



International Access to Higher Education Diploma

Licensing arrangements for Access Validating Agencies operating internationally

Summary of consultation responses

April 2026

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Executive summary

The Quality Assurance Agency for Higher Education (QAA) is the regulator of the Access to Higher Education Diploma (the Diploma), a qualification currently available to learners resident in the UK only. In response to sector interest, QAA has explored the potential to introduce an International Access to Higher Education Diploma (International Diploma) for learners outside the UK.

This report summarises the outcome of a public consultation undertaken during June and July 2025. The consultation formed part of the evidence base for determining whether QAA should proceed with a pilot to test the viability of the International Diploma.

The consultation proposed modelling the International Diploma on the existing domestic Diploma and fully aligning it with the QAA Access to HE Recognition Scheme. It sought feedback on the proposed approach to regulating and licensing the qualification, including the arrangements under which Access Validating Agencies (AVAs) could operate internationally. The consultation aimed to test the clarity and purpose of the qualification, assess whether the licensing framework was workable, and gather views on the safeguards, expectations and operational requirements needed to ensure the International Diploma remained comparable to the UK Access to HE Diploma when delivered outside the UK.

In December 2025, the QAA Board took the decision not to proceed with plans to pilot the International Diploma. The rationale for this decision is set out in the accompanying document [*International Access to Higher Education Diploma: Decision to discontinue the proposed pilot.*](#)

As the project will not be taken forward, QAA has not considered or determined positions on the specific suggestions raised by respondents to the public consultation. However, the analysis offered might offer insight that may be useful for other organisations seeking to design or implement an international qualification.

It is also important to acknowledge the insight shared by the nine consultation participants (eight Access Validating Agencies and one overseas provider) and reflect on how their feedback could shape any future work by QAA or the wider sector.

Headline findings are presented in Table 1 below, with a consolidated list of recommendations in the Appendix.

Table 1 - Summary of consultation responses

Theme	What was proposed	Key feedback (consultation findings)	Implications for any future development
Role and purpose of the International Diploma	<ul style="list-style-type: none"> • Introduce an international Level 3¹ Access to HE qualification aligned with domestic Diploma • Model based on the existing Access to HE Recognition Scheme 	<ul style="list-style-type: none"> • Definition broadly clear but needs stronger differentiation from foundation years • Uncertainty about progression routes (UK HE, UK-TNE, in-country HE) • Concerns about minimum age requirement and equity implications 	<ul style="list-style-type: none"> • Sharpen definition and academic positioning • Map progression routes and explore coordinated recognition activity • Re-examine minimum age requirement and equity considerations
Teaching, learning and assessment	<ul style="list-style-type: none"> • Maintain Level 3 equivalence • Require B2 English proficiency • Allow limited blended learning (20-40%) • Retain Diploma Specification and Grading Scheme 	<ul style="list-style-type: none"> • Strong support for B2 requirement, but need clarity on how providers assess language proficiency • Strong objections to fixed online-delivery caps; risk of inequity • Support for existing specification; requests for guidance on contextualisation • Support for grading model; need for tutor training 	<ul style="list-style-type: none"> • Provide guidance on acceptable evidence of B2 proficiency and responsibilities • Reconsider online delivery limits; adopt risk-based approach • Clarify contextualisation of specification; provide moderation support
Licensing and monitoring arrangements	<ul style="list-style-type: none"> • Introduce an international licensing pathway • Mirror but expand monitoring 	<ul style="list-style-type: none"> • Application process perceived as burdensome and unclear • Strong call for fee 	<ul style="list-style-type: none"> • Streamline and integrate domestic and international requirements • Provide clear

1 An explanation of qualification levels in England, Wales and Northern Ireland is available at: www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels. Scotland operates a separate system, the Scottish Credit and Qualifications Framework (SCQF), which uses different level numbers but is broadly comparable in terms of learning demand. For example, SCQF Level 6 is typically equivalent in demand to Level 3 of the Regulated Qualifications Framework (RQF), and SCQF Levels 9–10 align broadly with RQF Level 6 (Bachelor's degree level). Access to HE Diplomas are not currently delivered in Scotland.

Theme	What was proposed	Key feedback (consultation findings)	Implications for any future development
	arrangements <ul style="list-style-type: none"> • Introduce additional Conditions for international operations 	transparency <ul style="list-style-type: none"> • Concern about duplication between domestic and international Conditions 	evidence expectations and monitoring guidance <ul style="list-style-type: none"> • Clarify intervention protocols and ensure proportionality
Transition, timeline and Pilot model	<ul style="list-style-type: none"> • Implement a two-year pilot (2025-26 onward) • Use expressions of interest and staged applications • Monitor delivery during pilot 	<ul style="list-style-type: none"> • Mixed views on value and feasibility of two-year window • Confusion about start point and sequencing • Significant financial risk for AVAs • Recommendation that AVAs have at least 5 years of domestic operation 	<ul style="list-style-type: none"> • Align pilot with long-term licensing model • Provide clear timeline, milestones, and an evaluation plan • Develop transparent, stable fee model • Strengthen eligibility expectations
Marketing and positioning	<ul style="list-style-type: none"> • Use Subject Descriptor Compliance Marks • Protect trademarks • Promote strong demand for health pathways 	<ul style="list-style-type: none"> • Need a clearer international value proposition relative to A levels and foundation years • Concern that delivery limits may restrict market competitiveness • Uncertainty about QAA's promotional role; desire for consistent branding 	<ul style="list-style-type: none"> • Develop a coherent value proposition and messaging • Clarify QAA's international engagement role • Review delivery rules for market viability

Background and context

1 The Quality Assurance Agency for Higher Education (QAA) is the regulator of 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.

