



**The Quality Assurance Agency
for Higher Education**

Learning from AVA review 1999-2004



Sharing good practice

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Adamsway

Mansfield

NG18 4FN

Tel 01623 450788

Fax 01623 450629

Email qaa@linneydirect.com

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Glossary and explanations

The following definitions and explanations are offered for terms which are commonly used in this report.

Access	As a proper noun, used generically to indicate the totality of Access to Higher Education activities in England, Wales and Northern Ireland.
Access programme	Used generically to describe a programme of study which has been recognised by an AVA as an appropriate preparation for higher education for mature students and meeting the minimum requirements for the award of an Access to Higher Education certificate. Access programmes are targeted, in particular, at adults who may not have undertaken formal education for a number of years or at groups who are under-represented in higher education. Some Access programmes are broadly based; others offer specific discipline preparation; nearly all include study and/or other core skills. Most programmes can be completed in one year on a full-time basis; many are also available in part-time modes. The majority of Access programmes are offered in further education colleges, but some are provided in other locations, for example, adult education centres, community centres and higher education institutions.
ARLC	Access Recognition and Licensing Committee: the body appointed by the QAA Board with responsibility for the overall operation of the Recognition Scheme. The Committee monitors AVAs through the receipt and scrutiny of annual reports, and standard data about recognised programmes and students. The ARLC also oversees the process of periodic review of AVAs.
AVA	Authorised Validating Agency: a body licensed by QAA to undertake the development and recognition of individual Access programmes, the monitoring of recognised programmes, and the award of Access to Higher Education certificates to successful students. AVAs comprise both institutions that develop and deliver Access programmes, principally further education colleges, and those that receive students who successfully complete Access programmes, principally higher education institutions.
AVA review	The process of periodic review of AVAs which ensures that they continue to be fit bodies to hold an AVA licence, and that they continue to conform with the principles, criteria, and operational guidance set out in the Recognition Scheme.
Licensing criteria	Principles and Criteria for the Licensing of Authorised Validating Agencies: that section of the Recognition Scheme which sets out the principles and criteria established by QAA to which it refers when considering the fitness of a body to hold an AVA licence. The principles and criteria have been developed to provide assurance of the quality of the structures, operations and procedures of AVAs, in order to ensure that they are able to secure the quality of Access provision, its continuing fitness for purpose and the sufficiency and consistency of its standards. The licensing criteria are used both for the consideration of applications for new licences, and for the periodic review of existing AVAs. The licensing criteria are available at www.qaa.ac.uk/crntwork/access/recog_principles.htm
NOCN	The National Open College Network: the central organisation for the Open College Networks (OCNs) based across the UK. NOCN licenses and audits the OCNs' activities. Most AVAs are also OCNs and are engaged in other types of education and training in addition to Access provision. In this report, these are sometimes referred to as OCN/AVAs.

QAA	The Quality Assurance Agency for Higher Education: the regulatory body for the national recognition of Access programmes. QAA is responsible for undertaking reviews and audits of the standards and quality of higher education. In licensing AVAs, QAA is responsible for assuring the quality of recognised Access programmes, and the adequacy of standards of student achievement as a preparation for higher education.
Recognition Scheme	The QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland: the scheme established by QAA through which it meets its responsibilities as the regulatory body. The Recognition Scheme document is available at www.qaa.ac.uk/crntwork/access/recog_intro.htm

Introduction

The purpose of this report

1 The basis of this report is a consideration of the full cycle of periodic licence reviews of Authorised Validating Agencies (AVAs) undertaken between 1999 and 2004 by the Quality Assurance Agency for Higher Education (QAA) in its role as the national regulatory body for Access provision. The major purposes of the report are:

- to identify and consider issues which have emerged through the process of AVA review and which will assist QAA to develop the Recognition Scheme for Access provision;
- to identify and publicise good practice in AVAs;
- to identify and discuss areas of practice in AVAs which might be strengthened and developed further;
- to reflect on the nature of the process used to undertake AVA review and to discuss its future development.

A brief history of the national organisation and management of Access

2 Since their beginnings, the primary purpose of Access programmes has been the provision for mature students of an alternative, and more appropriate, preparation for higher education. Although definitions of 'mature' may have changed, and continue to change, this primary purpose remains as a fundamental principle for Access programmes. They are designed to respond to the need to broaden participation in higher education and, to cite the current Recognition Scheme documentation, they 'assume the need for, and desirability of, increased participation by those groups which are currently under-represented in higher education' and are 'built on the principle of extending opportunities for progression to higher education for those adults who have benefited least from their past educational experience'.

3 The systematic organisation of Access provision on a national basis can be traced to the 1987 White Paper, *Higher Education: Meeting the Challenge*, which called for the development of 'a framework within which the availability of well devised Access courses can be increased'. Subsequently, in 1989, the Council for National Academic Awards (CNAA), in cooperation with the Committee of Vice-Chancellors and Principals, established a national framework which was managed by CNAA's Access Courses Recognition Group (ACRG). The ACRG began to issue initial licences to AVAs in 1990. Under these licences, AVAs were permitted to approve Access courses offered by a range of providers including both higher education institutions (HEIs) and further education colleges.

4 With the closure of CNAA in 1992, responsibility for Access was passed to the Higher Education Quality Council (HEQC) and managed by HEQC's Credit and Access Advisory Group. The process of transfer was facilitated by the preparation and publication of *A consolidated bulletin on the framework of national arrangements for the recognition of Access Courses in England, Wales and Northern Ireland*. In 1995, HEQC reviewed its arrangements for Access and created a new managing committee, the Access Courses Recognition Subgroup.

5 A further process of transfer occurred in 1997 with the establishment of QAA which inherited the responsibility for Access recognition from HEQC. In December of that year, QAA created the Access Recognition and Licensing Committee (ARLC) to undertake the detailed work of the licensing and review of AVAs. In 1998, it also established the Access Recognition Advisory Committee as a consultative body, comprising Access practitioners and representatives from other interested bodies.

6 An initial version of the Recognition Scheme documentation was approved in 1998 and then expanded and revised for publication in early 1999. All licence reviews were conducted under the regulations of this scheme until 2001, when detailed criteria for the licensing of AVAs were developed and introduced.

7 In January 2003, the White Paper, *The Future of Higher Education*, invited QAA to 'come forward with proposals to modernise the criteria for Access Courses so that they are sufficiently flexible and attractive to meet the needs of today's adult learners'. The report of a QAA research project designed to meet this request was published in May 2004.

A brief history of AVA review

8 With the first AVA licences issued in 1990, an initial pilot review process was introduced by CNA in 1991. A complete cycle of reviews was then conducted in the five-year period to 1996. Initially, these reviews were conducted through a single meeting with the AVA. In 1994, the process was revised to focus on self-appraisal by the AVA with the assistance of 'mentors' appointed by HEQC, followed by an engagement with an HEQC panel. In all, a full cycle of 38 AVA reviews was conducted in this period. In preparation for a second cycle of reviews, initial work on a Learning from AVA review report was undertaken in 1996-97 but was not completed before the transfer of responsibilities for Access to QAA. HEQC also commissioned a more general review of Access, however, and the associated report (*Access Course Recognition and the Higher Education Quality Council: a review*), published in 1995, made a number of recommendations about the process of periodic review, which were taken forward by QAA in the development of the AVA review process.

9 The second cycle of reviews - which is the subject of this current report - began in April 1999 following the approval by the QAA Board of Directors of the *QAA Recognition Scheme for Access to Higher Education in England, Wales and Northern Ireland*. In the period from 1999 to 2004, a full programme of 28 licence reviews was conducted and three applications for new AVA licences were received, of which two were approved. This process of periodic licence review has been complemented by the submission to QAA of an annual review by each AVA. Piloted in 1999, the current format for the preparation, receipt and consideration of these annual reviews was established in 2000.

Structure, scope and methodology of this report

Structure

10 In broad outline, this report is structured into two main sections:

- *Learning about AVAs*, which focuses on what the review reports reveal about the operation of AVAs, how they fulfil their responsibilities for the recognition and quality assurance of individual Access programmes, and how they meet their obligations under the Recognition Scheme;
- *Learning about AVA review*, which focuses on the nature of the review process itself and its future development.

11 An internal structure for the first of these two sections, *Learning about AVAs*, has been created by using the seven principles for licensing and re-licensing of AVAs as an organising device. The principles provide a context for the more detailed criteria which define the requirements for the award and renewal of AVA licences. After a period of consultation in 2001, the principles were introduced in January 2002 and were used specifically for the purpose of licence review for the first time in March 2002. Since that date, the 10 licence reviews which have been undertaken have used the principles as a structure for the subsequent reports. In this context, the principles thus provide a logical structure for the section, *Learning about AVAs*. It is acknowledged that this section also covers 14 reviews which preceded the introduction of the principles in 2002. However, in essence, the principles simply extracted and formalised the key elements of the initial Recognition Scheme approved in 1999. While the reports of the pre-2002 reviews could not have been formally structured using the principles, it is clear that the criteria by which they were conducted were broadly similar, and that the contents of the reports thus lend themselves readily to a structure which uses the current principles.

12 The seven licensing principles, and the abbreviations used for each of them in this report, are listed below.

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.

(Structure and membership)

Principle 2

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

(Governance)

Principle 3

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

(Legal identity)

Principle 4

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

(Management and administration)

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.

(Development and approval of programmes)

Principle 6

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

(Standards of achievement)

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.

(Review and evaluation)

13 In *Learning about AVAs*, each principle will be set out again with:

- the licensing criteria which it generates;
- a brief consideration of its purpose and role in the process of AVA review;
- a discussion of the major issues to emerge from AVA review;
- a listing of the commendations made by review teams;
- some suggestions for areas where further development may be needed (these areas are deliberately broad and synoptic rather than simply repeating the detailed conditions and recommendations which may have been set during the review cycle).

14 The second of the two sections, *Learning about AVA review*, has a simpler structure which considers the logistics and mechanics of the review process, some qualitative analysis of it by all participants, and some discussion of future options.

Scope

15 Appendix B to this report records the 31 separate 'engagements' between QAA and AVAs in the period since April 1999. The three engagements which relate to applications for a new licence to operate as an AVA have been excluded from *Learning about AVAs*, since the nature of these exercises differs from the standard review of an existing licence. However, as the basic methodology used to consider a new licence application is broadly similar to that for licence review, account has been taken of the reports in *Learning about AVA review*. A similar decision has been reached in respect of

the four AVAs which underwent review in the period covered by this report but which are no longer operating as AVAs. It did not appear appropriate to include discussion of AVA practice which is now inaccessible, although the relevant reports and other related documentation have informed the discussions contained in *Learning about AVA review*. Hence, the documentary basis for *Learning about AVAs* comprises the remaining 24 review reports listed as part of Appendix B.

Methodology

16 This report is based on a qualitative consideration of the published reports described in paragraph 15 above. For *Learning about AVA review*, some additional material has been taken into account mostly comprising written feedback, where it has been received, from AVAs following review, and the feedback reports which are compiled by members of review teams. These documentary sources have been analysed for recurring or common themes which, where identified, have become the focus of the report. There has been no process of selection in terms of the documentary evidence: all review reports and all submitted feedback has been taken into consideration.

17 From the beginning of the cycle, all reports of AVA reviews have contained summary lists of points of commendation, conditions related to the renewal of the licence, and recommendations to the AVA on a range of other issues. There has been no attempt to use such summaries for any quantitative analysis although the preponderance of particular issues arising through the commendations, conditions and recommendations has in some instances been useful in determining which areas may be of most value for analysis and discussion.

18 Direct quotations from review reports are included at appropriate points in the text but are not referenced to individual AVAs: this document is not an attempt to undertake individual reviews again but is more interested in what can be learned in general from the overall process of AVA review. In one case, however - the listing of points of commendation in *Learning about AVAs* - individual AVAs have been named. The reason for this exception is to meet one of the purposes of this report which is to identify and publicise good practice. Although it is understood that some of the commendations may now relate to practice which has been developed further or superseded, QAA would be grateful if AVAs were willing to respond to requests they may receive for details of particular aspects of their good practice which might be made as a result of this report. A process of selection has been used in the choice of points of commendation. Those very occasional points which made direct reference to individual post-holders (who may no longer be in post) have been excluded, together with any points which were particularly fixed at the point in time of the review.

Learning about AVAs

Principle 1: Structure and membership

The principle

19 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.

The criteria

20 The organisation will be able to demonstrate that:

- it is responsible to a consortium or other structure including both institutions providing Access to HE programmes and at least two higher education institutions which receive Access to HE students;
- the consortium or other structure itself will not be a provider of Access to HE programmes or a receiver of Access to HE students;
- there are formal agreements between the organisation and the suppliers of any goods or services which are integral to the operation of the AVA (including where the supplier is one of its own members), which define the separation of the responsibilities, liabilities and authority of each party;
- it has sufficient numbers of members to secure its operational viability, and the institutions in membership will be able to provide appropriate experience and expertise for sound governance and for informed decision-making in relation to Access to HE matters;
- there is a clear and transparent process for admitting organisations into membership.

Rationale

21 To an extent, the principle of a structure which is based on a partnership of members reflects the traditions and origins of Access programmes which grew from productive cooperation and partnerships between higher and further education. In respect of the security and proper operation of the AVA licence, it is considered important that this structure of partnership should continue to be supported. The insistence on at least two HEIs being in membership is to prevent any sense in which an AVA might be seen merely as a 'feeder' organisation providing applicants to a single college or university. A major purpose of the Recognition Scheme is to promote the Access to HE certificate as a national award and it is thus focused on the licensing of an AVA as a disinterested body with a broad membership rather than one which has exclusive local links. The criteria attached to this principle also anticipate the establishment of formal agreements for the supply of services (especially where a supplier may be a member of the AVA) in order to provide the basis for the AVA's independence. This issue is taken up in more detail under Principles 2 and 3.

Major issues from AVA review

22 Given the roots of many AVAs and of Access as a whole, it is unsurprising that the issue of membership attracted much praise and comparatively little criticism during the cycle of reviews. The value of the 'partnership of members', enshrined in the Recognition Scheme's principles, was a frequent feature of the *Analytical Accounts* (see *Learning about AVA review*, paragraphs 151-152) prepared by AVAs for the purposes of review. This did not appear to be affected by the legal identity chosen by the AVA, that is, it was as likely to occur in an AVA with limited company status as in one which was an unincorporated association of members. Although it was not often a feature selected by review teams for formal commendation, it is not unusual to read of the high value placed by institutional members on the direct and indirect benefits which they gained from membership of the AVA.

23 In respect of the routine organisation of the receipt and approval of applications from prospective members, a standard pattern emerged of which the following example might serve as an illustration of the good practice to be encountered:

Applications for membership are made on a pro forma which is contained within a larger Membership Application/Renewal document. This comprises a comprehensive statement on membership including details of eligibility and criteria, fees and charges, method of application, and a statement of rights and responsibilities. Applications are considered by the Quality Assurance Group (QAG) which makes a recommendation to the [OCN's] Council. The minutes of the QAG demonstrated that appropriate attention was paid to applications and that QAG also monitored and amended the membership application documents when necessary.

24 This particular example demonstrates an AVA where applications from prospective members are considered through the governance structure as a 'peer' process. In other cases, such applications were received and processed by officers of the AVA very much as an administrative task. Review teams did not overtly criticise this latter procedure although it might be argued that it is not wholly appropriate as a practice for those AVAs which place value in the notion of the 'partnership of members'. In the cases of best practice, prospective members are commonly required to demonstrate that they are willing and able to support the mission and aims of the AVA. Those who are intending to become providers of Access courses are also assessed rigorously to ensure that they have the capacity to meet criteria related to quality standards, finance and resources, and general infrastructure. Assessing prospective members in these contexts would appear ideally to be a responsibility shared appropriately between the management staff of an AVA and its deliberative structures.

