing body, comprises one senior manager from each member organisation. While this structure allows all member organisations to be involved at the most senior level of decision making, it does not necessarily secure a membership for the Council with an appropriate range and spread of relevant experience, to provide the particular expertise which may be needed by the AVA.

87 The ability of the AVA to respond to new opportunities depends not only on strategies and structures but on resources. Until late 2006, CAVA was located in the premises of one of its HE members. The move to separate rented premises was a major and unexpected upheaval for the AVA and placed a demand on its resources at a time when it needed to devote staff time and resource to its implementation of the Access to HE Diploma. The AVA was able to respond with a much needed temporary expansion of its staffing, but its financial position has been weakened at a time when there is no certainty about future increases in numbers of learners or programmes, and limited resource available to invest in a marketing strategy which might help to address this situation.

88 CAVA still has a slim administrative structure, where the Executive Officer is the only full-time employee, with other support provided on a part-time basis. The recent appointment of a Quality Assurance and Development Officer has been widely welcomed; has already provided valuable support; and is recognised as potentially making a significant contribution to the success

of the AVA. However, the Officer's ability to be effective in both aspects of the role is likely to be restricted if, as planned, the overall staffing complement is reduced again. When considering the staffing structure for the future, the AVA should assess carefully the full needs of the organisation, and review the needs of management and leadership for strategic development. Currently, with no officer holding responsibility for leadership within the AVA, there is a lack of clarity about how that leadership role can be effectively exercised to bring about strategic developments, and support the potential for promotion offered by the introduction of the Access to HE Diploma.

89 The AVA is, in general, making appropriate progress towards establishing appropriate procedures and clear criteria for the award of the Access to HE Diploma, and its key procedures for the quality assurance Access to HE provision are reflected in comprehensive guidelines. Procedures are broadly fit for purpose although there are some weaknesses, particularly in the monitoring of outcomes of conditions set at validation or through moderation.

90 This weakness is caused by a more general weakness in record-keeping and the administration of the AVA's affairs affecting, in particular, records and formal communications about the outcomes of validation and moderation. In recent years, CAVA has, like many organisations, become heavily dependent on electronic communications. Currently, however, it does not have secure and effective procedures for handling, managing and storing electronic records and this position holds some real risks for the AVA. CAVA now needs to review all its record-keeping practices and develop, as a matter of urgency, procedures for effective information management which will allow it to store electronic communications and records securely and manage such records efficiently, resulting in reliable documentation, which is readily accessible and available to all who need it, while ensuring that all personal data are appropriately protected and held securely.

91 The CAVA scheme has a number of strong features, including a local reputation for producing students who are well prepared for HE, as well as a clear enthusiasm and strong and enduring sense of ownership and commitment to CAVA's mission among staff involved in its work. Sustaining its future, and remaining viable and competitive in a changing environment are the key challenges facing the AVA over the next few years.

The AVA licence

Review outcome

92 The Cambridge Access Validating Agency is awarded a provisional renewal of its AVA licence, with Conditions iv and vi to be met by 1 December 2007, and all other Conditions to be met by 28 March 2008. A revisit will take place in summer 2008.

93 CAVA has informed QAA that, subsequent to the review but prior to its receipt of the report, it took action to address some of the conditions and recommendations listed below. QAA recognises CAVA's positive response to the review and looks forward to receiving the evidence of progress in the AVA's formal response to conditions.