3 During 2024-25, substantial updates were made to the Recognition Scheme to modernise regulatory requirements for AVAs and their Providers, and to ensure that regulatory risk can be managed proportionately while supporting the continued growth of the Diploma. The updated Recognition Scheme will be fully implemented from 1 August 2026.

4 Formal work on developing an International Access to Higher Education Diploma ('the International Diploma') began in 2020-2022 with two commissioned feasibility and market research reports, and engagement involving government bodies in Malaysia, Oman, Saudi Arabia and Vietnam. However, the work was subsequently paused to allow completion of the new Recognition Scheme with which the International Diploma was intended to align.

5 Work resumed in 2023, with the first public consultation on the New Recognition Scheme which explored the broad principles of the proposed International Diploma. QAA presented two options for structuring an international model and reported how respondents were split between those favouring one option, those preferring the other, and those expressing concerns about both. Stakeholders also offered broader reflections on the feasibility and desirability of an international qualification. The consultation response captured initial views on specific design elements, including English language requirements, the proposal for one Diploma per subject per country, and expectations for blended learning, alongside general comments. The outcome of this consultation was published in Access to Higher Education Diploma: Review of Regulation and Licensing - Analysis of consultation responses and decisions.²

6 A further, more detailed public consultation was conducted during June and July 2025³. This second consultation invited further feedback from all stakeholders, particularly

² QAA (2025) *Access to Higher Education Diploma: Review of Regulation and Licensing – Analysis of consultation responses and decisions*, available at:

www.qaa.ac.uk/docs/qaa/access-to-he/access-to-he-recognition-scheme-consultation-response-english.pdf

³ QAA (2025) *Consultation on the licensing arrangements for Access Validating Agencies operating internationally*, available at: www.qaa.ac.uk/docs/qaa/access-to-he/consultation-on-the-licensing-arrangements-for-access-validating-agencies-operating-internationally.pdf

those with operational insight, to shape the specific details of the proposed International Diploma and its regulation, licensing, and monitoring. The consultation proposed a two-year pilot starting in academic year 2025-26.

7 Throughout the development phase, oversight and governance was provided through QAA's Access Regulation and Licensing Committee (ARLC), reporting to QAA Board.⁴

8 In December 2025, QAA Board took the decision not to proceed with plans to pilot the International Diploma. The rationale for the decision is presented within the accompanying document 'International Access to Higher Education Diploma: Decision to discontinue proposed pilot'.

9 Implementation always depended on approval through QAA's governance and a feasible pilot to demonstrate the model's viability. However, consultation feedback and the evidence base showed that a viable pilot could not be achieved, and as a result, neither the pilot nor implementation could move forward.

Overview of analysis undertaken

10 QAA received nine responses, eight from AVAs and one response was received from an international provider.

11 The analysis is set out to reflect the six key themes from the consultation:

- Role and purpose of the International Access to HE Diploma
- Arrangements for entering into an AVA Licence for the International Diploma
- Arrangements for retaining an AVA Licence for the International Diploma
- Teaching, learning, and assessment of the International Diploma
- Marketing the International Diploma
- Transition and implementation

12 Each section of the analysis follows a consistent structure. This approach helps demonstrate how consultation feedback has been considered and how it might inform any potential future development.

- **What we proposed** - summarises the proposal shared with stakeholders.
- **What respondents told us** - presents the feedback received, highlighting key themes and areas of consensus or concern.
- **Implications for future development** - analyses what the feedback means for policy, feasibility, and potential next steps.

⁴ Membership and remit of the ARLC and QAA Board are available on the QAA's website at: www.qaa.ac.uk/about-us/how-we're-run

- **Practical Recommendations** - sets out evidence-informed suggestions that could guide any future work.

13 There is inevitably some duplication of concerns across multiple themes, reflecting the need for each section to stand alone as a balanced analysis.

14 As the project will not be taken forward, QAA has not determined positions on the specific recommendations raised. However, the analysis offered might offer insight that may be useful for other organisations seeking to design or implement an international qualification.

Role and purpose of the International Access to HE Diploma

What we proposed

15 We defined the International Diploma as a Level 3 post-16 qualification primarily focused on providing adult learners aged 17 or over with the subject-specific knowledge needed to progress to HE. If taken as a full-time course, it could be completed in one year. On completion of an International Diploma, students might go on to study at a higher level with a HE provider - which could be a degree or other higher-level qualification at Level 4 or above.

What respondents told us

16 Respondents offered a mix of broad support, requests for clarification, and concerns about aspects of accessibility, progression, and delivery.

17 **Definition of the International Diploma** - Respondents broadly welcomed the definition with the positive framing for adult learners. However, there were suggestions that clearer differentiation from foundation years was needed.

18 **Distinction from other international HE provision** - a small number of respondents asked for clearer articulation of how the International Diploma differs from foundation-year provision and suggested reinforcing academic rigour and the intended audience. Others were content with the definition as drafted.

19 **Progression routes** - respondents asked for more information on likely progression destinations, including whether progression would be to UK-based HE, UK-TNE or in-country HE. Several asked QAA to take a more active role in recognition efforts - such as prioritising countries, facilitating recognition agreements, or, in one case, sharing a list of accepting universities.

20 **Intended purpose** - views were mixed. Some found it clear, while others described the wording as confusing - particularly regarding progression destinations and QAA's planned role in promoting the Diploma internationally. Several respondents observed that relying on private funding could reduce the focus on supporting adults who may face social, economic or other barriers to accessing education.

21 **Intended audience** - Respondents questioned the rationale for setting the minimum age at 17, noting its divergence from domestic practice and potential to disadvantage younger learners, those in rural communities or facing other barriers to learning.

