



International Access to Higher Education Diploma

Consultation on the licensing arrangements for Access Validating Agencies operating internationally

June 2025

Introduction	3
Context.....	3
Quality Assurance Agency for Higher Education - position statement.....	4
Summary of activity 2021-2025	6
Previous public consultation and next steps	7
Defining the role and purpose of the IAHER	9
Definition and purpose of the IAHER	9
Consultation questions.....	10
Arrangements for entering into an AVA Licence for the International Diploma	11
Taking part in the IAHER pilot phase.....	11
Eligibility for an International AVA licence.....	12
Applying for an International AHED licence	13
Application and annual administration fees	18
Consultation questions.....	18
Arrangements for retaining an AVA Licence for the International Diploma.....	19
Application of the Licence Arrangements to the IAHER	20
Application of the Access to HE Conditions to the IAHER	21
Application of the Monitoring Arrangements to the IAHER	24
Application of regulatory interventions to the IAHER	27
Consultation questions.....	28
Teaching, learning and assessment of the IAHER	29
Parity with UK Level 3 qualifications	29
English language requirements	30
Blended Learning.....	31
Application of the Diploma Specification to the IAHER.....	32
Application of the Grading Scheme to the IAHER	33
Consultation questions.....	34
Marketing the IAHER	35
Application of the Subject Descriptor Compliance Marks to the IAHER	35
Application of the Trademarks to the IAHER	36
Consultation questions.....	37
Transition and implementation.....	38
Overview of the pilot phase.....	38
Next steps after the pilot phase	38
Consultation question	39
Conclusion	40
Appendices.....	41

Appendix A: Preview of consultation survey questions.....	41
Appendix B: Standard Terms for the Licensing of AVAs Operating Internationally	43
Introduction	43
Standard Terms of the Licence	44
Identity, constitution and governance arrangements	44
Terms of agreement.....	45
Non-compliance	46
Appendix C: Proposed data collection fields.....	49

Introduction

Context

1 The Quality Assurance Agency for Higher Education (QAA) is responsible for regulating the Access to Higher Education (AHE) Diploma ('the Diploma'). The QAA Recognition Scheme for Access to HE ('the Recognition Scheme') provides the regulatory framework through which QAA exercises this responsibility. Within this framework, QAA authorises organisations to develop, validate, approve and award Access to HE Diplomas. An organisation that has been authorised by QAA for these purposes is known as an Access Validating Agency (AVA).

2 The Recognition Scheme comprises '*The Standard Terms for the Licensing of Access Validating Agencies*' and '*The Access to HE Conditions*'. The Conditions contain reference to requirements, expectations and arrangements which are set out in further regulatory documentation (the 'Regulatory Documents'). These include the licensing arrangements, monitoring arrangements, qualification requirements and guidance documents. We are proposing changes to the Recognition Scheme to accommodate international delivery via the introduction of an International Access to HE Diploma (IAHED).

3 This consultation develops proposals for IAHED in response to the stated desire from a number of AVAs to be able to offer the Diploma outside of the existing geographical limits. It aligns with QAA's desire to support the sustainability of the Diploma and is in line with the Agency's intention to further expand its international activity, capitalising on the excellent global reputation of QAA and UK Higher Education (HE), into new areas for the benefit of UK tertiary education. Therefore, the introduction of an IAHED aligns with the commercial ambition of many AVAs, some of whom already operate on an international basis and wish to pursue opportunities for market development outside of the UK.

4 This consultation follows initial consultation that formed part of a 2024 public consultation on changes to the Recognition Scheme, the outcome of which was shared with stakeholders including AVAs in May¹ 2025. A summary of consultation responses and analyses are provided contemporaneously within this commentary for each relevant section.

5 While the initial consultation secured responses from a range of stakeholders including AVAs, providers and academic staff and assessors to establish the broad principles for the introduction of an IAHED, this consultation seeks feedback on the specific detail on the licensing and monitoring arrangement for AVAs who wish to operate internationally. We welcome feedback from all interested stakeholders including AVAs, Access to HE providers, and policy-makers and practitioners with an international remit.

6 This consultation is open for five weeks until 17:00 on 6 July 2025. Responses should be submitted via the [online survey platform](https://forms.office.com/e/WuEAu6BK7B). The questions are presented for consideration at the end of each section of this consultation document so that they can be considered

¹ <https://forms.office.com/e/WuEAu6BK7B>

alongside the pertinent details. The complete set of questions is replicated within Appendix A.

7 Following the conclusion of the consultation, we will consider all responses and make changes to our proposals where we consider there is a clear reason to do so. It is our intention that once relicensed and fully transitioned onto the new domestic arrangements, AVAs should be able to apply, during the 2025-2026 academic year, for a licence to pilot IAHER provision in an identified territory, or for multiple licences to cover more than one territory.

8 The intention of this document is to provide specific detail with regard the Recognition Scheme and its application to the IAHER. The fundamental nature of the Recognition Scheme means that any changes to the Recognition Scheme must be approved by QAA's Board. AVA responses to this consultation exercise will support QAA in determining the further requirements that must be put forward for approval by the Board to support the introduction of the IAHER. Guidance documents provide additional advice on interpreting and meeting the requirements of the Recognition Scheme. They do not need Board approval and therefore afford flexibility so that they can be updated to effectively support AVAs on an ongoing basis. In places this consultation document refers to guidance that will be shared with AVAs at a later date. While we appreciate that such guidance might help to elucidate and illustrate the operationalisation of the IAHER, it would not be practical or appropriate to publish draft guidance which presupposes the outcome of this consultation.

9 This document should be read in conjunction with the following documents:

9.1 *The Standard Terms for the Licensing of Access Validating Agencies* – this document sets out the terms of the AVA Licensing Agreement, the regulatory requirements for becoming an AVA and maintaining an AVA licence. In this document we set out additional terms to which an AVA wishing to operate outside the UK will need to agree. We will call these the *Standard Terms for the Licensing of AVAs Operating Internationally*.

9.2 *The Access to Higher Education Conditions* – These are the conditions an AVA must continue to meet once it has been successfully awarded an AVA licence. An organisation that wishes to become an AVA must demonstrate how it meets, or may meet, these conditions. We are proposing amendments to the conditions for AVAs operating internationally.

10 Please direct any enquiries about the consultation to ahe@qaa.ac.uk

Quality Assurance Agency for Higher Education - position statement

11 QAA is committed to exploring how best to launch the IAHER and considers this activity to align with a key focus area of our published strategy – *Expanding our international activity, capitalising on the excellent global reputation of QAA and UK HE, into new areas for the benefit of UK tertiary education*².

² <https://www.qaa.ac.uk/about-us/qaa-strategy-2023-27>

12 The work we do supports our mission to safeguard standards and improve the quality of UK tertiary education wherever it is delivered around the world. We work with governments, agencies and institutions globally to benefit UK tertiary education and its international reputation.

13 QAA's established and internationally recognised status as a world expert in quality assurance within the tertiary sector means that we are well positioned to ensure the relevance of the Access to HE qualification and support its growth while also maintaining high quality, and standards. In particular, we seek to ensure that learners who complete this unique qualification are well positioned, if they wish, to secure a place to study at a higher level at a UK provider (within the UK or via a transnational arrangement) or at an international provider.

14 In the UK, we ensure that the security and robustness of the awarding arrangements for the Access to HE Diploma are maintained, and this will be an important facet of our work as the IAHEd gains foothold. QAA continues to be aware of the significant and complex risks associated with the development and delivery of an international version of any qualification, including the Access to HE Diploma, and cautions against a rush to delivery. We regulate the qualification to protect, first and foremost, the interests of students and the qualification itself.

15 We monitor AVAs as part of our regulatory responsibilities for the Diploma and to mitigate risk and promote best practice. The purpose of our regulation as set out in QAA's charitable objects is to provide advice (and ultimately assurance) to governments that may then offer support (in the form of funding) for the Access to HE Diploma in the UK. This is underpinned by the regulatory activities we carry out to maintain the integrity and quality of the qualification, and to ensure that learners are supported to progress to and succeed in higher education. To achieve this, we must ensure that our regulatory arrangements are proportionate while also being suitably robust.

16 We consider all these things important for creating an optimal environment to allow growth for the Access to HE Diploma both domestically and internationally. While it is QAA's role to do this in relation to the regulatory and policy context, it is less appropriate for us as the regulator to be involved in activities such as direct marketing and student recruitment. However, we will continue to engage collectively with AVAs in a strategic capacity to support their ambitions.

17 Our interest in developing the IAHEd responds to the desire to maintain the UK's globally competitive position in the higher education market. Our interest also speaks to widely held aspirations to raise the rate of participation in higher education across the globe to support economic growth and societal progress. Research undertaken by QAA suggests that while there is competition for the IAHEd, that competition exists predominantly as foundation years offered by universities. We consider that the target market for IAHEd differs given that many courses with English Level 3 equivalency do not lead to a stand-alone qualification because they are a 'year 0' stepping-stone into a specific HE course. The IAHEd leads to a qualification that allows greater flexibility and mobility, creating options for students.

Summary of activity 2021-2025

18 During 2021-22, a working group was assembled at QAA, and an international educationalist was hired to lead on development work for the IAHEd. This resulted in two key research papers:

- 18.1 International Access to HE Diploma: A Report on the Feasibility of Developing and Awarding an International Access to HE Diploma
- 18.2 International Access to Higher Education Diploma (IAD): Structure for approval, recognition and awarding of IAD in non-UK settings.

19 The *Feasibility Report* noted that consideration of an IAHEd was happening at a time when the UK Government was seeking to develop its international education strategy as set out in the *International Education Strategy: 2021 update*³ with its concomitant desire to increase the number of international higher education students in the UK and increase education exports in the form of transnational education. It was within this context that the *Feasibility Report* explored the potential contribution an IAHEd could make to diversifying international student recruitment. Since that time there have been several updates to Government policy concerning higher education and international students, most notably in the White Paper published earlier this month, however the UK remains committed to welcoming international students where they meet the requirements to study in this country.

20 QAA also entered exploratory discussions with government bodies in Malaysia, Oman, Saudi Arabia and Vietnam. These were captured within a market research report, and shared via periodic AVA briefings during 2022.

21 During 2022-23 feedback from AVAs in direct relation to the IAHEd and also in relation to operational issues arising from the Recognition Scheme highlighted growing concern surrounding the suitability of the existing domestic structures for the future needs of QAA, the AVAs and the AHED qualification itself. QAA received feedback from AVAs highlighting the impact that regulation had on them and, in particular, observations on whether all regulatory activity was proportionate.

22 As a result, there was a genuine concern about regulatory burden being passed on to providers of the qualification and the impact this might have. Overall, there was a risk that regulatory requirements that were disproportionate to regulatory risk could inhibit growth of the qualification, a matter which was undesirable for all parties. In May 2023, a decision was made to pause active development of separate arrangements for the IAHEd because they were heavily based on the domestic structures which were now under review, and it was essential that these fundamental matters were addressed first.

23 During 2022-23, QAA returned to 'normal ways of working' post COVID-19. During the pandemic, we needed to act quickly and introduced an Extraordinary Regulatory Framework (ERF) to specifically address the unique, and unprecedented, challenges that the pandemic brought about during academic years 2020-21 and 2021-22. We learned from the experience of implementing the ERF that there were a number of changes we could bring

³ <https://www.gov.uk/government/publications/international-education-strategy-2021-update>

NOTE: In September 2024, the UK government announced its intention to publish a new international education strategy in early 2025 under the guidance of Professor Sir Steven Smith.

about in our regulatory activities that would have benefits to the way that we oversee Access to HE.

24 We were pleased that, in 2023, the Department for Education confirmed that Access to HE Diplomas meet the new quality and necessity criteria, meaning that eligible learners will continue to benefit from government funding. We consider that this highlights the stature of the qualification, but it also adds further imperative to ensure that regulation of the qualification keeps pace with the wider tertiary environment given the ongoing scrutiny and review of the Level 3 and foundation year landscape⁴.

25 In May 2024, QAA conducted a public consultation on proposed changes to the Access to HE Recognition Scheme and announced its intention to conduct a further consultation in early 2025 in order to progress its plans for the IAHER. The revised Recognition Scheme has now been published, and in response to the first consultation, the QAA plans to conduct a two-year pilot phase of the IAHER via licences on a country-by-country basis. On successful completion of the pilot phase, AVAs will be able to transition to a licence permitting wider international operations. This current consultation presents an opportunity for stakeholders to shape QAA's application of the licence arrangements to international provision.

