



# **AVA licensing criteria**

# **Criteria for the licensing of Access Validating Agencies**

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**QAA** Recognition Scheme for Access to Higher Education

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#### Introduction

The Quality Assurance Agency for Higher Education (QAA) is responsible for arrangements for the formal approval and quality assurance of Access to Higher Education (HE) courses. The *QAA Recognition Scheme for Access to Higher Education* (the *Recognition Scheme*) provides the framework of structures, mechanisms and regulations through which QAA exercises this responsibility. Within this framework, QAA authorises organisations to approve Access to HE Diplomas, recognise Access to HE courses and award Access to HE Diplomas to students. An organisation that has been authorised by QAA for these purposes is known as an Access Validating Agency (AVA).

This section of the *Recognition Scheme* sets out QAA's requirements for the governance and management of AVAs, and the procedures and mechanisms to be operated by AVAs for maintaining the quality of Access to HE courses and the standards achieved by students awarded the Access to HE Diploma. These requirements are presented as a set of standard conditions and specific criteria for the award of an AVA licence. QAA uses these conditions and criteria in making decisions about the award and continuation of AVA licences.

The licensing criteria recognise that an AVA is a limited company and may also be a registered charity. QAA will expect it therefore to have constitutional and governance arrangements that enable it to meet the legal and public obligations associated with such organisational forms and that its agreements and contracts meet the requirements of relevant legislation, including Intellectual Property Law where applicable. The licensing criteria that follow specify the features and procedures that QAA requires to be in place to render the organisation capable of discharging its AVA responsibilities. The licensing and monitoring process concerns itself only with the AVA's ability to demonstrate its compliance with these criteria.

For the purpose of this document QAA requirements refer to: *The Access to Higher Education Diploma Specification* and any other regulatory information about the qualification published by QAA (including requirements relating to credit, unit specifications, rules of combination, grading and assessment regulations, major and minor modifications and licensing criteria amplification).

Revisions to the criteria are listed at the end of the document.

#### **Key terms**

An **Access to HE Diploma** is a full Level 3 qualification, designed to provide a preparation for study in higher education. Individual Diplomas are separately defined: they are titled according to their subject focus, and the required learning for each Diploma is indicated through the units of assessment specified in its rules of combination. The term is used both to refer to the qualification itself and to the learning requirements that lead to its award. (Further details are provided in *The Access to Higher Education Diploma Specification*). A Diploma may be delivered by one, or more than one, provider/centre.

An **Access to HE course** is a named Access to HE Diploma that has been approved for delivery by a particular provider/centre and is listed on QAA's Access Courses Database. A course is therefore unique to a particular provider/centre, even where the Diploma requirements are the same as those on one or more other courses.

## Criteria for the licensing of Access Validating Agencies

#### Governance

- 1 Its constitutional basis is clear and readily identifiable, and its formal documentation specifies its legal identity, function(s), aim(s), and principal governance structures.
- 2 Its legal identity, constitutional and governance arrangements jointly ensure:
  - a protection from the undue influence of any one of, or a minority group of, its members
  - b its independent decision-making and operation as an AVA, as required by these criteria and other requirements of the *Recognition Scheme*.
- It is not itself a provider of Access to HE Diplomas or a receiver of Access to HE students.
- It establishes, documents and maintains governance and deliberative structures (that is, a Board and appropriate committees) suitable for the discharge of its responsibilities as an AVA.
- 5 For the Board and committees, it determines, documents and communicates the:
  - a terms of reference, including membership specification (numbers of members, categories and/or balance of representation, quoracy requirements)
  - b terms of membership (process and criteria for appointment or election of members, period for which they are appointed)
  - c roles and responsibilities of members, and remit and accountability of committees to the organisation.
- 6 For all formal committees it:
  - a monitors and documents attendance
  - b holds meetings at times, in places and through mechanisms (for example, virtual attendance) that facilitate the regular attendance of all members
  - c operates transparent, systematic and consistent procedures for dealing with non and irregular attendance, and for the filling of vacancies.
- The organisation's board of directors (or equivalent most senior body within the governance structure) is the ultimate authority for the AVA licence and is responsible for ensuring that the organisation meets its responsibilities as an AVA. This body has direct responsibility, which may not be delegated, for the formal approval of:
  - a the annual AVA statement of compliance to QAA
  - b any written submission required by QAA for the process of AVA monitoring and review
  - formal statements to QAA about how the AVA has addressed requirements for the renewal of the AVA licence or any other queries formally raised by QAA about the AVA's compliance with the licensing criteria
  - d the AVA's strategic plan for Access to HE.