22 Respondents also commented on the importance of preserving the adult-focused ethos of Access to HE.

Implications for any future development

23 Marketing would play a critical role in establishing the identity of any new qualification by supporting recognition and building confidence among learners, providers, and international partners. Clear, consistent messaging would be essential to distinguish the International Diploma from comparable pathways, and to position it effectively across diverse global contexts.

24 **Definition and distinctiveness** - future development would need to articulate a clear distinction from foundation-year provision and reference academic rigour prominently, whether within the core definition or in supporting materials.

25 **Progression and recognition** - work would need to focus on mapping likely progression pathways while maintaining institutional autonomy. Longer-term engagement with governments and funding bodies would be needed to address concerns about accessibility and reliance on self-funding.

26 **Learner demographic and readiness** - the model would need to draw a clear distinction between regulatory and marketing activities and might need to take account of the national funding structures, particularly relating to age-based eligibility.

Practical recommendations

27 The following recommendations outline practical steps to strengthen the clarity, coherence, and accessibility of the International Diploma.

Definition and distinctiveness

- Refine the definition only where needed to maintain alignment with the domestic Diploma while strengthening clarity in areas highlighted by respondents, including differentiation from foundation-year provision.
- Consider whether more explicit reference to academic rigour would support international positioning.

Progression and recognition

- More clearly articulate progression expectations, including transparency about UK and international progression routes.
- Explore ways in which QAA could support AVAs in coordinated recognition activity (e.g. prioritising key countries, facilitating conversations, or sharing indicative information on accepting institutions).
- Consider how reliance on private or self-funding may affect access for adults facing social, economic or other barriers to learning.
- Explore opportunities for longer-term partnerships with governments or funding bodies to broaden accessibility.

Learner demographic and readiness

- Review the minimum age requirement to ensure consistency with domestic policy and maintain the adult-learning ethos.
- Provide guidance to support AVAs and Providers in assessing learner readiness, particularly where prior educational experience varies.

Arrangements for entering into an AVA Licence for the International Diploma

What we proposed

28 We proposed that the licensing process should begin with an AVA submitting an expression of interest indicating the intended territories, providers, and proposed Diplomas, followed by informal scoping discussions with QAA to identify potential risks or challenges. AVAs would then submit a full application, providing a detailed credible plan and supporting evidence, which QAA would review for completeness and alignment with the Recognition Scheme. We anticipated an assessment period of four to six months, with possible outcomes including a two-year pilot Licence, a three- or five-year full Licence, or refusal.

What respondents told us

29 Respondents provided a wide range of views on the proposed pilot phase, eligibility requirements, application processes, fee structures, and associated operational considerations. Their feedback highlighted both areas of broad agreement and points of concern, offering detailed reflections on the practical and regulatory implications of introducing an international licensing framework.

30 **Pilot phase** - respondents expressed mixed views on the value and feasibility of a two-year pilot. Several questioned whether the timeframe would allow a full delivery cycle, noting that late starts, ARLC queries, or other delays could reduce the effective timeframe and increase financial risk. They sought clarity on the meaning of 'small scale' delivery, and how QAA would manage demand if a large provider entered early. Some noted that aligning to a UK academic-year model might not suit all countries. While many supported a cautious, risk-managed approach, they emphasised the need for clearer guidance, stronger support for early adopters, and clarity on when the pilot would formally commence. Others viewed the pilot as unnecessary or too short to track full student completion.

31 **Eligibility for an International Licence** – many respondents felt that AVAs should demonstrate a strong track record of operating under a domestic Licence before being considered for an international one. Many respondents suggested at least five years' experience to show they can manage the risks and responsibilities involved. While most supported broad eligibility in principle, some questioned whether AVAs with little international experience should be allowed to progress without first showing they have the capacity to operate overseas. Others proposed combining domestic and international licensing to avoid duplication.

32 **Application process** - respondents frequently described the proposed process as overly complex and burdensome. They asked QAA to simplify requirements while maintaining regulatory integrity, suggesting phased submissions, collaborative applications

with in-country partners, clearer definitions of a “credible plan,” published timelines, and reference models such as Ofqual’s approach to scope expansion. Concerns included: requiring a country-by-country plan, limiting AVAs to one Diploma per subject per country during the pilot, and the four-to six-month assessment window which some felt was too long. Respondents also raised questions about ensuring consistency where more than one AVA operates in a country and about QAA’s role in assessing local market impact.

33 **Fee structure** - many respondents asked for more transparency on the fee model to enable business planning. They requested clarity on per-learner unit costs, minimum fee thresholds, and longer-term fee implications beyond the pilot. Many sought reassurance that international fees would not displace or inflate domestic costs for AVAs not participating in international activity, with some recommending international costs be ring-fenced. Respondents queried QAA’s overall cost exposure during the pilot; while some welcomed QAA’s commitment to covering pilot expenses, others said participation would depend on affordable per-learner fees.

34 **Commercial concerns** - respondents asked QAA to clarify how it would assess the impact on existing local provision without encroaching on competition management, and how it would treat sub-contracting or franchise models common in international contexts. Some sought reassurance that Licences could be paused or adjusted if in-country regulatory or economic conditions changed during the pilot. Respondents highlighted costs of market entry and compliance and asked about how countries might be selected.

Implications for any future development

35 Taken together, respondent feedback highlights a clear desire for greater practical coherence in the arrangements for licensing AVAs to operate internationally. Stakeholder comments point to the need for more streamlined processes and well-defined parameters to ensure that international development is both credible and manageable for AVAs.

36 **Pilot design and success criteria** - future pilot arrangements would need to define 'small-scale' delivery more clearly, include a detailed timeline of key events, and establish indicators of success such as student numbers, provider readiness and compliance.

37 **Managing delivery timelines and risk exposure** - a pilot would need to offer a realistic opportunity for AVAs to deliver the International Diploma, not simply engage in preparatory activity, and would need to mitigate financial risk where delays reduce the effective pilot window.

