



International Access to Higher Education Diploma

Decision to discontinue the proposed pilot

April 2026

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Executive summary

Following a period of development and consultation, QAA has reached a decision that it will not proceed with the International Access to Higher Education Diploma pilot. This conclusion follows a full exploratory phase comprising feasibility work, design, two public consultations, Access Regulation and Licensing Committee scrutiny, and final Board review.

The proposed International Diploma offered several potential benefits, including giving learners a portable Level 3 qualification that could support global recognition and mobility, creating new progression opportunities for those with limited local routes into higher education, and the potential to foster international partnerships and cultural exchange. However, these benefits were outweighed by significant risks.

There was not enough evidence of real market demand or reliable progression routes, which created a major reputational risk. The self-funded model raised concerns about whether the qualification still aligned with QAA's mission and whether it risked becoming too commercial for a qualification intended to support disadvantaged adults. The regulatory requirements across different countries were also highly complex, with unresolved issues such as oversight of delivery and local regulatory barriers. Finally, the amount of operational capacity needed would have taken resources away from core domestic priorities.

While mitigations were explored, QAA concluded that they did not sufficiently reduce risk, and therefore the pilot - and subsequent implementation - could not be justified.

QAA greatly values the resources and expertise stakeholders have invested in this work and we intend for the insights gained to inform future strategy and strengthen domestic provision.

AVA investment made it possible to undertake detailed and comprehensive evidence-gathering which enabled the Access Regulation and Licensing Committee (ARLC) and the Board to reach a clear, evidence-based decision. Ultimately, the research and consultation work revealed a set of risks that QAA could not responsibly ignore and which the Board judged to be unacceptable.

Our priority now is strengthening the domestic Access to HE Diploma, through improved data and evidence, deeper stakeholder and alumni collaboration, and exploring new or improved pathways which may enable growth and innovation in the domestic market.

For a full overview of consultation outcomes and future considerations, please see the accompanying document '[International Access to Higher Education Diploma: Summary of consultation responses](#)'.

Background and context

1 The Quality Assurance Agency for Higher Education (QAA) is the regulator of the Access to Higher Education (HE) Diploma (the Diploma) and is responsible, under its charitable objects, for providing advice to governments on Diploma recognition. QAA's core purpose is to ensure that students and learners experience the highest possible quality of education.

2 QAA operates the Recognition Scheme for Access to HE. This scheme sets out QAA's regulatory framework and requirements, enabling Access Validating Agencies (AVAs) to develop, validate, and award Diplomas under licence to learners in the UK. QAA also registers and holds the Access to HE Trademarks which protect the integrity of the qualification.

3 The Diploma plays a critical role in widening participation and supporting lifelong learning in England, Wales and Northern Ireland. In response to interest from AVAs, QAA explored the feasibility of introducing an International Access to HE Diploma (International Diploma) to extend the benefits of the qualification to learners outside the UK.

4 This work was overseen and governed by QAA's Access Regulation and Licensing Committee (ARLC), reporting to the QAA Board for review.¹

5 Implementation depended on full governance approval 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.

Development timeline

6 Development of the International Diploma commenced in 2020 but was paused during essential implementation of the Extraordinary Regulatory Framework during the Covid pandemic and development of the revised Recognition Scheme which is due to be implemented from August 2026.

7 Key points in the timeline:

- **2019** - AVA Chief Executives reiterate long-standing interest in having a QAA-recognised international Diploma, particularly for UK-linked FE providers with overseas campuses.
- **2020** - QAA signals strategic intent to explore an international Access to HE Diploma.
- **2021 and 2022** - initial feasibility work, including market scoping and research reports shared with AVAs, followed by the design of a regulatory and licensing framework intended to closely mirror the domestic Recognition Scheme. QAA sets out a three-stage plan to AVAs: research (Jan–Jul 2022), enabling pilot phase (Sep 2022–Jul 2023), and possible implementation from Sep 2023. QAA also undertook a high-level review of Access governance, which led to the disbanding of the Access Qualification

¹ Membership and remit of the ARLC and QAA Board are available on the QAA website at: www.qaa.ac.uk/about-us/how-we're-run

Development Group, previously reporting to ARLC on matters which included the international research and enabling phase.