- In addition to its responsibilities as specified by company and charity law, the organisation's board of directors (or equivalent most senior body within the governance structure) is ultimately responsible for:
  - a the allocation of resources for all AVA activities
  - b the strategic planning of AVA activity
  - c all procedures associated with the granting or withdrawal of approval of Access to HE providers, Diplomas and courses
  - d all outcomes of such activity
  - e the assurance of quality and standards on Access to HE Diplomas
  - f the procedures for the award and certification of Access to HE Diplomas.
- 9 There is a designated body within the organisation's governance structure that has responsibility for Access to HE, including:
  - a the procedures and practice of validation, approval and withdrawal of Access to HE Diploma providers and courses
  - b the assurance of quality and standards on Access to HE Diplomas
  - c the dissemination of the outcomes of all monitoring processes, and their use to enhance the AVA's Access to HE provision
  - d the effectiveness of the procedures and consistency of their operation.
- 10 It clearly defines, documents and monitors the extent and limits of the authority of bodies or individuals holding delegated responsibilities.
- It secures the active involvement of organisations providing Access to HE Diploma courses and higher education providers that receive Access to HE students in the governance and strategic planning of the AVA, including through the membership of at least one person from each sector on:
  - a the organisation's board of directors (or equivalent most senior body within the governance structure)
  - b the designated body responsible for the development and quality assurance of Access to HE provision.

#### **Operations**

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12 It provides financial, administrative and human resources sufficient to exercise its AVA responsibilities in full.

13 It operates a responsible, systematic and rigorous approach to the planning and management of its finances.

14 Its financial affairs are externally scrutinised through a full annual audit¹ by an auditor who is listed on the Register of Statutory Auditors and who is independent of the preparation of the accounts/financial statements.

<sup>&</sup>lt;sup>1</sup> Please note that this criterion applies irrespective of the status of the organisation or its eligibility for exemptions under the Companies Act 2006 and/or allowance to provide abbreviated accounts to Companies House for statutory purposes.

- Its staffing has the expertise to carry out the requirements of the AVA licence, including knowledge of all QAA requirements and responsibilities relating to:
  - a teaching, learning and assessment
  - b quality assurance
  - c qualification design and development
  - d data management and analysis.
- It has systems in place to ensure it is not unduly reliant on the knowledge, practices or efforts of individual staff.
- 17 Its staff are clear about the details of their responsibilities within the organisation's fulfilment of its responsibilities as an AVA, including those of line management.
- It fulfils the requirements of the AVA monitoring process, including submitting reports as requested, complying with other requests for information from QAA and updating the AVA profile.
- 19 It has documented processes for self-evaluation and risk assessment, which are systematically implemented and monitored at least annually.
- It monitors its continuing compliance with QAA's licensing criteria for the licensing and monitoring of AVAs.
- It takes appropriate action in response to the outcomes of self-evaluation and risk assessment activities, including developing, and where necessary implementing, contingency plans that protect the interests of students in the context of business failure, or the withdrawal of provider or course approval.
- It has documented processes for strategic planning relating to its Access to HE activity, which are systematically implemented and take account of:
  - a the outcomes of all monitoring and review processes
  - b the outcomes of consultation with organisations providing Access to HE Diploma courses and higher education providers that receive Access to HE students
  - c statistical and other information concerning Access to HE provision and related developments both regionally and nationally
  - d QAA requirements and developments relating to the Access to HE qualification.
- Its strategic plan is clearly documented, with resources and responsibilities assigned and deadlines set for meeting operational targets linked to specific strategic objectives, recorded either in the plan or an associated operational plan.
- 24 It regularly and systematically monitors and updates its strategic plan and takes action as applicable.
- It informs QAA immediately of any incidents that occur that are of such significance that they may threaten the reputation of the Access to HE qualification, the *Recognition Scheme* or QAA, or which damages the goodwill or reputation in the Access to HE logo trademark and Access to HE word trademark (the 'Access to HE Trademarks').
- It informs QAA immediately of any change in its circumstances that constitute a medium or long-term threat to its viability as an AVA.