25 In considering the range of organisations in membership, most AVAs operated some system of layered categories, although there was much variety in the ways in which the layers were established and how they were defined. However, although no standard pattern exists, it was frequent to find three basic categories:

- **Full** - normally describing those organisations (usually significant providers of education and training) who are committed to extensive participation in the work of the AVA in return for full rights as members.
- **Associate or affiliate** - usually applied to organisations wishing to use the services of the AVA, and to play a part in its operation, but which are unable to commit the significant time and resources of a full member.
- **Other** - defying a single definition but a category of membership often open to organisations simply wishing to use the validating services of the AVA but without any other involvement.

26 In general, the review cycle demonstrates the adroitness of AVAs in the design of such membership categories and their ability to accommodate within them the size, position and interests of their member organisations. Occasionally, membership categories appeared to be over-elaborate and a source of unnecessary administrative effort for an AVA. In such cases, it may be useful to recommend the practice of AVAs where no distinction is drawn between members although differential subscriptions may be charged according to some indicator of volume (for example, institutional size or number of learners).

27 There were a very limited number of examples of AVAs which had no formal process and associated documentation for admitting new members in place. There was no evidence that this was the result of any deliberate policy - in many cases, the AVA appeared simply to operate a more informal process for admitting new members which was no longer appropriate in the light of the licensing criteria. There were occasional examples, however, of AVAs where some difficulties may have been experienced in making the transition from earlier notions of the limited membership of an AVA whose only interest was the straightforward validation of Access programmes, to the much broader concept of membership which needs to be considered if the requirements of the AVA licence, as described in the 2001 Recognition Scheme, are to be met.

28 In such cases, it was usual to find membership restricted to higher education receivers of Access students and further education providers of Access programmes with little or no representation from

the voluntary, community or private sectors. The principles which drive the Recognition Scheme are informed by the wish to allow 'for responsiveness to the specific needs of adults and targeted groups, and to local needs and circumstances in the organisation of provision and in curriculum design. The resulting provision will inevitably be diverse, and the Recognition Scheme acknowledges both the diversity of programmes, as well as the diversity of providers engaged in this activity'. In some cases, then, AVAs with rather limited membership will find it increasingly difficult to respond to this diversity without expanding to include a broader range of organisations.

29 There was very little evidence in the review reports of AVAs which had deliberately sought to expand their membership by pro-active means. With very well established AVAs, it may be the case that virtually all organisations in their region with Access interests are already in membership. However, to the exception already described in the paragraph above, might be added the case of some HEIs which do not appear to be members of the AVAs which are located in their region. Some review reports comment on these absences and encourage AVAs actively to seek the membership of more HEIs. In some senses, this issue is related to the requirement of the licensing criteria that an AVA must have at least two HEIs in membership (and is also related to the discussion of the legal identity of AVAs in paragraphs 52-56 below and the notion of the 'host' institution). There is some evidence that HEIs can be sensitive to situations in which an AVA might appear to have a special relationship with a particular HEI, or where some residual, but now unused, preferential treatment might still be visible from a past exclusive relationship. The Recognition Scheme promulgates the consortium model of AVAs as an acknowledgement that it is the cooperation between further and higher education which is at the centre of the success of Access. In this context, the recruitment of HEIs to AVAs constitutes a priority.

30 At various points in this report, the notion of the 'critical mass' of an AVA will be raised. Briefly, this relates to the evidence arising from the review cycle which suggests that the operation of an AVA under the Recognition Scheme demands a certain level of resource if the licensing criteria are to be met satisfactorily or with any comfort. The first appearance of this theme is related to membership and the ultimate overall size of an AVA. Typically, an AVA may well call upon staff of its member organisations to assist in a number of its activities and operations, for example, committee membership, chairing of recognition and review panels, and appointment as moderators. It is an obvious point that the larger AVAs will have at their disposal a larger pool of people with sufficient and varied enough experience to take on these roles and duties. In many cases, the issue of 'externality' will also be less acute for them than for those AVAs with a very limited membership who may have to make particular arrangements to ensure that a measure of externality is built into their processes. There is no sense from the reports that review teams have supported a simple, and simplistic, argument that size is of paramount importance; they have pointed out, however, the continuing difficulties which may be faced by AVAs with a comparatively limited membership.

Commended practice

31 At the time of the relevant AVA review, the following examples of commended practice were noted:

- the commitment to cross-sectoral and inter-institutional partnership which underpins the work of the Open College Network (OCN) [OCNCE];
- its provisions for admitting organisations into membership [OCNWM].

Areas for further development

32 Some of the areas which might be developed further by AVAs in respect of this aspect of the Recognition Scheme are:

- a ensuring that the notion of membership responds to the requirements of the Recognition Scheme, and that AVAs have in membership a diversity of providers and other organisations in order to take a lead in the development of diverse opportunities for Access;
- b where opportunities are known to exist, pro-active efforts to expand the number of HEIs in AVA membership;
- c a consideration of the issue of 'critical mass' in respect of membership and its impact on the ability of an AVA to meet, and continue to meet, the licensing criteria and other demands of the Recognition Scheme.

Principle 2: Governance

The principle

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

The criteria

34 The organisation will be able to demonstrate that:

- it has a formal constitution which provides a description of its legal identity, functions, aims and structures;
- the constitutional arrangements and governance structures ensure that it is formally required to render itself accountable to its members and protect the organisation from the undue influence of any one of, or a minority group of, its members;
- responsibilities are clearly specified within the governance structures for:
 - the oversight and effective control of legal and financial matters;
 - strategic direction and policy development;
 - organisational structures and management; and
 - the quality assurance of Access to HE provision;
- decisions about AVA matters are made by accountable and properly constituted bodies;
- where the organisation has responsibilities in addition to those related to Access to HE, there is a clearly specified locus of authority for its AVA responsibilities within its governance structures;
- its major AVA responsibilities lie with the organisation itself and not with its officers or with any one of its individual members or an external body.

Rationale

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

Major issues from AVA review

36 As paragraph 47 below demonstrates, this was not an area that attracted frequent commendations from review teams. On the contrary, on the evidence of the review reports, it is an area which has been problematic for AVAs and the cause of persistent difficulties. This general statement is not intended to camouflage the good practice which does exist; a review team noted, for example, that the governing body of one AVA 'meets regularly, effectively conducting business that is appropriate to it and maintaining a strong commitment to strategic positioning, planning and review. Its membership is knowledgeable...and the seniority of representation contributes to the authority of the organisation with member organisations'. However, it remains the case that such commendations are rare. It is more common to read of committee structures being under strain, badly affected by poor attendance and iniquity, and with ad hoc solutions having to be adopted in order that essential business can be conducted in a timely manner.

37 Even with the variance in the size and nature of AVAs, there are some common patterns in their deliberative and governance structures. Many have an overarching body, a council of members, which represents the whole of the membership of the AVA and, in many cases, is the source of ultimate authority (referred to here as the Council for convenience). The day-to-day management of the AVA is then placed with a smaller executive body which has more frequent contact with the

management staff of the AVA (referred to here as the Executive). Typical sub-committees of the Executive are those for quality matters (known, for convenience, as the Quality Committee in the text of this report) and for resource issues including finance and staffing.

38 An analysis of the difficulties which AVAs have experienced in the operation of their governance structures would be lengthy in its own right. A synopsis of the major and most frequent issues raised in review reports would include:

- a *the basic articulation of the deliberative structure including clear statements on areas such as membership, remits, and terms of reference.* It is not unusual to encounter conditions set at review which require an AVA, for example, to 'review[s] its committee structures and membership, and make[s] revisions as necessary in order to address and clarify, in particular, matters of quoracy and members' voting rights; accountability through reporting lines; and the optimum numbers and representation required for effective and accountable governance', or to 'review[s] the Constitution, and committee terms of reference, names, functions and relationships and current practice; and revise[s] documentation or practice as necessary to ensure consistency between constitutional obligations and operational practice';
- b *the representation or positioning of Access within the governance structure of the AVA.* The role of specific committees with responsibilities for Access matters is discussed in paragraphs 38c and 39 below. In this context, the more general issue is the overall representation of Access in OCNs where Access programmes may constitute only a proportion of their work (referred to as OCN/AVAs in this report). From the evidence of the review reports, there appears to be a tension between a position adopted by some OCNs - that Access matters are simply embedded in their mainstream work and therefore require no particular representation - and the requirement set by the licensing criteria for review teams to seek and identify the single locus of authority and responsibility for Access within an AVA's governance structure. The same issue arises in respect of strategic planning within an OCN/AVA and is discussed in paragraphs 69-70, below. In some senses, this is an artificial tension. The 'single locus' does not necessarily imply a special 'Access committee' or even special representation for Access on other committees: there are examples of OCN/AVAs where the responsibility for the AVA licence is clearly located in the governance structure, unambiguously stated in the appropriate remit or terms of reference, and where minutes and papers demonstrate the attention which is given to Access matters. There are some cases, however, where a senior committee has stated responsibility for the operation of the AVA licence but has little prospect of fulfilling that responsibility simply because a process of devolvement to sub-committees has left it with little or no direct involvement. In general, review teams have looked for genuine rather than theoretical responsibility for Access;
- c *the use of a separate committee for Access in the governance structure of OCN/AVAs.* In most cases, such committees have chiefly quality assurance responsibilities although they may also be the focus for discussions of policy and strategy. Typically, then, they might deal with such business as the recognition of new Access programmes, the consideration of annual programme reviews and moderators' reports, and the appointment of moderators. It is unavoidable that, in an OCN/AVA, there will be another committee in the structure undertaking exactly the same tasks for the non-Access provision of the OCN. Although there are isolated examples where this co-existence appears to work (albeit often through rather uneasy compromise), there are more cases where the existence of two committees dealing with similar quality issues creates tension and confusion. It could be argued that, in many cases, there has been insufficient thought given to the remits of separate committees for Access: the differences between Access and non-Access provision are not essentially related to fundamental quality assurance processes, but are often in the context of the nature, development and enhancement of specific Access provision;
- d *the proper delineation of responsibility between executive officers of the AVA and its committees.* Some issues in this area are straightforward, for example, the occasions where review teams have reminded AVAs of basic good practice in governance which prevents officers of the organisation from being members of committees rather than being in attendance. Other issues are more complex and are related to the general operation of the AVA. In many AVAs, officers play an

absolutely key role in providing committees with the information and advice which they require in order to fulfil their remits. This is an area of work which requires a thorough appreciation of the line which separates the responsibilities of the executive and deliberative structures, a line which had perhaps been blurred in the case of an AVA required to ensure that 'its committees discharge fully their responsibilities as set out in their terms of reference in the Constitution and that its officers do not exercise the responsibilities of committees or their chairs'. However, it must be said that, in the light of the problems encountered by AVAs in securing adequate attendance for key committees, it is difficult not to feel some sympathy for AVA officers who are responsible for ensuring that the business of the AVA is conducted in a timely and efficient manner. On the other hand, it is possible for influential and decisive officers unwittingly to make, for example, a Quality Committee redundant or marginal and thus contribute to a decline in the commitment of its members. Nevertheless, the evidence of the review cycle indicates not only the importance of the proper delineation of responsibilities between the executive and the committee structure, but also why that delineation is important for the health and security of the AVA;

- e *the basic operation of committees.* At a very detailed level, but seen by some review teams as demonstrative of a particular misunderstanding of the importance of the governance structure, is the occasional weak level of committee servicing usually evidenced by poor minuting standards. As examples, one report notes 'the reporting of the AVA's activities, discussions and decisions was not to a uniform standard, and the quality of minuting and reporting had varied across committees and time, sometimes to the detriment of clarity'; another report comments that minutes 'were not sufficiently substantive to provide adequate records of the Committees' work for the purposes of external audit or scrutiny'. Given that review teams rely on minutes as a key written evidence source, this might be interpreted as irascibility on their part. However, in this and other cases, teams have reminded AVAs that their minutes function not only as an internal record of outcomes to be addressed, but also as evidence of business for external information. In terms of public accountability, all formal records of an AVA should be produced to a standard expected of a validating body.

39 A striking feature of the review reports is the common existence in OCN/AVAs of an advisory group on Access. The formal title of this body varies from AVA to AVA (it is often known as an Access Tutors' Group or Forum), but the comments made in review reports on such groups are remarkably similar. Mainly comprising Access practitioners, they are often described in *Analytical Accounts* as being a key feature of the AVA's approach to Access. Their role includes offering advice on Access policy and strategy, and generally providing a forum for the discussion of key issues for Access as they emerge. However, they are rarely part of the formal deliberative structure of the AVA and review teams have commented on the tendency for their work to be marginalized, or for there to be confusion about their role and powers. More often than not, such groups have the greatest experience and expertise in Access and, in some cases, they appear to attract better levels of attendance from higher education members who may see their major interests in Access rather than the broader work of the OCN. On the evidence of the review reports, these groups are a lost opportunity in many AVAs. In terms of the discussion contained in paragraph 38c above, AVAs may wish to consider whether there is greater value in the formal inclusion of such groups in their committee structures rather than the current emphasis on separate quality-based committees for Access.

40 Given the terms of the Recognition Scheme and the nature of the licence awarded by QAA, a focus on the particular function and effectiveness of quality committees in governance structures is to be expected in review reports. In general, such committees do not escape the criticisms which are levelled in reports at committee structures overall. It is not uncommon to read of weaknesses in the basic statements of remit, terms of reference, quoracy regulations and membership. There have been cases when such committees have been criticised for not operating effectively either because of such weaknesses or, on a small number of occasions - but of more fundamental concern - because they do not appear to have the expertise and experience required to undertake the work involved. This may appear to be a somewhat gloomy picture. It is ameliorated by aspects of good practice which are noted by review teams (some of which are considered below) and, to an extent, by the uncertainties caused by the transitions taking place in the working methods of quality committees.

41 This transition in working methods appears to have two main catalysts: the advent of self-assessment and internal audit as features of the internal quality assurance practice of AVAs, and the weight of work which faces a quality committee in most AVAs. It would now be unusual, except perhaps in the smallest of the AVAs, for a quality committee to have direct contact with all aspects of Access provision, that is, to receive and consider in full detail, all annual programme reviews or moderator reports. From the evidence of the review cycle, many have adopted a method in which synoptic reports are prepared by AVA officers for the consideration of the committee. Review teams have not criticised this practice per se but they have commented on those cases where such synoptic reports appear to be the only source of evidence or information for the committee. Teams have noted the potential fragility of a method in which the committee is wholly reliant on the quality of synoptic reports, and the extent and accuracy of their coverage. It has not been thought good practice to reach a position in which the quality of the officer support to the committee becomes the most crucial element for the committee's effective operation.

42 In terms of learning from AVA review, some of the reported developments in self-assessment and internal auditing may well recommend themselves for wider consideration. The practice of a quality committee undertaking some direct sampling is commonplace (for example, committee members considering a sample of moderators' reports following the receipt of an officer-prepared summary of all moderators' reports), although review teams have commented on the small size of the sample sometimes chosen. Other methods of 'direct contact' between members of quality committees and the quality functions of the AVA may occur as part of normal practice, for example, the common use of such members to chair, or be members of, recognition panels. In some cases, the contacts are less common, for example, members of a quality committee attending a sample of assessment boards. There are also cases where a quality committee selects a number of programmes from the AVA's provision on an annual basis and audits them separately as a means of verifying the general accuracy of the synoptic reports it may receive.

43 Examples of fully developed internal audit systems were not common in the review cycle, although it is clear that all OCN/AVAs are adopting such systems in response to the requirements of NOCN Quality Audit. Good practice in the consideration of such systems and in their development was noted by review teams. As an example:

Since the last formal AVA review, the working methods of the Quality Assurance Committee have been subject to evaluation and consequent change. The volume of provision...initially led the Committee to request summary reports from officers rather than to scrutinise, for example, all annual reviews or moderator reports on an individual basis. The Committee did not, however, consider that this method provided a sufficient level of evidence for it to fulfil its remit...

[The AVA has] thus developed a more distinctive audit approach...[which]...involves individual members of the Quality Assurance Committee taking a lead responsibility for auditing a particular aspect of the OCN's operation. Currently there are five such aspects: programme recognition, certification, moderation, organisation, and the general AVA function. In most cases, another member, or members, of the Committee assists the lead auditor.

