

Review of Annual Commissioning Arrangements – Health Education and Improvement Wales

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Summary report

About this report

- 1 High quality care and patient safety start with ensuring there is a well-trained workforce with the right skills to meet current and future needs. The role of Health Education and Improvement Wales (HEIW) is to take the lead on education, training, and development, shaping the Welsh healthcare workforce to help drive high quality care for the people of Wales. One of the ways it fulfils this remit is by commissioning education and training for a wide range of health professional groups. It is responsible for commissioning education and training for all healthcare professionals, with the exception of undergraduate medical and dental education which is funded directly by the Welsh Government. This is HEIW's core function and its biggest investment. HEIW's overall expected spending for 2021-22 is £274.2 million; £227.9 million of which is for commissioning education and training. This is broken down as:
 - £127.9 million – health professional education (nursing and allied health professionals)
 - £55.2 million – postgraduate medical training
 - £26.2 million – postgraduate GP training
 - £9.3 million – pharmacy training
 - £9.1 million – postgraduate dental training
- 2 When HEIW was established, the health professional education contracts were due to expire. With the agreement of the Welsh Government, HEIW extended the contracts for a three-year period. This allowed HEIW time to plan new contracts through its strategic review of health professional education. As part of this, HEIW considered the scope and configuration of education to meet the ambitions set out in A Healthier Wales. It also focused on the value for money of new contracts, that they are fit for purpose, and align with HEIW's strategic objectives. HEIW is delivering its review in two phases¹. Following an extensive procurement exercise during the first phase, HEIW agreed ten-year contracts in August 2021 in readiness for courses starting in September 2022. Phase two is currently underway.
- 3 Our audit examined whether HEIW has effective arrangements for the annual commissioning of health education and training in Wales. This review does not examine the strategic review or the new contracts, but reference has been made where appropriate. Specifically, we looked at whether the annual commissioning of health education and training is well-planned, supported by robust systems and appropriate resources, and underpinned by robust performance monitoring and oversight. To test practical arrangements, our fieldwork mainly focused on the commissioning process for health professional education.

¹ Phase one predominantly focused on pre-registration health professional education. Phase two largely focuses on post-registration education.

Key messages

- 4 Overall, we found that **HEIW has a good approach to the annual commissioning of health education and training. This is enabled by strong stakeholder engagement, internal controls and contract variation process. There is scope to improve the information upon which HEIW relies for commissioning and strengthen performance reporting and the quality of improvement action plans.**
- 5 HEIW has a clear approach for developing its annual commissioning plan. It is strengthening the approach further by aligning the planning processes for the annual commissioning plan and strategic planning. HEIW engages stakeholders well as part of the annual commissioning approach. The Education Commissioning and Quality (ECQ) Team uses a range of information to develop commissioning plans. They rely on workforce information within health board Integrated Medium Term Plans (IMTPs), but these are often of varying quality. HEIW is working to improve the accessibility of benchmarking data to better inform the commissioning process.
- 6 Board, executive and operational level roles and responsibilities for planning and managing education and training contracts are clear. This was further clarified through the recent strategic review of contracts. HEIW is also strengthening the Education Commissioning and Quality (ECQ) Team by taking action to build resilience within the team.
- 7 HEIW applies appropriate internal controls to support annual commissioning and there are clear arrangements to review and vary education and training contracts each year.
- 8 HEIW's framework for managing contract performance is improving and has been strengthened in the new contracts. But there is scope to improve the quality of university improvement action plans, which we found were presented in inconsistent formats and were of varying quality. There is also scope to improve the administration of contract business meetings through timely circulation of draft minutes. And an opportunity for HEIW to better triangulate the information presented in the all-Wales annual performance and annual quality reports to help understand trends and issues. HEIW is planning to strengthen the information provided in the quarterly integrated performance report, which should further support the Board's scrutiny and oversight role. However, there is scope to improve reporting to the Education, Commissioning and Quality Committee, by standardising the format of the quality assurance reports for each healthcare professional. This will strengthen scrutiny and assurance by enabling committee members to review information before the meeting.

Recommendations

- 9 Recommendations arising from this audit are detailed in **Exhibit 1**. HEIW's management response to these recommendations is summarised in **Appendix 1**.