38 **Eligibility for an International Licence** - a licensing model would need to balance sector preferences (such as a five-year domestic track record) with aims relating to inclusivity and innovation. A single licensing model covering domestic and international activity may warrant exploration.

39 **Proportionality of application process** - the application process would need to be streamlined, potentially through phased submission, collaborative applications, firmer timelines, and clearer definitions of what constitutes a 'credible plan'. Proposed restrictions such as one Diploma per subject per country may need to be reviewed.

40 **Fee structure and cost transparency** - early clarity on per-student fees and longer-term arrangements would be essential for AVA planning.

41 **Operating models and contingency** - clear positions on subcontracting and franchise arrangements and mechanisms for pausing or adjusting Licences in response to in-country regulatory or economic changes would be needed.

Practical Recommendations

42 The following recommendations identify ways to enhance the feasibility and proportionality of the proposed international licensing model.

Pilot design and success criteria

- Define the pilot with greater precision, including the formal start point, the meaning of 'small-scale' delivery, and clear success metrics.
- Consider whether a two-year window is sufficient for implementation and completion.
- Provide structured support for early participants, including guidance, checklists and scheduled touchpoints.

Eligibility for an International Licence

- Examine whether a single, integrated domestic/international licensing model could reduce duplication.

Proportionality of application process

- Streamline the application process by clarifying evidence expectations, offering phased submissions, and providing clearer guidance on what constitutes a 'credible plan'.
- Review restrictions that may limit viability during the pilot (e.g. one Diploma per subject per country).
- Clarify the extent to which QAA will consider local market impact when reviewing applications.

Fee structure and cost transparency

- Publish an early, transparent fee framework, including indicative per-learner levels, thresholds, and post-pilot arrangements.
- Consider ring-fencing international costs to avoid cross-subsidy from domestic fees.

Operating models and contingency

- Provide clearer guidance on subcontracting and franchise delivery models commonly used internationally.
- Build mechanisms that allow Licences to be paused or adjusted where in-country conditions materially change.

Arrangements for retaining an AVA Licence for the International Diploma

What we proposed

43 We proposed that, to ensure proportionate but robust oversight that protects the quality, integrity and reputation of Access to HE globally, AVAs operating internationally should follow the existing domestic Standard Terms for licensing Access Validating

Agencies, alongside a new set of international Standard Terms and a parallel set of Access to HE International Conditions.

44 We explained that the international arrangements would closely mirror the domestic framework to minimise burden, while introducing additional requirements to reflect the higher risks of international provision - for example, separate compliance statements and monitoring for domestic and international activities, and provisions allowing QAA to apply general or enhanced monitoring where risks arise.

What respondents told us

45 The feedback reflected a broad and detailed set of concerns. Contributors consistently pointed to areas where the framework appeared overly complex or administratively burdensome. Respondents highlighted the need for clearer guidance, streamlined processes and more coherent alignment between domestic and international expectations. Many felt that existing quality processes already allowed AVAs to manage risk effectively and questioned whether additional arrangements were needed. Overall, the feedback represented a collective call for a more focused, transparent and detailed model before further development.

46 **Application of Access to HE Conditions** - while most respondents supported the principle of applying International Conditions, many argued that domestic and international Conditions should be consolidated to avoid duplication. Several expressed the view that the proposed Conditions were overly complex, duplicative, or inconsistent with how other regulators operate.

47 **Monitoring Arrangements** - respondents raised concerns that proposed monitoring would introduce significant additional workload, especially if domestic and international monitoring were separated. Respondents asked that monitoring be primarily desk-based to minimise cost, and for clarity on notifiable events, translation requirements and the feasibility of collecting destination data internationally.

48 **Regulatory Interventions** - many respondents said intervention processes were unclear and potentially disproportionate. They requested clearer, more reasonable protocols, aligned with the domestic approach where possible. Where investigations might be chargeable, respondents sought limitations of liability, proportionate fees, and a presumption of desk-based approaches, avoiding travel and accommodation costs except in exceptional, agreed circumstances.

49 **Regulatory burden** - in addition to concerns about complexity, several respondents felt that the proposed framework would make business planning difficult, due to the number of new processes and expectations being introduced. Significant concern was also raised about the potential impact on domestic operations, with respondents noting that increased capacity and resource demands could divert attention away from the existing UK system.

Implications for future development

50 Overall, respondent feedback underscores the need for proportionality, clarity and coherence to ensure that international activity does not compromise the stability and effectiveness of domestic provision.

51 **Regulatory framework** - future development may need to consolidate regulatory requirements to avoid parallel domestic and international systems, ensuring alignment and proportionality.

52 **Monitoring and evidence** - monitoring expectations would need to be proportionate, clearly scoped and realistic about the availability of international data. Parameters for notifiable events and documentation should be well defined.

53 **Regulatory interventions** - the framework would need to provide precise definitions of when and how interventions apply internationally, distinguishing developmental oversight from formal sanctions. Investigation protocols may need to account for cross-jurisdictional challenges.

54 **Protecting domestic provision** - international activity would need to remain clearly separated from domestic operations in responsibilities, costs, and capacity to protect the stability of the domestic system.

55 **Feasibility and business planning** – clear timelines, expectations, and fee structures would be needed to support AVA planning. Streamlined processes and transparent cost models would be essential for viability assessments.

Practical recommendations

56 The following recommendations focus on creating a clearer, more proportionate regulatory framework for AVAs operating internationally.

Regulatory framework

- Combine domestic and international regulatory requirements where possible to minimise duplication.
- Provide a clear rationale for any additional requirements that apply specifically to international operations.
- Ensure alignment with established practices across comparable regulators.