- **Late 2022** - progress paused due to sector concerns about pace and the need to align International Diploma development with domestic Diploma regulatory reforms and international regulatory developments.
- **Early 2023** - QAA writes to AVA CEOs confirming that international work cannot continue until domestic licensing and monitoring changes are complete. The previously anticipated 2023 relicensing timeline is formally postponed.
- **Mid 2023** - work resumed with revised expectations and timelines and a commitment to full public consultation before any decision. QAA holds strategic meetings with AVAs and key stakeholders.
- **2024** - first public consultation aims to establish the broad concept, regulatory intent, and dependencies for an international diploma before developing detailed licensing proposals.
- **2025** - Response to first public consultation published, announcing implementation of a revised Recognition Scheme for the domestic Diploma from August 2026. Second public consultation aims to establish detailed licensing arrangements for AVAs operating internationally.² QAA officers undertake detailed analysis of consultation responses.
- **Late 2025** - ARLC scrutinise evidence at multiple meetings and QAA Board makes the decision to formally discontinue the planned pilot.

Value of work undertaken

8 QAA greatly values the resources and expertise stakeholders have invested in this work. AVA investment made it possible to undertake detailed and comprehensive evidence gathering which enabled ARLC and the Board to reach a clear, evidence-based decision. Ultimately, the research and consultation work revealed a set of risks that QAA could not responsibly ignore and which the Board judged to be unacceptable.

9 Although the pilot will not proceed, the work completed has strengthened QAA's understanding of international demand, regulatory design, and stakeholder priorities. These insights will inform future strategy and domestic innovation, ensuring that resources invested in this development continue to deliver benefit.

Summary of the 2025 consultation and outcome

10 QAA proposed a two-year pilot phase commencing in academic year 2025-26. This would have allowed AVAs with existing UK licences to apply for country-specific licences and test feasibility before wider rollout. QAA planned to develop international licensing terms and conditions, monitor compliance through general and enhanced monitoring, and issue guidance to support AVAs in creating credible plans for operating in specific territories. QAA intended to evaluate the pilot phase, refine its approach based on feedback, and transition AVAs to full international licences for broader operations.

² All references for publications are provided in Appendix A at the end of the document.

Over-arching principles and purpose

11 QAA's proposals were grounded in three principles:

- **Parity and quality** - the International Diploma would remain equivalent to Level 3 in the Regulated Qualifications Framework (RQF) for England and Northern Ireland,³ using the existing Diploma Specification and Grading Scheme to ensure comparability and reliability across territories.
- **Learner protection and transparency** - AVAs would be required to demonstrate credible country-specific plans, robust progression arrangements, and clear information for students, with monitoring designed to safeguard the qualification's integrity and the student experience.
- **Purpose aligned to access and progression** - the International Diploma's primary purpose would be to offer adult learners outside the UK a recognised route into higher education (HE), including UK transnational education (UK-TNE), with English proficiency at B2⁴ supporting progression and academic success.

12 QAA also proposed a blended learning model - principally face-to-face with a limited proportion of remote delivery - reflecting both educational value and policy constraints prevalent in some markets. Fully online delivery would not have been permitted, except in limited circumstances (e.g. emergencies or individual reasonable adjustments).

Consultation scope and responses

13 The first public consultation in 2024 on the New Recognition Scheme 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.

14 A further, more detailed public consultation was conducted in summer 2025.⁵ This second consultation invited further feedback from all stakeholders, particularly those with operational insight, to shape the specific details of the proposed International Diploma and

3 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 RQF Level 3, 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.