Exhibit 1: recommendations

Recommendations

Workforce information

- R1 Health board Integrated Medium Term Plans (IMTP) are the main source of information used to determine required student numbers and placements. However, our work has identified that the quality of data and information within IMTPs relating to workforce planning is of variable quality.

HEIW should:

- a) work with the Welsh Government to strengthen annual and/or IMTP planning guidance to ensure that workforce commissioning requirements are clearly set out in core health body plans or supporting documents; and**
- b) work with health boards to identify and forecast longer-term workforce trends and needs to inform commissioning plans.**

Contract business meeting minutes

- R2 Minutes of the contract business meetings are not circulated in a timely manner. The minutes are circulated along with the papers of the next meeting, leaving a four-month lag. To improve the administration of contract business meetings, **HEIW should aim to circulate draft minutes within two weeks of the meeting taking place. The minutes can be formally confirmed as accurate at the next meeting.**

University improvement action plans

- R3 Where HEIW identifies areas of underperformance or issues, universities are required to produce an action plan, which HEIW monitors. We found the action plans submitted by the universities were of varying quality and submitted in a variety of formats. **HEIW should develop a standardised format for action plans that as a minimum ask universities to set out:**

- **Identified issues**
- **Mitigating/improvement actions**
- **Lead for each action**
- **Time scales for completion**

Recommendations

- **Space for progress updates**
-

Annual performance and quality report

R4 There are two annual reports on the commissioning process, one on performance and one on quality. This is because performance and quality information are available at different times of the year and producing two reports avoids a reporting lag. However, separating the two reports means that HEIW is potentially missing key trends or issues. **HEIW should identify ways in which they can bring together key themes and issues from the annual performance and quality reports to provide a more comprehensive picture of the commissioning process and education effectiveness.**

Reporting to Education Commissioning and Quality (ECQ) Committee

R5 The ECQ Committee receive regular reports on the quality of commissioned education and training, but the format of these reports is inconsistent and presented as a mixture of verbal and written updates. To strengthen assurance and to allow committee members to review information before the meeting, **HEIW should present its quality assurance reports in a standardised, written format at each meeting.**

Detailed report

The annual commissioning approach is good and supported by strong stakeholder engagement. However, there are opportunities to strengthen the information used to inform plans

HEIW has a clear and improving approach for developing its annual commissioning plan and engages well with stakeholders as part of this process

- 10 Each year, HEIW develops an Education Commissioning and Training Plan for the following year's student intake. The new planning cycle starts in January, 18 months ahead of the new intake, by collating, evaluating, and modelling workforce data. HEIW engages its stakeholders effectively on the draft recommendations, usually in May. In June, the executive signs off the plan prior to committee level scrutiny and final Board approval in July. Once the Welsh Government approves the plan and associated funding, HEIW formally writes to commissioned universities and health boards confirming student numbers and placements. This normally takes place in December.
- 11 The plan sets out the levels of medical and health professional education and training that need commissioning in the upcoming academic year. Specifically, HEIW provides detail on the number of proposed student places, the rationale for any changes in the number of placements and the financial investment needed. In July 2020, the Board, subject to prior scrutiny by the ECQ Committee, approved HEIW's 2021-22 Education Commissioning and Training Plan. This is the second commissioning plan that HEIW has developed since its establishment.
- 12 The planning process is complicated because the organisation must work both to an academic and financial year (**Exhibit 2**). A consequence of this is that the Board approved HEIW's 2021-22 Annual Plan around a year after the 2021-22 Education Commissioning and Training Plan. In this instance it has meant that the plan driving the organisation's strategic direction is approved after the plan that should support its delivery. There are also financial implications. The funding to support the commissioning plan, representing over 80% of HEIW's total budget, is approved by the Welsh Government before the strategic annual plan. The two planning cycles can also result in teams duplicating work to support both arrangements. HEIW is considering options to improve the process and reduce some of the duplication of effort when planning. Any significant process changes would need to be agreed with the Welsh Government and academic partners.
- 13 In the interim, the planning department is managing the development of the 2023-24 commissioning plan. That team is also responsible for developing the IMTP and this should help to better align the timing and content of plans. This is a pragmatic

interim solution, which should build stronger links between the annual commissioning and strategic planning cycles.