Previous public consultation and next steps

26 The variation in stakeholder comments from the 2024 public consultation in relation to our original proposals for the IAHER reflected the complexity of developing a qualification which will fit the specific requirements of each party. The comments also reflected the complexity of the policies and legislation that impact tertiary education and the 'shifting sands' that underpin the sector.

27 Following a consideration of the responses, we have refined our proposals and now seek further input from the AVAs who, alongside QAA, will bear much of the risk associated with developing and implementing the IAHER.

28 In the public consultation we set out two possible models for the arrangements in respect of the IAHER and stated a preference for option 1 which entailed the award of a licence to individual AVAs on a country-by-country basis following demonstration of a credible plan for operating in that country. Option 2 entailed the award of a licence permitting wider international operations in multiple countries following the demonstration of a credible plan for operating in those countries.

29 In a change to the original proposals, and in response to feedback from the public consultation, we now plan to conduct the two-year pilot phase of the IAHER offer in line with option 1 set out above and then on successful completion of this, transition AVAs to the option 2 model.

30 We also sought feedback on fundamental strategic and operational issues such as

⁴ The Office for Students is due to publish outcomes from its second round of quality investigations (in which franchising and foundation years will be a focus) during 2025.

English language requirements (specifically that on completion of their Access to HE course a student should be able to demonstrate English language level B2 on the Common European Framework of Reference scale⁵) and the adoption of face-to-face and blended learning as opposed to a remote delivery. (The latter is not permitted in some territories and presents access and quality concerns in many others.) Such issues are discussed in more depth in the relevant sections of this consultation, and we invite further feedback from AVAs in respect of them.

31 This consultation has six main sections. It is broadly structured around the constituent parts of the Recognition Scheme (the Licence arrangements, the Access to HE Conditions, the Monitoring Arrangements, the qualification requirements), with additional sections attributed to the proposed pilot phase and specific features of the IAHEd including English language requirements, the adoption of blended learning, and topics related to marketing the qualification including the use of trademarks, wordmarks and the Subject Descriptor Compliance Marks.

32 Following the conclusion of the consultation, we will consider all responses. We will then make changes to our proposals where we consider there is a clear reason to do so. We have set out proposals for how we might transition to these new international arrangements in the final section of this consultation. We will confirm the transition and implementation arrangements in our response to the consultation, which will be published in Autumn 2025. It is our intention that AVAs wishing to apply for a licence or licences to approve IAHEds will be in a position to do so during academic year 2025-26.

⁵ <https://www.coe.int/en/web/common-european-framework-reference-languages/home>

Defining the role and purpose of the IAHER

33 In this section, we set out the definition and defining features of the IAHER. In the UK, the AHED is recognised for its uniqueness – a curriculum and delivery designed for adult learners who aspire to higher education. Its recognised quality and necessity have hitherto safeguarded its future in terms of government funding in the UK. Any international endeavour, regardless of commercial imperative, should protect and promote the calibre and distinctive core purpose of Access to HE in supporting progression to higher education.

Definition and purpose of the IAHER

34 Across the globe, secondary school completion rates are rising, but the pace is slow and uneven. Only one in six countries will achieve universal secondary school completion targets by 2030. The Covid pandemic caused learning losses in four out of five countries studied by the United Nations⁶. Global enrolment in higher education has doubled in the past two decades, but persistent and deep inequalities remain in who can access, succeed in, and benefit from higher education⁷.

35 Access to HE has the potential to change the lives of individuals, as well as supporting economic growth and broader societal progress. The introduction of an IAHER should contribute to Goal 4 of the UN's Sustainable Development Goals - 'Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all'. The calibre and core purpose of Access to HE provision, regardless of territory, will therefore remain a point of focus throughout this consultation and any future development of an IAHER.

36 The Access to HE Diploma is a Level 3 post-16 qualification (equivalent to A-levels and T-levels in England) primarily focused on providing adult learners who wish to enter higher education the necessary qualifications in the subject area they wish to follow. If taken as a full-time course, it can be completed in one year. On completion of an Access to HE Diploma, students may go on to study at a higher level with a higher education provider - which could be a degree or other higher-level qualification at Level 4 or above.

37 In practice, it is our view that the demographic of students that the IAHER would be suitable for includes:

- 37.1 students aged 17+ who have found A Level-equivalent study incompatible but who are identified as having potential for university
- 37.2 those aged 24+ who are seeking to retrain and follow a different career path
- 37.3 those aged 24+ who are seeking to develop their career further and require a higher education qualification to do this.

⁶ <https://sdgs.un.org/goals/goal4>

⁷ <https://unesdoc.unesco.org/ark:/48223/pf0000392154>

38 The purpose of the IAHER is primarily to provide students in international locations with the opportunity to enter higher education – by higher education, we mean education that is delivered at a level equivalent to Level 4 of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) or Level 7 of the *Scottish Credit and Qualifications Framework* (SCQF)⁸, irrespective of whether the student aims to enter UK higher education, or higher education in another country.

39 As part of these proposals, QAA is not intending to involve itself in the admissions arrangements of higher education providers worldwide. It will therefore be necessary for AVAs, and the providers with which they wish to work, to seek to ensure that appropriate progression routes are available to students from providers that will accept the IAHER as part of having a credible plan for operating in that country.

40 We recognise that initially most IAHER students will likely be privately funded. This may include those who would like to study towards a UK higher education qualification, but who wish to reduce their exposure to the costs of studying abroad for an additional year. We therefore consider that the IAHER has the potential to be an accessible route to a UK education, where such progression arrangements are permitted within a given country.

41 Nevertheless, we recognise Access to HE's reputation and value in serving equity deserving groups such as: racialised people, indigenous peoples and minorities, people with limited economic means, persons with disabilities, women, LGBTQ+ persons, forcibly displaced people, people from remote and/or rural locations. QAA intends to liaise with governments abroad to negotiate formal recognition of the IAHER and to identify potential sources of funding for adult learners who wish to pursue a higher education via IAHER but do not have personal financial means to do so. Our priorities and approach will be informed by AVA interest and activity within specific markets.

Consultation questions

Q1. Do you have any comments regarding the definition of the IAHER?

Q2. Do you have any comments regarding the intended purpose of the IAHER?

Q3. Do you have any comments regarding the intended student demographic?

Q4. Do you have any other comments regarding this section of the consultation?

⁸ <https://www.qaa.ac.uk/docs/qaa/quality-code/the-frameworks-for-higher-education-qualifications-of-uk-degree-awarding-bodies-2024.pdf>

Arrangements for entering into an AVA Licence for the International Diploma

42 In this section, we set out our proposals for changes to the domestic licensing arrangements so that AVAs can be licensed with regard to the IAHER. The expansion of Access to HE provision into new territories is likely to increase resource requirements in general for both QAA and AVAs. While we will endeavour to ensure that this kind of burden is minimised in our approach, this will not be at the expense of thorough and appropriate review and treatment of the risks.

43 For clarity and to significantly reduce any additional burden, it is our intention that there should be comparability between the licence arrangements for domestic provision and those for international provision. Where adjustments have been proposed, they reflect fundamental differences in the provisions which if left unchecked could cause substantial risk to quality.

44 This section also includes proposals setting out how organisations can apply for a Licence from QAA, how we will operate a periodic relicensing process, and the details regarding the fees applicable to licensed AVAs.

Taking part in the IAHER pilot phase

45 The pilot phase represents a two-year period during which the QAA and existing AVAs can work together to test international provision on a small scale before full-scale implementation. The time will be used to identify potential issues, gather feedback, and refine our approach to the delivery of the IAHER.

46 During the initial public consultation, we suggested two options for the award of international licences. Option 1 entailed the award of a licence to individual AVAs on a country-by-country basis following demonstration of a credible plan for operating in that country. Option 2 entailed the award of a licence permitting wider international operations in multiple countries following the demonstration of a credible plan for operating in those countries.

47 Non-AVA respondents to the initial public consultation conducted in 2024 were generally in support of option 1, as were some AVAs. However, other AVAs put forward suggestions for alternative approaches and, a result of feedback, we now propose that option 1 be implemented during the pilot phase, with AVAs transitioning to option 2 post-pilot, subject to licence renewal.

48 Key objectives of the pilot phase will be to:

- 48.1 **Test feasibility** – determine if the IAHER concept is viable and achievable in real-world conditions
- 48.2 **Gather data and feedback** – Collect data on student recruitment, success and progression rates and potential challenges
- 48.3 **Identify and address issues** – discover and resolve problems (for instance relating to student experience) before they impact a larger rollout

- 48.4 **Refine the approach** – make necessary adjustments based on pilot results to enhance the design of the provision and monitoring arrangements
- 48.5 **Assess scalability** – identify any challenges in shifting from territorial (country-by-country) licensing to international licensing
- 48.6 **Build confidence** – develop stakeholder awareness and confidence in the IAHER offer.

49 Overall, the pilot phase is a crucial step in reducing risk, improving quality, and ensuring a successful and efficient implementation. The international licence shall therefore only be available to AVAs with an existing UK licence. It is in the interests of providers and students that only AVAs experienced in the validation of providers, validation and approval of courses and award of Diplomas are permitted to participate in the pilot. Additionally, only those AVAs in possession of a domestic licence at the time of this consultation, and that are successfully relicensed under the new arrangements, will be permitted to participate in the pilot phase.

Eligibility for an International AVA licence

50 For the purpose of clarity, this consultation document differentiates between:

- 50.1 **Pilot phase** – the term used to describe the two years commencing academic year 2025-26 during which all international activity across all participating AVAs will be evaluated for the purpose of developing the IAHER.
- 50.2 **Pilot period** – the term used to describe the two years during which an AVA that is newly approved to award the IAHER on a country-by-country basis operates under Option 1 (see paragraph 28), before becoming eligible for application for a full international licence.

51 For existing AVAs participating in the QAA pilot phase, their two-year pilot period will commence on approval of an international licence as part of the pilot phase and will continue beyond the pilot phase.

52 QAA considers the pilot phase an important part of the process for developing international provision for an AVA. Therefore, any AVA who intends to apply for an international licence for the first time post-pilot phase will have to undergo a similar two-year pilot period. Two years ensures an entire academic year is fully covered. This includes existing AVAs who choose not to participate in the initial pilot phase, and organisations who become licensed as an AVA during or after the initial pilot phase. During their pilot period, an AVA will be licensed on a country-by-country basis as per Option 1 (see paragraph 28).

53 We do not require that an AVA should have prior experience of operating within a country before it can be awarded a licence to deliver the Diploma there. We consider that this could disadvantage AVAs whose provision is, at this time, largely Access to HE or limited to Access to HE.

54 We do not at present have plans to put any controls in place on the number of AVAs licensed to operate in a given country. We also do not in principle see any reason why existing validated Diplomas could not be adapted or offered internationally as part of a

credible plan which recognises the context of the country and their requirements. This includes Subject Descriptor Compliant Access to HE (Medicine), Access to HE (Nursing) and Access to HE (Health Professions) Diplomas, provided that international iterations meet the overall structural requirements of the Diploma specification and content readies students for progression routes that are achievable within both their home nation and the UK (see paragraph 154 for more details).

Applying for an International AHED licence

55 Regulatory burden was a prominent theme throughout the 2024 public consultation responses. We recognise that the process of applying for an additional licence or licences will naturally incur some additional burden on the part of AVAs. It is for each AVA to consider and determine whether the IAHEd is suitable for their operation.

56 As with domestic licences, international licences will be awarded for a specified time period, after which an AVA must reapply to retain its licence. The time period of an AVA licence will be determined on an individual basis, but will be subject to the following general policy position as a guide:

57

Licence type	Time period
Initial (Pilot period) international licence for an individual country – for all AVAs new to the IAHEd, including those participating in the pilot phase	Two years
Renewal of international licence – AVAs seeking relicensing with no ongoing compliance concerns (for example, not currently subject to an ongoing investigation) and not subject to any regulatory activity	Five years
Renewal licence – AVAs seeking relicensing with ongoing compliance concerns or where the AVA is subject to any current action from QAA as a result of any monitoring activity	Three years

58 An AVA will need to have held a domestic licence for at least two years prior to any application for an international licence. This ensures that an organisation has time to become familiar with all aspects of the Recognition Scheme prior to applying it to providers in a remote location. Two years ensures an entire academic year is fully covered.

59 The renewal of an international licence and the renewal of a domestic licence are two separate processes. However, we recognise that an AVA might prefer for its domestic and international licences to run concurrently and QAA will work with AVAs to adjust renewal dates where there are demonstrable and proportionate benefits to doing so.

60 An AVA may surrender its international licence/s with no bearing on the validity or terms of its domestic licence.

61 Regulatory judgements, compliance concerns and regulatory monitoring activity such as active investigations in relation to both the domestic Access to HE Diploma and the IAHEd will inform the decision as to whether to award or renew an AVA's international licence. There will be a right to appeal QAA's decision.