- It informs QAA at the earliest opportunity of any decision or imminent decision to merge with another organisation or in any other way change its organisational form or ownership.
- 28 It informs QAA at the earliest opportunity of any proposed changes to:
  - a its aims
  - b its legal identity
  - c the name(s) under which it operates
  - d the locus of authority for the AVA licence within the AVA's governance structure
  - e the terms of reference, including the membership specification, of its governing body and any other body that may hold specific delegated Access to HE responsibilities
  - f any formally binding relationships with any external organisations
  - g the chief officer (or other senior manager who holds responsibility for ensuring that the organisation continues to meet the obligations of its AVA licence).
- It operates a documented procedure for systematically monitoring and regularly reviewing and updating its operational procedures for Access to HE to ensure that they are fit-for-purpose and consistent with QAA requirements.
- It has documented accessible procedures to enable complaints and appeals to be received, considered and resolved fairly. These procedures relate to:
  - a appeals made by students
  - b complaints made by students
  - c appeals made by providers
  - d complaints made by providers.
- 31 Its procedures for complaints and appeals:
  - a ensure that the individuals charged with deciding the outcome of the appeal or complaint have appropriate authority, were not involved in the incident that is the subject of the complaint or appeal, and have no vested interest in the outcome
  - b provide clear and accessible information about the procedure to be followed for potential appellants and complainants
  - c ensure the timely resolution of the appeal or complaint.
- It maintains full and accurate records of committees' decision-making, which are appropriate for purposes of:
  - a public accountability
  - b internal reference and direction in the development of the AVA's policy and operation
  - c effective administration.
- It retains minutes of the governing body for at least 10 years from the date of the meeting.
- It retains minutes of other committees' proceedings and other formal records for an agreed period (normally at least six years).
- It maintains a complete and up-to-date record of Access to HE Diplomas that its providers are approved to offer.

- It ensures that the Access to HE courses database is kept up-to-date, with any necessary amendments made promptly.
- 37 It systematically records and retains accurate records of its award of grades, credits and Diplomas, which will allow it to:
  - a monitor provision across the AVA and over time
  - b provide data to external agencies, including QAA, as required.
- It collects statistical data about Access to HE courses and students in line with QAA requirements.
- In the event of merger or other arrangements for transfer of AVA responsibilities to a new organisation, it ensures the secure transfer of all relevant records to the successor organisation(s).
- Its record-keeping procedures include a procedure for ensuring access to records is maintained (backup and disaster recovery), for ensuring that data security is maintained, and a plan for transferring the records to a successor organisation if required.
- 41 Its records are available for inspection by QAA on request.
- It makes use of the Access to HE trademark and logo in compliance with QAA requirements.
- It monitors providers' published information about Access to HE to verify its accuracy and consistency with QAA requirements, including use of the Access to HE trademark and logo, and takes action to remedy any incidence of non-compliance.
- It has a range of appropriate and effective mechanisms through which it communicates with organisations providing Access to HE Diploma courses and higher education institutions about matters relating to Access to HE, including regulatory matters.
- It issues an Access to HE Diploma certificate to all students who have been awarded the Access to HE Diploma. This certificate has a standard format that includes:
  - a the specific title of the Diploma (in the standard format for Access to HE Diploma titles, as stipulated in *The Access to Higher Education Diploma Specifications*) and no other title
  - b the name and logo of the AVA
  - c the authorised Access to HE logo (including the words 'recognised by the Quality Assurance Agency for Higher Education')
  - d no name or logo of any other organisation<sup>A</sup>
  - e the signature of the chair and/or chief executive and no other signature
  - f the unique issue number.
- It issues students with a transcript of unit achievement that has a standard format and records achievement for all units completed.
- It takes immediate action to record and remedy any errors relating to the award or certification of the Access to HE Diploma.