4 Common European Framework of Reference for Languages (CEFR), available at: www.coe.int/en/web/common-european-framework-reference-languages/

5 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

its regulation, licensing, and monitoring. The consultation proposed a two-year pilot starting in academic year 2025-26.

15 This second consultation covered six key themes, exploring issues such as eligibility, delivery modes, English language requirements, and regulatory frameworks to ensure quality:

- Defining the role and purpose of the International 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

16 QAA received nine responses, mainly from AVAs who gave highly detailed feedback and one response was received from an international provider.

17 A fuller consultation response is provided within the accompanying report, ['International Access to Higher Education Diploma: Summary of consultation responses'](#).

Why the pilot is not proceeding

Governance outcome

18 While there was ambition for a full pilot, the changes introduced through the Recognition Scheme required the original commitment to be carefully re-evaluated, particularly given the regulatory implications and the increasingly difficult geopolitical environment. The decision to discontinue the pilot was therefore reached after extensive deliberation at multiple meetings of QAA's ARLC and the QAA Board.

19 QAA carefully considered the consultation feedback and feasibility evidence in the context of its strategic purpose to ensure that students and learners experience the highest possible quality of education, and considering its charitable mission.

Benefits acknowledged

20 QAA recognised the potential benefits highlighted during consultation, committee and Board discussions:

- **Global recognition and mobility** - an International Diploma could have provided a portable Level 3 qualification and opened routes into UK-TNE and other HE systems.
- **Progression and learner opportunities** - supporting learners in regions with limited local pathways to higher education.
- **Stakeholder confidence in structured regulation** - extending familiar licensing, specification, and grading schemes internationally might have supported quality assurance and confidence across borders.
- **Partnerships and cultural exchange** - fostering partnerships with international providers offered scope for cultural exchange and innovation in delivery models.

- **Strategic alignment with QAA's broad international vision** - the concept resonated with sector ambitions for global engagement, even if conditions today are not conducive to piloting.

Risks identified

21 The decision reflected a wide set of risks and constraints:

- **Uncertain market demand and progression routes** - evidence of sustained market demand and credible progression routes remained insufficient; the inability to guarantee progression presented the highest reputational risk to learners and QAA.
- **Target audience:** Consultation feedback confirmed that the target audience for any international pilot needed to be clearly defined from the outset. Although AVAs indicated possible demand from international learners seeking progression into UK higher education, ARLC and Board emphasised that, given the current geopolitical environment, the priority must be learners intending to undertake UK-TNE programmes in their home country. However, the absence of clarity on this point contributed to broader uncertainties about progression, regulatory oversight, and purpose, and therefore to the reputational and operational risks associated with a pilot.
- **Mission alignment and reputational exposure** - a self-funded model risked undermining both Access to HE's core purpose of access and progression and commercialising the qualification. While some commercial organisations operate international Level 3 products, QAA must be mindful of its charitable objects and principles.
- **Regulatory complexity** - diverse national requirements, evolving visa and immigration policies, and regional instability increase the complexity and risk of international delivery. Further unresolved issues included sub-contracted delivery oversight, treatment of satellite sites, language of delivery/assessment, identity/authentication for online elements, and jurisdiction-specific in-country regulatory constraints.
- **Operational capacity and opportunity cost** - QAA determined it could not expand its Access to HE operations without fee increases; adding an international pilot would also divert capacity from domestic priorities.

22 While mitigations - such as review points, early 'step-off' triggers, and targeted monitoring - were proposed, the Committee and Board judged that these measures did not sufficiently reduce the overall risk to justify piloting at this time.

Alternative approaches that were explored

23 Before reaching its decision, QAA explored two alternatives:

- **A smaller-scale, regional or localised pilot** - this approach might have enabled targeted engagement and reduced initial risk through a more manageable scope but would not have addressed the inherent risks of wider rollout related to purpose, progression and regulatory complexity.
- **Extending the domestic Diploma online** - this approach was dismissed to safeguard standards and protect brand integrity, particularly as many of the concerns associated with online delivery in the domestic context are still being considered in light of evolving legal and regulatory expectations.