In discussion with members of the Quality Assurance Committee, the review team heard that, typically, the equivalent of two days a year might be spent by auditors in reviewing their assigned area of the OCN's operation. This could include sampling of the work of officers, seeing appropriate reports and reviews, and a more general review of the process in question. At the end of each cycle, a report is made to the full Quality Assurance Committee.

44 Such audit systems clearly have the potential to provide a quality committee with ample reinforcement for the normal synoptic reports, although there are evident training issues for members of the committee to ensure that they have the expertise to undertake the audit function. The adoption of internal audit highlights the issue of the expertise of committee members in a broader sense. The format of review reports does not allow any robust quantitative analysis, but it does not appear that AVAs make any significant use of external members on their quality committees, although there are some instances where a member of a neighbouring AVA has been

invited to join a committee. It might be helpful for AVAs to consider a more substantial use of external members, especially where they feel that internal experience may not be sufficient, or simply as an expression of good practice in demonstrating the transparency of their quality assurance processes. This injection of externality may be particularly pertinent in respect of smaller AVAs where review teams have commented on the tendency for the same members to occupy multiple committee places.

45 In summary, and drawing general messages from the review reports, it is difficult to escape the conclusion that the most fundamental issue related to governance in AVAs is caused by the gap between ideal theoretical structures and the realities of practical governance. A frequent cause for criticism is the inability of committees to carry out fully their specified remits. Very often, such remits are unrealistic for reasons which may involve the ability of the AVA to guarantee sufficient attendance, or because the committee could not possibly undertake the prescribed duties in the manner and timescales described. Two examples related to the position and role of the Council illustrate this problem and the solutions which were implemented:

The Governing Council as a large inclusive body was judged to be inappropriate as a vehicle of executive management within the AVA since it was never quorate and all decisions had to be ratified by postal ballots. In practice, much day-to-day executive responsibility fell upon officers or the Management Group and there was thus a mismatch between the AVA's constitution and the reality of the way in which authority was exercised. The new arrangements which have now been adopted by the AVA were intended to remedy these deficiencies. The Governing Council was abolished and replaced by a Council of Members which holds an annual general meeting. The Management Group was recast as the Executive Committee, and a Quality Committee was established as the locus of...quality assurance arrangements. Members of both committees are elected by the Council of Members at its AGM.

And continuing the theme of 'realistic' governance:

...changes had been made to the constitution which devolved substantial powers from the Council to the Management Committee. These changes appeared to the team to be a recognition on the part of [the AVA] that its governance structure, particularly in respect of the Council, was increasingly unable to respond effectively to the needs of the organisation. In the papers scrutinised by the team, for example, it was clear that the Council had not had a quorate meeting for some years (including the meeting at which the constitution was changed), and that the pattern of its meetings was somewhat irregular..

In discussion with senior staff of [the AVA], it was clear to the review team that the changes to the constitution had been made with an understanding of their consequences. In this sense, the organisation has acted responsively to a situation in which the Council could not realistically undertake those responsibilities which the constitution had allocated to it. The team believes, however, that the consequences of the constitutional changes now need to be followed through. The transfer of significant responsibilities to the Management Committee effectively establishes it as the senior body in the governance structure. However, the relatively small size of the Management Committee, which would appear essential for its efficiency, leaves open the question of how [the AVA] is generally held accountable as an organisation to its full membership. This might be resolved by a clear statement on the future role of the Council as a consultative body but the retention of its annual task to elect the members of the Management Committee.

46 The retention of a Council as a consultative body with powers to elect the members of the main executive committee permits the AVA to meet the requirement of the Recognition Scheme that it formally renders itself accountable to its members. It removes, however, an unrealistic situation in which considerable routine powers are invested in a body which has little possibility of ever discharging them. The same principle might profitably be applied to all parts of the governance structures of AVAs.

Commended practice

47 At the time of the relevant AVA review, the following examples of commended practice were noted:

- the role of Council in lending authority to the work of the OCN within member institutions and the cordiality of relationships evident among its members [OCNCE];
- its successful engagement of a wide range of staff at all levels in its member organisations in the work of its committees and panels. This is particularly noteworthy given the geographically dispersed nature of the region which it serves [NWOCN];
- the achievements of the Access to Higher Education Standing Panel [GMOCN].

Areas for further development

48 Some of the areas which might be developed further by AVAs in respect of this aspect of the Recognition Scheme are:

- a ensuring that all aspects of the deliberative structure are operated as professionally as possible. This includes establishing, and maintaining, clear statements on areas such as membership, remits, and terms of reference, and the mode of operation of committees and, in terms of public accountability, ensuring that all formal records of an AVA are produced to a standard expected of a validating body;
- b the identification of the single locus of authority and responsibility for Access within the AVA's governance structure, that is, the body which holds the AVA licence; and a clear description of the role and responsibilities of any sub-committees which may be involved in the practical operation of the licence;
- c further consideration of the use of separate committees for Access, not necessarily for the purposes of quality assurance, but for purposes which would not be duplicated elsewhere in the deliberative structure (for example, the discussion of Access policy and strategy, and the provision of a forum for the discussion of key issues for Access as they emerge);
- d continuing to seek the most efficient and effective ways for the quality assurance of Access provision, particularly through the development of self-assessment and internal audit models;
- e reviewing the overall governance structure of the AVA to ensure that it achieves the most effective balance between constitutional obligations, the requirements of external licensing bodies and pragmatic operational practice.

Principle 3: Legal identity

The principle

49 The organisation is aware of and in a position to meet its legal and public obligations.

The criteria

50 The organisation will be able to demonstrate that:

- its constitutional basis is clear and readily identifiable;
- either its legal identity ensures that its liability exists separately from that of its individual members and their individual representatives, or it has taken steps to limit its liability and that of its individual members, so far as is possible, through insurance;
- there is a clearly identified basis on which it is able to enter into formal legally binding agreements;
- either its legal status requires it to have formally regulated financial arrangements or it has established an appropriate agency arrangement through which its financial affairs are scrutinised;
- its constitutional basis or relationship to any other organisation does not restrict the independent decision-making or operation of the AVA as specified under the terms of this licence.

Rationale

51 It is a fundamental aim of the Recognition Scheme to promote the Access to Higher Education certificate as a national award which is consistent and comparable across the range of licensed AVAs. It is therefore in the interests of the Recognition Scheme, and the Access provision which it regulates, to ensure that AVAs are independent bodies, which are able to respond to the requirements of the Recognition Scheme without being restricted or controlled by any other body or organisation. It is also important, for the AVA's security, that the liability of the organisation and its members, and the basis for any formal agreements is made explicit. The adoption of a clear legal identity is thus seen as a key element, as is the ability of an AVA to control its own staffing, finances, and other resources.

Major issues from AVA review

52 The issue of legal identity and the concept of the restriction of the 'independent decision-making or operation of the AVA' may well constitute the most sensitive area of this cycle of AVA review. The sensitivity arises from the position which has been taken by QAA - that it would not be fulfilling its remit from the DfES as the regulatory body for Access if it were to grant licences to organisations which were not in full and independent control of their own operations - and the origins of many AVAs which are in specific links with host organisations, most usually a local HEI. As is often evidenced in review reports, AVAs have benefited significantly from their close contact with a host HEI, not the least in the provision of free services, including office accommodation, and use of professional services related to finance and personnel. There is no question that the generosity of such host organisations has been of immense benefit to the development of Access provision, but the current regulatory environment differs from that which pertained when many AVAs were first established and the notion of a clear legal identity and independence is now a priority.

53 Most AVAs have recognised the nature of this changing environment and have reacted accordingly although, during the review cycle, seven of the 24 AVAs received conditions on the renewal of their licence which related to issues of independence and the nature of their relationship with a host organisation. There is no pattern to be discerned in these AVAs which might suggest that membership of NOCN, or a particular legal identity, is more or less helpful in securing independence. Of the seven AVAs, six were also OCNs; at the time of the review, five were unincorporated associations and two had incorporated company status.

54 In some senses, these details are unimportant since the licensing criteria do not indicate a preference for any particular legal identity. As a matter of interest, however, at the time of review, there was a roughly equal balance between AVAs which were unincorporated associations and those which had company status, with a slight preponderance of the former over the latter (a situation which, at the time of writing, has probably been reversed). In seeking to apply the criteria, it is clear that review teams also did not seek any one particular status but looked for a convincing statement of the chosen legal identity and a demonstration of the independence of the AVA. The 'tests' of independence also seem clear from the texts of review reports. They included:

- *is permission needed from any other body before the AVA acts?* In some cases, particularly in relation to the appointment of staff and the management of budgets, the permission of a host organisation was needed for certain decisions, or the AVA was restricted in its actions by the prevailing regulations and practices of the host organisation;
- *what is the employing body for staff?* Review teams drew a distinction between AVAs where staff were direct employees of the host organisation and AVAs which contracted the personnel and employment services of a host organisation but remained essentially the employer of their own staff;
- *what is the reporting line for the chief officer of the AVA and who undertakes his or her staff development review?* Review teams noted those instances where such reviews were undertaken by senior managers of the host organisation and those where, as a demonstration of independence, the chief officer's review was undertaken by the chair of the governing body of the AVA;
- *are special privileges granted to any members of the AVA in return for its position as host?* The licensing criteria do not legislate against the existence of a host organisation per se but do require the AVA to protect itself from 'undue influence'. The assumption is that services from a host organisation will be contracted on a formal basis rather than being paid for 'in kind'.

55 This last point raised some particular issues during the review cycle. As noted above, some AVAs benefit significantly from the provision of the free services offered by a host organisation and most were aware of the possible financial consequences of the withdrawal of those services. There were a small number of AVAs, however, where there appeared to have been inadequate risk assessment applied to a possible future where such services might have to be purchased at full cost or sought commercially. Although the relationships between AVAs and their host organisations was never less than cordial and, as also noted above, the host organisation frequently offered support because of its belief in the aims and mission of the AVA, there remains the possibility of a change in circumstances or in the prioritising of resources which might affect the AVA adversely.

56 The interpretation of the phrase 'undue influence' by different AVAs was also variable. In some cases, AVAs were convinced of their essential independence while admitting that the guarantee of that autonomy was often 'understood' rather than written down. This variability also applied to those situations where a relationship had been committed to paper. Review reports describe a range of arrangements from basic memoranda of cooperation to binding service-level agreements, the legal status of the former often being more open to debate than the latter. The range of understanding of the concept of independence, and the reaction to it, might be illustrated by one AVA which had legally binding service-level agreements in place with its host organisation and had also amended its constitution to ensure that the representative of that host organisation could not become chair of the AVA, to an AVA which had not yet achieved an appropriate degree of separation from its host organisation which still enjoyed a guaranteed seat on the Executive of the AVA.

57 It is a tribute to the majority of AVAs that they have been willing to make amendments to their structures and organisation in order to meet the requirements of the Recognition Scheme, particularly since this has often meant considerable effort, substantial change and the loss of some of the advantages which they might otherwise have enjoyed. In its wish to develop the Recognition Scheme, QAA will continue to implement the criteria regarding legal identity and independence. The report of the recent Access to HE Project leaves little doubt about QAA's wish to confirm the Access to HE certificate as an acknowledged national award, and its drive towards ensuring that successful Access

students enjoy the same broad opportunities and choice of programmes and HEIs as, for example, successful A level students. One of the foundations for the achievement of these aims is the existence of strong, independent AVAs who are able to exercise their rights as validating bodies without restriction.

Commended practice

58 No examples of commended practice were noted in this area during the cycle of reviews.

Areas for further development

59 An area which might be developed further by AVAs in respect of this aspect of the Recognition Scheme is where there remains any doubt, considering further action to demonstrate their legal identity and independence.

Principle 4: Management and administration

The principle

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

The criteria

61 The organisation will be able to demonstrate that:

- it has aims which are congruent with the Aims of the QAA Recognition Scheme for Access to HE;
- it has systematic and effective mechanisms which enable it to pursue its aims;
- it has established procedures to review the AVA's performance in relation to its aims;
- it operates a systematic and rigorous approach to the management of its financial affairs;
- there is a level and structure of staffing and physical resources capable of delivering the requirements described in this document;
- its staff are fully accountable to it through clear management lines;
- it provides appropriate services to support its processes for the quality assurance and enhancement of Access to HE provision;
- it has documented statements describing its operational procedures relating to Access to HE, including statements relating to registration of students with the AVA; the development and recognition of programmes; the receipt of moderators'/examiners' reports; and the award and issue to students of Access to HE certificates;
- it has effective systems for the collection, recording and holding of data about Access to HE programmes and students, and is able to provide accurate and timely information to satisfy QAA's reporting requirements;
- it communicates to its members effectively about matters relating to Access to HE;
- it has an approved equal opportunities policy, the implementation of which is evident in relation to its activities, processes and procedures;
- it has procedures in place, which are easily understood and readily accessible, to enable complaints, grievances and appeals to be received, considered and resolved fairly;
- it has procedures for monitoring and assessing the continuing quality and effectiveness of its management and operation, including consideration of potential risks to its operation, and mechanisms to ensure that appropriate action is taken;
- it is able to produce an annual report on its activities and the Access to HE provision for which it has responsibility, in accordance with the requirements from QAA.

Rationale

62 The rationale for the use of this principle, and its associated criteria, in the award or review of an AVA licence is to ensure that the organisation has the general administrative and management capacity and ability to operate that licence appropriately and that it demonstrates every indication that its operations can be sustained into the future. Many of the requirements are statutory, or would be expected as good practice, for any organisation (for example, policies for equal opportunities and to respond satisfactorily to complaints or appeals). The focus on areas such as systematic data collection, rigorous financial management, proper record-keeping and written procedures for key operations is designed to ensure that the work of the organisation is well established, sustainable and not reliant on individual staff. The expectation that an AVA will engage in activities which promote Access more generally is part of the Recognition Scheme's aim to extend the opportunities which are provided by Access programmes regionally and nationally.

Major issues from AVA review

63 This particular principle covers many of the operational aspects of an AVA and, as can be seen in paragraph 83 below, attracted a significant number of commendations for good practice. Many reports acknowledged the quality of the basic administrative functions within AVAs and the staff who undertake them. There are also commendations for, among other things, the nature of communications between AVAs and providers of Access programmes, customer service levels and strategic planning processes. The range of activities covered by this principle has meant that a process of selection has been necessary in describing what might be learnt from the review cycle in this area. As such, the following paragraphs cover:

- communications;
- administrative procedures;
- strategic planning;
- targeting of Access provision;
- data collection;
- equal opportunities.

Communications

64 From the evidence of the review reports, AVAs excel in the range and nature of their communications with their members. Throughout the reports, there are abundant examples of written means of communications including newsletters, bulletins and annual reports (in some cases, the AVA uses the annual report submitted to QAA for the purposes of informing its members about the year's work). Many AVAs also produce a range of information packs and guides on various aspects of Access provision which are clearly welcomed by providers and students. There was increasing mention of web sites in the later stages of the review cycle, and almost all AVAs now have them (see Appendix A). Many Access coordinators or programme leaders met by review teams expressed their appreciation for the frequent and helpful contact with AVA staff, and for the range of forums or conferences designed to help them to keep up to date with developments in the AVA and in Access more generally. Those AVAs with a large enough critical mass to be able to employ staff with specific responsibilities for Access appeared to be particularly well placed to create and maintain excellent links with members and providers. In some cases, member organisations were assigned an officer as a designated personal link.

65 In one aspect of communications between AVAs and providers, however, review teams did express the need for some improvement in practice. As validating bodies, it is incumbent on AVAs to ensure the accuracy of what is presented about them and the award which they validate in providers' promotional and other literature. In a limited number of cases, review teams found that some of this information was inaccurate and potentially misleading for a prospective student. Typically, there was no acknowledgement of the AVA or QAA as validating and regulatory bodies, incorrect use of Access logos and outdated references to former regulatory bodies. It is part of their responsibility as validating agencies for AVAs to establish a process by which they can verify the accuracy of providers' promotional literature.