Exhibit 2: HEIW’s planning process timeline



Exhibit source: HEIW 2021-22 Annual Plan

- 14 HEIW works with a range of partners to develop and adapt its commissioning plans including:
 - Regulatory and professional bodies
 - The Council of Deans for Health (Wales)
 - Welsh Government
 - Health board and trust executive directors, deputy directors of nursing and deputy directors of therapies and healthcare science
 - Various colleges and societies
- 15 When developing the previous 2020-21 Education Commissioning and Training Plan, HEIW staff attended peer meetings and had face to face discussions about proposals for health education and training. However, the 2021-22 planning process started at the early stages of the COVID-19 pandemic. HEIW adapted well

and adopted a virtual planning approach. During an initial three-week virtual consultation exercise in May 2020, HEIW sent stakeholders a presentation outlining the proposals. The consultation led to HEIW refining and improving the draft commissioning plan, for example, increasing the number of student placements for some allied health professions. Due to the ongoing restrictions, HEIW adopted a similar virtual approach to stakeholder engagement for its 2022-23 Education Commissioning and Training Plan, which was approved by the Board in July 2021.

- 16 HEIW's commissioning plan engagement helps to inform discussions with universities and colleges. Some of these conversations take place at their contract business meetings allowing the universities and HEIW an opportunity to discuss practicalities and potential issues before commissioning and placement numbers are set. Overall, the university school managers were complimentary about their relationship with HEIW. They felt HEIW were striking the right balance between being the commissioner and supporting as an education partner.

While commissioning plans are informed by a range of information, they are heavily reliant on workforce information within health board IMTPs which are of varying quality. HEIW is however taking steps to improve the accessibility of benchmarking data

- 17 Understanding current and future workforce needs, challenges and trends is a key element of the annual commissioning process. Based on this intelligence, HEIW seeks to ensure that the right number of students are being recruited in the right disciplines to meet healthcare workforce needs across the NHS in Wales.
- 18 HEIW considers a good range of information including strategies and policies which set out national service priorities, available workforce data and an evaluation of the previous year's performance. The commissioning team also considers the capacity within the NHS bodies to effectively support student training.
- 19 HEIW primarily uses health board Integrated Medium Term Plans (IMTP) to determine the required student numbers and placements and assess wider workforce needs and challenges. For example, the 2021-22 commissioning plan highlights professions with resource shortfalls, such as:
- Nursing – across the board including adult, child health, mental health (including CAMHS), practice nursing
 - Allied Health Professionals –including physiotherapy, dietetics, orthoptists
 - Health Care Science – radiographers, sonographers, cardiac physiologists

- 20 However, those we met with during our fieldwork highlighted that the workforce planning information within IMTPs is of variable quality. This is also an issue that we have highlighted in past structured assessments². The concern for HEIW is that without robust, reliable workforce plans, it cannot be confident that the identified workforce need reflects true need (**Recommendation 1**).
- 21 The 2021-22 commissioning plan includes predicted workforce projections for some healthcare professions from 2019 to 2025. Whilst this is positive, HEIW needs to work with health bodies to forecast longer-term workforce trends and needs. HEIW has limited benchmarking data to inform the commissioning process. For example, the 2020 All Wales Annual Performance Report includes some benchmarking data, such as comparing university fill and attrition rates, but this is limited to Wales. HEIW is setting up a task group with its counterparts in England, Scotland, and Northern Ireland to improve benchmarking on a UK-wide basis. Where courses are commissioned at several universities, such as nursing, this helps to improve and enable comparison of performance through benchmarking. The strategic review has enabled the expansion of some courses to other universities, so this will also aid benchmarking in the future.

The annual commissioning process is supported by appropriate internal controls and HEIW is strengthening its capacity in the Education, Commissioning and Quality Team

Roles and responsibilities to plan and manage annual education contracts are clear, and HEIW has taken steps to strengthen resource weaknesses in the Education Commissioning and Quality Team

- 22 The 12 strong (10.76 WTE) Education, Quality and Commissioning (ECQ) team, sits within the Nursing and Health Professional Directorate. They are responsible for work-based learning, pre-registration education, post registration education and placement quality development. There is a head of service for each of these areas.
- 23 The team is becoming better resourced to deliver its core role, although the resilience of the team was a risk. Some members perform a distinct role which could result in a single point of failure if they are away from work. HEIW is starting to address this issue. This includes transferring the ECQ Team's data analyst to the Workforce Data Analytics Team, with that data analyst working as a business partner with the ECQ team. This provides peer support and enables more than one

² We have not reviewed health board annual plan/IMTP workforce plans as part of this review. However, we plan to explore this topic area in future reviews.

data analyst to support the ECQ Team if needed. The ECQ Team has also adapted its contract business manager role into a recently recruited to business improvement manager position. This new remit is broader with a stronger emphasis on relationship management, working with HEIW's finance business partners, college deans and university school managers. The ECQ Team has also employed additional dedicated administrative support to bolster capacity.