62 We contend that the requirement for AVAs to demonstrate a credible plan for each country represents best practice and mitigates a number of serious risks in relation to the reputation of the qualification, the AVA and QAA. We particularly note the importance of due diligence and sensitivity to the requirements of each individual country when delivering an international qualification, and that these requirements are diverse and wide-ranging. We consider that risk is high if we do not ensure that AVAs have undertaken requisite research and planning and that we have assured ourselves of this.

63 We are proposing that AVAs should be limited to operating one Diploma per subject per country during their pilot period. This is to ensure we avoid any inconsistency within a country and are able to provide assurance of the viability of the qualification as a route to higher education to agencies and governments in the relevant international markets. We accept that this will constrain in the short term an AVA's ability to develop different Diplomas for different providers; however, we think that the benefit that all students in a country will encounter a consistent curriculum outweighs any disadvantage. This restriction will be removed once an AVA has completed its pilot period.

64 AVAs will be invited to submit expressions of interest for the pilot phase from September 2025. At this point, they will be asked to provide an indication of the territories in which they wish to operate, the providers with which they intend to collaborate and their business model (e.g. franchise), and the Diplomas they are likely to develop. AVAs should also outline notable features of the national landscape that are similar to, comparable with, or different to, the UK. Such features might include:

- 64.1 home government's strategic plan for tertiary education
- 64.2 current private and public post-16 options and funding
- 64.3 national qualifications framework
- 64.4 national awards registers
- 64.5 statute and legal formalities that impact on teaching and education including equality and consumer rights
- 64.6 quality assurance / inspection regimes
- 64.7 higher education entry requirements.

65 QAA will undertake an informal scoping activity after the submission of an expression of interest and discuss the AVA's plans with them. There is no formal selection or approval process at this stage. The intention is to open up discussion to ensure that QAA can effectively support the AVA in developing and presenting its proposal and to identify, early, any potential challenges that might jeopardise the credibility or viability of a proposal. It will also be an opportunity for AVAs to ask questions of QAA with regard the next stages of their application for an international licence.

66 After an initial expression of interest, AVAs will refine their proposal for each territory so that they can present a credible plan within their application (a template will be provided). The application must be submitted within one calendar year of the expression of interest, or six months before the end of the pilot phase, whichever is soonest. Post-pilot, QAA will continue to expect that an application for an international licence is submitted for approval

within one calendar year of the initial expression of interest.

67 Following submission of the application, a QAA officer will conduct a document check to ensure the application form has been completed in its entirety and all required supporting documentation has been submitted. The AVA will be given an opportunity to submit further information and the application will not be progressed until that information has been received.

68 Once the application is confirmed to be complete, all submitted documentation will be reviewed, seeking evidence that the organisation meets, or will meet, the requirements of the Recognition Scheme for international provision. Applications will be considered with reference to the following points:

- 68.1 the adequacy and clarity of the information provided
- 68.2 the ability of the organisation to carry out the responsibilities of an internationally active AVA
- 68.3 the potential ability of the AVA organisation to address and meet the licensing conditions for international operations
- 68.4 the readiness of the AVA to address any issues identified during the application process
- 68.5 the impact of the award of a new international licence on existing Access to HE provision in the locality.

69 If the licensing team requires further information (for instance, additional evidence, further clarification or assurance) to complete their assessment of the application, they may contact the AVA, ideally combining their queries into one request which also contains guidance on the expected format for the provision of the requested information and the deadline by which it must be provided.

70 Under the QAA Scheme of Delegated Authority, decisions relating to the award and withdrawal of AVA Licences must be considered by the Access Regulation and Licensing Committee (ARLC) for recommendation to the QAA Board. Accordingly, the licensing team's recommendation will be reported to the ARLC. If ARLC agrees with the licensing team's recommendation it will be passed to the QAA Board for final decision; if ARLC are not in agreement with the licensing team, the application will be passed back to the licensing team for reconsideration.

71 The QAA Board will make the decision as to whether to award an international licence or not. Possible outcomes are:

- 71.1 Granting of a two-year initial (pilot period) international licence, subject to standard conditions and any specific required actions (for AVAs new to the international award)
- 71.2 Granting of a three-year full international licence, subject to standard conditions and any specific required actions (for AVAs renewing their licence after completion of their pilot period)
- 71.3 Granting of a five-year full international licence, subject to standard conditions and any specific required actions (for AVAs renewing their licence after completion of their pilot period)

71.5 Refusal of international licence.

72 The length of time it takes to assess an application will depend on a number of factors including complexity, demand (the number of licence applications currently being processed and other regulatory activity being undertaken by QAA) and the timing of the submission in relation to the schedule of QAA decision-makers. In general, we expect an application to take 4-6 months from submission to decision. During the process, QAA Officers will expect to be in touch with AVAs to discuss the application and its progress.

73 Where an AVA disagrees with the outcome as decided by the QAA Board, they will be able to make a representation via a formal appeals process should they wish.

74 We will issue guidance to support AVAs in making an application for an international licence post consultation. The guidance will direct AVAs to ensure that they explicitly address how each aspect of the QAA Licensing Conditions will be supported in the international context:

- 74.1 Management, governance and strategy
- 74.2 Monitoring and information provision
- 74.3 Provider and course recognition
- 74.4 Development of Access to HE Diplomas
- 74.5 Setting, delivering and moderating assessments
- 74.6 Awarding the qualification

75 The application should identify and consider any potential challenges or risks and mitigating factors. Factors that might be considered include, but will not be limited to:

- 75.1 the presence of educational sovereignty policies that discourage the entrance of foreign partners
- 75.2 the tension between attracting high-income students and those from disadvantaged groups
- 75.3 the validity of the proposed curriculum in terms of local (home country) and UK need
- 75.4 consideration of social and cultural differences including implications for communication, ways of working and quality assurance, including approaches to collating and responding to student feedback
- 75.5 careful adoption of blended learning that complies with local (home country) requirements and clearly benefits students
- 75.6 the maturity of the market, including public and employer awareness and acceptance of adult tertiary education and competing qualifications
- 75.7 English language proficiency within the locality (home country) and future student cohorts.

76 The guidance will also recommend that AVAs refer to the British Council & Universities

UK Risk Management Checklist when completing their application.⁹ This attends to issues such as:

- 76.1 financial risk
- 76.2 reputational risk
- 76.3 academic freedom and freedom of speech
- 76.4 security considerations
- 76.5 relationship and personnel management
- 76.6 cyber, intellectual property (IP) and data management.

77 The guidance will direct AVAs to ensure that their proposals include an expanded exploration of the national landscape and any features that were identified within their initial expression of interest, such as (and where available):

- 77.1 the home government's strategic plan for tertiary education
- 77.2 current private and public post-16 options and funding
- 77.3 national qualifications framework
- 77.4 national awards registers
- 77.5 subject classification systems
- 77.6 statute and legal formalities that impact on teaching and education including equality and consumer rights
- 77.7 quality assurance / inspection regimes
- 77.8 higher education entry requirements
- 77.9 indices for identifying and measuring disadvantage (see Appendix C footnote 25 concerning our expectations and the availability of data).

78 QAA's guidance will direct AVAs to provide explicit information on any local regulatory requirements that might impact the viability of a proposal regardless of its credibility in all other respects, and to confirm what action has been taken to comply with these.

79 QAA will not issue an international licence where local regulatory requirements are not compatible, or cannot be made compatible at the time of assessment, with the core purpose or character of the IAHEd. The onus will be on the AVA to evidence their consideration of, or compliance with:

- 79.1 Any local permissions that the AVA or QAA must obtain in order to deliver and award the IAHEd
- 79.2 Any local regulations with which the AVA and QAA must adhere when

⁹ <https://www.universitiesuk.ac.uk/universities-uk-international/insights-and-publications/uuki-publications/managing-risk-and-developing-responsible>

delivering and awarding the IAHER

- 79.3 Any state level recognition that must be negotiated (by QAA, the AVA or an individual student) in order for the IAHER to be used for entry into HE
- 79.4 Any regulatory protections afforded to specific subjects (e.g. medicine, law, architecture).

80 The guidance will also direct AVAs to include market research that demonstrates and evidences demand for the proposed Diplomas – both in the form of Access to HE and with reference to subject specificity. This should include information on intended progression routes for those who achieve the Diploma, and should be contextualised in relation to existing transnational education within the territory and current or potential partnership opportunities.

Application and annual administration fees

81 QAA intends to cover the investment behind the pilot phase, which will also allow us to accurately determine the costs that we will bear. This in turn will allow us to develop an appropriate fee schedule. We do not anticipate that the costs of operating our proposals will be excessive or significant, although we do concede that there will naturally be an increase in resource required to operate additional arrangements. These will be accurately determined through piloting.

82 There will be no fee for the submission of an expression of interest or a full application or their assessment at any time during or after the pilot phase. Likewise, an application to renew a licence will not attract any charge.

83 Once a licence has been issued, annual administrative fees will be calculated in the same way as the domestic arrangements. For clarity, this means that AVAs will be charged on a per capita basis based on the previous year's new student registrations. This means that existing AVAs will benefit from one year of registrations after the issue of a new licence before any further fee is levied.

84 The per student 'unit cost' will be determined by forecasting QAA's costs in operating the Recognition Scheme for the IAHER, less total income derived from the IAHER. As with the domestic arrangements, we will set a minimum fee for AVAs whose fee total falls below a specified threshold.

85 AVAs participating in the pilot phase will not be subject to administrative fees during the pilot phase.

Consultation questions

Q5. Do you have any comments regarding the two-year pilot phase for current AVAs?

Q6. Do you have any comments regarding eligibility for an international AVA licence?

Q7. Do you have any comments regarding the process of applying for an international licence?

Q8. Do you have any comments regarding the international licence fee structure?

Q9. Do you have any other comments regarding this section of the consultation?

Arrangements for retaining an AVA Licence for the International Diploma

86 This section describes the licence arrangements that set out the requirements for becoming an internationally active AVA, and the ongoing conditions with which an AVA must continue to comply to retain their international licence. It also describes how QAA will monitor and assess compliance through a regime of general and enhanced monitoring to inform regulatory judgements.

87 As the award and retention of an international licence is contingent upon the award and retention of a domestic licence, AVAs who operate outside of the UK must be compliant with:

87.1 *The Standard Terms for the Licensing of Access Validating Agencies* – existing documentation – this document sets out the terms of a domestic AVA Licensing Agreement, the regulatory requirements for becoming an AVA and maintaining a domestic AVA licence. In this document, we set out additional terms to which an AVA wishing to operate outside the UK will need to agree.

87.2 *The Standard Terms for the Licensing of AVAs Operating Internationally* – proposed documentation – this document will set out the terms of the AVA International Licensing Agreement, the regulatory requirements for becoming an international AVA and maintaining an international AVA licence.

87.3 *The Access to Higher Education Conditions* – existing documentation – These are the conditions an AVA must continue to meet once it has been successfully awarded a domestic AVA licence. An organisation that wishes to become an AVA must demonstrate how it meets, or may meet, these conditions.

87.4 *The Access to Higher Education International Conditions* – proposed documentation – These will be the conditions an AVA must continue to meet once it has been successfully awarded an international AVA licence. An organisation that wishes to become an international AVA must demonstrate how it meets, or may meet these conditions.

88 We are conscious of regulatory burden, and where possible the licence arrangements for the IAHEd are comparable with those of the domestic Diploma arrangements. Where the increased risk of operating internationally has warranted a different approach, we have balanced expedience with the need to accurately determine the nature and likely impact of any given risk and the action needed to mitigate that risk. Our intention is to support AVAs in protecting the international student experience.

89 AVAs are invited to provide feedback on the licensing arrangements, and may find it useful to refer to the domestic terms and conditions in order to situate and contextualise the international arrangements in relation to their current practice. To this end, the domestic terms and conditions have been supplied alongside this consultation document.

90 We are consulting with AVAs on the application of the Diploma Specification and Grading Scheme to IAHEds also; we do this in the section entitled '*Teaching, Learning and Assessment of the IAHEd*' (paragraphs 139-145).

Application of the Licence Arrangements to the IAHER

91 The licence arrangements are the arrangements QAA has in place to manage the licensing process for AVAs. They set out the requirements for becoming an AVA ('the Licensing Agreement') and maintaining an AVA licence.