Administrative procedures

66 Paragraph 83 lists particular commendations made by review teams in relation to the administrative excellence of AVAs, and review reports in general are very positive in this respect. Together with common praise for the teamwork demonstrated in many AVAs, the reports confirm that key procedures and processes are usually well documented. In isolated cases, and often without challenging the quality of procedures as they were operated, review teams noted the need for more systematic statements or operational handbooks to ensure continuity in the face of staff changes. There were a number of particular commendations for customer service and for the use of service standards which describe what a provider can expect in areas such as programme development and recognition, moderation and certification.

67 In respect of the particular service offered to members for Access provision, there are links with the comments made on communications in paragraph 64 above. The individual competence of AVA staff is not in question, but it was clear from review reports that those AVAs which were able to appoint officers with special responsibilities for Access, and thus establish a pool of particular Access expertise, were able to offer a more extensive service to their members. This is simply the issue of critical mass again. One indication of the variety and range of AVAs is the volume of their staffing levels. On the evidence of the review reports, the smallest AVA has 0.5 staff and the largest has over 20. Irrespective of the size of an AVA's Access provision, these differences are striking and cannot help but affect the level of service provided to members.

Strategic planning

68 The review cycle demonstrated that some system of strategic planning, and the production of a written strategic plan, was present in almost all AVAs. A typical pattern emerged of the periodic strategic plan (often three years) supported by annual operating statements containing more detailed targets. Although the majority of AVAs had reasonably systematic methods for establishing, implementing and reviewing strategic plans, review teams noted occasions where the information and data gathering for the planning process could be improved. The overall quality of strategic plans varied between coherent documents resulting from a 'strong strategic planning cycle' to instances where AVAs have been required to undertake a substantial review of their planning methods and ensure that strategic plans and operational statements include 'specific targets, allocated responsibilities and target dates'.

69 In examples of best practice, the strategic planning cycle was methodical, included appropriate references to Access provision, involved both executive and committee contributions, and was reflective in terms of future enhancement. For example:

[The OCN] operates a two-year strategic planning cycle which incorporates annual operational plans. The strategic plan is developed in the first instance by the staff of the AVA and is then approved by the Management Committee. The Committee is also responsible for the monitoring of the annual operating plans.

In its scrutiny of this process, the review team noted that the general strategic aims which emerge from the text of the current Strategic Plan are translated into more specific objectives; these are in turn used to produce specific targets and performance indicators in the annual operational plans. In the current planning documents, the team was able to trace this logical progression as it applied to the strategic aim for Access provision which culminated with a detailed action plan for [the OCN's] AVA activities. It was clear from its minutes that the Management Committee devoted an appropriate amount of its time to the discussion and monitoring of the Strategic Plan and the related annual plans.

In its Account, the AVA reported that an internal analysis had revealed the need for greater involvement on the part of its staff in planning processes. To this end, it has established a Strategy Group to inform the strategic direction of the AVA. Such a development can only enhance further what, in the belief of the review team, is an already effective strategic planning process.

70 The most common issue to surface in review reports related to OCN/AVAs and the place of Access in their strategic plans. In a number of cases, teams noted the absence of specific reference to Access or the lack of any particular objectives or targets which responded to the needs of Access provision. On occasion, an OCN/AVA might argue that Access 'remained central to the ethos of the OCN and was intrinsically embedded within its aims and objectives' and therefore did not require any particular attention in strategic planning (an argument similar to the one forwarded in respect of governance, see paragraph 38b above). It is clear, however, that the interpretation of the licensing criteria used by review teams led them to seek - whatever the planning process adopted by the AVA - a clearer identification of the needs of Access in strategic plans and a consequent greater specificity in aims and targets in plans and operational statements. As an example:

The team recognised the legitimacy of the AVA's integrated approach to strategic planning, but had concerns that the current processes did not secure the place of Access to HE or its development as a particular area of activity, and that the responsibility for the development and monitoring of a

strategic agenda explicitly for Access to HE within the AVA's structures was uncertain...While not wishing to understate the extent and value of [the AVA's] current and recent developmental activity in relation to Access to HE, the team concluded that future strategic planning should include specific consideration of the further development of [the OCN's] AVA responsibilities and Access to HE provision. The results of this process should be reflected in discrete and specific strategic objectives, in order to secure the place of Access within [the OCN's] overall strategic framework.

71 In summary, review teams were faced with three general categories of strategic plans in OCN/AVAs:

- an overall undifferentiated strategic plan which had no particular reference to Access;
- an overall strategic plan which contained specific aims for Access;
- an overall undifferentiated strategic plan accompanied by a separate statement or action plan for Access.

72 Of these categories, only the first was consistently criticised by review teams. There were some OCN/AVAs which attempted the separate plans described by the last category and, despite the potential for lack of coherence or articulation between two such plans, it is worth noting that at least one had successfully managed this:

[The OCN's] planning is conducted through a three-year Business Plan and an annual Strategic Plan. There is also a separate Access to HE Action Plan...

The Strategic Plan and Access to HE Action Plan are both structured around the same six broad strategic aims: Learner Achievements and Standards; Quality; Curriculum; Governance and Management; Equal Opportunities and Social Inclusion; and Finance. Further linkage is made in relation to the 'tasks' and 'indicators' listed under the corresponding aims in these two plans; the Access to HE Action Plan details Access-specific aspects of relevant general 'tasks' and/or Access specific 'indicators' of relevant general 'tasks'. With this degree of articulation between these two plans and, furthermore, the direct reporting line from the Access to HE Committee, which recommends the Access to HE Action Plan to the Board of Directors, the organisation has the capacity to ensure that the AVA role is strongly represented in its strategic policy development.

73 In another example, an OCN/AVA produced a three-year strategic plan supported by:
...annual operational plans both for the OCN as a whole and also specific to the AVA role, with progress recorded against set targets. The existence of this separate Access to HE operational plan...with measurement of achievement against targets, provides, in the view of the review team, an effective mechanism by which the OCN can discharge its AVA responsibilities within the overall process of determining appropriate strategic planning and target setting for the OCN as a whole.

74 In cases where they perceived weaknesses in strategic planning processes, review teams also persistently commented on the failure to ensure that all appropriate activities of the AVA were brought to bear on strategic plans. In many cases, this involved an insufficient use of the data collected by AVAs (see paragraph 78 below); teams also noted instances where the outcomes of self-assessment processes were not always clearly used to inform future strategic planning.

Targeting of Access provision

75 On the evidence of the review cycle, the expectations of the Recognition Scheme in respect of the identification and targeting of particular groups which might benefit from Access provision have not always been satisfactorily met by AVAs. Typical comments were that 'targeting is currently perceived as primarily the responsibility of member organisations and there is no evidence of a deliberate strategic approach to following through any identification of low or non-participant groups with targeting policies or advice' or 'the AVA could play a more active role in helping providers to target and effectively recruit members of groups under-represented in higher education'.

76 AVAs do commonly offer valuable support and advice to their providers in the development of Access programmes for particular target groups and, in some cases, insist that providers demonstrate at the point of recognition that a proposed Access programme meets a target group

specified in the general strategy of the AVA. The existence of aims related to the targeting of particular groups is not unusual in AVA strategic plans but review reports have been critical of the essentially passive approach adopted by AVAs and have encouraged them to adopt 'a more proactive and purposeful approach in the context of targeting policies and strategies'.

Data collection

77 In general, review reports have avoided any detailed discussions of the relative merits of different management information systems. In addition, while they have noted instances where data collection and returns have been affected by late submissions or inaccuracies - and have required these to be remedied - their major interest has been in the use of data rather than its simple collection.

78 In particular, and as noted above, there has been frequent criticism of the failure to use data for the purposes of general strategic planning and, more specifically, to assist in the targeting of Access provision. Typical requests have been for an AVA to extend 'the depth and range of statistical collection, analysis and reporting in order to improve its capacity to monitor current Access to HE provision and its ability to plan for the future' or, where such data does exist, to make use 'of its own statistics and other data to evaluate the success of Access to HE programmes in identifying and reaching their target groups within the area', or to adopt 'a more systematic method for the evaluation and use of statistical data to review, develop and promote Access provision for the benefit of learners, providers and receiving HEIs in the region'.

79 Such comments indicate an important message from AVA review: some of the key principles of the Recognition Scheme, and the ways in which AVAs fulfil them as validating bodies, are reliant on the foundation provided by accurate and focused data on learners and provision and, more importantly, its deliberate use by AVAs to develop and promote Access opportunities in the regions in which they operate.

Equal opportunities

80 This is an area which attracted broadly positive comments from review teams. All but two AVAs had satisfactory written policies in place (in one of these cases, the AVA was using the policy of its host organisation which, in the judgement of the review team, did not adequately cover all aspects of the AVA's activities). In addition, the majority of AVAs made reference to equal opportunities in general, and to equal access to learning opportunities in particular, in their organisational aims and objectives.

81 Review teams also noted and commended AVAs where it was clear that the commitment to equal opportunities was not allowed to remain simply as a passive statement:

The AVA has an appropriate policy statement on equal opportunities, the implementation of which is apparent in relation to its major activities. The promotion of equal opportunities is also embedded in its mission statement and its statement of aims. The review team noted examples of the ways in which the commitment to equal opportunities was implemented in the AVA's activities. These include the checklist contained in the document, Submitting a Programme for Recognition where, following a restatement of the policy, providers are offered comprehensive guidance under the headings of curriculum, recruitment, course structure, the learning environment, and learner support, which is designed to ensure awareness of equal opportunities in all aspects of programme design and delivery. Moderators are also asked to comment on evidence that programmes are continuing to meet the equal opportunity requirements of the original submission document. The AVA is to be commended on its commitment to equal opportunities and the ways in which this commitment is evident in its activities and procedures.

and the AVA with:

...a statement on equal opportunities, which underpins the organisation's approach to membership, promotional materials, staff selection, and curriculum. The review team noted that a statement on equal opportunities was also a requirement in submission documents, and that the principles which governed the AVA's approach to moderation required moderators to comment generally on the issue of inclusivity, and specifically to examine methods of assessment for 'fairness, equality of opportunity and clarity'.

82 These examples serve as useful illustrations of the ways in which written policies can be actively implemented to ensure that equal opportunities are maintained as an effective and functional aspect of the work of the AVA.

Commended practice

83 At the time of the relevant AVA review, the following examples of commended practice were noted:

- its work with the Coordinators' group and practitioner networking to ensure good communications with Access to HE providers and tutors and to provide a strong sense of involvement amongst practitioners [OCNW];
- the effectiveness of its methods for communications with its members [OCNSW];
- the efficiency and effectiveness of its communications with providers [LOCN];
- the value of the annual AQA 'Partnership' Meeting as a method of communication with its providers [AQA];
- its comprehensive and effective communications with Access to HE providers and HEIs [OCNSEM];
- the cooperative approach to the management of the AVA which involves both further education providers and local HEIs [OCNW];
- the strong teamwork among the executive team and the care which it takes in relation to the processes associated with the award of Access certificates [OCNCE];
- the standard of its administration in support of its operation as an AVA [SEOCN];
- its investment in the training and development of its administrative staff [NWOCN];
- the efficiency and effectiveness of its administrative management and structures [TROCN];
- the provision of efficient customer services to members [OCNW];
- its customer service [TRACOCN];
- the adoption of a clear operational plan and key aims by HEAC (Higher Education Access Committee), ensuring that there is a formal mechanism within the OCN for the development of Access activities and quality processes [OCNCE];
- the development of a specific operational plan for Access to HE [OCNNWM];
- the organic connections between the *Strategic Plan* and the *Operational Business Plan* [OCNKM];
- the thorough and systematic methods used to develop the *Strategic Plan* [GMOCN];
- the sustained and systematic collection and collation of data relating to Access [NEMOCN];
- the provision of data services, and the use of data to analyse the AVA's activities [SEOCN];
- the range and comprehensiveness of documentation about quality assurance processes produced for its users [LOCN];
- the standard of its publications and the clarity of its guidance documentation [SEOCN];
- the high quality and comprehensiveness of its publications and the transparency which they bring to the AVA's procedures and structures [OCNWN];
- the clarity and detail of its service standards document [WROCN];
- the range, nature and detail of its service-level agreements with the University of Essex [ASOCN];
- the extensive range of activities made available to providers through its staff development programme [OCNWN];
- its commitment to equal opportunities and the ways in which this commitment is evident in its activities and procedures [OCNWM].

Areas for further development

84 Some of the areas which might be developed further by AVAs in respect of this aspect of the Recognition Scheme are:

- a improved processes by which, as part of their responsibility as validating bodies, AVAs verify the accuracy of providers' promotional literature;
- b a consideration of the staffing levels necessary to offer a full service to providers and members;
- c the adoption by OCN/AVAs of strategic plans which make specific reference to Access and contain appropriate objectives and targets for Access provision, or the use of a separate action plan for Access which is articulated with the overall strategic plan for the organisation;
- d the use and evaluation of data for the purposes of strategic planning and, particularly, for the targeting of Access provision;
- e more proactive and purposeful approaches by AVAs in the context of targeting policies and strategies;
- f the active implementation of policies for equal opportunities across the activities of the AVA.

Principle 5: Development and approval of programmes

The principle

85 The organisation is able to assure the quality and fitness for purpose of Access to HE programmes to which it grants formal recognition.

The criteria

86 The organisation will be able to demonstrate that:

- it operates a system of programme development which encourages providers to present programmes for recognition that are explicitly designed to prepare students from under-represented groups for study in higher education, and which meet the AVA's specific requirements;
- there are standard systems and procedures for the recognition of programmes which ensure externality, objectivity and consistency of process in the consideration of Access to HE programme submissions;
- the AVA operates rigorous processes for programme recognition which ensure consistency of outcome in relation to the quality and fitness for purpose of Access to HE programmes;
- the recognition of an Access to HE programme is made with the full authority and approval of the AVA.

Rationale

87 The approval of individual Access programmes is at the heart of the Recognition Scheme and is one of its key quality assurance processes. This principle acknowledges the importance of thorough and transparent development and recognition processes, and requires that the act of recognition is made with the full authority of the AVA as the holder of the licence.

Major issues from AVA review

88 From the evidence of the review reports, the process of programme development and recognition is of high quality in most AVAs. Many AVAs undertake these processes in a broadly similar fashion. It is thus common to read of extensive pre-recognition development supported by good paperwork and AVA officer involvement; properly constituted recognition panels undertaking their work in a purposeful and expert manner; and formal approval granted by a responsible committee within the AVA. A characteristic example is provided by an AVA where the review team noted that:

In the initial stages, a Development Officer works with tutors to ensure that submission documents are accurate and comprehensive in preparation for a more formal recognition or validation event. Detailed pro forma are issued by the OCN to cover individual unit specifications as well as more general programme and provider information. Separate documents are employed where a broader Credit Framework is offered for recognition together with more streamlined submission for additions to such Frameworks which are already recognised. In each case, [the OCN] also issues helpful notes for guidance.

Acting on behalf of the Quality Assurance Committee, it is the responsibility of the assigned Development Officer to approve the readiness of a proposal to progress to a formal recognition panel. In respect of proposed Access programmes, this panel's membership includes representation from further and higher education providers. The OCN provides general guidance to recognition panels and, specifically, to those which are undertaking the validation of Access programmes. Such guidance is detailed and includes a set of principles to which a proposed programme must adhere, together with advice on specifications for the award of the kitemark, notes on the approval of individual programmes of study, and arrangements for the accreditation of prior learning.

A formal recognition panel report records the decisions of the panel, including any recommendations or conditions...Examples of recognition panel reports considered by the review team demonstrated the detailed and careful consideration given to submissions...

In summary, and on the evidence of recognition panel reports and discussions with both officers and tutors from providing organisations, the review team was able to confirm the thorough and robust nature of the programme recognition process operated by [the OCN].

89 It is a measure of the routine high quality of programme development and recognition processes that this example is one of many which could have been cited. It is likely that this widespread good practice is related to the familiarity of the peer process for validation and recognition which has been operating for some time in both further and higher education. The faith in this process has worked to the advantage of AVAs in providing a basis for consistency in the recognition of Access programmes.