Monitoring and evidence

- Prioritise a monitoring approach that is proportionate, clearly scoped and primarily desk-based.
- Publish standardised guidance on evidence expectations, translation needs, and notifiable events.
- Re-assess expectations for international destination data and consider lighter-touch alternatives where appropriate.

Regulatory interventions

- Clarify the boundary between developmental oversight and formal sanctions, ensuring that intervention processes are proportionate and transparent.
- Establish principles for cost recovery, limiting investigative fees and avoiding travel-based costs except in exceptional cases.
- Consider how investigative processes will operate in an international context.

Protecting domestic provision

- Maintain clear separation of domestic and international activity to avoid diversion of resources or regulatory capacity.

Feasibility and business planning

- Publish fee structures, timelines, and application requirements early to support effective planning.
- Reduce bureaucratic burden in Licence submissions, including options for staged or phased approaches.
- Ensure timelines avoid conflict with peak domestic periods (e.g. relicensing cycles).

Teaching, learning, and assessment of the International Diploma

What we proposed

57 We proposed maintaining the International Diploma as fully equivalent to a UK Level 3 qualification by aligning it with national level-descriptor frameworks and the existing Diploma Specification and Grading Scheme. AVAs would be required to ensure that International Diplomas met UK Level 3 expectations in knowledge, skills and academic demand, to support progression and recognition opportunities.

58 We proposed that learners' English language ability should be assessed at registration to ensure they could complete the course, and that they should be able to achieve Common European Framework of Reference for Languages level B25 by completion, to meet UK HE entry expectations.

59 Delivery was to be primarily face-to-face, with blended learning allowed for 20-40% of delivery where educationally justified. These thresholds were informed by Home Office Remote Delivery Policy.⁶ Fully remote delivery would only be permitted in exceptional circumstances.

60 The Diploma Specification and Access to HE Grading Scheme were to be implemented unchanged to ensure consistency, parity, and quality across all international contexts.

What respondents told us

61 Consultation responses highlighted support for clear English language requirements, significant concern about restrictive limits on online delivery, strong endorsement of the existing Diploma Specification, and broad approval of the current grading model. Respondents also sought clearer guidance and consideration of diverse learner needs.

5 *Common European Framework of Reference for Languages (CEFR)*, available at: www.coe.int/en/web/common-european-framework-reference-languages/home<https://www.coe.int/en/web/common-european-framework-reference-languages/home>

6 *UK Visas and Immigration Guidance - Sponsorship duties*, available at: www.gov.uk/government/publications/student-sponsor-guidance/sponsorship-duties-accessible#courses

62 **English language requirements** - respondents supported the requirement for learners to reach Common European Framework of Reference for Languages (CEFR) B2 by the point of award, recognising its importance for successful progression into HE. However, several AVAs emphasised that providers - not AVAs - would be responsible for assessing language proficiency, and wording should be revised accordingly. Respondents also asked for clearer guidance on acceptable forms of evidence for B2 attainment and urged consideration of learners with special educational needs or disabilities, and/or bilingual backgrounds.

63 **Blended / remote delivery** - respondents emphasised the need for clear, consistent definitions of delivery modes - particularly the distinctions between remote, synchronous, and asynchronous learning – as well as clarity on 'taught hours' and 'demonstrable educational value'. Many argued that a 20-40% cap on online delivery is too restrictive and does not reflect current practice. They emphasised that rigid limits could disadvantage certain learners, including rural learners, disabled learners and those unable to travel frequently. AVAs also highlighted that high-quality synchronous online teaching can be pedagogically equivalent to in-person delivery.

64 **Diploma Specification** - respondents overwhelmingly supported using the existing Access to HE Diploma Specification, emphasising the importance of maintaining consistency and integrity across UK and international provision. However, several noted that local contextualisation may be required (e.g. case studies, examples) and asked for clarity about how specification alignment would be judged in cases where UK Level 3 descriptors and local frameworks diverge or conflict.

65 **Grading Scheme** - most respondents supported retaining the existing Pass/Merit/Distinction grading model but requested additional tutor training and moderation guidance for international contexts.

Implications for future development

66 If work on the International Diploma were to resume, the approach would need to balance clarity, consistency, and proportionality. The following areas would require attention:

67 **English language requirements** - future development would need to clarify responsibilities, ensuring wording recognises that providers - not AVAs - conduct language assessment. Clear guidance on acceptable evidence for demonstrating B2, and consideration for learners with special educational needs (SEND) or bilingual backgrounds, would be essential to ensure consistency and fairness internationally.

68 **Blended / remote delivery** - strong feedback indicates the need to reconsider restrictive online-delivery limits. A more flexible, risk-based approach may be necessary to avoid disadvantaging rural learners, replicating inequities, or misaligning with evolving UK practice. Detailed, international-specific definitions of delivery modes would support clarity and avoid inconsistent interpretation.

69 **Diploma Specification** - retaining a single UK specification supports consistency, but QAA may need to provide clearer guidance on local contextualisation and a framework for resolving divergence between UK Level 3 descriptors and in-country frameworks.

70 **Grading Scheme** - additional tutor training, moderation guidance, and assurance mechanisms may be needed to avoid inconsistent interpretation of grade descriptors in different cultural or educational environments.

Practical Recommendations

71 The following recommendations aim to enhance the clarity, consistency, and flexibility of Access to HE provision in international contexts.

English language requirements

- Provide clear guidance on acceptable B2 evidence and how it should be verified.
- Clarify that AVAs oversee provider processes but do not directly assess learners' language ability.
- Consider reasonable adjustments for learners with SEND or bilingual educational histories.