92 Any AVA that successfully applies for a licence to operate in an international territory will be required to agree to additional terms of licensing. These will be in addition to the *Standard Terms for the Licensing of AVAs*¹⁰ to which they agreed with QAA to become an AVA. The *Standard Terms for the Licensing of AVAs Operating Internationally* (the 'international terms') will set out the terms with which an AVA must agree to obtain and maintain a licence to validate and award the Access to HE Diploma to students in countries outside of the UK.

93 The International Terms and the Standard Terms will co-exist independently of one another such that it will be possible for an AVA to enter into or withdraw from an international licence arrangement with no impact on its domestic arrangements. However, concerns arising from compliance with one set of Terms may give QAA cause to investigate compliance across both the AVA's domestic and international operation. It may also be possible for an AVA to be in breach of the International Terms while remaining compliant with the Standard Terms. In such cases, it may be that enhanced monitoring or sanctions might be applied to international operations but not domestic operations. This is discussed further in the section entitled '*Application of the Monitoring Arrangements to the IAHER*'.

94 The proposed *Standard Terms for the Licensing of AVAs Operating Internationally* are provided within Appendix B of this document and we invite your feedback on them as part of this consultation. They are derived from the *Standard Terms* for domestic licences, and AVAs who wish to operate outside of the UK will be required to observe both sets of terms.

94.1 Section 1 identifies the International Access to HE Diploma ("IAHER" or "the International Diploma") and international trademarks and wordmarks.

94.2 Section 2 has the word 'International' added throughout. Recognition is redefined as recognition by government and higher education institutions for progression purposes rather than funding although this will remain a QAA focus. This is due to the differing educational and funding systems that an International Licence will cover.

94.3 Section 3 identifies the *Standard Terms for the Licensing of AVAs Operating Internationally* which will coexist with the *Standard Terms for the Licensing of Access Validating Agencies*. (Section 10 requires adherence to both sets of Terms, and hence an AVA must hold a domestic licence in order to hold an International Licence).

94.4 Section 4 outlines the Regulatory Documents which comprise discrete documents for the arrangements for the licensing of the IAHER and the terms and conditions of an International Licence. To minimise regulatory burden, these are comparable with the domestic arrangements and, in some cases, extant documents

¹⁰ <https://www.qaa.ac.uk/en/access-to-he/access-to-he-resources/access-to-he-licensing-criteria>

(e.g. *Requirements for the use of Access to HE Trademarks* may be amended to incorporate International arrangements).

94.5 Sections 5 through 9 are largely comparable with the domestic terms, with occasional insertion of the word 'international'.

94.6 Section 10 requires adherence to both the *Standard Terms for the Licensing of Access Validating Agencies* and the *Standard Terms for the Licensing of AVAs operating Internationally*. Hence an AVA must hold a domestic licence in order to hold an International Licence. QAA considers this important in ensuring the quality of the IAHER. For clarity, terms from the domestic Terms relating to an AVA's identity, constitution and governance have been retained as sub-clauses within the International Terms. This has implications for the numbering of subsequent terms and cross-references.

94.7 Section 11 is largely unchanged with the exception of the insertion of the word 'international' or 'internationally' and reference to *The Access to HE Licensing Arrangements for AVAs Operating Internationally*. All AVAs are required to inform QAA of proposed changes to ownership under the domestic Standard Terms. In addition, International AVAs will be required to inform QAA of significant changes to the organisational structure of the AVA that may impact upon international operations.

94.8 Sections 12 to 13 are largely unchanged with the exception of the insertion of the word 'international' and reference to *The Access to HE Licensing Arrangements for AVAs Operating Internationally*.

94.9 Section 14 has an additional term that specifies that QAA may terminate an International Licence on termination of the AVA's domestic licence. This aligns with Section 10 and the requirement for an AVA that is operating internationally to also hold a domestic licence.

94.10 Section 15 now refers to *The Access to HE Licensing Arrangements for AVAs Operating Internationally*.

Application of the Access to HE Conditions to the IAHER

95 The Licensing Conditions are the conditions an AVA must continue to meet once it has been successfully awarded an AVA licence. An organisation that wishes to become an AVA must demonstrate how it meets, or may meet, these conditions.

96 We have reviewed each of the current domestic Licensing Conditions and have identified six that require amendment in order to be effective in ensuring the quality of the IAHER given the complexities of international delivery. We are therefore proposing a suite of new conditions for the IAHER. These will be comparable to the domestic Licensing Conditions to minimise regulatory burden.

97 AVAs should note that any AVA that wishes to operate internationally will be required to observe and comply with the domestic Licensing Conditions in relation to their operations in the UK and also the International Licensing Conditions in relation to their operations in all

other territories.

98 The preamble for the International Licensing Conditions (which will draw on the existing domestic Licensing Conditions) will include introductory text in relation to the QAA's remit, the Recognition Scheme and its purpose, and key definitions. The changes that we propose here are limited to contextual amendments that switch the focus of the document from domestic to international provision, for example, insertion of the word 'International' ahead of 'licence' and substitution of the qualification title 'Access to HE Diploma' with the title 'International Access to HE Diploma' or 'IAHED'.

99 We then propose the following specific amendments:

- 99.1 **A2.2** The AVA must have a Strategic Statement approved by QAA regarding its role as an AVA. In preparing its Strategic Statement, the AVA must secure, and through the content of its Statement demonstrate, the input of:
- providers of the IAHED, and
 - *higher education providers within the countries that they operate*

Change: Amendment - Original text read *higher education providers in the UK*.

Rationale: A straightforward change to reflect the scope of the international conditions.

Comment: To minimise burden, AVAs will be asked to submit on an annual basis a single Strategic Statement that covers both domestic and international operations.

- 99.2 **A2.3** An AVA must make an Annual Statement of Compliance to QAA *in relation to each licence that it holds*.

Change: Expansion - Original text did not include the second phrase (in italics).

Rationale: Separate licensing agreements will be in place for domestic and international operations, necessitating a Statement of Compliance for each.

Comment: To minimise burden, during the pilot phase when an AVA may hold multiple country-by-country licences, one Statement of Compliance may be submitted to cover all international operations; a second Statement of Compliance will be required for domestic operations.

- 99.3 **C1.1** An AVA must have in place and implement a documented procedure for the approval of providers to deliver Access to HE Diplomas. This procedure must include a requirement for a provider approved to deliver Access to HE Diplomas to have:

- ~~- a main base, which is in the UK, Channel Islands or Isle of Man~~
- ~~- systems to ensure that only students with a UK (including British Force Post Office), Channel Islands or Isle of Man address are registered for an Access to HE Diploma~~
- *systems to ensure that individuals who do not have a right to remain in the country (e.g. through citizenship) have the correct visas (or other permissions) in place prior to registration*
- *systems to ensure that only students who are able to benefit from*

teaching, learning and assessment in English language are registered for an International Access to HE Diploma

- systems to ensure that by the point of award, students can demonstrate English language proficiency equivalent to level B2 on the Common European Framework of Reference scale.

Change: Deletions - Clause relating to location of providers deleted; Clause relating to home address of students deleted; Insertions - Clause relating to visa requirements inserted; Clauses relating to English proficiency at point of registration and award inserted.

Rationale: The changes open up the market to a range of potential providers and widen access to students, in line with our mission and in response to increasing intra-region mobility, for instance in Asia¹¹. English language proficiency has significant visa implications and will impact on student ability to enter UK-TNE and some employment sectors where there are PSRB requirements (see paragraphs 127-131).

Comment: At this point, we do not see any reason to prevent a self-funding student from studying in any country where they have visa entitlement to do so. We will, as part of routine data returns, ask AVAs to collect information on student ethnicity. Visa and migration data will not be collected by QAA but may inform a provider's marketing strategy.

- 99.4 **D1.2** *Learning, teaching and assessment must be wholly face-to-face or blended with remote learning up to a specified proportion where there is demonstrable benefit to students. Delivery solely via remote methods shall be permitted exceptionally:*
- where continuity of education provision would otherwise be interrupted by unforeseen circumstances*
 - as a reasonable adjustment to remove or reduce disadvantage due to an individual student's disability or health condition.*

Change: Insertion: New clause added to existing clauses on accessibility.

Rationale: As outlined in paragraphs 131-140, the IAHEd should provide face-to-face classroom-based learning and this may be blended with remote learning where there are sound reasons to do so.

Comment: AVAs will have flexibility to validate courses with up to 40% remotely taught content; we have refrained from identifying a specific threshold within the Conditions to allow future revision (through guidance documents) in response to technological advancement. We remind AVAs of their obligations with regard other clauses within D1.2 with regard their duties under the Equality Act 2010, which will also apply to the IAHEd.

- 99.5 **D2.1** A validation panel means a panel of members who jointly provide current, relevant experience and expertise in:
- curriculum knowledge relevant to the Diploma(s) and all the units being

¹¹ <https://opportunities-insight.britishcouncil.org/short-articles/reports/intra-regional-mobility-east-asia>

considered, *with due regard for local, national and international relevance and societal and cultural differences.*

- effective, culturally sensitive and accessible approaches to learning, teaching and assessment in classroom or blended learning environments as appropriate.

Change: In relation to the definition of a validation panel, one sub-clause extended and one new sub-clause added.

Rationale: The Conditions now explicitly require consideration of local social and cultural context. Previously this was implicit.

Comment: The intention is to ensure that, particularly where an existing Diploma is exported as an IAHER, there is due regard for such matters.

- 99.6 **D2.3** These arrangements should allow an AVA to ensure that the experience of students registered on Access to HE Diploma courses at an international provider is:
- equitable – at least of an equivalent quality to the experiences of students studying at organisations *within the UK* ~~at least of an equivalent quality to the experiences of students studying at organisations subject to external inspections by other bodies~~
 - consistent - delivery of the programme of study is provided by qualified teachers and is at least comparable to that at other organisations delivering the AVA's Diplomas
 - robust - the educational experience is at least as secure as for those students studying *within the UK*. ~~at traditionally funded organisations.~~

Change: Two sub-clauses have been amended to include the words '*within the UK*'. The first sub-clause previously read '*at least of an equivalent quality to the experiences of students studying at organisations subject to external inspections by other bodies*'. The second sub-clause previously read '*at traditionally funded organisations*'.

Rationale: The domestic arrangements ensure parity between different types of institutions within the UK. The amendments shift the focus to ensure global parity with the UK.

Comment: QAA is developing its database and data collection fields to facilitate monitoring and assessment of the IAHER.

Application of the Monitoring Arrangements to the IAHER

100 In order to ensure that AVAs are able to meet the Terms and Conditions of their international licence, QAA has a responsibility to undertake assessments which provide assurance that IAHERs are validated, delivered and awarded in a manner that is consistent with the requirements of its Recognition Scheme. Expectations with regard to AVA engagement in monitoring and information provision are set out in section B of the Conditions and further detailed within *The Access to Higher Education Monitoring*

*Arrangements*¹².

101 The monitoring arrangements for the IAHER will be comparable with those utilised in the monitoring of domestic provision. The emphasis remains on the collation of data to inform reliable assessments of compliance and risk, apply regulatory judgements and, where appropriate, publish information on those judgements.

102 The intention of the monitoring arrangements is to:

- 102.1 maintain the integrity of the IAHER
- 102.2 support students to progress and succeed in higher education
- 102.3 ensure the relevance of the IAHER and support its growth.

103 Assessments of compliance are based on a variety of sources of information which is mainly collected through predetermined arrangements where the AVA agrees to submit certain information to QAA under certain circumstances. As per the domestic arrangements, monitoring of international licences will occur at two specific levels – general monitoring and enhanced monitoring.

104 General monitoring is broadly defined as monitoring activity which is predictable, planned or not undertaken on the basis of an assessment of risk. General monitoring will be applied to all AVAs operating within international territories, and will include cyclical review, notifiable events and other intelligence or information.

105 **Cyclical review** – scheduled reporting windows will occur to coincide with domestic arrangements. Despite similarities in the cyclical review process, monitoring for the IAHER and monitoring for the domestic AHED will be treated as separate procedures, requiring separate and stand-alone submissions. AVAs who operate internationally will be required to prepare one submission for domestic operations and one submission to cover all international operations. We will add a data field to the collection tool and provide AVAs with guidance on how to complete the field.

106 The international submission will likely include (but will not be limited to):

- 106.2 statement of compliance with international licensing conditions
- 106.3 learner cohort data and destination data on a country-by-country basis – see Appendix C for proposed data collection fields.

107 Additionally, AVAs should ensure that business continuity strategies are reflective of international operations and contingency plans, and that their strategic statement includes consideration of their international objectives.