- 24 Roles and responsibilities for planning and managing education and training contracts are clear at Board, executive and operational levels. Roles have been further clarified through the recent strategic review of contracts. HEIW is a relatively small organisation and internal processes such as workshops, cross-team working, and mid-term reviews with executives give staff the opportunity to understand each other's roles. The university school managers we spoke to said they were clear who their key HEIW contacts were and appreciated the open-door policy the ECQ team operates.

There are appropriate controls for annual commissioning and clear arrangements to review and vary education and training contracts

- 25 In any given academic year there are new students and existing students at various stages of progress in their training. For new student placements, HEIW writes to each university setting out the number of student places required. But each year the numbers of students in their second year or beyond will change as students may leave courses or defer their place. As such, there needs to be a process to vary the contracts on an annual basis. Contract variation ensures agreement of revision of numbers and the payments received by the universities are based on actual student numbers.
- 26 HEIW has a clear process to manage annual variation orders. Each year the ECQ team draws up a variation order for each course. The partners ratify variation orders at the contract business meetings with universities. These are then signed by the appropriate university personnel, such as the school dean or university's head of finance. As per its scheme of delegation, the Chief Executive signs the variation orders on behalf of HEIW, unless they are above £5 million, which the Board then approves. This was the case for the 2021-22 variation orders for the four universities providing pre-registration nursing education, where the Board approved the orders at its closed session in September 2021. The school managers we interviewed felt the contract variation process was straight forward and did not raise any issues.
- 27 HEIW's existing financial controls and governance processes help to support the annual commissioning process. For example, the roles and responsibilities for annual commissioning and contract variations are set out in HEIW's standing financial instructions. The limits for financial authorisation are detailed in the

organisation's delegated financial limits. Both documents are reviewed on an annual basis.

- 28 HEIW uses its risk management arrangements to help anticipate the potential issues that it needs to manage or control. The corporate risk register clearly identifies several risks that could interrupt the delivery of education and training. For example, COVID-19 disrupting training and placements, lack of jobs for students opting for a bursary and the inability to capture NHS workforce data hindering workforce modelling. Operationally, the ECQ Team manages its own departmental risk register.

HEIW manages its contracts and delivery of the annual commissioning plan well. But there are opportunities to strengthen action planning and performance reporting

HEIW has a good framework for managing contract performance, which has been strengthened in the new contracts. There is scope to improve the quality of university improvement action plans and performance reporting

- 29 HEIW has a continuous cycle of contract performance management. The arrangements and expectations for which are stipulated in the contracts HEIW holds with universities. Annually, HEIW holds three formal contract business meetings with each university. The meetings, chaired by the Deputy Director of Education Commissioning and Quality, are an opportunity to review and hold universities to account on their performance and to discuss any issues. The contract business meetings cover finance, performance, and quality. Equivalent meetings are held at an operational level.
- 30 In October 2021, we observed a contract business meeting and found that HEIW and the university had a respectful relationship, with HEIW providing healthy challenge but also support. The meeting was well chaired, but the agenda was quite large, meaning the latter items were a bit rushed. The school managers we interviewed spoke positively about these meetings. They felt that HEIW balanced being a commissioner and education partner well, and they felt challenged on areas of underperformance. They also value the task and finish groups HEIW organises for all universities to tackle common issues, such as student vaccinations. They would like more opportunities to meet in such forums. However, university school managers did raise that they do not get the minutes of the previous contract business meetings in a timely manner. The minutes are

circulated along with the papers of the next meeting, leaving a four-month lag (**Recommendation 2**).