Blended / remote delivery

- Replace fixed online-delivery caps with a flexible, risk-managed approach, allowing AVAs to justify higher proportions where appropriate.
- Publish clear definitions of synchronous/asynchronous delivery, remote learning, blended learning, and 'demonstrable educational value'.
- Ensure delivery requirements do not inadvertently exclude rural or disadvantaged learners.
- Ensure that quality assurance expectations protect qualification integrity without constraining innovative delivery models.

Diploma Specification

- Produce guidance on appropriate contextualisation for international settings, including how to adapt examples while retaining specification fidelity.
- Clarify how conflicts between UK Level 3 descriptors and local frameworks should be resolved.

Grading Scheme

- Provide international-specific tutor training materials and moderation criteria.
- Offer exemplars or comparative guidance to support consistent grade interpretation across cultural contexts.

Marketing the International Diploma

What we proposed

72 The consultation proposed extending Subject Descriptor Compliance Marks to International Diplomas so AVAs could clearly signal recognised progression routes to students, while ensuring transparent information about where each qualification was accepted. It also highlighted strong global demand for health-related study and supported offering compliant International Diplomas in Medicine, Nursing and Health Professions. The proposals also set out measures to protect QAA's intellectual property by registering international trademarks and requiring AVAs and providers to use them appropriately. These steps were intended to safeguard the brand, provide clarity for stakeholders, and maintain confidence in the quality of the International Diploma.

What respondents told us

73 Stakeholders emphasised the importance of strong international visibility, clarity in the value proposition, and ensuring coherent messaging across markets. They also sought clearer guidance on QAA's role in international promotion and recognition, highlighting the need for consistent branding and coordinated communication to support credibility and growth.

74 **Value proposition and market differentiation** - respondents stressed the need to articulate the Diploma's value proposition more clearly. While the International Diploma offers significant potential as an alternative pathway into higher education, its purpose and benefits must be communicated more explicitly internationally. They emphasised the importance of distinguishing it from A levels, foundation years and other Level 3 programmes, particularly where qualification frameworks vary. One respondent added that messaging should highlight flexibility, cost-effectiveness, and clear progression routes, especially for self-funded learners, to ensure it is recognised as a credible option.

75 **QAA's international role and sector support** - respondents also sought clarity on QAA's role in promoting the Diploma internationally. Some welcomed indications of a more proactive approach, while others were unsure whether this reflected a firm commitment or an aspiration dependent on capacity. They requested clearer information on how QAA would prioritise engagement with countries and institutions, and how coordinated recognition activity could support AVAs' promotional work.

76 **Alignment between design and promotion** - respondents noted that Access to HE is unfamiliar in many international contexts, and that inconsistent messaging across AVAs could create confusion or weaken the Diploma's credibility. Several suggested that QAA provide clearer guidance on branding, terminology, and promotional messaging to support coherent communication.

Implications for future development

77 The emerging implications highlight the need for a coherent international marketing strategy, a clearly defined value proposition, and greater clarity around QAA's role. Ensuring alignment between the International Diploma's design, delivery model and promotional messaging would be essential to establishing confidence, distinctiveness and sustainable international growth if qualification development were to resume.

78 **Value proposition and market differentiation** - a clear value proposition will be essential to establishing the International Diploma as a distinctive qualification within a crowded international pathways landscape. If its positioning relative to A levels, foundation years and other preparatory routes is not explicitly articulated, the Diploma may be perceived as insufficiently distinct, weakening its brand identity. This could lead to challenges in securing government recognition, reduce confidence among institutional partners, and limit the ability of AVAs to build sustainable recruitment pipelines.

79 **QAA's international role and sector support** - uncertainty around the extent of QAA's involvement in international awareness-raising has practical implications for the sector. A limited or reactive role from QAA could leave AVAs with inconsistent levels of support, particularly in countries where they lack existing networks or capacity. A more proactive and coordinated role would require dedicated resourcing, strategic planning and prioritisation to ensure consistent international presence and effective sector engagement.

80 **Alignment between design and promotion** - effective international marketing would depend on alignment between outward-facing messaging and the Diploma's internal structure, regulatory model and intended progression routes. Any ambiguities or perceived restrictions within the design could create a disconnect between promotion and practice, potentially undermining confidence, hindering early adoption and complicating long-term international growth.

81 **Role of recruitment agents** - although no stakeholders specifically commented on the role of recruitment agents during consultation, future development should consider whether their use should be permitted, and what safeguards would be required. Any approach should incorporate consumer-rights protections to ensure learners receive accurate, transparent, and unbiased information.

Practical Recommendations

82 The following recommendations outline ways to strengthen the international visibility, coherence, and viability of the International Diploma.

Value proposition and market differentiation

- Develop a clear, globally relevant value proposition that articulates how the Access to HE Diploma differs from A levels, foundation years and other Level 3 routes.
- Emphasise differentiators such as flexibility, affordability, equity of access and progression opportunities.
- Provide consistent messaging and branding guidance - including terminology, logos, and qualification descriptors - to ensure coherent communication across AVAs and new markets.

QAA's international role and sector support

- Clarify the scope of QAA's involvement in international promotional work, including whether it will engage directly with governments and funding bodies.
- Outline how priority countries or regions might be identified and targeted.
- Offer sector-wide supporting materials - such as market briefings, templates, or recognition summaries - to help AVAs align their outreach and engagement activity.

Alignment between design and constraints

- Review how delivery rules (e.g. online learning restrictions, eligibility requirements, progression pathways) interact with international marketing aims.
- Ensure operational frameworks do not unintentionally limit the Diploma's appeal, accessibility, or feasibility in key markets.

Use of recruitment agents

- Implement clear standards, transparency expectations and oversight arrangements to ensure that any use of recruitment agents results in accurate, impartial information for learners and protects them from hidden fees or incentives.
- Introduce accessible mechanisms for complaints and redress so learners can raise concerns, seek resolution, and be protected from misleading or unfair practices.