108 **Notifiable events** – as set out in Condition B1, an AVA is required to notify QAA when it has a reason to believe that any notifiable event has occurred or is likely to occur. A notifiable event is any actual or potential incident that, in the reasonable judgement of QAA,

¹² <https://www.qaa.ac.uk/en/access-to-he/access-to-he-resources/access-to-he-licensing-criteria>

negatively affects or could negatively affect an AVA's ability to meet the terms of its international licence or comply with the International Conditions.

109 We will issue guidance to help AVAs determine what is reportable and what is not. During the pilot phase, it will be necessary to take a cautious approach to reporting and recording incidents to ensure that issues are identified and resolved promptly and effectively. This will protect stakeholders and the future growth of the IAHEd. Transparency will enable AVAs and QAA to learn from incidents when they arise and to develop appropriate mechanisms to minimise occurrence and mitigate impact. For this reason, while there will be commonalities in relation to the nature of a notifiable event across the globe, thresholds for determining what should be reported may differ between domestic and international arrangements.

110 **Other intelligence and information** – this refers to any intelligence or information obtained by QAA, or of which QAA becomes aware in the course of its operation of the Recognition Scheme, such as concerns raised by stakeholders or within media coverage, which leads us to form a view that an AVA may not be compliant with the terms and requirements of its International Licence. In introducing the IAHEd, we must implement effective regulation that works for all stakeholders to ensure the validity and reliability of the Access to HE Diploma in the international qualifications landscape. Where possible, we will draw from existing information sources to avoid unnecessary duplication of effort and minimise the burden on AVAs. We will make informed judgements to determine the extent of any information request so that there is clarity of purpose and intentionality. We will make a clear distinction between information requests pertaining to domestic arrangements, and those that relate to international arrangements.

111 **Enhanced monitoring** – this will be utilised where an increased risk of potential non-compliance or actual non-compliance with the terms of the International Licensing Agreement and/or the International Licensing Conditions has been identified through general monitoring. While AVAs will be required to make separate domestic and international submissions for general monitoring purposes, and outcomes from those processes will be separate, where a risk of non-compliance or potential non-compliance has been identified within one licence, enhanced monitoring and engagement may be triggered in relation to another licence.

112 **Investigation** – QAA may choose to open an investigation where it identifies an increased risk of potential non-compliance with the requirements of its International Licence or one or more of the International Licensing Conditions, or where actual non-compliance is identified. Where QAA opens an investigation, it is likely that this decision will be based on the outcomes of other monitoring activities. Where translation costs arise (e.g. due to the need to communicate with providers or learners directly) these will be included in investigation fees.

113 Under the *Standard Terms*, AVAs may be required to pay additional fees for any activity falling outside the AVA general monitoring processes. Enhanced monitoring and investigations can be carried out at any time where there is sufficient concern that an AVA is not compliant or at risk of being unable to comply with the requirements of its licence and may be applied to:

- 113.1 one or more countries, including UK and international territories
- 113.2 one or more of an AVA's licences, including domestic and international licences.

Application of regulatory interventions to the IAHER

114 Regulatory judgements arising from international monitoring will stand alone from those arising from domestic monitoring, and will relate solely to the international licence/s in question. This includes scenarios where a combined investigation has been conducted into compliance across both UK and international arrangements. Such an investigation would result in a regulatory judgement for domestic arrangements and a separate regulatory judgement for international arrangements. During their pilot period, when an AVA might hold multiple licences (one licence per territory) a single regulatory judgement will be used to describe all activity under those licences.

115 Regulatory interventions arising from international monitoring will stand alone from those arising from domestic monitoring, and will relate solely to the licence(s) in question. The regulatory interventions pursuant to an investigation are: formal notice, imposition of a specific condition or imposition of a formal sanction. The imposition of a formal sanction may include:

- 114.1 imposing restrictions on an AVA's international licence
- 114.2 temporarily suspending an AVA's international licence
- 114.3 withdrawing an AVA's international licence.

116 The withdrawal of a domestic licence will automatically result in the contemporaneous withdrawal of any international licence/s due to the requirement for an AVA to hold a domestic licence in order to hold an international licence (see paragraph 58). However, the withdrawal of the international licence may not necessitate the withdrawal of the domestic licence where there is no evidence of concern regarding the AVA's operation in the UK.

117 QAA will suspend any international licence/s on the suspension of a domestic licence where it considers it appropriate to take action to immediately reduce the impact of compliance concerns to international students, stakeholders or the IAHER.

118 In scenarios where a combined investigation has been conducted into compliance across both UK and international arrangements, the investigation might conclude that one set of interventions or sanctions should be applied to the international licence, and another set should be applied to the domestic licence. During a pilot period, when an AVA might hold multiple licences (one licence per territory) interventions and sanctions will be applicable on a licence-by-licence basis.

119 To be clear, the findings arising from a single investigation that QAA conducts into a potential or actual breach of both domestic and international licence arrangements may result in one outcome for a domestic licence, and another outcome for an international licence. During the pilot phase, regulatory judgements will be applied holistically to all licences but decisions on interventions will be decided on a licence-by-licence basis. This will ensure that our regulatory interventions are sufficiently granular so that intervention is:

- 119.1 **Prioritised** – focusing on matters that pose a risk to students, stakeholders or the qualification in specific localities
- 119.2 **Proportionate** – taking action that is proportionate to the geographic spread and level of risk or severity of the non-compliance and takes into account the

behaviour of the AVA to mitigate risks and the impact on students in the specific locality

- 119.3 **Targeted** – focused on addressing the particular risks that are posed
- 119.4 **Transparent** – QAA will clearly set out the reasons that an intervention has been applied and action the AVA is required to take for each geographic location
- 119.5 **Accountable** – QAA will be accountable for the decisions that it takes and for explaining these to relevant AVAs and other international stakeholders as required.

Consultation questions

Q10. Do you have any comments regarding the application of Access to HE Conditions to an AVA's international operations?

Q11. Do you have any comments regarding the application of Monitoring Arrangements to an AVA's international operations?

Q12. Do you have any comments regarding the application of regulatory interventions to an AVA's international operations?

Q13. Do you have any other comments regarding this section of the consultation?

Teaching, learning and assessment of the IAHER

120 We are proposing to include a condition that requires AVAs to have in place and implement procedures to ensure that the qualification remains equivalent to a UK Level 3 qualification wherever it is delivered. In this section, we also focus on specific requirements that we will impose with regard to English language proficiency for students to enable progression into UK HE, and modes of delivery as we consider that these have a profound impact on course quality, student experience and student outcomes. This section also considers the application of the Diploma Specification and Grading Scheme to the IAHER.

Parity with UK Level 3 qualifications

121 Level 3 qualifications represent a significant step in education and career development, requiring a deeper understanding of subject matter and the ability to apply knowledge and skills in more complex and challenging situations. Examples of Level 3 qualifications in the UK include Access to HE, A-levels, BTECs National and Extended Diplomas, T-levels and the Welsh Baccalaureate Advanced.

122 When validating and approving a Diploma for international delivery, an AVA must update the QAA database to ensure that that QAA is able to complete compulsory registrations with overseas authorities.

123 In developing a Diploma, the AVA should familiarise itself with any level descriptors for qualifications within the home nation that are equivalent to Level 3 in the UK. This will support the portability of the qualification and recognition by prospective employers and HE institutions in the home nation.

124 At the same time, the Diploma should respond to UK Level 3 descriptors (as defined by Ofqual, the Office of Qualifications and Examinations Regulation, and Qualifications Wales) to ensure parity with other regulated Level 3 qualifications in the UK. This will support the portability of the qualification and recognition by prospective employers and HE institutions within the UK or with international operations. Course outcomes should ensure that knowledge and skills descriptors for Level 3 are achieved by any student who is awarded the Diploma. Example descriptors are presented below.

125

Knowledge descriptor (Regulated Qualifications Framework, and Credit and Qualifications Frameworks)	Skills descriptor (Regulated Qualifications Framework, and Credit and Qualifications Frameworks)	Autonomy and accountability descriptor (Credit and Qualifications Frameworks only)
<ul style="list-style-type: none">• The holder has factual, procedural and theoretical knowledge and understanding of a subject or field of work to complete tasks and address problems that while well-defined, may	<ul style="list-style-type: none">• The holder can identify, select and use appropriate cognitive and practical skills, methods and procedures to address problems that while well- defined, may be complex and non-routine.	<ul style="list-style-type: none">• The holder can take responsibility for initiating and completing tasks and procedures, including where relevant, responsibility for supervising or guiding others.

be complex and non-routine. <ul style="list-style-type: none"> • The holder can interpret and evaluate relevant information and ideas. • The holder is aware of the nature of the area of study or work. • The holder is aware of different perspectives or approaches within the area of study or work. 	<ul style="list-style-type: none"> • The holder can use appropriate investigation to inform actions. • The holder can review how effective methods and actions have been. 	<ul style="list-style-type: none"> • The holder can exercise autonomy and judgement within limited parameters.
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126 AVAs will note that the above Level 3 descriptors are implicit within, and supported by, the Access to *HE Grading Scheme* and grading standards, and that the Licensing Conditions require that assessors and moderators are enabled to effectively calibrate standards to ensure and assure the validity and reliability of assessment. The application of the Grading Scheme to the IAHD is discussed further in paragraphs 145-148.

English language requirements

127 The need for an English language requirement was generally accepted by those who participated in the public consultation in 2024, and AVAs asked for flexibility to make proper judgements as part of the student recruitment and registration process. Respondents identified the need to observe Home Office and other Professional, Statutory and Regulatory Body (PSRB) requirements and cautioned against 'setting the bar too low'.

128 We are therefore proposing the following English language requirements for the IAHD:

129 When a student is registered on an IAHD, the AVA must ensure that an assessment has been made of both the students' overall ability and suitability to enter onto the course. Specifically, the AVA must ensure that the student's English language ability is such that they will be able to complete the course. Additional English language tuition may be offered alongside the Diploma as a separate course but should not form part of the validated units given that the purpose of the Diploma is academic development rather than the teaching of English language.

130 Upon completion of the course, the student should be able to demonstrate English ability equivalent to level B2 on the Common European Framework of Reference for Languages¹³. This is equivalent to the Home Office requirement for student sponsors wishing to enter English higher education for degree-level study. AVAs will be afforded flexibility to determine the most appropriate means of assessing English proficiency.

131 We have discounted setting our requirements at the lower B1 level which is the Home Office requirement for students entering courses below degree level, as we consider from

¹³ <https://www.coe.int/en/web/common-european-framework-reference-languages/home>

our research that students are most likely to utilise the IAHER in order to pursue degree-level study, and therefore should be prepared to level B2 in order to be adequately prepared.

Blended Learning

132 We are proposing that the IAHER should be delivered through a blended learning approach that uses 'multiple methods to deliver learning by combining face-to-face¹⁴ interaction with online activities',¹⁵ delivered through local providers. Online activities may be delivered either synchronously (meaning students and teachers participate in activities at the same time) or asynchronously (meaning students participate at different times according to their individual schedule).

133 Respondents to the 2024 public consultation were concerned that QAA appeared to intend to restrict or limit face-to-face learning. This is not our intention; rather our focus is on finding an appropriate balance between remote delivery and face-to-face delivery. Respondents noted the importance of protecting students from low quality courses and the importance of understanding the relative 'pros and cons' of each approach. To this end, it was suggested that the AVA should determine what is most appropriate for each context.

134 We consider that a blended approach will combine the best of both worlds, leveraging the benefits of in-person interaction (such as immediate feedback, social connection, and hands-on activities) while also incorporating the flexibility and accessibility of remote learning (such as independent study, resource access, and personalised learning paths).

135 Our proposal to deliver the IAHER through blended learning is informed by the Home Office Remote Delivery Policy¹⁶ for international students of Level 6 or higher which is to be implemented from September 2025. We have also noted UK Visas and Immigration's stance that stringent attendance and engagement policy is needed at Levels 4 and 5 because they are 'more vulnerable to abuse' from 'non-genuine students'¹⁷. The latter requires that students attend no less than 15 hours of daytime classroom-based study per week and sets an attendance threshold at 85%.

136 We propose that, in line with Home Office policy for Level 6 and above, remote delivery of the IAHER be ordinarily permitted for up to 20% of an IAHER timetable, rising to 40% where there is demonstrable educational value. We will publish guidance on our

¹⁴ Face-to-face teaching is defined here as the physical presence of students and teacher together in a learning space.

¹⁵ <https://www.advance-he.ac.uk/knowledge-hub/blended-learning-0>

¹⁶ <https://www.gov.uk/government/publications/student-sponsor-guidance/sponsorship-duties-accessible#courses>

¹⁷ https://assets.publishing.service.gov.uk/media/62bc65218fa8f535ae14985a/An_inspection_of_the_migration_system_as_it_relates_to_the_higher_education_sector_October_2021_March_2022.pdf

definitions in this respect, and also on how the calculation should be made.