It advises QAA immediately of any major errors in the issuing of Diploma certificates and then provides written information within five working days of planned actions to remedy the error. Within 20 working days of reporting the error the AVA will provide QAA with a written report on the cause of the error, including an action plan for how such errors will be avoided in the future.

#### Provider and course recognition

- The AVA operates a transparent, systematic and consistent *procedure for* the approval of providers *to deliver* Access to HE Diplomas.
- The AVA's procedure and criteria for provider approval ensure that a provider that is approved to deliver Access to HE Diplomas and courses has:
  - a a main base, which is in the UKB
  - b a named quality assurance contact for Access to HE provision, and a named senior manager for the consideration of the strategic management of Access to HE provision
  - c systems to ensure that only students with a UK<sup>B</sup> address (including BFO) are registered for an Access to HE Diploma
  - d clear arrangements for the day-to-day operational management and coordination of Access to HE courses
  - e appropriate facilities and resources at each site, and for each mode of delivery, for the delivery of its approved Access to HE courses
  - f learning support resources and facilities for Access to HE students, including those with special learning needs
  - g staff to teach who have the professional competence and skills to teach and assess necessary for the mode(s) of delivery to be used, and the level of subject expertise necessary to teach and assess the units available on the Diploma(s) it is approved to offer
  - h arrangements for providing pre-course guidance to applicants and criteria for selection and admission to Access to HE courses, which are consistent with QAA's requirements with respect to admissions
  - i the expertise and resources to provide information, advice and guidance on HE applications and progression opportunities
  - j systems for maintaining secure records of individual students' registration and achievement
  - k internal moderation arrangements that meet the AVA's requirements
  - I arrangements for internal course monitoring and self-evaluation, including methods for eliciting and responding to student evaluation and feedback
  - m procedures and criteria for the recognition of prior learning that meet the AVA's requirements
  - n quality assurance procedures relating to the delivery of provision, including transparent processes for handling appeals and complaints.
- The AVA's procedure and criteria for provider approval ensure that a provider makes an explicit commitment to cooperate with QAA requirements and the AVA's moderation, standardisation and monitoring procedures and that, in particular, it:
  - a will deliver recognised Access to HE Diplomas and courses in accordance with the requirements of the definitive Diploma documentation
  - b will make arrangements for moderator visits and final awards boards as requested by the AVA
  - c will provide information and access to records about assessment, internal moderation and student achievement as requested by the AVA

- d will allow staff to participate in AVA events and activities that are essential for maintaining the quality and academic standards of the Access to HE Diploma
- e will ensure that its public information about Access to HE is accurate and reliable and that any use it makes of the Access to HE logo and wordmark is consistent with QAA's guidance
- f will take immediate action to address any issue that poses a threat to the quality or academic standards of the AVA's Access to HE Diplomas or courses, or the integrity or reputation of the Access to HE Diploma, or of QAA, as may be notified to it by the AVA
- g will not sub-contract any part of its responsibilities for the delivery, assessment and quality assurance of the provision for which it is approved.
- In addition to its normal quality assurance requirements, the AVA has a documented procedure for approving and monitoring the delivery and quality of teaching of Access to HE Diplomas offered by providers that are not subject to external inspection.<sup>c</sup>
- The AVA formally confirms provider approval for the delivery of named Access to HE Diplomas (or Access to HE provision), *to relevant parties* before course recognition is confirmed (that is, before the provider is permitted to deliver all or any part of any Access to HE Diploma for which it is approved).
- The AVA monitors providers' performance and compliance with the terms of provider approval through the analysis of:
  - a moderation reports
  - b provider course evaluations
  - c the analysis of relevant data on student achievement and retention data
  - d any other data or information that is relevant, including student feedback
  - e the nature and incidence of any appeals and complaints received by the AVA.
- The AVA risk assesses providers on the basis of its monitoring of provider performance.
- The AVA has a documented procedure for the performance management of providers, including criteria and a procedure for the withdrawal of approval from a provider or for a specific Access to HE Diploma before the end of its validation period. This procedure involves the designated body.
- The AVA takes prompt action to amend, suspend or withdraw approval from a provider or for a specific AHE Diploma, in line with its procedures, where a provider is not meeting the terms of its approval.
- The AVA's procedures for developing Access to HE Diplomas are transparent, systematic and consistently applied.
- 59 The AVA ensures that the content and structure of Access to HE Diplomas:
  - a meet QAA requirements
  - b are informed by people with the relevant educational expertise, including from people in higher education in the associated subject area
  - c provide students with a planned and coherent programme of study.
- The AVA publishes guidance for those involved in the development of Access to HE Diplomas, including guidance on:

- a the form and content of documentation to be submitted for Diploma validation
- b the processes and requirements for each stage leading to Diploma recognition
- c the AVA's guidance on Diploma titles
- d the AVA's continuing quality assurance arrangements for Access to HE Diplomas
- e all relevant QAA requirements.
- The AVA's guidance includes explicit statements that:
  - a the design of Diplomas must be appropriate to the primary purpose of Access to HE courses, which is to provide higher education progression opportunities for adults who, because of social, educational or individual circumstances, may have achieved few, if any, prior qualifications
  - b the award of a Diploma does not provide guaranteed entry to UK higher education programmes.
- The AVA's validation process and criteria ensure that, for a Diploma to be recommended for approval:
  - a it complies with QAA requirements
  - b intended potential progression route(s) in higher education are clearly stated, and the subject coverage, level and structure of the content, and choice of options where they are available, are appropriate as a preparation for that/those route(s)
  - c information provided about *unit content*, delivery and assessment methods is sufficient to ensure consistency in the required standards of achievement, whenever and wherever the Diploma is delivered.
- The AVA has a transparent and documented procedure for the validation of Access to HE Diplomas, which complies with QAA requirements and is consistently applied.
- This procedure is applied to Diplomas developed by an AVA for subsequent delivery by approved providers and to Diplomas developed by approved providers.
- The procedure includes the use of a validation panel to scrutinise the proposals against a set of clear, standard criteria
- The composition of validation panels ensures that panel members jointly provide current, relevant experience and expertise in:
  - a the delivery and assessment of Access to HE Diplomas
  - b curriculum knowledge relevant to the Diploma(s) and all the units being considered
  - c the delivery of higher education programmes in subject areas indicated as intended progression routes for the Diploma(s) being considered
  - d the admissions requirements for the intended higher education progression routes
  - e QAA's current requirements about the Access to HE Diploma.
- The AVA provides clear and timely guidance relating to the operation of validation panels and their possible outcomes. The information that AVAs produce includes:
  - a the number of members and composition of validation panels, and the criteria for selecting and approving panel members
  - b their roles and responsibilities

- c the purpose and conduct of validation panel events
- d QAA's current requirements about the Access to HE Diploma
- e the criteria for successful validation
- f the possible outcomes of the validation process, including advice about how to differentiate between conditions of approval, other recommended amendments to the Diploma itself, and required textual amendments to the Diploma documentation
- g the post-panel process, and the relationship of the validation process to approval and course recognition.
- No one involved in the development of a Diploma, or who has an immediate or potential conflict of interest in the decision about a proposed Diploma, is involved in the process of validation of that Diploma or in monitoring and confirming whether conditions for approval have been met.
- AVA officers contribute to validation events in an advisory capacity only, to ensure consistency of conduct, and advise the panel on the AVA's validation process and requirements, including requirements that relate to the proper application of QAA's requirements for Access to HE Diplomas.
- Validation panel recommendations for approval and any associated conditions are referred to and considered by the designated body for formal approval. No more than one member of the validation panel may be a member of this designated body.
- The designated body considers the validation panel report and the panel's recommendations and confirms that the AVA's validation processes and criteria have been properly and consistently applied.
- The designated body grants (with or without conditions) or withholds approval and, with respect to any conditions on the approval of a Diploma, it confirms:
  - a that conditions ensure that the Diploma meets the AVA's validation criteria in full
  - b that there are clear timescales within which to demonstrate that conditions have been met
  - c the date by which any conditions must be met (which will be before the start date for the first planned delivery of the Diploma by any provider)
  - d the process for confirming that conditions have been met where major conditions have been set, the designated body may require that the response to conditions from the provider/centre is reported to the designated body itself.
- The outcomes of the validation process for each Diploma, and any associated details, including recommended conditions of approval and textual amendments to documentation, are fully recorded.
- The AVA informs providers that a new Diploma is available for delivery only when the validation process is fully completed and the approval formally recorded.
- The AVA makes any necessary amendments to the Access courses database as a consequence of Diploma approval promptly.
- There is a standard validation period for Diplomas, which is no more than five years from the date of initial approval, and a forward schedule of revalidation for Diplomas. Where exceptional circumstances require an extension to the standard period, the validation period will be endorsed/approved by the designated body and will not normally be extended by more than one year.