- 31 Contract management arrangements require the universities to submit a range of information to HEIW. Some university school managers raised that the volume of information that HEIW requests can be burdensome, and some also felt that HEIW is duplicating a role already performed by regulators. However, as the commissioner, HEIW needs assurance that education providers are meeting their contractual obligations and improving the quality of health education.
- 32 HEIW sets out performance information requirements in their contracts. These have recently been strengthened with the new arrangements, starting in September 2022. The type of information HEIW currently collects from universities includes:
- the university's internal quality information;
 - regulator reports, for example, reports from the Nursing and Midwifery Council (NMC) and the Health and Care Professions Council (HCPC);
 - national student survey results;
 - course fill rates;
 - student attrition rates; and
 - student demographic data.
- 33 HEIW also triangulates the data provided by the universities and regulators. Each year, the ECQ Team meets with a sample of trainees from every year group for every course commissioned, student bodies, health board placement mentors and practice education facilitators. This is an effective way for HEIW to get first-hand understanding of the quality of the courses they commission and listen to students' and mentors' experience. HEIW is in the early stages of strengthening its quality assurance processes for training and education. It is developing a quality framework spanning all health professions. The advantage of this approach is a standardised quality management process for medical and non-medical professions, consistent terminology, and effective information sharing.
- 34 Where HEIW identifies areas of underperformance or issues, universities are required to produce an action plan setting out how the issues will be addressed. The action plans are monitored by the ECQ team through routine engagement with universities. We reviewed a sample of action plans and found they were of varying quality and presented in different formats. Some did not have clear, measurable actions, identified leads or timescales. HEIW would benefit from developing an action plan template which it can issue to universities to complete (**Recommendation 3**).
- 35 HEIW produces an annual performance report for each university. The report summarises the university's performance against its key performance indicators (KPIs) and highlights any improvement actions. An all-Wales Annual Performance Report provides an overall summary. However, the performance reports do not include quality measures. HEIW prepares a separate Annual Quality Report which

summarises information such as results of the national student survey, its annual meetings with students and mentors, and regulator reports. HEIW explained that performance data and quality information is available at different times of the year. The two annual reports are produced separately to avoid a reporting lag to the Board and ECQ Committee. However, HEIW is potentially missing key trends and triangulation of issues because of this. HEIW should consider how the information is triangulated from both reports to provide a more comprehensive picture of education effectiveness for board members (**Recommendation 4**).

HEIW is strengthening information provided to the Board on annual commissioning plan delivery, but there is scope to improve how performance is reported to the Education, Commissioning and Quality Committee

- 36 HEIW's quarterly integrated performance report provides the Board with updates on commissioning activity, such as contract and performance issues, recruitment activities and fill rates. HEIW is in the process of strengthening the integrated performance report by seeking to incorporate more commissioning indicators for health professional education, such as attrition rates and national student survey scores.
- 37 At each meeting, the ECQ Committee receives updates on education performance and quality. This includes a separate update for each health professional group, (medicine, dentistry, pharmacy, nursing, and health professionals). The updates inform the committee on aspects such as current student recruitment rates, quality issues and student and mentor surveys and feedback. Whilst these updates are positive, we found the format of the updates was inconsistent. The update for medical training tends to be a written report, whereas updates for the other professions are a mixture of verbal and written. Although the meetings are minuted, the committee would benefit from receiving a report in a consistent format for each health professional group, this would allow members to review the information prior to the meeting, which in turn would allow members to consider the questions they want to ask in advance and strengthen assurance. (**Recommendation 5**).

Appendix 1

Management response to audit recommendations

Recommendation	Management response	Completion date	Responsible officer
<p>Workforce information</p> <p>R1 Health board Integrated Medium Term Plans (IMTP) are the main source of information used to determine required student numbers and placements. However, our work has identified that the quality of data and information within IMTPs relating to workforce planning is of variable quality.</p> <p>HEIW should:</p> <ul style="list-style-type: none"> a) work with Welsh Government to strengthen annual and/or IMTP planning guidance to ensure that workforce commissioning requirements are clearly set out in core health body plans or supporting documents; and b) work with health boards to identify and forecast longer-term workforce trends and needs to inform commissioning plans. 	<p>Producing an annual education and training plan is a statutory function of HEIW, given our role as the workforce and education body for NHS Wales. We consider the workforce plans from NHS Wales Health Boards and Trusts, and the views and advice from other stakeholders. It is our responsibility to produce a plan that is both challenging but deliverable and we don't just rely on IMTP information for the development of the education commissioning recommendations. We review and consider the following:</p> <ul style="list-style-type: none"> • education commissioning requests from organisations. We consider trends in requesting and trends that we have contracted over the past few years. We consider students in training and training capacity and quality – we undertake modelling for Nursing and AHP which looks at student training information against workforce information. • we look at organisations' IMTP and their plans for services going forward and 	<p>September 2022</p>	<p>Martin Riley</p>