90 Review teams did raise a small number of issues in relation to recognition processes which might contribute to the further enhancement of already successful practice. The licensing criteria are clear that the recognition of an Access to HE programme should be made with 'the full authority and approval of the AVA'. In most cases, a recognition panel makes a recommendation to the quality committee or an equivalent body in the AVA whose remit indicates its authority to approve programmes. Review teams were critical of a number of AVAs where the power to approve a programme appeared to rest with the recognition panel rather than with a more senior committee within the AVA, for example:

The review team noted with some concern the absence of a clear, single point of responsibility within the AVA for the final recognition of Access programmes. Although the Q[uality] A[ssurance] C[ommittee] is notified of all programmes which complete the validation process, it is not clear that the Committee holds any responsibilities in relation to the approval of Access programmes, and there is no documentary evidence to suggest that this responsibility goes beyond individual validation panels. While the evidence presented for the review indicated that panels were properly conducted, the team considered it essential that the process should include verification of consistency by a body with some continuity of membership and holding formal responsibility for the recognition of Access programmes.

91 In the face of some feeling that, following a recognition event, such committee approval was routine and amounted to 'rubber-stamping', this captures the two main reasons why review teams raised this issue on each appropriate occasion:

- the need for responsibility for the final approval of Access to HE programmes to be specifically located within the AVA's governance structures to ensure that the decisions of recognitions panels are subject to accountability;
- the view, as one report commented, that 'validation panels are transient bodies selected for a specific purpose and, except in the case of fortuitous continuity of membership, are unlikely to be able to provide a structured consistency in overseeing the granting of the 'kitemark' to the variety of Access programmes which are approved by [the AVA]'

92 In some cases, the purely formal nature of a committee's approval of the recommendation of a recognition panel might be a further example of the issue raised in paragraphs 45 and 46 above, that is, the practice of assigning a responsibility to a committee which is then not able properly to fulfil it. The act of final approval of an Access programme does not have to occupy one of the extreme positions occasionally cited in review reports, that is, either a nominal confirmation or a further complete and detailed scrutiny of the proposal. There are a number of methods by which AVAs can discharge their responsibility to exercise full authority in the approval of Access programmes through their deliberative structures. In essence, the role of the deliberative structure is not to conduct a duplicate recognition event but to ensure that the recognition panel has reached its recommendation through the proper exercise of the AVA's stated procedures.

93 The issue of consistency and comparability in the development of Access programmes was a feature of some reports. The setting of common credit targets (see paragraphs 111-113 below) is periodically discussed as a foundation for comparability of programmes. In some particular AVAs, a measure of standardisation is achieved by default through the adoption of curriculum structures that make use of banks of common units. Elsewhere, subject-based 'standing panels' are employed in some curriculum areas to encourage the development of units of a consistent and appropriate standard. There has also been the encouraging development of inter-AVA work to plan GCSE-equivalent units for mathematics, science and English. All of these developments should be encouraged as valuable contributions to a move towards consistency and comparability which will doubtless be given further

impetus by the recent Access to Higher Education Development Project, the recommendations of which include the development of both qualification and subject-level benchmarks for Access provision.

94 Although it may appear to be a relatively minor detail, the issue of the eligibility to chair recognition panels was raised in a number of reports. The catalyst for this was the view of review teams that the independence of the chair should not be in doubt and should respond appropriately to the requirement in the criteria for 'externality, objectivity and consistency of process'. AVAs have different methods for identifying the chairs of their recognition panels: they may be drawn from the membership of the AVA (in many cases, more specifically from the membership of the quality committee), or from the officers of the AVA. Given the difficulty which can be experienced in locating chairs for panel events, some AVAs now use their own officers exclusively in this role (in some cases, this might include the chief officer). Review teams were critical of AVAs where an officer who might have been closely involved in the development stages of a programme was also appointed as the chair of the recognition panel for that programme; they also commented on other systems where the chairing of panels might be shared between a relatively small number of the same AVA officers. In essence, the importance of this issue is not the detail of whether AVA officers should be in the chair, but the way in which the choice of a chair indicates the essential transparency and independence of the recognition event as a whole. The ideal chair for such an event, irrespective of provenance, is a person who is competent and has no real or apparent interest in the outcome.

Commended practice

95 At the time of the relevant AVA review, the following examples of commended practice were noted:

- providing opportunities which allow students to enter higher education feeling confident that they have been adequately prepared for higher education [OCNW];
- the effectiveness of the support it offers to learners in their progression to higher education [OCNSW];
- its thorough and supportive processes for the development and validation of new programmes [OCNSW];
- the thorough and robust nature of its programme recognition process [NEMOCN];
- the support offered to providers in the process of unitisation of programmes [OCNNWM];
- the care taken in the development of Access programmes and the thorough and robust nature of the validation process [SEWOCN];
- the work of its subject standing panels, which ensure comparability of standards across Access programmes, between Access programmes and other equivalent qualifications, and across other OCNs in Wales [NWOCN];
- the work of its Curriculum Working Parties and the consistency of standards that their work brings to Access provision [HAVA];
- the clarity of the 'kitemark' specification produced as part of the validation process [SEWOCN];
- the thoroughness of its procedures for the evaluation of the programme recognition process, and the use made of evaluation for the enhancement of this process [OCNWNV].

Areas for further development

96 Some of the areas which might be developed further by AVAs in respect of this aspect of the Recognition Scheme are:

- a ensuring that the recognition of an Access to HE programme is made with the full authority and approval of the AVA, and the need for responsibility for the final approval of Access to HE programmes to be specifically located within the AVA's governance structures to ensure that the decisions of recognitions panels are consistent and subject to accountability;
- b continuing to work towards methods, both regionally and nationally, which will enhance consistency and comparability in the development and recognition of Access programmes.

Principle 6: Standards of achievement

The principle

97 The organisation is able to safeguard the continuing quality of Access to HE programmes, and to secure the standards of achievement of students awarded the Access to HE certificate.

The criteria

98 The organisation will be able to demonstrate that:

- it has established a system of regular external programme monitoring and assessment ('moderation') through which the quality, comparability and fitness for purpose of Access to HE programmes, and the consistency and sufficiency of standards of student achievement, are assured;
- it has procedures that will ensure that those who act on the AVA's behalf to monitor the quality of Access to HE programmes and the standards of student achievement ('moderators') are competent to do so;
- it makes use of the outcomes of the moderation process to improve and enhance recognised Access to HE programmes;
- it has specified procedures for the award of Access to HE certificates to students, according to clear criteria;
- it has a regulated process for the issue of Access to HE certificates to students.

Rationale

99 Given that it deals with both the quality of Access programmes and the standards which students must achieve to be awarded an Access to HE certificate, this is a central principle of the Recognition Scheme. The focus is on the ways that an AVA establishes and operates its systems for ensuring that the consistency and sufficiency of academic standards is maintained, predominantly through external moderation. This principle also incorporates the requirement for regulated and secure processes for the award and issue of the Access to HE certificate.

Major issues from AVA review

100 In contrast to their consideration of AVA practice in programme development and recognition, review reports delivered relatively few commendations and a relatively large number of conditions and recommendations in respect of the systems of moderation which are central to the principle covering standards of achievement. In considering the evidence of the reports, it is also noticeable that, in comparison with the standard patterns of procedure for programme recognition, AVAs have found a variety of different ways of undertaking what might seem to be fundamentally the same process of moderation.

General management of moderation

101 Despite this general context, there is evidence of good practice in the general administration of moderation including the selection and training of moderators. Where issues have been raised, they have tended to congregate around the responsibilities of the AVA as a validating body as expressed in the conduct of moderation. Some examples of these issues are:

- *control of the choice and appointment of moderators.* In many cases, moderators for Access programmes are drawn from HEIs although there are relatively few instances of an AVA selecting its moderator cohort solely from higher education as deliberate policy. AVAs frequently use their own member institutions as a pool for moderator selection. This poses few problems for large organisations but has given cause for comment with smaller AVAs, especially those with a limited number of HEIs in membership. In these cases, AVAs have sought to expand their cohort by appointing moderators from outside the AVA membership. As with other quality assurance processes, it is not unusual for AVAs to assign the formal approval of a moderator to its quality committee but for the process to be conducted by an

officer. The committee thus exercises this responsibility with a light touch, or no touch at all. AVAs may wish to consider that the standards of achievement on the programmes which they validate - and therefore, their reputation as a validating body - rests on the quality of the moderator cohort which they appoint. In this context, it is not unreasonable to anticipate that the committee in the AVA's structure with overall responsibility for quality and standards should have a significant involvement in the appointment of moderators;

- *the periods of office of moderators.* AVAs have established different practices in this respect: some renew moderator contracts on an annual basis; some make appointments on a fixed basis (for example, three or five years); and some do not appear to have any formal limit on how long a moderator may serve. From the evidence of the reports, review teams have been critical of AVAs which do not appear to monitor the periods of office of moderators and, in extreme cases, have identified cases where the same moderator has been attached to an Access programme for many years. It is a principle in most academic quality assurance systems that moderators and similar external examiners should not, through time, become over-familiar with a particular programme. Following the best practice of a number of AVAs, the establishment of an appropriate period of office for moderators, and the subsequent monitoring of appointments to ensure that they are not exceeded, is one of the more straightforward messages from AVA review;
- *the training of moderators.* Review teams reported much good practice in the initial training of moderators and the provision of later updating opportunities. One report provides a typical summary: 'Moderators are required to undertake initial training and also periodic updating. [The AVA] issues a helpful and supportive Moderator Handbook and those moderators met by the review team endorsed the quality of the training and support they received'. The reference to a handbook for moderators is supported by many other references in reports to helpful guides and information packs produced by AVAs. Induction courses are also a common feature of practice, although there were some AVAs where induction and training was undertaken solely through paper-based guidance. The review reports present an interesting difference in the general approach made by AVAs to moderator training. In some AVAs, initial training was compulsory (in some cases, periodic renewal of training was also mandatory); in other AVAs, all training appeared to be discretionary. This latter practice may be a function of the most significant problem encountered by AVAs, that is, the securing of attendance at such training. However, given the importance of the role in relation to standards, review teams have been quicker to commend and encourage those AVAs which do not permit a moderator to serve without appropriate training. Other AVAs may wish to consider this practice as being fundamental to an organisation with awarding powers. It was also noticeable that the presence of an AVA officer or officers dedicated to the moderation process was valuable not just in the administration of the moderation system, but also because the staff involved tended to accumulate specific expertise and experience which could be put to good use in training events.

Models of moderation

102 In respect of the basic framework for moderation, AVAs presented a variety of models, with an occasionally bewildering range of nomenclature. Except in a small number of cases, however, they involved systems of moderation at both discipline and programme level. This is an appropriate response to the requirement of the licensing criteria that the 'sufficiency of standards of student achievement' is assured. A typical model therefore comprised subject-based moderators, who might be working at unit level in large modular frameworks or at programme level if an Access programme is discipline-based, and lead moderators whose task is to ensure the consistency of assessment across the range of a student's programme.

103 The most significant departures from this basic model are those where moderators are not appointed as subject specialists but, as one report describes them, 'arbiters of process':

In this model, it is necessary to have only one (or occasionally two) moderators for a programme, even where the programme includes pathways or subjects in which the moderator has no specialist knowledge or background...

Although there could be concerns that, with such a system, the level of subject-specific skills and knowledge could receive insufficient attention, moderators advised the review team that external

moderation is supported by interaction with colleges' internal verification systems which consider the detail of subject-specific standards of achievement. The Account acknowledges that this model of moderation 'relies heavily on effective systems of internal moderation/verification', but also recognises that this position has not yet been achieved. Indeed, the OCN's current guidance for moderators suggests a developing model, stating that 'Increasingly, an organisation's internal moderation (or verification) system will become a key quality indicator and the moderator's role ... will become less of a curriculum specialist and more of a generic function'. Discussion with various participants in review meetings confirmed that the two systems are not yet working to complement each other in all cases...

...there is not yet evidence to suggest that all providers have rigorous systems of internal verification in place...[and]...the review team concluded that, although there was clear evidence that the OCN had begun to address this matter, the stage had not yet been reached where it could be assumed that moderation was supported by reliable and fully operational systems of internal moderation or verification.

104 The interaction between internal moderation or verification (commonly referred to as IV) and the moderation systems put in place by an AVA has been a developing theme in the review cycle. The example quoted above, which describes such interaction in its early stages, is from a review conducted in November 1999. In the same month, another review notes that:

One key external development influencing models of moderation has been the introduction and increasingly widespread use of internal verification (IV) within further education. The use of IV within Access programmes is still evolving and the review team noted some concern expressed by moderators as to the effectiveness and consistency of application of IV practices for Access. OCN guidelines have been produced with regard to IV but, with continuing developments in this area, these will need careful monitoring and there may be a need to strengthen the support and guidance available to providers and moderators, in order to ensure consistency of moderation practice in Access provision in relation to the use of IV.

105 This sense of evolution continued to be a theme in review reports and was seen as particularly crucial for AVAs which were making a transition towards the role of moderator as a quality auditor, focusing on standardisation and verification, and therefore becoming more dependent on internal verification to assure standards of achievement at subject level. In June 2000, in one such model:

Some providers had internal systems in place and some did not. Where these did exist, there were considerable differences and inconsistencies between them. Moderators had little guidance as to how they were expected to interact with internal systems, and practice was inconsistent. While a model of internal verification had been identified in one member institution as excellent practice which might be promoted and adopted, there was currently no clear process by which this might take place nor was there any certainty that it would be acceptable to all member institutions. The review team was unable to identify any minimum requirements made by [the OCN], either in relation to the quality standards for systems and processes of internal moderation/verification, or in relation to their articulation with [its] own external moderation processes.

and, in June 2001, in another AVA with:

...a model of moderation which appears to be in transition between a subject specialist model and one where the moderator becomes, to a great extent, an arbiter of process, heavily reliant on the successful implementation of an internal verification system. While both programme managers and moderators who met the review team expressed broad confidence in the system, the team noted that, in the composite moderation report...for 1999-2000, there were a number of comments on specific moderation reports which indicated that some aspects of internal verification continued to cause concern, and that moderators may be asked to take on trust that the college system is working, with minimal evidence provided to support a tutor's assertion.

106 By February 2003, review reports were indicating significant progress in this area, for example, an AVA where 'internal verification within provider institutions is integrated within the moderation process and used as a quality check by moderators' and, towards the end of the review cycle in May 2003, it is clear that integrated systems of verification and moderation were being considered with more confidence:

The AVA, through the Q[uality] A[ssurance] G[roup], is considering the appropriateness of the current system of moderation with two visits per year from all module moderators and also from the overall programme moderators. It is thought that, in view of a considerable reduction in the number of curriculum-related issues over the past few years and the increasing rigour of providers' internal moderation systems, it may be possible to reduce the level of review by external moderators of learners' work, relying more on internal moderation processes, thus possibly reducing the number of visits necessary by external moderators. Currently, both module and overall programme moderators review internal moderation processes to confirm their effectiveness rather than to utilise their outcomes.

107 The growth of internal verification has offered a series of interesting challenges to AVAs. From the evidence of the review reports, they have begun to meet those challenges by developing their approaches to moderation and seeking ways in which internal and external systems can be integrated. From the perspective of the Recognition Scheme, the licensing criteria do not legislate for any one particular model of moderation as long as there is an assurance of 'quality, comparability and fitness for purpose of Access to HE programmes', and of 'the consistency and sufficiency of standards of student achievement', that is, as long as the system of moderation guarantees standards at both programme and subject level. Models of moderation which use internal verification as the main source of evidence for subject-level standards can fulfil the criteria although ultimate authority should still rest with those appointed by, and reporting to, the AVA itself. It may also be a message from AVA review that those AVAs which do incorporate internal verification into their moderation systems should have in place appropriately rigorous processes for considering and approving the IV system which is proposed. In this context, scrutiny of the IV system of a provider would clearly become a vital part of recognition and review procedures.

Consistency of standards

108 Review reports have also commented on the methods employed by AVAs to ensure the consistency of standards achieved across the range of Access programmes which they validate. A limited number of AVAs have experienced some difficulties in the basic processes which contribute to consistency of judgement, for example, inconsistent practice in the operation of final assessment or examination boards. The use of standard guidelines for the conduct of such boards, and standard agendas has helped in this context.