137 We consider that this blended approach will allow IAHER Level 3 students to prepare for the remote learning that their undergraduate course may permit at Level 6 while also instilling good practice in relation to attending and engaging with classroom-based learning at Levels 4 and 5.

138 The blended learning model may also facilitate an enriched transnational experience for both international and domestic learners where teaching and learning can be shared, sensitively, across nations to create opportunities for students to learn more about each other's culture and society. We acknowledge that such a model may also reduce the cost of delivering teaching and learning, but this should be a secondary consideration behind the benefit to students whose education should be 'globally grounded but locally relevant'.¹⁸

139 It will not be permissible to deliver the IAHER fully online. While QAA acknowledges that remote learning can be a powerful tool in facilitating access to learning and widening participation, we consider that technology should enhance teaching and learning and serve the learning objectives, not dictate them. This is particularly important while the IAHER becomes established and we ascertain, in particular, the suitability of the Diploma Specification, Grading Scheme and individual Diploma and Unit content in international settings.

140 Further, we are aware that some nations do not permit remote learning. The reasons are complex and include, by way of example:

140.1 **Internet censorship** – In some countries, the government heavily restricts internet and blocks certain websites, making it difficult to access online learning platforms or educational resources

140.2 **Limited infrastructure** – In some developing countries, internet access may be limited or unreliable, making online learning challenging

140.3 **Political instability** – During times of political unrest or conflict, internet access may be disrupted or shut down entirely, preventing online learning

140.4 **Fraudulent activity** – Concerns include the proliferation of 'essay mills', certification fraud and challenges around authenticating the location and identification of learners.

141 Therefore, in order to ensure parity in standards across countries, teaching by remote delivery only will not be permitted except where continuity of education provision would otherwise be interrupted by unforeseen circumstances (e.g. pandemic outbreak) or as a reasonable adjustment to remove or reduce disadvantage due to an individual student's disability or health condition.

Application of the Diploma Specification to the IAHER

142 The Access to HE Diploma Specification presents the generic requirements for the

¹⁸ <https://www.hepi.ac.uk/2025/01/21/rethinking-the-financial-challenge-of-english-universities/>

achievement of the Diploma. It also specifies the range and nature of any requirements that may be stipulated in addition to the generic requirements for the achievement of named Access to HE Diplomas.

143 The purpose of the Diploma Specification is to ensure consistency and transparency in the academic demand and standards of the Access to HE Diploma, and equity for students in the ways it can be achieved. Its core requirements are:

- 143.1 60 credits, comprising 45 graded credits at Level 3 and 15 ungraded credits at either Level 2 or Level 3, delivered during 600 notional learning hours¹⁹
- 143.2 A minimum of one unit of either 6 credits or 9 credits to be included in each Diploma (from graded or ungraded credit)
- 143.3 A maximum of 30 credits that can be made up of 6 or 9-credit units (offered as ungraded and/or graded credits provided the maximum of 30 credits is not exceeded).

144 We do not consider that there is a compelling reason to deviate from the Diploma Specification. It is our contention that the specification has developed over time to offer a robust structure that allows both flexibility and parity so that providers can offer course content that responds to local needs while also protecting the integrity of Access to HE as a brand. These are features that we consider beneficial in introducing and embedding the Diploma into the international qualifications landscape.

Application of the Grading Scheme to the IAHER

145 Access to HE Diplomas are graded using a scheme which has been designed to accommodate the flexibility of the qualification, so that it can be applied to all Access to HE Diplomas, whatever their subject or structure. It is our contention that the *Access to HE Grading Scheme*²⁰ will support the introduction of the IAHER into new markets given its structured and prescriptive approach to awarding grades and credits.

146 The Grading Scheme details the common requirements, reference points and assessment regulations that define how grading judgements are made, as well as the process for the award of grades. There are three grading standards which will be applied equally to all units and across all assessments - knowledge and understanding, subject specific skills, and transferable skills.

¹⁹ One credit represents those learning achievements that can be demonstrated in 10 notional learning hours. The concept of 'notional learning hours' therefore takes into account all learning which may be relevant to the achievement of the learning outcomes, including directed and private study, practical and project work, assignments and assessment time.

²⁰ <https://www.qaa.ac.uk/en/access-to-he/access-to-he-resources/access-to-he-grading-scheme>

147 The Grading Scheme establishes the standards against which students are assessed to determine their performance, and is thus an essential tool in ensuring and, through assessment standardisation procedures, assuring, continued parity with other Level 3 qualifications and expectations with regard to Level 3 outcomes (see paragraphs 121-125).

148 We do not have any compelling reason to deviate from the Grading Scheme. It is our contention that the scheme has developed over time to offer a robust system that allows both flexibility and parity so that grading outcomes are valid and reliable across Diploma subjects and the wide variety of assessment types that have developed through innovation in teaching and learning.

Consultation questions

Q14. Do you have any comments regarding the proposed English language requirements for the IAHEd?

Q15. Do you have any comments regarding the blended delivery that IAHEd will entail?

Q16. Do you have any comments regarding the implementation of the existing Diploma Specification in international territories?

Q17. Do you have any comments regarding the implementation of the existing Grading Scheme in international territories?

Q18. Do you have any other comments regarding this section of the consultation?

Marketing the IAHER

149 This section considers arrangements with regard to marketing the IAHER. This includes the use of Subject Descriptor Compliance Marks for international Diplomas, insofar as they signify certain information about progression routes. These were developed with UK students and their progression in mind, but might be sensitively adapted for adoption outside of the UK. It will be imperative that there is clear information available to all stakeholders concerning progression routes should the compliance marks become internationally applicable. This section also considers the use of, and protection of, trademarks and wordmarks.

Application of the Subject Descriptor Compliance Marks to the IAHER

150 The Access to HE Subject Descriptor Compliance Mark is available for use by AVAs and Access to HE providers to identify Access to HE Diplomas that meet the requirements of QAA's Subject Descriptors for the following:

- 150.1 Access to HE (Medicine)
- 150.2 Access to HE (Nursing)
- 150.3 Access to HE (Health Professions).

151 The purpose of the subject descriptors is to define the minimum requirement of content for Diplomas that use the above reserved titles. The aim of the subject descriptors is to bring greater standardisation to Diplomas using the reserved titles. The subject descriptors provide higher education admissions staff with confidence that a student achieving such a Diploma has covered specified content, although it does not guarantee that a student who achieves such a Diploma will gain entry to a higher education course.

152 There is a strong appetite for UK HE courses in the health professions – numbers of inbound students were 55,810 in 2024 and 58,085 in 2023 (compared with 35,985 in 2015)²¹. According to NHS Digital, in June 2023 there were 264,822 NHS staff who reported a non-British nationality, up from 220,000 a year earlier. This accounts for nearly one in five of NHS staff with a known nationality.²²

153 The above data supports QAA's proposal that Subject Descriptor Compliant Diplomas should be available to international students. We are therefore proposing that the Subject Descriptor Compliance Marks may be used to promote compliant IAHERs. The reserved titles will be:

- 153.1 International Access to HE (Medicine)

²¹ <https://www.iie.org/research-initiatives/project-atlas/explore-data/united-kingdom-2>

²² <https://commonslibrary.parliament.uk/research-briefings/cbp-7783/>

- 153.2 International Access to HE (Nursing)
- 153.3 International Access to HE (Health Professions).

154 AVAs should note the following distinctions and ensure information, advice and guidance for prospective IAHE students with regard progression is clear and transparent (in accordance with Licensing Condition 1.2):

- 154.1 **Access to HE Diploma** – a range of Diploma titles available to students with a registered address in the UK; awarded in the UK for potential entry into higher education within the UK
- 154.2 **Subject Descriptor Compliant Access to HE Diploma** – three specific Diploma titles available to students with a registered address in the UK; awarded in the UK for potential entry into higher education within the UK
- 154.3 **International Access to HE Diploma** – a range of International Diploma titles available to students in a specified country; awarded in a specified country for potential entry into UK HE within that specified country or the UK; they may not be recognised in other nations
- 154.4 **Subject Descriptor Compliant International Access to HE Diploma** – three specific International Diploma titles available to students in a specified country; awarded in a specified country for potential entry into UK HE within that specified country or the UK; they may not be recognised in other nations

155 AVAs will continue to have the flexibility to validate and approve medical and health courses that are not Subject Descriptor Compliant. They may not use the reserved titles, however. This flexibility will allow AVAs and providers to respond to local market conditions, regulations and other requirements so that a Diploma may ready students for higher education and/or employment within their home country rather than, or as well as, the UK.

Application of the Trademarks to the IAHE

156 QAA is aware of the existence of some qualifications offered under the banner of 'international' which are similar to the Level 3 Access to HE Diploma but not regulated by QAA. In developing these arrangements, we are looking to protect the Access to HE and QAA brands. Some of the protections we have within our framework include requirements around the use of trademarks, and requirements around clear public information and marketing.

157 We are currently seeking to register logo, recognition mark and wordmarks for the IAHE in the UK. This will enable the logo, recognition mark and wordmarks to act as an international visual marker to identify Access to HE qualifications approved within the terms of the Recognition Scheme. AVAs will be required to use the trademarks as per the requirements set out in the International Conditions, and have procedures in place to ensure that providers also use the International trademarks as per the regulatory requirements.

158 Intellectual property (IP) rights are territorial in nature, meaning that rights issued by the Intellectual Property Office of the UK only give protection in the UK. It is our intention to also register with the World Intellectual Property Organization (WIPO) to protect our IP assets more widely, and we will review coverage on a needs basis as the IAHE gains

market share. AVAs should note that trademark and IP considerations should form part of any risk assessment or credible plan for operating in a given country.

Consultation questions

Q19. Do you have any comments regarding the implementation of the Subject Descriptor Compliance Marks in international territories?

Q20. Do you have any comments regarding the protection of Access to HE intellectual property (e.g. trademarks) in international territories?

Q21. Do you have any other comments regarding this section of the consultation?

Transition and implementation

159 This section provides an overview of the pilot phase. Much of the information has been previously presented, but we consider that it is important to present questions specifically on this aspect of the proposed arrangements. We also reiterate the steps that AVAs (existing and new) will need to take to transition from piloting the IAHERD on a country-by-country basis to applying for their first full international licence.

160 Our plans respond to feedback provided during the 2024 public consultation, in which AVAs expressed frustration that the IAHERD had taken considerable time to develop and appealed for a phased transition to allow them to relicence at a time that fits their business year.

Overview of the pilot phase

161 This consultation will take place over a five-week period during June 2025 and July 2025. Following the conclusion of the consultation, QAA will consider all responses and make changes to our proposals where we consider there is a clear reason to do so. AVAs will receive a report on our response to the consultation in Autumn 2025 following its approval by ARLC (Access Regulation and Licensing Committee) and the QAA Board.

162 The pilot phase is intended to commence during academic year 2025-26, at which point AVAs which have transitioned to the new domestic arrangements will be invited to submit expressions of interest, to be followed by a more detailed application within one calendar year.

163 AVAs with international licences will be subject to the Monitoring Arrangements (general monitoring procedures with the potential to lead to enhanced monitoring and/or investigation) from the point of licence approval. Information arising from general and enhanced monitoring will inform evaluation of the pilot phase, and QAA will also, from time to time, organise additional opportunities for AVAs to share their experiences with us and other AVAs (e.g. in the form of focus groups, online surveys).

164 The pilot phase will close after two years, at which point a final evaluation of the IAHERD will be undertaken. This will inform future development and enhancement of the qualification and the Recognition Scheme for its licensing, delivery and award. Individual AVA licences issued during the pilot phase may continue beyond this date so that they will complete a full two-year pilot period under country-by-country licences.

Next steps after the pilot phase

165 Where there is no apparent serious or significant risk which is likely to affect the outcome of QAA's evaluation of the pilot, relicensing and licensing will continue in line with the plans set out in this consultation during the evaluation period in order to maintain operational continuity.

166 Any new AVAs entering the market will be permitted to apply for an international licence after the closure of the pilot phase (only existing AVAs may participate in the pilot phase). New AVAs must have held a domestic AVA licence for two years at the point of application for an international licence. They will need to submit an initial expression of interest on or after the date that the pilot phase closes, and will be subject to a two-year pilot

period from the date of international licence approval.

167 Existing AVAs that have participated in the pilot phase will become eligible to apply for a renewal of their licence (a full international licence lasting three or five years, dependent on our assessment of risk) as they near the end of their two-year pilot period. QAA will issue further guidance on the renewal process and its timing after this consultation. There will be no charge for the renewal of a licence.