Conditions

94 The licence is renewed on condition that the AVA:

- i revises its formal statement of members' rights and responsibilities to provide a clear statement of member organisations' responsibilities, with reference to their involvement in the AVA's work (paragraph 14)
- ii reviews its processes for identifying Council members and criteria for membership, to ensure that the Council's membership provides the expertise required by CAVA in matters such as governance, strategic planning, and legal and financial affairs (paragraph 20)
- iii reviews the quorums of its committees and increases the quorum of Council (paragraph 23)

- iv establishes processes which will ensure that the formal approval of the annual report takes place prior to its submission to QAA (paragraph 24)
- v reviews responsibilities and establishes mechanisms for effective leadership in respect of strategic and business development within the AVA (paragraph 44)
- vi reviews and revises its current policy and practices for records management to ensure that data is held systematically and securely, and with reference to current best practice and the provisions of the Data Protection Act (paragraph 46)
- vii reviews and revises its systems for a) formally recording the outcome of validation and revalidation panels and b) maintaining definitive programme documentation, to ensure that such records are readily available and continue to be maintained as complete, accurate and up to date (paragraph 58)
- viii revises its requirements for course leaders' reports to ensure that it meets licensing criterion 3.9 in full (paragraph 61)
- ix establishes robust monitoring mechanisms for moderation outcomes, which ensure that recommendations made by external moderators for actions by providers are appropriately recorded and that the AVA keeps complete records to demonstrate when and how recommendations made by external moderators are addressed (paragraph 72)
- x provides explicit guidance about the function, process and appropriate membership of final assessment boards or meetings for the award of the Access to HE Diploma, as required by the AVA licensing criteria (paragraph 73).

Recommendations to the AVA

- 95 The review team recommends that the AVA:
- i continues its efforts to expand its membership further, specifically to include a broader range of organisations in the governance and activity of the AVA (paragraph 12)
 - ii amends the explicit reference to provision for 'adult students' in the light of current legislation on age discrimination (paragraph 19)
 - iii introduces a limit to the number of times that directors may be reappointed to Council (paragraph 21)
 - iv considers how it might ensure that there is an appropriate balance of members at meetings, including representation from HEIs (paragraph 23)
 - v reconsiders the cycle of meetings through the year and, in particular, revises the practice of conducting Finance Committee meetings immediately before Council meetings, to allow up to date minutes of Finance Committee to be received at Council meetings (paragraph 25)
 - vi reviews the membership requirements of its committees to encourage the inclusion of a larger number of individuals and wider range of experience in the AVA's deliberative structures (paragraph 27)
 - vii reviews its definition and use of the term 'externality' in relation to committee membership and AVA documentation (paragraph 28)
 - viii explores how it might achieve a higher response rate to committees' self-assessment in order to provide a fuller evaluation of its processes (paragraph 29)
 - ix takes forward its plans to engage in more data analysis, especially trend analysis, and to have more direct engagement with learners (paragraph 35)

- x develops a more formal communications strategy (paragraph 47)
- xi includes a specific requirement in its guidelines for submission for the inclusion within the programme document of a description of the aims of the course (paragraph 50)
- xii records the representation of HE on validation panels, including where representation comes from staff delivering HE in an FE context, and includes consideration of this aspect of panel membership in the standard procedures for monitoring by the QA Committee (paragraph 51)
- xiii rewords references to 'ratification' in its formal validation documentation when it is next reviewed to ensure that it makes clear that authority for final and formal course approval lies with Council (paragraph 54)
- xiv develops the procedure to clarify the distinction between minor and major changes to programmes and considers whether responsibility for approving major changes, which currently lies with the QA Committee, and responsibility for approving new programmes, which currently lies with the Council, should both lie with the same body (paragraph 55)
- xv reviews its Manual of Information for CAVA Member Institutions to ensure that it is up to date, and establishes an annual process of document review to ensure the currency and accuracy of its documentation (paragraph 65)
- xvi develops a more explicit statement of criteria for appointment of external moderators, including clearer definition of 'recent experience' to limit the length of service which is permissible after moderators leave relevant employment. The criteria should also include a requirement for moderators to have relevant subject expertise for the course to which they are appointed (paragraph 68)
- xvii establishes the planned external moderator meeting for moderator standardisation as a regular event, in order to ensure that standards and judgements across providers are compared regularly and systematically (paragraph 70)
- xviii includes consideration of variability of moderator among the QA Committee's responsibilities for monitoring moderators' performance, with a view to considering whether training or individual support might be required (paragraph 71).

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 certificate
 - 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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