109 In managing other aspects of consistency, it is not uncommon for AVAs to manipulate their moderation systems to ensure that each moderator works with more than one programme and at more than one provider. There is evidence from the review reports that such a method can contribute to a greater uniformity (although they are understandably more difficult to operate logistically). Often, AVAs have established particular groups to enable moderators to meet and discuss practice and standards. These moderation forums or task groups have the potential to contribute significantly to consistency of practice. In some cases, more ambitious initiatives have been launched to address the issue of standardisation. An example would be an AVA which has:

...organised standardisation events to review assessment practice. These focus on curriculum by looking at specific units and allow for the review of assessment practice and further confirm the standardisation of the award of level and of credit...

In its Account, the AVA states that 'it has made considerable efforts to engage Access practitioners and moderators in standardisation events and will be introducing an element of compulsion to ensure that participation in these activities is prioritised in the future'...The Account also notes, in relation to regional standardisation, that all colleges will be 'required to attend and provide samples'...the team considered the AVA's approach to engaging Access practitioners and moderators in standardisation events to be a positive and realistic response to a difficult situation.

110 Review reports commend all of these efforts while noting that many of them are undermined by poor or erratic attendance. A message from AVA review would be that any initiative aimed at enhancing the consistency of standards is to be encouraged. In order to lend greater support to AVAs, however, there is a growing feeling that, as an issue, standardisation should have a national dimension. This is certainly one of the significant issues covered by the recent *Access to Higher Education Project Report*.

Credit targets

111 In 1995-96, at the point at which the first cycle of AVA reviews had been completed by HEQC, it had been the intention to produce a report, *Learning from Access Reviews: A digest of issues and recommendations from the reviews of authorised validating agencies 1994-1996*. The report was begun but never completed, largely as a result of a combination of staff illness and the imminent transfer of regulatory responsibilities from HEQC to QAA. However, a draft of the report was presented to the then managing committee, HEQC's Access Course Recognition Subgroup. It is instructive to note what the draft had to say on the issue of credit targets:

For a 'kitemark plus' offer from HE, the Access qualification may come with 16 credits, but the student may be required to achieve say 24 credits for his/her chosen University place. Clearly this threatens to undermine the significance of the kitemark itself as the standard matriculation qualification. On the other hand, it is obvious and inescapable that strong competition does exist for places in HE, especially the more popular subjects/courses and the prestigious institutions, and HEIs have to find a basis for selection and conditional offers. Selection through individual in-depth interview (and tests) continues, but this is diminishing because it is so costly, and many HEIs distrust references alone as a basis for unconditional offers.

112 Almost 10 years on, the *Access to Higher Education Development Project Report* comments on: *the much-reported variation in credit requirements for the award of the Access to HE certificate, from the national minimum for AVAs which are Open College Networks, of 16 credits with 12 at level 3, to 22 credits required by one AVA using the same credit framework. Other work in this area suggests the upper limit of requirements for the award of the Access certificate is higher still for some courses...*

This inconsistency in the requirements for the award of the Access certificate was the major cause of concern for HE admissions staff, who commented on the implications for consistency of offers when the variability between programmes' requirements was so great...[and]...were experiencing difficulties in applying fair admissions procedures in a situation of extremely diverse requirements and regulations...They suggested that the current position could create barriers for students who were not local to the HEI to which they were applying, and that it undermined the status of the Access certificate as a nationally recognised qualification.

Furthermore, admissions staff were concerned that these differences in descriptions of requirements for the award of the Access certificate could indicate a more fundamental variation in the actual required standard of achievement for the award of the Access to HE certificate, and that this produced a reluctance, in some areas of HE, to consider Access candidates. Discussions with national bodies also noted a concern about 'the relatively small proportion of Access entrants to pre-92 universities', which led to the suggestion that this may indicate a 'lack of recognition or confidence in the qualification'. The acceptance of the Access to HE certificate as a robust nationally recognised qualification is a matter of priority if those students who choose this route into higher education are to be able to apply successfully to all Universities, whether pre- or post-1992.

113 This appears to require little further comment. Review reports are a source of evidence of the variation in credit targets to which the *Access to Higher Education Development Project Report* refers, and which does not appear to have improved in almost ten years. Reports note, for example, 'a degree of uncertainty over the minimum credits required for an Access certificate', or 'that beyond the statement of the national credit minimum, the AVA did not have a developed policy in relation to credit targets on Access programmes'. Where there has been ambiguity in this area, review teams have normally requested that the AVA clarifies its position and works towards a greater degree of consistency amongst its providers. Echoing the *Access to Higher Education Development Project Report*, and ten years on from an initial identification through AVA review, a key message from this cycle of AVA reviews is that the issue of consistent credit targets must be resolved if the Access to HE certificate is to be confirmed as a national award.

The use of moderator reports

114 Most AVAs have in place a system which is designed to provide a functional response to moderators' reports and to resolve any issues which they raise. All such systems appear to have been satisfactory with the best of them providing models for the efficient processing of moderators'

reports and an appropriate level of involvement by AVA officers and committees with responsibilities for quality:

The Moderation Officer is responsible for receiving and logging moderation reports, which are written to a prescribed format, facilitating comparison and consistency. The Moderation Officer, normally in conjunction with the Development Officer responsible for the institution to which the report relates, reads and evaluates all moderation reports. Any matters of concern are signalled to the institution and are reported to the relevant Access Validating Committee, although the Moderation Officer will take early action where appropriate. The Moderation Officer is also responsible for compiling an annual evaluation report for consideration by AVCs and the Quality Assurance Committee. The report will highlight a range of issues, make recommendations for improvement, and identify any issues of concern. Moderation reports and evaluations are available to the autumn meeting of the AVC for sampling. All reports which raise issues in respect of the quality of programme delivery or the validity of the award of credit are separately identified to the AVC for action. All actions are followed up by the Moderation Officer and reported back to the AVC on a regular basis. The AVCs report any issues of on-going concern to the QAC. Evidence presented to the reviewers confirmed that this system is working well and that difficult issues had been picked up and followed through to appropriate outcomes.

The control and issue of certificates

115 In keeping with the generally positive comments made in review reports regarding AVA administrative structures, teams found satisfactory procedures in place for the secure control and issue of certificates in almost all AVAs. In the isolated cases where some improvement in procedures was required, the issue was usually to ensure that the necessary procedures were totally in the control of the AVA and that they included a verification process which involved the appropriate moderator.

Commended practice

116 At the time of the relevant AVA review, the following examples of commended practice were noted:

- the potential of the system of moderation for developing comparability and consistency across partner institutions as well as in its own operations [OCNW];
- its arrangements for the training of moderators and the quality of the supporting documentation [OCNSW];
- the attention given to the induction of new moderators through briefing sessions [NEMOCN];
- the establishment of a Moderators' Task Group [SEWOCN];
- the introduction of a certificated programme of training for moderators [LOCN];
- the introduction of activities to monitor consistency of assessment [SEOCN];
- its recognition of the central importance of assessment to the quality of Access programmes, and the design of unit templates to assist the rigour of the assessment process and consistency of results [TRAC];
- in collaboration with the Lead Moderator, having developed and implemented the model of lead moderation in a robust and supportive manner [OCNSEM].

Areas for further development

117 Some of the areas which might be developed further by AVAs in respect of this aspect of the Recognition Scheme are:

- a the further 'professionalisation' of their approach to moderation by establishing and monitoring fixed periods of office for moderators, and by ensuring - through mandatory programmes of initial and continuing training - the readiness of all moderators to undertake their prescribed duties;
- b ensuring the involvement of key committees with responsibilities for quality and standards at appropriate points in the overall framework for moderation including the appointment of moderators and the receipt of, and response to, moderators' reports;

- c the continuing integration of internal verification systems within overall moderation processes;
- d initiatives aimed at enhancing the consistency of standards, and a readiness to become involved in any national projects which have the same purpose;
- e the introduction of consistent credit targets across the range of Access provision within an AVA and a readiness to become involved in any national initiative which addresses the issue of credit targets for Access programmes.

Principle 7: Review and evaluation

The principle

118 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.

The criteria

119 The organisation will be able to demonstrate that:

- it has a rigorous system for the regular review and development of AVA activities and procedures, and of Access to HE provision with reference to quality and comparability of programmes and consistency of student outcomes;
- it has a system for the periodic revalidation of programmes which assure their continuing quality and fitness for purpose.

Rationale

120 This principle expresses those aspects of the Recognition Scheme which require AVAs to establish mechanisms by which both their own operations and the Access programmes which they validate are subject to continuing review and enhancement. The intention of the principle is to encourage the development of a culture of quality and self-assessment within an AVA.

Major issues from AVA review

121 Given that in many AVAs the processes used for the periodic revalidation of programmes are based closely on those used for initial recognition, it is unsurprising that review reports are generally complimentary about prevailing practice. A standard pattern emerges from reports of a three to five-year period of approval before revalidation, an appropriate level of support from AVA officers for those providers undergoing revalidation, the use of moderators' reports and annual reviews from intervening years to inform the process, and similar levels of efficiency and expertise in the establishment and conduct of revalidation panels as had been applied for the initial recognition event. As an example, in one AVA:

...revalidation takes place when a course has run through the normal three years of approval granted for a new course. The procedures for revalidation, designed 'to encourage the planned development of Access courses and based on the operation of the course to date', are similar to those for validation with one significant exception. Incorporated into the proposal document must be a 'thorough analytical and evaluative review of the course, assessing the extent to which the aims and objectives of the course have been achieved and detailing all the changes already made or proposed'. If successfully revalidated, a further four years of approval will normally be given to a course. In looking at the evidence the review team was able to concur with the conclusion reached by [the AVA] in its account, namely that the AVA 'has developed vigorous and effective procedures for the process of revalidation.'

122 In respect of the regular scrutiny of Access provision, AVAs commonly maintain a system of annual programme review. The nature of the review may differ: some AVAs require specially produced documents; others make greater use of reports which have been generated as part of a provider institution's own internal quality assurance procedures. In the latter case, there is evidence that the consideration of annual reviews is facilitated by a uniformity of structure and that some problems have been experienced through the variety of provider-generated reviews. Good practice in annual review is not difficult to locate in review reports. In one example:

The OCN requires an annual Evaluation and Review report for each of the programmes which it recognises (a further summary report is also required where a provider operates programmes through a broader credit framework). A common format for such reports is encouraged which, in particular, requires the tabulation of major issues, the action proposed, responsibility for such action, and the timescale by which it will be achieved. Review reports are considered by officers of [the OCN] and, where necessary, issues are raised with providers or, where relevant, with

moderators for the programme in question. In discussion with Access programme leaders, who generally confirmed the value of the annual review process, the review team heard that such feedback is usually provided promptly.

The Quality Assurance Committee is informed in the case of late submission of reports and considers the reasons for delay. Minutes of the Committee demonstrated that this responsibility was taken seriously, with some programmes being subject to additional monitoring in the subsequent year. Providers are also given notice that the withdrawal of recognition is a possible consequence of not fulfilling the requirement to submit reports on time...

The review team was able to confirm that the process of annual review was conscientious and carefully managed, with the OCN being active in enhancing its systems through evaluation of the outcomes of each round.

123 There are some examples of more complex systems of monitoring and review although, in general, review teams report that they do not always operate with appropriate efficiency. As an example, one AVA:

...has developed a five-year cycle of evaluation and reporting for Access programmes. This constitutes a requirement on providers for a full evaluation report in years one and four, and a short, summary report in year five, in addition to regular action plans. The evaluation cycle is designed to complement the external moderation process...In practice, the evaluation cycle does not appear to be operating with any consistency and the boundary between evaluation by providers and monitoring by external moderators is unclear. A review of programme files revealed inconsistency in the provision of evaluation reports...Those reports that are received by the OCN are not currently dealt with in any systematic way and it was acknowledged that this was an area of the AVA's procedures that needed development.

124 In some AVAs there is no separate system of annual review of programmes. In such cases, annual monitoring is usually undertaken through the use of moderators' reports. There is no compulsion in the licensing criteria for a separate process of annual programme review (or, if such a system is in place, that it should be conducted on an annual basis). However, the criteria, and their accompanying indicative evidence statements, do imply the receipt and consideration by AVAs of material beyond that normally included in moderators' reports. In many cases, AVAs appear to have responded positively to this position: there are examples where annual programme review has been made compulsory rather than voluntary; has been introduced for the first time; or has been re-introduced 'to reinforce the ability of the AVA to evaluate and monitor its recognised provision'. The overall message from AVA review in this respect is that specific annual programme review is considered as best practice in order to ensure the successful 'regular review and development...of Access to HE provision with reference to quality and comparability of programmes and consistency of student outcomes'.

125 One possible area for improvement in relation to annual programme reviews is their use in any overall process of self-review implemented by the AVA. There are few examples of the issues which are generated in annual review being used to inform the enhancement of the AVA's overall activities. The ways in which AVAs have, in general, met the licensing criterion which refers to 'the regular review and development of AVA activities and procedures', that is, the quality enhancement of the organisation as a whole, is difficult to judge from the evidence of review reports. Prior to the publication of the specific principles and licensing criteria in 2001, this area was not a feature of reports and, prior to 2000, was probably not a feature of AVA practice in any methodical or systematic fashion.

126 The point in the review cycle at which more regular mention is made of organisational self-review coincides with the introduction of the licensing process by NOCN and the subsequent first round of NOCN Quality Audits which were aimed at ensuring compliance with the licence requirements. At the heart of these licence requirements is the notion of quality development through systematic self-assessment. Hence by November 2000, an OCN/AVA is reported as operating 'a detailed quality development plan which has been introduced recently. The overall purpose of the plan would appear to be the demonstration of compliance and continuous improvement as driven by licensing requirements from NOCN' and, later in March 2001, a report

notes that an OCN/AVA 'has begun to develop systematic self-assessment over the past year in order to ensure it is operating effectively against quality standards and the requirements of the regulatory bodies'. By June 2001, assumptions are being made regarding the impact of these quality standards: 'Compliance with recent NOCN licensing requirements, such as the process of self-assessment, formal production of an annual business plan and record-keeping requirements within a specific format, are likely over time to improve the effectiveness and consistency of [the OCN's] operations'. By 2002, it is clear that self-assessment has been developed further and more integrated as in the OCN/AVA where:

A 'continuous improvement model' was adopted in August 2002 in which strengths and weaknesses are identified in relation to four 'key product/service areas': [OCN] policy; regulatory requirements; the award of credit, NOCN qualifications and Access to HE qualifications; and services to external organisations and internal customers. This process results in the production of a self-assessment report and a continuous development plan. The Quality Committee is responsible for overseeing the self-assessment process and the Access Committee monitors progress on those items within the development plan which are relevant to the network's AVA activities. The potential effectiveness of this new procedure was demonstrated by the clarity and comprehensiveness of the documentation that it has generated and by the careful manner in which the documentation was considered at November 2002 meeting of the Quality Committee.

127 Given the partial nature of the evidence, and the fact that NOCN-driven self-assessment systems will only pertain in OCN/AVAs, it is difficult to draw any equitable or robust conclusions on the methods by which AVAs undertake the process of self-review for organisational enhancement. It is likely, however, that this area will be a much more significant part of the next review cycle and those AVAs which are not also OCNs - and therefore might not yet necessarily have introduced systematic self-assessment - may wish to consider the example of an internal quality assurance system commended in the later part of the review cycle.