- Periodic Diploma revalidation and confirmation of provider approval are required for continued Diploma course recognition.
- If a Diploma is to be withdrawn at or before the end of its validation period, providers are informed of the final date on which new starters may be enrolled, allowing reasonable time for registered students to complete the course or transfer to another appropriate course, and arrangements are made for transfer of credit, if appropriate.
- The AVA implements transparent, systematic documented procedures for the revalidation of Diplomas, which involve validation panels and the designated body in line with the requirements for initial Diploma validation.
- Revalidation of Diplomas takes account of course reviews and moderation reports, and ensures the continuing currency and appropriateness of units that are to be retained in the revalidated Diploma.
- Where an approved provider is seeking approval to run Access to HE courses based on an AVA-developed Diploma, the validation procedures and criteria that apply to Diploma approval are applied to course approval.
- The AVA provides mechanisms through which relevant parties (such as providers and moderators) can suggest modifications to units or Diplomas and for those suggestions to be systematically considered.
- It operates standard documented procedures for managing modifications to units and Diplomas.
- The procedure includes consultation with providers, moderators and receiving higher education institutions and ensures that this feedback is taken into account.
- The procedure:
  - a differentiates between minor and major modifications
  - b makes clear where authority lies for making different kinds of modification or amendment
  - c ensures an appropriate level of scrutiny to each (including full revalidation where modifications are substantial).
- The procedure ensures that each modification is informed by, and does not contradict, decisions made at validation and any subsequent modifications except where there is a change in higher education requirements for progression.
- When minor modifications are considered (including modifications to units included in more than one Diploma), the AVA confirms that affected Diplomas will continue to comply with the AVA's validation criteria before approving the modification.
- The AVA ensures that all providers delivering the Diploma are informed of the amendments.
- The AVA has a transparent and documented procedure for managing requests for Diploma/course transfers, which is consistently applied and meets QAA requirements.
- In considering a request by a provider to transfer its Access to HE provision to another AVA,<sup>D</sup> the AVA to which it has requested to transfer ensures, before the

#### transfer is agreed, that:

- a the provider meets the AVA's approved provider criteria
- b the AVA is able to provide adequate and appropriate quality assurance arrangements, staff development and support for the Diploma(s) and/or course(s) to be transferred
- c the provider has been made aware of the AVA's specific validation criteria and procedures
- d implications for students registered on the course(s) at the point of transfer have been considered and appropriate arrangements made relating to any records of assessment and achievement
- e the ability of the receiving AVA to support the continuing study and achievement of students part way through a course(s) has been thoroughly investigated and arrangements for continuation that meet the needs of students are confirmed
- f the AVA has the resources to undertake the revalidation of the Diploma(s)/course(s) through its usual validation procedures before the transferred Diploma(s)/course(s) reaches the end of its period of validation.
- Where a receiving AVA operates its own AVA developed Diplomas, the provider must be informed about:
  - a how the AVA will accommodate any Diplomas devised by the applicant provider
  - b what its requirements are for the timely integration of the applicant providers' provision, including any requirement to adopt the standard Diplomas offered by the AVA, and any associated timescales for this.

#### Standardisation and moderation

- The AVA has a documented strategy for moderation and standardisation that sets out its approach to ensuring the consistency and comparability of the standards of student achievement.
- It has a systematic and documented procedure for the implementation of its strategy for moderation and standardisation.
- 94 The strategy covers all aspects of assessment design and practice, including:
  - a unit design
  - b assessment strategy at course level
  - c assessment design at unit level
  - d assessment decisions
  - e moderator decisions
  - f resubmissions and referrals.
- The AVA ensures that assessment design:
  - a is appropriate for the method and medium of delivery
  - b provides an appropriate level of academic demand
  - provides opportunities, appropriate to the mode of study, for students to achieve the learning outcomes and assessment criteria of the unit
  - d provides opportunities for differentiation of performance consistent with the requirements of the grade descriptors
  - e requires the demonstration of academic skills
  - f facilitates valid and reliable assessment of student achievement.