Consultation question

Q22. Do you have any comments regarding the implementation of the International Access to HE Diploma and the transition into and from the pilot phase?

Q23. Do you have any other comments regarding this section of the consultation?

Conclusion

168 In late 2021 and early 2022, QAA undertook development work focused on the feasibility of launching and developing the International AHED. In autumn 2022, we shared an approach with AVAs that was based on the same regulatory infrastructure as the domestic arrangements. However, it became apparent that we were likely to need to prioritise making changes to these arrangements, and so paused work on the development of the IAHEd.

169 QAA re-engaged with AVAs in the summer of 2023 to better understand their reasons for wanting to launch the IAHEd, and public consultation in 2024 allowed us to explore initial proposals for the introduction of an international licence for a pilot phase. From this work we have developed a more substantive proposal on which we are now seeking comprehensive and detailed feedback from the organisations that will bear much of the financial and reputational risk in implementing an IAHEd - the AVAs themselves.

170 Consultation feedback may be submitted online by 17:00 on 6 July 2025 and QAA intends to share its response during Autumn 2025 with a view to AVAs applying to participate in a two-year pilot phase which will commence during academic year 2025-26.

Appendices

Appendix A: Preview of consultation survey questions

- Q1.** Do you have any comments regarding the definition of the IAHER?
- Q2.** Do you have any comments regarding the intended purpose of the IAHER?
- Q3.** Do you have any comments regarding the intended student demographic?
- Q4.** Do you have any other comments regarding this section of the consultation?
- Q5.** Do you have any comments regarding the two-year pilot phase for current AVAs?
- Q6.** Do you have any comments regarding eligibility for an international AVA licence?
- Q7.** Do you have any comments regarding the process of applying for an international licence?
- Q8.** Do you have any comments regarding the international licence fee structure?
- Q9.** Do you have any other comments regarding this section of the consultation?
- Q10.** Do you have any comments regarding the application of Access to HE Conditions to an AVA's international operations?
- Q11.** Do you have any comments regarding the application of Monitoring Arrangements to an AVA's international operations?
- Q12.** Do you have any comments regarding the application of regulatory interventions to an AVA's international operations?
- Q13.** Do you have any other comments regarding this section of the consultation?
- Q14.** Do you have any comments regarding the proposed English language requirements for the IAHER?
- Q15.** Do you have any comments regarding the blended delivery that IAHER will entail?
- Q16.** Do you have any comments regarding the implementation of the existing Diploma Specification in international territories?
- Q17.** Do you have any comments regarding the implementation of the existing Grading Scheme in international territories?
- Q18.** Do you have any other comments regarding this section of the consultation?
- Q19.** Do you have any comments regarding the implementation of the Subject Descriptor Compliance Marks in international territories?
- Q20.** Do you have any comments regarding the protection of Access to HE intellectual property (e.g. trademarks) in international territories?
- Q21.** Do you have any other comments regarding this section of the consultation?

Q22. Do you have any comments regarding the implementation of the International Access to HE Diploma and the transition into and from the pilot phase?

Q23. Do you have any other comments regarding this section of the consultation?

Appendix B: Standard Terms for the Licensing of AVAs Operating Internationally

Introduction

- 1 The Quality Assurance Agency for Higher Education ('QAA') is the regulator of the Access to Higher Education (HE) Diploma ("the Diploma") and the International Access to Higher Education Diploma ("IAHED" or "the International Diploma") and is responsible in its charitable objects to provide advice to governments on Diploma and International Diploma recognition. QAA also registers and holds the Access to HE logo trademark and Access to HE word trademark (together the 'Access to HE Trademarks'), which are the trademarks associated with the Diploma. QAA seeks to protect the International Diploma through international copyright protections also.
- 2 In maintaining the means through which the International Diploma is recognised by governments and higher education institutions for funding, QAA operates the QAA Recognition Scheme for Access to HE ("the Recognition Scheme"). The Recognition Scheme refers to QAA's arrangements for exercising its responsibilities in respect of the International Diploma, and includes a framework of requirements set out in documentation through which QAA permits International Access to HE Diploma courses to be developed, validated and approved, and International Diplomas awarded, by Access Validating Agencies ("AVAs") under International licence (the "International Licence").
- 3 QAA will award and permit AVAs to maintain their International Licence for these purposes on the basis that they agree to adhere to QAA's requirements in relation to the International Diploma as set out in the following documents which make up the Recognition Scheme:
 - 3.1 These **Standard Terms for the Licensing of Access Validating Agencies Operating Internationally** ("International Terms") which set out the terms that an AVA must agree to in order to operate outside of the UK and maintain its International Licence; and
 - 3.2 The **Access to HE International Conditions** ("International Conditions") which are the obligations AVA must comply with (or demonstrate its ability to comply with) to become an AVA and to continue to comply with to maintain its International Licence.
- 4 The Conditions contain reference to requirements, expectations and arrangements which are set out in further regulatory documentation (the "Regulatory Documents"), and in meeting the requirements of the Conditions it is expected that the AVA will adhere to the requirements and guidance set out in these further documents. The Regulatory Documents include:
 - 4.1 The **international licensing arrangements**: This refers to the arrangements QAA has in place for the award, withdrawal and surrender of International Licences, as set out in *The Access to HE Licensing Arrangements for AVAs Operating Internationally*.
 - 4.2 **The monitoring arrangements**: These are the arrangements QAA operates to

monitor and make judgements about whether an AVA is meeting the requirements of the Recognition Scheme, as set out in *The Access to HE Monitoring Arrangements*. This also includes information on the approaches QAA may take where it has concerns about an AVA's compliance with its requirements.

4.3 The qualification requirements: These requirements are set out in *The Access to HE Diploma Specification*, *The Access to HE Grading Scheme* and the Subject Descriptors. The Access to HE Diploma Specification and The Access to HE Grading Scheme set out QAA's requirements for the design, delivery, assessment and award of Diplomas. The Subject Descriptors set out requirements for the content of particular subject areas. Together, these qualification requirements ensure consistency across the qualification, and across AVAs.

4.4 Guidance documents: QAA will, from time to time, produce guidance documents that provide further explanation and detail as to how specific elements of the Recognition Scheme will operate or be implemented by QAA. For example, to provide explanation of what behaviours QAA may consider compliant or uncompliant with its Terms or Conditions of the **International** Licence.

Standard Terms of the Licence

- 5 AVAs must agree to these Terms and demonstrate their continued compliance with the requirements set out in the Conditions and associated Regulatory Documents, in order to be awarded and maintain an **International Licence**.
- 6 Failure by an AVA to comply with these Terms and/or the Conditions or any other aspect of the Recognition Scheme may result in an investigation by QAA.
- 7 QAA may undertake an investigation into the AVA or any of its Providers if so required, at any time on reasonable notice, for any legitimate reason. Such reasons include but are not limited to circumstances where there is evidence that any of these Terms or any of the criteria or documents referred to within these Terms, are not being complied with. Such investigations can take place at the premises of an AVA or a Provider and can lead to procedures being instigated for the withdrawal of the **International** Licence in the case of the AVA, or other activity as set out in *The Access to HE Monitoring Arrangements*. For the purposes of these Terms, the term 'Provider' refers to an organisation that has entered into a contract with an AVA to deliver **International** Access to HE courses validated by that AVA (whether or not those courses are delivered in practice).
- 8 Charges will be imposed for any investigation or activity undertaken outside general AVA monitoring process as set out in further detail in *The Access to HE Monitoring Arrangements*.
- 9 Save where expressed otherwise, in the event of a conflict between these Terms and any document referred to within these Terms, these Terms shall prevail.

Identity, constitution and governance arrangements

- 10 **Only an AVA operating in accordance with the Standard Terms for the Licensing of**

Access Validating Agencies may apply for and receive an International Licence under the **Standard Terms for the Licensing of AVAs operating Internationally**. Furthermore:

- 10.1 An AVA must be a company registered in England or Wales or have a constitutional basis that is clear and readily identifiable, and have formal documentation that specifies its legal identity, function(s), aim(s) and principal governance structures, with a main address in the United Kingdom.
- 10.2 An AVA's legal identity, constitutional and governance arrangements must jointly ensure:
- 10.3 protection from the undue influence of any one of, or a minority group of, its members; and
- 10.4 its independent decision-making and operation as an AVA, as required by these Terms and other requirements of the Recognition Scheme.

Terms of agreement

11 The AVA agrees that it will:

- 11.1 continue to comply with these Terms;
- 11.2 comply with the **International** Conditions and the Regulatory Documents;
- 11.3 act in accordance with the requirements set out in the Recognition Scheme and such other requirements for AVAs that may be issued by QAA from time to time;
- 11.4 exercise its AVA responsibilities through its own organisation as required by the **International** Conditions, and not devolve to any other body any part of those responsibilities, subsequent to QAA's approval of the organisation's arrangements for operation of the **International** Licence;
- 11.5 follow, and be able to demonstrate that it has followed, the procedures that it has set out in formal submissions to QAA to demonstrate how it meets the **International** Conditions, which have been approved by QAA through the processes of AVA licensing or monitoring, as set out in *The Access to HE Monitoring Arrangements*;
- 11.6 make resources available to implement fully the approved procedures that are set out in its formal documentation or submissions to QAA, and requirements that may be made by QAA for the continuation of the **International** Licence;
- 11.7 contribute a specified annual fee as determined by QAA to the costs of maintaining and developing the Recognition Scheme **for International purposes** as set out in ***The Access to HE Licensing Arrangements for AVAs Operating Internationally***;
- 11.8 ~~promptly inform QAA of any proposed changes in ownership of the AVA and in any event within one working day of such change;~~ **inform QAA of significant**

changes to the organisational structure of the AVA that may impact upon international operations;

11.9 consult with QAA before adopting a new legal identity, in order to confirm:

- the appropriateness of the new identity for meeting its public obligations **internationally** and
- that the new identity (or other, additional arrangements) ensures that the AVA's liability exists separately from that of member or partner organisations and their individual representatives;

11.10 cooperate with, and participate in, QAA's arrangements for the licensing and monitoring of AVAs as set out in *The Access to HE Monitoring Arrangements*, including the submission of reports and data, according to requirements specified by QAA; and comply with requirements made by QAA for the continuation of its **International** Licence;

11.11 take no action and make no omission that, in QAA's reasonable opinion, brings into disrepute or could endanger the reputation of the **International Diploma, Diploma**, the Recognition Scheme, or QAA, or which damages the goodwill or reputation in the Access to HE and **International Access to HE** Trademarks;

11.12 use, and ensure that eligible Providers only use, the **International** Access to HE Trademarks in such forms and such manner as permitted by QAA's *Requirements for the use of Access to HE Trademarks* (as may be amended from time to time) and comply, and ensure that Providers comply with all other provisions of that document and the ~~licensing criteria~~ **International Licensing Conditions** in the use of the Access to HE **and International Access to HE** Trademarks;

11.13 not sub-license, assign or otherwise dispose of any rights granted under these Terms to any third party other than to eligible Providers in accordance with these Terms, and also acknowledge that all rights and goodwill in the Access to HE Trademarks shall belong to QAA and that neither the AVA, nor any Provider, shall acquire any rights in the **International Access to HE** Trademarks other than as expressly set out in these Terms; and

11.14 conduct an inspection or audit at any time on reasonable notice at any one or more of the Providers, should it, or QAA, be of the reasonable belief that the Provider is not operating in accordance with the requirements of any part of the Recognition Scheme, including, but not limited to, guidelines for the use of the Access to HE Trademarks in their use of the **International Access to HE** Trademarks.

Non-compliance

12 Where QAA, in its reasonable opinion, concludes there has been, or there is risk of, non-compliance with any requirement of these Terms, the Conditions and/ or the Recognition Scheme, QAA may:

12.1 issue a notice to an AVA that requires an AVA to take targeted action to

resolve the non-compliance, or risk of non-compliance;

12.2 impose a specific condition or conditions on an AVA that must be complied with, which may require an AVA to take certain action, or prohibit it from taking certain action; and/ or

12.3 impose a formal sanction on an AVA such that the AVA is restricted in the activities it can undertake under its **International** Licence, or suspend or withdraw its **International** Licence.

13 Where QAA has taken any action specified in Term 12 above, and the AVA has failed to comply with the action, QAA may take further action and issue a notice as per Term 14 to terminate the AVA's **International Licence**, in line with processes set out in ***The Access to HE Licensing Arrangements for AVAs Operating Internationally***.