Commended practice

128 At the time of the relevant AVA review, the following examples of commended practice were noted:

- the self-critical approach demonstrated through the Inspectorate system and the action taken in response to the recommendations of Inspectors' Reports [OCNW];
- having raised [its] profile in colleges through the Inspectorate system and improving quality by ensuring compliance with [its] systems and quality standards [OCNW];
- the maintenance of an overview of Access activities and trends in recruitment, achievement and progression since 1992 [OCNCE];
- the conscientious and careful management of the process of annual review [NEMOCN];
- cooperation with other OCNs on work on GCSE equivalent programmes [OCNWM];
- its use and response to interim reports to ensure that early action is taken to rectify problems and deal with difficulties about programmes which are raised during the year [OCNKM];
- the comprehensiveness of the annual review of Access programmes [OxOCN];
- the steer provided to ensure that students have a voice in the processes for the review of Access programmes [OxOCN];
- the potential value to its quality assurance arrangements of the work of the Quality Audit Unit [AQA];
- its undertaking of a comparative study of Access to HE courses [AQA];
- its tracking of students in higher education [AQA];
- its internal quality assurance systems [OCNWM].

Areas for further development

129 Some of the areas which might be further developed by AVAs in respect of this aspect of the Recognition Scheme are:

- a the introduction, where it does not already exist, of specific annual programme review;
- b the establishment by non-OCN/AVAs of systematic self-assessment for the purposes of the enhancement of organisational quality.

Conclusions

130 In addition to the areas for further development listed at the end of each of the sections above, a number of general conclusions might be drawn from a consideration of this cycle of AVA reviews.

131 There are some examples quoted in this report of progressive improvements, for example, in areas such as the integration of internal verification systems and advances in self-assessment but, in general, these tend to be the result of external forces or imperatives. It is difficult to demonstrate that the overall AVA review cycle per se was used as a tool for quality enhancement by AVAs while it was being undertaken. A reader is therefore likely to find remarkably similar conditions and recommendations in the earliest and the latest reports in the review cycle. Using only the review reports themselves, it is clearly impossible to make any authoritative claim, but there is certainly no evidence that they were considered routinely within AVAs, either tactically - to note which aspects of practice were receiving praise or criticism - or more generally as a ready-made source of discussion of quality issues facing all AVAs. If accurate, this is disappointing since it may indicate a lack of awareness of the value of external information and intelligence in the general consideration of quality assurance matters. It may also say something about the current and future nature and composition of those AVA committees with responsibilities for quality and standards. In addition to their functional responsibilities in areas such as recognition, review, and moderation, it is likely that under self-assessment systems they will also have broader responsibilities for the principles and values of quality in the organisation as a whole. In which case, consideration of sources of information such as the reports generated over a five-year period by AVA review should become a key feature of their work.

132 There is of necessity a healthy tension between conformity and diversity in the interpretation of the Recognition Scheme and the licensing criteria. If this were not the case, then a somewhat dull regime of compliance would be likely to restrict innovation by AVAs and limit the possibility of necessary regional differences. However, a consideration of areas of broad similarity, and areas of distinct variety, is of interest. In key quality assurance processes, for example, it is clear that recognition practices are very much the same across the range of AVAs; it is equally clear that moderation systems can be very different. On the evidence of the review reports, there is more good practice to commend in the former, and more practice which attracted conditions and recommendations in the latter. There is a strong temptation to draw a causal link here. In one sense, AVAs themselves appear almost to have established an invisible code of practice for programme recognition. Would there be merit in some similar agreement on the process of moderation? And should this be encouraged by some appropriate amendments to the Recognition Scheme? Given the issue about the balance between diversity and adherence to some common code, it might be helpful if - in the case of moderation and its key role in maintaining standards - there were not multiple methods adopted for doing fundamentally the same thing.

133 Particularly in the mid-1990s, a common theme in the first round of AVA reviews was the way in which the transition between AVA to OCN/AVA was being managed and how the AVA function, role and presence was being protected (it was indeed to have been a focus of the unfinished Learning from Access Reviews: A digest of issues and recommendations from the reviews of authorised validating agencies 1994-1996). That period of transition is now presumably almost complete but, in this second cycle of reviews, there have still been residual concerns about the AVA function in OCN/AVAs. These are often expressed in issues related to governance and strategic planning where review teams have sought to identify the precise role and identity of Access in an OCN/AVA where it may, in truth, be a minor presence. However, the issue now is not the management of transition but the ways in which OCN/AVAs manage the fact that they have (at least) two regulatory bodies. A first acknowledgement is that OCNs as organisations currently exist through their licence from NOCN and that this will naturally dictate their sense of first loyalty. This

should not mean, however, that Access and the OCN's role as an AVA needs to be wholly subsumed. In some areas OCN and NOCN methods and practices are not always appropriate for the requirements of the Recognition Scheme and OCN/AVAs need to recognise this and react appropriately. The evidence of the review reports tends to suggest that there is value in maintaining a distinct body within the OCN/AVA's deliberative structure as a focus for its AVA work (although not necessarily with responsibilities for quality assurance).

134 The issue of the size or the critical mass of AVAs has been raised on a number of occasions in this report. The issue is a relatively simple one: evidence of personal competence is to be found throughout the review reports and at no time do the reports (or the licensing criteria) make any general assumptions about a minimum size for an AVA. However, it is difficult to ignore the fact that the larger, well-resourced AVAs have decided advantages. Their breadth of membership allows a greater choice and opportunity for staff of member organisations in areas such as appointment to panels, working groups and committees; the same breadth also offers more opportunities for the AVA itself to secure the expertise it needs to operate some of its key processes. A larger staffing base also offers the prospect of more development support and enhancement opportunities for providers, especially if specific posts are created for Access provision. The demands of external regulatory bodies such as QAA and NOCN have led to greater pressure on the resources of AVAs and it appears, from the evidence of the review reports, this has been felt more keenly in the smaller AVAs: it is unlikely that these demands will ease in the foreseeable future.

135 Given the existence of the Access to Higher Education Development Project and its report, what might be learnt from AVA review cannot stand on its own. The messages from the Project, and the experience gained from the review cycle, should be invaluable partners. As an example, the fulfilment of one aim of the Project - to confirm the national recognition of the Access to HE award - has much resonance with learning from AVA review. Some of the key messages of this report are crucial for the national status of the award, including the unquestioned independence of the AVA as a validating body, the ways in which the AVA accepts full responsibility for its actions as a validating body and the need for clarity in the credit specification of the award.

136 On the evidence of the review reports, and on any other evidence base, AVAs have been extraordinarily successful in the development of Access. As the name implies, their first responsibility has been for the validation of Access provision although, of course, they have been involved in a much greater range of Access-related activities. However, it is possible that the recommendations of the *Access to Higher Education Development Project Report* may represent a watershed for AVAs. Certainly, some of the recommendations indicate a deliberate development of their role and anticipates them being substantially involved in the development, enhancement and promotion of Access and other learning opportunities for adults at a regional level, and active contributors to broader regional and national strategies for access and widening participation. AVAs have never been simple passive validators of Access programmes; in the future, however, more may well be asked of them in accepting responsibility for reaching out and proactively creating opportunities for adult learners on a broader regional basis.

Learning about AVA review

The review process

137 At the point of the transfer of responsibilities for Access regulation from HEQC to QAA in 1997, it was decided that the initial review cycle would be six years, a period determined, in part, by a plan for mid-term 'minor' reviews, a plan which was later overtaken by the introduction of a process of annual reporting by AVAs instead. The review process itself was initially developed by the QAA Assistant Director with responsibility for Access, with reference to other QAA review methods, and discussed and agreed in early meetings of the Access Recognition Advisory Committee and the Access Recognition and Licensing Committee (ARLC).

138 The review process typically extends over nine months from the point where an AVA is informed of its review dates to the publication of the final report. In broad terms, the process follows the model which is used by QAA for other of its review and audit activities:

- the organisation under review produces a document analysing and evaluating its activities (the *Analytical Account*);
- the document is considered by a team of peer reviewers supported by a QAA Assistant Director and a visit schedule is planned;
- a visit takes place during which the review team gathers evidence to test the organisation's description of itself in the self-assessment document; the evidence sources comprise relevant papers and minutes, and discussions with key staff and others connected with the organisation;
- a report is written, and a recommendation is made, on the basis of the evidence gathered.

Prior to the review visit

139 The review process begins with an initial information meeting between the AVA and the QAA Assistant Director, during which the scope of the review is described and any queries on the part of the AVA are clarified. The dates for the review are also provisionally set. The AVA then submits the evaluation of its activities, the *Analytical Account*, together with other supporting material which describes its quality assurance procedures and standard operational processes. The *Analytical Account* is prepared with reference to guidelines issued by QAA.

140 Some six weeks prior to the review, the selected review team attend a planning meeting, the principal purpose of which is to enable the team to decide on its main lines of enquiry and to establish a schedule and draft programme for the review visit. The team may also request further documentation from the AVA if it believes that this will assist in its full understanding of the AVA's structures, processes and procedures. The review team also meets on the day immediately preceding the visit to discuss any additional information which has been received.

During the visit

141 The review visit normally extends over two days. The common pattern is for the first day to be spent in discussion with groups involved in, and affected by, the AVA's activities. For each meeting, the reviewers work to a previously agreed agenda. The QAA Assistant Director makes notes of the discussion at all meetings. The review team will also allocate time to read and consider other written sources of evidence during the visit: in most cases, these comprise AVA records related to a selected number of individual Access programmes. On the afternoon of the second day, the team considers its key findings in relation to the licensing criteria and the areas it wishes to highlight in its report.

142 The recommendation to be made to the ARLC is also decided before the end of the visit. The outcomes following a review are:

- *unconditional* confirmation of renewal of licence for a specified period;
- *conditional* confirmation of licence with conditions to be met by a specified date or dates;
- *provisional* confirmation of licence with conditions to be met and a further review visit by a specified date;

- *withdrawal* of licence for operation as an AVA;
- *temporary renewal* of licence with request for further information by specified date (decision suspended).

After the visit

143 According to a division of responsibilities agreed at the planning meeting, the team compiles its report in the two weeks following the review visit. Since the formal approval of the principles and accompanying criteria in 2001, reports have been written to a template which reflects those principles. The QAA Assistant Director is responsible for the compilation and editing of the final report using the contributions from the two reviewers. The confirmed report is presented to the next scheduled meeting of the ARLC by a member of the review team who answers any queries which the ARLC may have about the report or the team's recommendation. On the basis of the draft report and its own discussions, the ARLC reaches a decision on the renewal of the AVA's licence.

144 At this point, the agreed report and the decision of the ARLC is forwarded to the AVA. The AVA is asked to consider the report and to highlight any perceived factual inaccuracies or judgements which it believes are based on a misunderstanding of the facts. The response of the AVA is circulated to the review team who may then agree amendments to the text of the report. In cases where the AVA's response indicates that the security of the final judgement may be in doubt, the report and response is referred back for reconsideration by the ARLC.

145 In cases where conditional or provisional judgements are reached, the AVA supplies the requested additional material by a specified date or dates. The reviewers are asked to consider this material and indicate whether they believe that the conditions have been appropriately met. All reviewers' responses are considered by the the ARLC prior to informing the AVA of the committee's decision about the renewal of the AVA's licence.

Evaluating the review process

146 Following a licence review, QAA invites each AVA to submit an evaluation of the review process. Guidelines are offered which suggest structuring the evaluation under the three headings of: the preparation for the review, the review visit, and the review report and follow-up. By no means all AVAs took advantage of this invitation during the review cycle but where evaluations were received, they were considered by ARLC. Members of review teams are also asked to complete a Feedback Report following each review which included a self-assessment section to enable them to reflect on their own performance during the review. Evidence from AVA evaluations and reviewer feedback has been used in this section, although in neither case has it been ascribed.

The planning stages

147 It is clear that both AVAs and reviewers appreciated the advice and assistance of the QAA Assistant Director who managed the complete cycle of reviews from 1999 to 2004. AVA evaluations commented in particular on the usefulness of the initial planning meeting and the opportunity to understand fully the scope and logistics of the review process. These comments were supported by others which noted the readiness with which advice and support was offered during the whole of the review process. An appreciation of the work of the Assistant Director was also a common theme in reviewers' feedback particularly the support given to new reviewers and the general expertise provided in Access matters. There seems little doubt that this cycle of reviews benefited significantly from the consistent presence of an expert officer: it helped to ensure the overall stability of the review process and the reliability of judgements delivered by review teams.

148 In the early part of the review cycle, AVA evaluations commented on the brevity of the period between the planning meeting and the review visit. AVAs reported difficulties in preparing for the visit with what they considered to be the late receipt of a detailed programme. As the review cycle progressed, a longer period of time between the planning meeting and the review visit was built

into the process. In addition, as the process developed and programmes began to share common characteristics, it became easier to provide guidance to AVAs about the likely pattern of, and participants in, the review programme. Although AVAs would wish for as long a period as possible in which to prepare, it is likely that this period has now been extended as far as is possible without creating such a large gap between the two events that the initial preparatory work of the review team is invalidated.

Review teams

149 The basic principles in the selection of review teams are that they are knowledgeable about the Recognition Scheme and Access in general, and are able to examine an AVA independently and impartially. Many reviewers commented on the importance of achieving a balance in review teams reflecting complementary interests and expertise. They had also found the training offered by QAA to be appropriate in most respects - particularly the inclusion of observation at a 'live' review - although some felt that further emphasis on report writing would have been welcome.

150 Building on one aspect of practice inherited from the first HEQC round of reviews, virtually all review teams contained at least one member of the ARLC. The functional reason for this was to facilitate the presentation of reports to the committee. However, it also reflected a belief that, in order to undertake its responsibilities properly, the ARLC needed not only to be an expert committee but also to be in constant touch with the major process which it employed for its licensing activities. In a very practical sense, the ability of the committee to undertake the licensing of AVAs, and the expert nature of its discussions, are aided considerably when all members have direct experience of the review process. A balance needed to be struck, however, between such direct experience and the consistency it adds to the process, and the possible limiting of the cohort of reviewers (in all 25 individuals were involved in AVA review of whom 12 undertook more than one review). With a relatively small number of reviews being undertaken in any one year, there were limited opportunities for drawing in new reviewers, developing the experience of others and ensuring that all review teams included at least one experienced member. That there were few negative comments made by AVAs on the composition of review teams tends to suggest that the personnel, mix and balance was generally appropriate.

Analytical Accounts

151 As might be expected across a large number of AVAs, the nature of *Analytical Accounts* varied greatly. The feedback from review teams frequently contained references to *Accounts* which were particularly helpful or unhelpful. In the former category were those *Accounts* which set out the major activities of the AVA in a clear and comprehensible manner; included useful guides to major changes since the previous review visit; provided evaluations of the AVA's work in key areas often indicating those where some improvements were needed or were underway; and included well-organised and informative appendices with appropriate cross-references to them in the text. Less helpful *Accounts* shared few or none of these qualities.

152 A good *Analytical Account* is valuable for a number of different reasons including its primary purpose of allowing the AVA to reflect upon its own activities as a preface to its licence review. Whatever the future development of AVA review, it is difficult to imagine that self-assessment of some kind will not continue to form an integral part of the process. One message from this cycle of AVA review is that further advice and guidance from QAA on the compilation of *Accounts* and further sharing of practice between AVAs would be worthwhile exercises.

The review process and review visits

153 The essence of the review process is the statement and evaluation by the AVA of how it considers it is meeting the requirements of the Recognition Scheme, and the testing of this by the review team. A further essential feature of the process is that review teams cannot cover every aspect of the operation of an AVA during a licence review and therefore must employ sampling

techniques to decide on the effectiveness of the AVA's work, its quality assurance arrangements, and its overall operation of the licence. The review process seeks to ensure the robustness of its findings through the proper construction of sampling, the careful consideration of the evidence provided, consensus between team members, and the advice of the Assistant Director who ensures a level of consistency of practice between reviews.

154 One of the key sampling techniques, the range of meetings conducted during a review, appeared satisfactory to both AVAs and review teams themselves. Although there was some variability at the beginning of the cycle, on the evidence of the review reports, the nature and number of meetings settled into a reasonably predictable pattern. People invariably seen included AVA officers and staff, members of key committees including those specifically for quality and Access matters, moderators, Access programme coordinators, HE admissions tutors, and students. The only issue raised by review teams was that, not infrequently, personnel who had been invited to attend a meeting as part of the agreed schedule were then not able to be present at the review itself. The absence of key personnel, or the general overall reduction in the size of groups, may in some cases have had an effect on the conduct of the review, for example, where a review team had asked to meet eight or 10 Access programme leaders but where only two or three were eventually able to attend. In such cases, the evidence gathered from the meeting needs to be treated with particular care since it is much less likely to constitute a reasonable sample from which to draw conclusions. There is every sympathy for AVAs in this context: in all reviews, the majority of people seen were not employed by AVAs who therefore had little absolute control over their commitments and eventual presence. However, if such meetings are to continue to be used in the process as an important source of evidence, then some resolution to this issue needs to be found.