Transition and implementation

What we proposed

83 The consultation set out a two-year pilot phase beginning in academic year 2025-26, during which existing AVAs would be invited to submit expressions of interest and, if successful, subsequent full applications. It stated that QAA would monitor international Licences throughout the pilot and gather feedback to inform final evaluation. After the pilot closed, existing AVAs would have become eligible to apply for a full international Licence, while new AVAs entering the process later would undergo their own two-year pilot period.

What respondents told us

84 Respondents broadly supported the principle of a pilot but raised concerns about its practicality. They emphasised the need for clearer expectations, more coherent timelines, and a model that better aligns with long-term international licensing arrangements.

85 **Design and purpose of the pilot** - respondents noted that elements of the pilot, such as country-specific Licences, differed from the intended long-term model and that this might limit the pilot's value in preparing AVAs for eventual implementation.

86 **Timing and sequencing** - respondents raised concerns about the timing of the pilot. They noted uncertainty about when the two-year period would formally begin and warned that delays could shorten the time available for delivery. Respondents noted timelines for curriculum and staffing might place most delivery in the second year and asked for greater clarity on how review and evaluation would be scheduled.

87 **Assessment and proportionality** - respondents asked QAA to define success criteria for the pilot, such as expected student outcomes or compliance thresholds, and to provide guidance on what would constitute a credible plan. They requested clarity on whether participation in the pilot would offer any advantage when applying for future international Licences, and greater transparency about any limits on the number of countries or Diplomas that AVAs could propose.

Implications for future development

88 The considerations below outline the key factors that would need to be addressed.

89 **Design and purpose of the pilot** - a future pilot would need to align more closely with the long-term licensing model to avoid operational inefficiencies and support smoother transition from pilot activity to full implementation.

90 **Timing and sequencing** - a coherent implementation timeline, aligned with QAA capacity and AVA planning cycles, would be essential - supported by clear milestones for delivery, monitoring, and evaluation.

91 **Assessment and proportionality** - Clear success criteria, streamlined assessment processes and proportionate administrative requirements would be essential to support effective planning and efficient delivery.

Practical Recommendations

92 The following recommendations highlight the key conditions needed to support any future pilot.

Design and purpose of the pilot

- Align any renewed pilot structure with the long-term international licensing framework to ensure scalability and operational consistency.
- Simplify design features and clarify responsibilities to support smoother implementation and transferability of learning.
- Establish a model that enables efficient transition from pilot activity to sustained international delivery.

Timing and sequencing

- Create a coherent timeline that coordinates pilot activities with QAA capacity and key sector planning cycles.
- Set clear sequencing for ARLC processes, relicensing points, curriculum adaptation, and recruitment timelines.
- Build in sufficient time for delivery, monitoring, evidence gathering, and robust evaluation.

Financial risk and resourcing

- Develop a stable and transparent financial model to support long-term planning and sustainable investment.
- Ensure cost-recovery mechanisms are proportionate and support participation from organisations of varying size.

Licence eligibility

- Implement a strengthened eligibility framework - such as requiring a sustained period of domestic licensing - to support quality and reduce risk.
- Integrate eligibility requirements into long-term policy to ensure consistency and predictability for future entrants.
- Communicate criteria early to support workforce planning and structured market entry.

Assessment and proportionality

- Define clear, measurable criteria for participation, assessment, and country-specific delivery expectations.
- Streamline documentation and evidence requirements to reduce administrative load and support efficient submissions.
- Maintain a proportionate administrative model and ensure a clear separation of regulatory and commercial functions to support trust and operational effectiveness.

Conclusion and next steps

93 The consultation on the proposed International Diploma provided valuable insight into the opportunities and challenges of extending the Access to HE framework internationally. Although QAA is not proceeding with the pilot, the feedback demonstrates strong sector endorsement of the principles that underpinned the original proposal - parity and quality, learner protection and transparency, and a purpose aligned to access and progression.

94 Consultation responses reinforced the importance of maintaining parity and quality by ensuring that any future International Diploma remains fully equivalent to a UK Level 3 qualification, using the existing Diploma Specification and Grading Scheme to protect comparability, reliability and academic integrity across territories. They also highlighted the need for robust learner protection and transparency, with clearer expectations around country-specific planning, progression routes, and proportionate monitoring arrangements designed to safeguard learners and uphold confidence in the qualification's integrity.

95 Respondents similarly emphasised that any international model must continue to reflect a purpose aligned to access and progression, offering adult learners outside the UK a recognised route into higher education - including UK-TNE - supported by appropriate English language proficiency to enable successful transition and academic achievement. These principles were seen as essential not only to the credibility of the qualification but also to its relevance and value in diverse global contexts.

96 Together, these themes should inform QAA's thinking should conditions change and work on an international qualification be revisited. They provide a clear framework for balancing opportunity with risk, supporting proportionate quality assurance, and ensuring alignment with QAA's mission to uphold standards and widen access to higher education.

97 We thank all contributors for their thoughtful responses and reaffirm our focus on strengthening the domestic Access to HE Diploma.

98 If you have any questions about our response to this consultation, please contact the Access to HE team via ahe@qaa.ac.uk.

APPENDIX:

Consolidated list of recommendations for future consideration

Role and purpose of the International Diploma

- Refine the definition only where needed to maintain alignment with the domestic Diploma while strengthening clarity in areas highlighted by respondents, including differentiation from foundation year provision.
- Consider whether more explicit reference to academic rigour would support international positioning.
- More clearly articulate progression expectations, including transparency about UK and international progression routes.
- Explore ways in which QAA could support AVAs in coordinated recognition activity (e.g. prioritising key countries, facilitating conversations, or sharing indicative information on accepting institutions).
- Consider how reliance on private or self-funding may affect access for adults facing social, economic or other barriers to learning.
- Explore opportunities for longer term partnerships with governments or funding bodies to broaden accessibility.
- Review the minimum age requirement to ensure consistency with domestic policy and maintain the adult learning ethos.
- Provide guidance to support AVAs and Providers in assessing learner readiness, particularly where prior educational experience varies.