Recommendation	Management response	Completion date	Responsible officer
	<p>consider this against WG strategy and priority areas.</p> <ul style="list-style-type: none"> • we consider wider workforce information from ESR including trends and key workforce indicators such as changes to participation rates, wider workforce considerations to create the bigger picture eg population, Labour Market Intelligence and undertake horizon scanning or research: <ul style="list-style-type: none"> – National priorities ie Made in Wales – Availability of applicants – Placement capacity – Roles available for graduates – More recently the impact of the pandemic <p>Closer work with Health Boards and the E&T Planning process is being continually refined and has a new focus in 22/23.</p>		
<p>Contract business meeting minutes</p> <p>R2 Minutes of the contract business meetings are not circulated in a timely manner. The minutes are circulated along with the papers of the next meeting, leaving a four-month lag. To improve the</p>	<p>Targets will be set for a 2 week turnaround of minutes.</p> <p>This will be built into the contract business meeting planning process.</p>	April 2022	Martin Riley

Recommendation	Management response	Completion date	Responsible officer
<p>administration of contract business meetings HEIW should aim to circulate draft minutes within two weeks of the meeting taking place. The minutes can be formally confirmed as accurate at the next meeting.</p>			
<p>University improvement action plans</p> <p>R3 Where HEIW identifies areas of underperformance or issues, universities are required to produce an action plan, which HEIW monitors. We found the action plans submitted by the universities were of varying quality and submitted in a variety of formats. HEIW should develop a standardised format for action plans that as a minimum ask universities to set out:</p> <ul style="list-style-type: none"> • Identified issues • Mitigating/improvement actions • Lead for each action • Time scales for completion • Space for progress updates 	<p>All action plans contain the content included in the recommendation:</p> <ul style="list-style-type: none"> • Identified issues • Mitigating/improvement actions • Lead for each action • Time scales for completion • Space for progress updates <p>The reason a standard template is not used is that individual Universities are subject to their own internal improvement plans – eg their annual performance review (APR) or Programme Improvement Plan (PIP).</p> <p>Rather than be prescriptive and make them produce the same information in a different way we accept their internal format.</p> <p>In addition – depending upon the issue – the plan can be lengthy/complex.</p>	<p>June 2022</p>	<p>Martin Riley</p>

Recommendation	Management response	Completion date	Responsible officer
	<p>However, the ECQ Team will create a standard register/database to collate a summary of all the actions. This will standardise the information and the longer submitted action plans will act as backing information.</p> <p>There is already work underway to standardise quality reporting to the ECQ Committee and this database will provide a useful audit tool and can be used to inform and update committee of progress.</p>		
<p>Annual performance and quality report</p> <p>R4 There are two annual reports on the commissioning process, one on performance and one on quality. This is because performance and quality information are available at different times of the year and producing two reports avoids a reporting lag. However, separating the two reports means that HEIW is potentially missing key trends or issues. HEIW should identify ways in which they can bring together key themes and issues from annual performance and quality reports to provide a more comprehensive picture of the commissioning process and education effectiveness.</p>	<p>A new Performance and Quality Framework is being developed as part of the move towards the new contracts commencing in September 2022.</p> <p>This will incorporate both performance KPIs and Quality reporting.</p> <p>The updates of this will be fed into the HEIW Quarterly Performance Reports.</p>	September 2022	Martin Riley

Recommendation	Management response	Completion date	Responsible officer
<p>Reporting to Education Commissioning and Quality (ECQ) Committee</p> <p>R5 The ECQ Committee receive regular reports on the quality of commissioned training, but the format of these reports is inconsistent and presented as a mixture of verbal and written updates. To strengthen assurance and to allow committee members to review information before the meeting, HEIW should present its quality assurance reports in a standardised, written format at each meeting.</p>	<p>This is already being actioned and the ECQ Committee have commended the move to a more integrated and consistent written approach.</p> <p>This will continue to be refined and the new system addressed in Recommendation 4 will further support this move.</p>	<p>February 2022</p>	<p>Martin Riley</p>



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