155 Other than in this area, there was much praise from review teams on the good administration of review visits by AVAs. Additional evidence for sampling, such as the papers related to a range of individual Access programmes validated by the AVA, were generally made very accessible, were well laid out and referenced, and made this part of the review team's work significantly easier.

156 There was little in the feedback from AVAs to suggest that the review visit had not been conducted satisfactorily in the majority of cases. There were some occasional comments that teams may have been overly adversarial in their tone and approach, but in many more cases teams were noted for the professional and thorough approach which they took.

Decision-making process

157 On the part of AVAs, the most common criticism of the whole review process was the lack of any immediate feedback at the conclusion of the review visit itself and the provision of some sense of closure to an exercise which, at that point, would already have extended over several months. It has been the position of QAA throughout that it is the ARLC and not the review team which has the authority to make decisions on the renewal of a licence. For this reason, QAA has considered that the review team should not share their recommendations with the AVA at the conclusion of the review visit, since those recommendations may be subject to amendment by the committee.

158 This would not be a sustainable position if the ARLC's approval of a review recommendation was a cursory action. However, as suggested in paragraph 143 above, the consideration by the ARLC of the report and recommendation of a review team is not perfunctory and may involve a good deal of detailed discussion. These discussions can lead to changes to review reports and their conditions. Part of the rationale for this method of operation is to ensure that decisions on licence renewal are as equitable and consistent as possible. Although some feedback to AVAs at the end of a review visit might be perceived as desirable, it would remain an inappropriate exercise for as long as the ARLC undertakes its responsibilities for licence renewal by the current method.

Future options

159 The purpose of this concluding section is to reflect on the nature and conduct of AVA review and to discuss the possible options and developments for the next cycle. An initial question, of course, is whether there should be any changes at all. With some necessary amendments, can the basic review process used between 1999 and 2004 be employed again? The issue is perhaps not the durability of the review process, but the nature of what is being reviewed. There have been substantial developments and significantly new challenges for AVAs in the period since 1999. Some of these, for example, the growth of internal verification methods, the introduction of internal audit, the changing requirements of regulatory and funding bodies, have been touched upon in this report. There would seem little doubt that the process of licence review must also change in order to ensure that it is appropriate for the next stage in the development of AVAs and Access provision.

160 It might be argued that there are three factors which should influence changes to the nature of AVA review:

- the development of the relationship between periodic licence review and the annual reviews which QAA requires from each AVA;
- the report of the Access to Higher Education Development Project;
- the impact of the 1999-2004 cycle of reviews.

161 The annual review process applied to AVAs has been progressively developed by the ARLC since its piloting in 1999. ARLC devotes a substantial amount of time to the consideration of these reviews and, increasingly, uses them as a significant indicator of the continuing health of an AVA. The logic of this development is that the use of annual reviews must be allowed to influence the conduct and application of periodic review. In a context where annual review is well established, and where the ARLC is increasingly confident of the evidence which it provides, should an AVA which consistently demonstrates its effectiveness and suitability to hold and operate its licence, be subjected to a different form of periodic review? If the two processes of annual and periodic review are to be seen as coherent and mutually supportive, then this option would appear to be an appropriate one to explore in more detail. In so doing, the nature and content of the annual review submitted by an AVA would need to be the subject of further consideration to ensure that the report is capable of supplying the necessary and consistent level of assurance for the ARLC.

162 The Access to Higher Education Development Project has already been mentioned several times in this report. If the recommendations of the Project report are accepted and implemented, they will constitute a substantial development of Access and will perhaps lead to a different concept of the AVA. Some new or expanded responsibilities would be assigned to AVAs leading to changes to the licensing criteria and, consequently, changes to the nature of AVA review.

163 The impact of the 1999-2004 cycle of reviews should not be ignored, particularly where good and consistent practice has been identified, or where relatively straightforward operational features have been checked. Inevitably, part of the cycle of reviews has been devoted to straightforward monitoring against the criteria (a process which has been made significantly easier for review teams since the formal articulation of the principles and licensing criteria). If the 1999-2004 cycle of AVA reviews has been effective, then the next cycle should not need to monitor in detail, for example, the process of recognition (a clear point of consistent and good practice) but might wish to focus on how AVAs assist in targeting the development of new programmes; equally, there should no longer be the need simply to check the existence of an equal opportunities policy in an AVA, but more emphasis on how such a policy, and others like it, is implemented across the activities of the AVA.

164 Although the nature of what is reviewed may be changing, and given that any process can always be enhanced and improved, there is little from AVA review to suggest that the fundamentals of the current method need to be radically amended. A peer process, the catalyst for which is self-assessment, involving a visit and a variety of sampling techniques, might still provide the basic platform for review. Considering the three factors above, however, the themes which might

dominate the next cycle and the philosophy of the review method might change. It is likely, for example, that such themes might include:

- *self-assessment* and a greater use of, and focus on, an AVA's internal quality audit or assessment practices as an indicator of its maturity as an organisation;
- the *academic standards* of Access programmes and the ways in which AVAs use the internal moderation practices of their providers and their own external moderation in order to ensure that the Access award is confirmed as a national qualification indicating clearly a readiness for higher education;
- the *regional role* of an AVA, its involvement in broader policies and strategies for adult learning, the purposeful targeting of disadvantaged groups, and the generation and analysis of data in order to achieve this;
- the conception of the AVA as a '*training*' body as well as a validating body, being equipped and willing to provide a broad programme of initial and updating opportunities for the development of all those involved in Access provision;
- if the recommendations of the Project are implemented, the ways in which AVAs adopt and implement the *qualification* and *subject benchmarks* that are envisaged.

165 As for the 'philosophy' of an amended review process, QAA has within its own operational experience what might appear to be a helpful model. The first complete round of academic audits of HEIs from 1991 to 1997 was characterised in part by its relatively detailed scrutiny of quality assurance processes and their practical operation. QAA's reflection on the nature of the second round of audits led it to develop and then implement the process called 'continuation audit'. In essence, the difference between the two processes was one of focus; where first-round audit teams checked for themselves whether quality assurance processes were operating effectively, continuation audit teams were more interested in scrutinising an HEI's own methods for providing such assurance. Key questions, therefore, were how does an institution know that it is discharging effectively its corporate responsibility for the standard of each award granted in its name? And how does it assure the sufficiency, validity and reliability of the evidence that it is relying on for this purpose?

166 AVA review between 1999 and 2004 had already adopted some of the key characteristics of continuation audit, particularly the reliance on the AVA's own account of its activities as a basis for the conduct of the review. It is an option for the future for AVA review also to adopt that approach of continuation audit which scrutinises not the detail of processes, but the ways in which an AVA itself undertakes the assurance of the quality of those processes.

Appendix A

Authorised Validating Agencies

Authorised Validating Agency	Acronym (as used in this report)	Further information	Notes
Anglia South Open College Network	ASOCN	www.asocn.co.uk	
Assessment and Qualifications Alliance	AQA	www.aqa.org.uk	
Cambridge Access Validating Agency	CAVA	www.cava.ac.uk	
Chiltern Region Open College Network and Access Consortium	CROCNAC	www.crocn.org.uk	
Greater Manchester Open College Network	GMOCN	www.gmocn.ac.uk	
Hampshire Authorised Validating Agency	HAVA		
London Open College Network	LOCN	www.locn.org.uk	
Merseyside Open College Network	MOCN	www.mocn.co.uk	
North East Midlands Open College Network	NEMOCN	www.nemocn.org.uk	
North Wales Open College Network	NWOCN	www.nwocn.org.uk	Known as North Wales Access and Credit Consortium (NWACC) at the time of its review in April 2000.
Open College Network (North and East London and Hertfordshire)	OCN (NELH)	www.ocnetwork.co.uk	
Open College Network (South Yorkshire and Humber Region)	OCNSYH	www.shu.ac.uk/ocn	
Open College Network (TROCN)	TROCN	www.trocn.co.uk	
Open College Network for Central England	OCNCE	www.ocnce.warwick.ac.uk	
Open College Network Kent and Medway	OCNKM	www.ocnkm.ac.uk	
Open College Network North West Midlands	OCNNWM	ocnnwm@staffs.ac.uk	
Open College Network of the South West	OCNSW	www.ocnsw.org.uk	
Open College Network of the West Midlands	OCNWM	ocnwm.wlv.ac.uk	

Appendix A

Authorised Validating Agency	Acronym (as used in this report)	Further information	Notes
Open College Network South East Midlands	OCNSEM	ocnsem@ocnsem.com	
Open College Network West and North Yorkshire	OCNWNKY	www.wnyocn.org.uk	Known as West and North Yorkshire Open College Network at the time of its review in November 2001.
Open College of the North West	OCNW	www.ocnw.com	
Oxfordshire Open College Network	OxOCN	ocn@oxocn.org.uk	
South East Wales Open College Network	SEWOCN	croeso@sewocn.co.uk	
South of England Open College Network	SEOCN	www.brighton.ac.uk/seocn/	
Thames Region Accrediting Consortium Open College Network	TRACOCN	www.tracocn.co.uk	
Western Region Open College Network	WROCN	info@wrocn.co.uk	Known as Open College Network West at the time of its review in March 2002.

Appendix B

Details of AVA reviews and licence applications, 1999-2004

The titles of AVAs are those in use at the time of the review or licence application

AVA	Review date	Review team	Outcome
1998-99 (academic year)			
Open College of the North West	26-27 April	<i>Professor Beverly Sand (University of Derby)</i> Dr Clive Linnett (Bradford & Ilkley Community College)	Provisional Renewal
Open College Network of the South West	20-21 May	<i>Dr Peter Easy (Cheltenham & Gloucester College of HE)</i> Ms Miriam Griffiths (Open University in Wales)	Conditional Renewal
Open College Network for Central England	16-17 June	<i>Professor Steve Bristow (Shrewsbury College of Arts & Technology)</i> Ms Margaret Davidson (Charles Keene College)	Unconditional Renewal
Bedfordshire Access Consortium*	24-25 June	<i>Dr Pete Johnston (University of Essex)</i> Ms Carole Stott (LOCN)	Provisional Renewal
1999-2000			
North East Midlands Open College Network	9-10 November	<i>Dr Peter Easy (Cheltenham & Gloucester College of HE)</i> Ms Sue Georgious (OCNC)	Conditional Renewal
Open College Network North West Midlands	17-18 November	<i>Dr Pete Johnston (University of Essex)</i> Mr Alan Smith (NWACC)	Conditional Renewal
University of Ulster Authorised Validating Agency*	8-9 December	<i>Professor Beverly Sand (University of Derby)</i> Ms Miriam Griffiths (Open University in Wales)	Conditional Renewal
Open College Network (North and East London and Hertfordshire)	10 February	<i>Dr Pete Johnston (University of Essex)</i> Professor Steve Bristow (Shrewsbury College of Arts & Technology)	Licence Awarded
South East Wales Open College Network	1-2 March	<i>Dr Peter Easy (Cheltenham & Gloucester College of HE)</i> Mr Anthony McClaran (UCAS)	Provisional Renewal
South West Wales Open College Network*	15-16 March	<i>Dr Geoffrey Copland (University of Westminster)</i> Mr Steve Babbidge (SEOCN)	Provisional Renewal
North Wales Access and Credit Consortium	6-7 April	<i>Professor Steve Bristow (Shrewsbury College of Arts & Technology)</i> Ms Christine Davies (Nottingham Trent University)	Conditional Renewal

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London Open College Network	1-2 June	<i>Professor Beverly Sand (University of Derby)</i> Mr Mike Farmer (Cheltenham & Gloucester College of HE)	Conditional Renewal
Tyne and Border Counties Access Partnership*	14-15 June	<i>Professor Janet Finch (University of Keele)</i> Mr Malcolm Barry (Goldsmiths College, University of London)	Licence Withdrawn
2000-01			
Open College Network Kent and Medway	8-9 November	<i>Dr Pete Johnston (University of Essex)</i> Mr Malcolm Barry (Goldsmiths College, University of London)	Provisional Renewal
Oxfordshire Open College Network	22-23 November	<i>Mr Steve Babbidge (SEOCN)</i> Ms Priscilla McGuire (OCNWN)	Provisional Renewal
South of England Open College Network	22-23 March	<i>Mr Anthony McClaran (UCAS)</i> Ms Sue Georgious (OCNCE)	Conditional Renewal
Assessment and Qualifications Alliance	27-28 February	<i>Dr Peter Easy (Cheltenham & Gloucester College of HE)</i> Mr Alan Smith (NWO CN)	Provisional Renewal
Thames Region Accrediting Consortium Open College Network	7-8 June	<i>Professor Beverly Sand (University of Derby)</i> Ms Gill Evans (OCNNWM)	Conditional Renewal
Chiltern Region Open College Network and Access Consortium	13 June	<i>Dr Pete Johnston (Independent)</i> Professor Tony Chapman (University of Wales Institute Cardiff)	Licence Awarded
2001-02			
West and North Yorkshire Open College Network	20-21 November	<i>Dr Pete Johnston (Independent)</i> Mr Anthony McClaran (UCAS)	Conditional Renewal
Open College Network West	5-6 March	<i>Mr Steve Babbidge (SEOCN)</i> Mr Anthony McClaran (UCAS)	Provisional Renewal
Hampshire Authorised Validating Agency	15-16 May	<i>Dr Pete Johnston (Independent)</i> Dr Philip Bentley (Shrewsbury College of Arts & Technology)	Conditional Renewal
Cambridge Access Validating Agency	28-29 May	<i>Dr Peter Easy (University of Gloucestershire)</i> Dr Rob Allen (University of Greenwich)	Provisional Renewal
2002-03			
South West Wales Open College Network*	5 November	<i>Dr Pete Johnston (Independent)</i> Dr Andy Thompson (NESCOT)	Application Referred
Open College Network South East Midlands	19-20 November	<i>Mr Steve Babbidge (SEOCN)</i> Professor Colin Raban (Edge Hill College of HE)	Conditional Renewal

Greater Manchester Open College Network	11-12 February	<i>Ms Sue Georgious (OCNCE)</i> <i>Mr David Burtenshaw (HAVA)</i>	Conditional Renewal
Open College Network (TROCEN)	18-19 February	<i>Dr Pete Johnston (Independent)</i> <i>Ms Jill Ward (University of Derby)</i>	Conditional Renewal
Open College Network of the West Midlands	13-14 May	<i>Dr Peter Easy (University of Gloucestershire)</i> <i>Mr Alan Smith (NWOCN)</i>	Conditional Renewal
Merseyside Open College Network	7-8 May	<i>Mr Mike Farmer (University of Gloucestershire)</i> <i>Dr Philip Bentley (Shrewsbury College of Arts & Technology)</i>	Provisional Renewal
2003-04			
Open College Network (South Yorkshire and Humber Region)	12-13 November	<i>Mr Steve Babbidge (SEOCN)</i> <i>Ms Jill Ward (Wedgwood Memorial College)</i>	Provisional Renewal
Anglia South Open College Network	19-20 January	<i>Dr Peter Easy (University of Gloucestershire)</i> <i>Mr Keith Fletcher (OCNSW)</i>	Conditional Renewal

Normally, a review team included one member of the ARLC in order to involve the committee directly in the process of licence review (and to facilitate the presentation of the draft report to the committee). ARLC members are identified by the use of italics. In cases where no ARLC representative was present, the team included at least one member with previous experience of AVA review, who was invited to report on the review outcomes to the ARLC. In the case of applications for new licences, both team members are drawn from the ARLC.

* = no longer operating as an AVA.

Quality Assurance Agency for Higher Education

Southgate House
Southgate Street
Gloucester
GL1 1UB

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

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