14 QAA may terminate the **International** Licence at any time on written notice to the AVA with immediate effect:

14.1 if the AVA is in breach of any of these Terms or **the International** Conditions and, if the breach is capable of remedy, the AVA has failed to remedy such breach within 30 days of the date of the notice from QAA requiring such remedy;

14.2 if the AVA is in breach of any of these Terms or the **International** Conditions which is not capable of remedy;

14.3 if a resolution is passed or an order is made for the winding up of the AVA (other than for the purpose of solvent amalgamation or reconstruction) or the AVA becomes subject to an administration order or a receiver or administrative receiver is appointed over, or an encumbrancer takes possession of any of the AVA's property;

14.4 for non-compliance by the AVA with Term 11.9 by entering into a new legal identity without adherence to relevant QAA procedures;

14.5 for non-compliance by the AVA with the QAA's *Requirements for the use of Access to HE Trademarks* or in the event that, by reason of any act or omission of the AVA, there has been, or there is likely to be, damage to the reputation of QAA;

14.6 in the event that in QAA's reasonable opinion, by reason of the use being made of the **International** Access to HE Trademarks by the AVA, there is a risk that the Access to HE **and/or International Access to HE Trademarks** may become devalued by its generic use or application; or that the International Access to HE Trademark has been used in such a way as to suggest QAA's approval has been given to activities that are unrelated to the **International** Access to HE Diploma; and/ or

14.7 in the event that the use by any of the AVA's Providers results in or is likely to result in one of the outcomes set out in Terms 14.5 and 14.6 above, and QAA has notified the AVA of such circumstances, and the AVA has not taken steps to rectify the same within a reasonable time period of being given notice to do so.

14.8 on withdrawal or termination of the AVA's domestic licence by the AVA or through QAA intervention in line with section 17 of the *Standard Terms for the Licensing of Access Validating Agencies*.

- 15 Where QAA terminates the **International** Licence in accordance with **Term 14**, the consequences and process for this shall be as set out in ***The Access to HE Licensing Arrangements for AVAs Operating Internationally***.

Appendix C: Proposed data collection fields

We propose to add the following fields (indicated in red) to our routine data collection for the IAHERD to monitor coverage and accessibility, and to determine place-based disadvantage.

4: Country

5: Study_Location

15: Student_Domicile

18: Employment_Status

19: Source_of_Funding

Field number	Field description	Guidance	Data field type
1.	AVA	Please enter the AVA's name. This should appear on each row of the submission against which there is a student entry.	Text
2.	StudentNumber	<p>Please enter a unique numerical ID for each student. This may be a:</p> <ul style="list-style-type: none"> • student record ID²³ taken from the AVA's database; OR • sequential number. <p>This should appear on each row of the submission against which there is a student entry.</p> <p>To note: Students who have more than one registration at an AVA should be included in the data submission. They must have a unique ID for each entry on the submission; this may reflect the student record ID derived from a registration ID and course ID.</p> <p>The total credit value for each student record ID submitted must equal 60 credits.</p>	Text
3.	Provider	Please enter the name of the provider. This should appear on each row of the submission against which there is a student entry.	Text

²³ For Quartz users this could match to the student ID that is derived from the registration ID and course ID.

Field number	Field description	Guidance	Data field type
4.	Country	Please enter the country of operation for each provider. This should appear on each row of the submission against which there is a student entry	
5.	Study Location	<p>Please enter the study location from the fields below</p> <ul style="list-style-type: none"> • Main or only centre location • Regional centre • Other centre location <p>This should appear on each row of the submission against which there is a student entry.</p>	
6.	Diploma Title	<p>Please enter the Diploma title. This should appear on each row of the submission against which there is a student entry.</p> <p>This field should not include Access to HE/Higher Education Diploma or any brackets. For example, Access to HE Diploma (Nursing) should be shown in this field as 'Nursing'.</p>	Text
7.	Subject Area Tier 1	<p>Please enter the subject sector area (SSA) tier 1 in numeric format only.</p> <p>The following notes the main SSA tier 1 allocations for Access to HE Diplomas</p> <p>1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 15</p> <p>This should appear on each row of the submission against which there is a student entry.</p> <p>Information is available from the “Awards by AVA, provider and status report” on the AVA report site.</p>	Text
8.	Subject Area Tier 2	<p>Please enter the SSA tier 2 in numeric format only. Only the following SSA tier 2 entries will be accepted:</p> <p>1.1, 1.2, 1.3, 1.4, 1.5, 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, 5.1, 5.2, 5.3, 6.1, 6.2, 7.1, 7.2, 7.3, 7.4, 8.1, 8.1,</p>	Text

Field number	Field description	Guidance	Data field type
		<p>9.1, 9.2, 9.3, 9.4, 10.1, 10.2, 10.3, 10.4, 11.1, 11.2, 11.3, 11.4, 11.5, 12.1, 12.2, 12.3, 13.1, 13.2, 15.1, 15.2, 15.3, 15.4, 15.5</p> <p>This should appear on each row of the submission against which there is a student entry.</p> <p>Information is available from the “Awards by AVA, provider and status report” on the AVA report site.</p>	
9.	<p>Learning Aim</p> <p>(QAA’s database automatically allocates a learning aim to Diploma titles added by AVAs)</p>	<p>Please enter the learning aim. This should appear on each row of the submission against which there is a student entry.</p> <p>Where these are not held on the AVA's database, the AVA should complete the proforma using information available from the “Awards by AVA, provider and status report” on the AVA report site.</p>	Text
10.	Learner Start Date	<p>Please enter the start date in dd/mm/yyyy format only. This should appear on each row of the submission against which there is a student entry.</p> <p>Database date stamps should be removed prior to submission to QAA.</p> <p>Entries must be formatted as a DATE in the Excel Workbook.</p>	Date
11.	Learner End Date	<p>Please enter the end date in dd/mm/yyyy format only. This should appear on each row of the submission against which there is a student entry.</p> <p>Where the end date is not known, AVAs should use:</p> <ul style="list-style-type: none"> 31 July of the reporting year for students who have completed or withdrawn in the reporting year, i.e. 31 July 2023 31 July of the coming academic year for learners who are continuing their studies, i.e. 31 July 2024 	Date

Field number	Field description	Guidance	Data field type
		<p>Database date stamps should be removed prior to submission to QAA.</p> <p>Entries must be formatted as a DATE in the Excel Workbook.</p>	
12.	Ethnicity	<p>Please enter the learner's ethnicity using the fields identified by QAA and shared with AVAs.</p> <p>Arab Asian -Bangladeshi Asian-Chinese Asian-Filipino Asian-Indian Asian-Pakistani Asian-any other Asian background Black -African Black -Caribbean Black -any other background</p> <p>Mixed or multiple ethnic groups-White and Asian Mixed or multiple ethnic groups -White and Black-African Mixed or multiple ethnic groups -White and Black-Caribbean Mixed or multiple ethnic groups -any other mixed background White-British White-Irish White-any other white background Any other Not known Not disclosed/withheld</p> <p>This should appear on each row of the submission against which there is a student entry.</p>	Text

Field number	Field description	Guidance	Data field type
13.	Gender	<p>Please enter gender identified by learner using the fields noted below:</p> <ul style="list-style-type: none"> • male • female • other • unknown • not disclosed/withheld <p>This should appear on each row of the submission against which there is a student entry.</p>	Text
14.	Age Band	<p>Please enter the learner's age band using the fields noted below:</p> <ul style="list-style-type: none"> • Under 17 • 17-19 • 20-24 • 25-29 • 30-34 • 35-39 • 40-44 • 45-49 • 50+ • unknown <p>This should appear on each row of the submission against which there is a student entry.</p>	Text
15.	Student Domicile	<p>Please enter the region or district where the student is domiciled</p> <p>This should appear on each row of the submission against which there is a student entry.</p>	
16.	Disadvantage ²⁴	Please enter from the fields noted below information	Text

²⁴ Disadvantage to be determined by AVAs using the data collected from students with consideration specifically to: Racialised people, Indigenous peoples and minorities, People with limited economic means, Persons with disabilities, Women, LGBTQ+ persons, Forcibly displaced people, People from remote and/or rural locations. We recognise the importance of collecting disadvantage data on both domestic and international qualifications, however recognise the complexity this presents for AVAs and providers in the context of different national

Field number	Field description	Guidance	Data field type
		<p>relating to the learner's area of disadvantage status:</p> <ul style="list-style-type: none"> • disadvantaged • not disadvantaged • unknown • not disclosed/withheld <p>This should appear on each row of the submission against which there is a student entry.</p>	
17.	Learning Difficulties and Disabilities	<p>Please enter from the fields noted below information relating to the learner's learning difficulty and/or disability:</p> <ul style="list-style-type: none"> • disabilities • learning difficulties • disabilities and learning difficulties • no disability or learning difficulties • unknown • not disclosed/withheld <p>This should appear on each row of the submission against which there is a student entry.</p>	Text
18.	Employment Status	<p>Please enter the learner's employment status at the start of their programme of study from the fields noted below:</p> <ul style="list-style-type: none"> • Employed full time • Self-employed full-time • Employed part-time • Self-employed part-time • Retired • Not employed • Unknown • Not disclosed/withheld 	
19.	Source of Funding	<p>Please enter how the student funded their IAHER from the fields noted below:</p> <ul style="list-style-type: none"> • Self-funded 	

approaches. In the short term (i.e. during the Pilot Phase initially), AVAs will be encouraged to collect and submit this where possible.

Field number	Field description	Guidance	Data field type
		<ul style="list-style-type: none"> • Bursary (centre) • Sponsored (individual / charity / company) • No fee • Unknown • Not disclosed/withheld <p>This should appear on each row of the submission against which there is a student entry.</p>	
20.	Completion Status	<p>Please enter the learner's completion status from the fields noted below:</p> <ul style="list-style-type: none"> • continuing • withdrawn • completed • transfer to new aim • break in learning <p>This should appear on each row of the submission against which there is a student entry.</p> <p>Definitions: Continuing = students who have not completed their course of study and have indicated they will be returning to complete the course in the next academic year. Withdrawn = students who have not completed their course of study, are no longer attending classes and have been withdrawn by the course provider, or have indicated they will not be returning to complete their studies in the next academic year. Where a student is marked as withdrawn, the LearnerEndDate field must record an end date within the reporting year. Where the end date is not known, AVAs should use 31 July of the reporting year for students who have completed or withdrawn in the reporting year.²⁵ Completed = students who have completed their course of study. Transfer to new aim = students who have formally</p>	Text

²⁵ QAA is aware that some AVAs maintain student registrations for a period of time after a student has left a course to allow them to rejoin at a later date. Students in this category who are not active in the reporting period should be withdrawn in the statistics reported to QAA.

Field number	Field description	Guidance	Data field type
		<p>transferred to another learning aim (will apply to publicly funded students in England only).</p> <p>Break in learning = students who have formally been approved for, and taken, a break in learning (may apply mainly to publicly funded students).</p>	
21.	Destination	<p>The following entries will be accepted by the statistics database:</p> <ul style="list-style-type: none"> • Continuing Existing Programme • Destination unknown • Employment • Further education (within FE or HE institution) in country • Further education (within FE or HE institution) in the UK • Higher education (within FE or HE institution) in country • Higher education (within FE or HE institution) in the UK • Other • Withdrawn <p>The data fields entered should appear on each row of the submission against which there is a student entry.</p>	Text
22.	Achievement	<p>Please enter the learner's achievement status from the fields noted below:</p> <ul style="list-style-type: none"> • achieved • continuing • no achievement • partial achievement <p>This should appear on each row of the submission against which there is a student entry.</p>	Text
23.	Unit Title	Please enter the titles of all units against which the student is registered.	Text
24.	Credit Value	<p>Please enter the credit value for the named unit. Only the following numerical credit value entries will be accepted: 3, 6, 9</p> <p>This field should not include the word 'credit'. For example, a 3-credit unit should be shown only as the figure 3.</p>	Text

Field number	Field description	Guidance	Data field type
25.	Level	<p>Please enter the level of the named unit. Only the following numerical credit value entries will be accepted: 2, 3</p> <p>This field should not include the word 'level'. For example, a unit at Level 2 should be shown only as the figure 2.</p>	Text
26.	Grade	<p>Please enter the unit grade for each named unit. Only the following alphabetic unit grade entries will be accepted:</p> <ul style="list-style-type: none"> • Achieved • Pass • Merit • Distinction • Not Achieved 	Text
27.	Certification Date	<p>Please enter the certification date in dd/mm/yyyy format only. This should appear on each row of the submission against which achievement has been certificated against each student entry.</p> <p>Database date stamps should be removed prior to submission to QAA.</p> <p>Entries must be formatted as a DATE in the Excel Workbook.</p>	Date

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