Arrangements for entering into an AVA Licence

- Define the pilot with greater precision, including the formal start point, the meaning of 'small-scale' delivery, and clear success metrics.
- Consider whether a two-year window is sufficient for implementation and completion.
- Provide structured support for early participants, including guidance, checklists and scheduled touchpoints.
- Examine whether a single, integrated domestic/international licensing model could reduce duplication.
- Streamline the application process by clarifying evidence expectations, offering phased submissions, and providing clearer guidance on what constitutes a 'credible plan'.
- Review restrictions that may limit viability during the pilot (e.g. one Diploma per subject per country).
- Clarify the extent to which QAA will consider local market impact when reviewing applications.

- Publish an early, transparent fee framework, including indicative per-learner levels, thresholds, and post-pilot arrangements.
- Consider ring-fencing international costs to avoid cross-subsidy from domestic fees.
- Provide clearer guidance on subcontracting and franchise delivery models commonly used internationally.
- Build mechanisms that allow Licences to be paused or adjusted where in-country conditions materially change.

Arrangements for retaining an AVA Licence

- Combine domestic and international regulatory requirements where possible to minimise duplication.
- Provide a clear rationale for any additional requirements that apply specifically to international operations.
- Ensure alignment with established practices across comparable regulators.
- Prioritise a monitoring approach that is proportionate, clearly scoped and primarily desk-based.
- Publish standardised guidance on evidence expectations, translation needs, and notifiable events.
- Re-assess expectations for international destination data and consider lighter-touch alternatives where appropriate.
- Clarify the boundary between developmental oversight and formal sanctions, ensuring that intervention processes are proportionate and transparent.
- Establish principles for cost recovery, limiting investigative fees and avoiding travel-based costs except in exceptional cases.
- Consider how investigative processes will operate in an international context.
- Maintain clear separation of domestic and international activity to avoid diversion of resources or regulatory capacity.
- Publish fee structures, timelines, and application requirements early to support effective planning.
- Reduce bureaucratic burden in Licence submissions, including options for staged or phased approaches.
- Ensure timelines avoid conflict with peak domestic periods (e.g. relicensing cycles).

Teaching, learning and assessment

- Provide clear guidance on acceptable B2 evidence and how it should be verified.

- Clarify that AVAs oversee provider processes but do not directly assess learners' language ability.
- Consider reasonable adjustments for learners with SEND or bilingual educational histories.
- Replace fixed online-delivery caps with a flexible, risk-managed approach, allowing AVAs to justify higher proportions where appropriate.
- Publish clear definitions of synchronous/asynchronous delivery, remote learning, blended learning, and 'demonstrable educational value'.
- Ensure delivery requirements do not inadvertently exclude rural or disadvantaged learners.
- Ensure that quality assurance expectations protect qualification integrity without constraining innovative delivery models.
- Produce guidance on appropriate contextualisation for international settings, including how to adapt examples while retaining specification fidelity.
- Clarify how conflicts between UK Level 3 descriptors and local frameworks should be resolved.
- Provide international-specific tutor training materials and moderation criteria.
- Offer exemplars or comparative guidance to support consistent grade interpretation across cultural contexts.

Marketing the International Diploma

- Develop a clear, globally relevant value proposition that articulates how the Access to HE Diploma differs from A levels, foundation years and other Level 3 routes.
- Emphasise differentiators such as flexibility, affordability, equity of access and progression opportunities.
- Provide consistent messaging and branding guidance - including terminology, logos, and qualification descriptors - to ensure coherent communication across AVAs and new markets.
- Clarify the scope of QAA's involvement in international promotional work, including whether it will engage directly with governments and funding bodies.
- Outline how priority countries or regions might be identified and targeted.
- Offer sector wide supporting materials - such as market briefings, templates, or recognition summaries - to help AVAs align their outreach and engagement activity.
- Review how delivery rules (e.g. online learning restrictions, eligibility requirements, progression pathways) interact with international marketing aims.
- Ensure operational frameworks do not unintentionally limit the Diploma's appeal, accessibility, or feasibility in key markets.

- Implement clear standards, transparency requirements, and oversight for recruitment agents to ensure information provided to learners is accurate, impartial, and free from hidden fees or incentives.
- Introduce accessible mechanisms for complaints and redress so learners can raise concerns, seek resolution, and be protected from misleading or unfair practices.

Transition and implementation

- Align any renewed pilot structure with the long-term international licensing framework to ensure scalability and operational consistency.
- Simplify design features and clarify responsibilities to support smoother implementation and transferability of learning.
- Establish a model that enables efficient transition from pilot activity to sustained international delivery.
- Create a coherent timeline that coordinates pilot activities with QAA capacity and key sector planning cycles.
- Set clear sequencing for ARLC processes, relicensing points, curriculum adaptation, and recruitment timelines.
- Build in sufficient time for delivery, monitoring, evidence gathering, and robust evaluation.
- Develop a stable and transparent financial model to support long-term planning and sustainable investment.
- Ensure cost-recovery mechanisms are proportionate and support participation from organisations of varying size.
- Implement a strengthened eligibility framework - such as requiring a sustained period of domestic licensing - to support quality and reduce risk.
- Integrate eligibility requirements into long-term policy to ensure consistency and predictability for future entrants.
- Communicate criteria early to support workforce planning and structured market entry.
- Define clear, measurable criteria for participation, assessment, and country-specific delivery expectations.
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