- 96 The AVA ensures that assessment practices on Access to HE courses:
  - a are consistent with *The Access to Higher Education Diploma Specification* and grading requirements
  - b maximise the reliability and validity of assessment outcomes.
- 97 The AVA's operation of moderation ensures that consistent assessment standards are applied in all instances where Access to HE Diplomas or common units are delivered on more than one course or more than one occasion.
- The standardisation procedure provides opportunities for tutors, internal moderators and external moderators to share, discuss, and where necessary recalibrate their expectations relating to the standards of work expected by:
  - a the requirements of any work at Level 2 or Level 3
  - b the learning outcomes and assessment criteria of the specific units that they work with
  - c the grade descriptors.
- The AVA ensures that consistent standards are applied in assessment, so that equivalent student achievement and performance is reflected in consistent recommendations for credits and grades.
- The AVA ensures that the assessment demand and assessment outcomes of units in cognate subjects within different Diplomas is subject to standardisation to ensure the consistency and reliability of decisions relating to student performance.
- 101 The procedure ensures that:
  - a moderators engage with assessment and grading decisions in the early stages of a course, and as early as is practicable
  - b moderators advise on and, if necessary, challenge provisional grades assigned to student work.
- The AVA ensures that its providers operate rigorous internal moderation procedures which meet the AVA's requirements, and which facilitate:
  - a the application of consistent standards of demand in assessment
  - b assessment design that maximises reliability and validity in assessment outcomes
  - c the consistent and accurate application of QAA assessment regulations.
- The AVA allocates responsibilities to moderators in a way that enables it to meet its obligations for the assurance of quality and standards of Access to HE Diplomas and courses, as specified in licensing criteria 95-101 above.
- The AVA operates standard procedures for the selection and appointment of moderators, which ensure that moderators:
  - a have relevant teaching and assessment experience and/or qualifications in adult, further or higher education
  - b have relevant and current subject knowledge for their area(s) of moderating responsibility at a level at or higher than the level they are moderating.
- Agreements between the moderator and the AVA specify:
  - a the moderator's duties and term of service

- b the criteria and process for termination of a moderator's employment
- the nature of the relationship between the moderator and the AVA (that is that they are directly accountable to the AVA, do not have any conflicts of interest and are not part of a providing or receiving institution or any other body and cannot subcontract any of their work).<sup>2</sup>
- The AVA monitors moderator performance and takes appropriate and timely action if performance is judged to be unsatisfactory.
- 107 Moderators are:
  - a external to the provider
  - b not directly involved in admissions decisions for students progressing from a Diploma course that they moderate.
- The moderators involved in the moderation of any individual Access to HE course jointly provide sufficient expert subject moderation for the number and range of subject areas and levels included in a Diploma.
- Where the moderator's role involves a direct relationship with individual Access to HE courses, the moderator's period of office for work with the individual course(s) is, in normal circumstances, no longer than four years.
- The strategy ensures that moderators report regularly to the AVA on all aspects of course organisation including registration, content, assessment design and practice (including internal moderation, assessment and grading decisions) for which they are responsible.
- The AVA operates standard procedures for responding to moderators' reports, including procedures for:
  - a receiving and responding promptly to individual moderation reports
  - b providing copies of moderators' reports to appropriate provider/centre staff
  - c ensuring that matters raised in reports that require specific action by providers are brought to providers' attention, a clear timescale for action is given, and implementation of actions is confirmed.
- The AVA operates standard documented procedures for the award of Access to HE Diplomas that are consistent with QAA requirements. These include:
  - a procedures outlining the function, process and membership of Final Awards Boards
  - b procedures that ensure a final moderation process has taken place before the Final Awards Board and before recommendations for the award of credits, grades or Diplomas are made to the AVA
  - c procedures to ensure that students on Access to HE courses are awarded credit and, where appropriate, grades for all units achieved and an Access to HE Diploma if the specified units have been achieved.

<sup>&</sup>lt;sup>2</sup> The statement in LC105 relates to moderators holding a position in an organisation which may put them in the position of having a conflict of interest with any of the providers they are allocated to moderate.

- The AVA provides expert advice on the delivery of the Access to HE Diploma to ensure that providers meet QAA requirements.
- The AVA provides opportunities for practitioners to develop and enhance their practice in the planning, delivery, assessment, moderation and standardisation of their Access to HE provision.
- 115 Moderator training and development provided by the AVA ensures that moderators are competent to:
  - a make judgements about the standards of performance that demonstrate achievement at Level 3
  - b judge the comparability of input and outcome standards across the provision that they moderate.
- The AVA requires moderators to participate in induction and training that ensures they are prepared for, and continue to fulfil, the requirements of their role.
- The AVA provides information about the operation of its moderation and standardisation procedures in written guidance to moderators and to providers.
- The AVA provides timely updating to moderators on any changes in the AVA's or QAA's requirements in relation to the delivery and assessment of the Access to HE Diploma.

# **Appendix 1: Document information**

Document owner	Access Manager			
Oversight committee	Access Recognition and Licensing Committee (ARLC)			
Published location	www.qaa.ac.uk/en/access-to-he/access-to-he-resources			
Other documents referenced	The Access to Higher Education Diploma Specification			
	Please refer to:			
	www.qaa.ac.uk/en/access-to-he/access-to-he-resources			
Acknowledgements	Access Officer			
Next review	Full review to be undertaken in 2023			

Version control				
Version number	Date issued	Author	Update information	
V1.0	October 2016	J Farmer	First published version	
V2.0	June 2018	J Mizon	The policy was updated in June 2018 to incorporate reference to Intellectual property law within the introduction of the document (p 1). See criteria revisions below.	
V3.0	September 2018	J Mizon	The policy was updated in September 2018 with the replacement of 'Access to Higher Education Diploma and Credit Specifications' with 'Access to Higher Education Diploma Specification'. See criteria revision below.	
V4.0	May 2019	A Karadia	Footnote outlining considerations for AVAs relating to intellectual property relating to Diploma transfer.	

### **Criteria revision (June 2018)**

#### A Licensing criterion 45d

AVAs with Access to HE provision regulated by Qualifications Wales, and delivered by providers in Wales, may include the Qualifications Wales logo on certificates for this provision only

(Approved Access Recognition and Licensing Committee 11 July 2017 for immediate implementation)

#### B Licensing criteria 50a and 50c

Also including the Channel Islands and Isle of Man

(Approved Access Recognition and Licensing Committee 15 November 2017 for implementation April 2018)

#### C Licensing criteria 52

The rationale for the criterion is to ensure the experience of students registered on Access to HE Diploma courses at providers not subject to external inspection subject is:

- equitable at least of an equivalent quality as for those students studying at organisations subject to external inspection by other bodies
- consistent delivery of the programme of study is provided by qualified teachers and is at least as comparable to that at other organisations delivering the AVA's Diplomas
- robust at least as secure as those for students studying at traditionally funded organisations.

#### AVAs should ensure:

- their provider approval and quality assurance policies and procedures include elements to assure themselves of the quality of the provision of providers not subject to external scrutiny; these may involve the use of data and reports, particularly that relating to achievement, progression and, student feedback and satisfaction; to triangulate evidence about the quality of delivery
- their policies and procedures are appropriate, and based on an understanding of their provision and the providers being scrutinised, and are applied consistently
- they have sufficient expertise and resource to carry out the activities required.

(Approved Access Recognition and Licensing Committee 15 November 2017 for immediate implementation).

#### **Criteria revision (November 2018)**

#### D Licensing criterion 90

AVAs must take into consideration any Intellectual Property rights that may have been assigned to Access to HE Diplomas when making decisions about Diploma transfers

(Approved Access Recognition and Licensing Committee 14 November 2018 for immediate implementation)

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Tel: 01452 557060

Web: www.qaa.ac.uk/access-to-he