What this decision means for stakeholders

24 AVAs and providers will be unable to offer a QAA Access to HE International Diploma to learners outside the UK. QAA remains open to revisiting options in the longer term if evidence and context change significantly.

25 We hope that the wider analysis and lessons learnt through the exploratory phase will be useful for AVAs or other organisations seeking to design or implement an international qualification not carrying the Access to HE brand.

Our focus and ambition going forward

Strengthening domestic impact

26 Following the decision not to progress with the International Diploma pilot, QAA is focusing on delivering the greatest public value by further focusing on our work in revitalising and expanding the Access to HE Diploma across the UK, which has also been our ambition following the changes to domestic regulations.

27 Quality and equality of opportunity form the two core pillars of the Access to HE Diploma's value proposition - reinforcing its credibility as a rigorous Level 3 qualification and its central role in widening participation.

28 Alongside completing the licensing of all existing AVAs under the new Recognition Scheme in 2026 and reviewing the revised Grading Scheme and the Professional Behaviours Unit in the Medicine Subject Descriptor, we will continue to focus on implementing a principles-based, risk-based regulatory approach. Drawing on evidence from Ofsted, Estyn and other sources, we will strengthen our risk-based monitoring and build a clearer picture of how funding structures affect learner access and provider sustainability.

29 We also have a clear set of proposed strategic priorities designed to strengthen quality, relevance and impact. We are keen to shape these collaboratively with AVAs and Diploma providers. We will:

- **strengthen the visibility and position of Access to HE across the UK**, working with governments, regulators and funders to embed the Diploma within national access, participation, skills and lifelong learning agendas. This includes deepening our relationships with UCAS and improving engagement with careers services to support consistent, high-quality information, advice and guidance. We will continue to work with QAA members and HE mission groups to enhance the Diploma's credibility in admissions.
- **raise awareness of the Diploma** alongside A, T and V Levels, ensuring that Access to HE is recognised as a high quality, flexible pathway for adults. We will champion delivery models that remove barriers for learners - particularly through flexible, blended and digital provision - and highlight how the Diploma aligns with priority sectors, skills pipelines and opportunities for adult reskilling and mid-career change. We will also explore possible models for Access student ambassadors and/ or an UK alumni network that adds value to the work of individual AVAs.
- **build the national profile of the qualification** by publishing an Annual State of Access to HE report, presenting the scale, impact and future potential of the Diploma across the UK.

- **enhance QAA’s social media, website and digital presence**, strengthening our position as a credible, authoritative voice on Access to HE and widening participation.
- **develop a systematic data and evidence roadmap** to better understand learner journeys and generate actionable insights for policy, growth and quality improvement. This includes exploring an interactive dashboard for AVAs and stakeholders; analysing disadvantage gaps in achievement and completion; investigating regional disparities and under 19 participation and undertaking deep dives into specific patterns of participation and withdrawal.
- **tackle structural inequalities** including those created by funding models, digital access, regional disparities and part-time provision.
- **strengthen support for groups who face additional barriers to Access to HE** - including veterans, prisoners, care-experienced learners, refugees and those with English as an additional language and will explore whether current provision meets the needs of diverse learners through understanding where bilingual, accessible and neuro-inclusive approaches are enabling growth.
- **expand pathways and progression opportunities**, working with AVAs and providers to co-design new pedagogical approaches, explore demand for micro-credentials and new subject descriptors, consider options for Professional, Statutory and Regulatory Body (PSRB) recognition, and develop clearer routes into degree apprenticeships and effective use of the Lifelong Learning Entitlement in England.

30 By working with governments, regulators and inspectorates across the three nations in which the Diploma operates, we will:

- **deepen our understanding of how Access to HE operates across different regulatory and funding systems**, including how English devolution reshapes local provision and how Access to HE remains aligned with post-16 tertiary reforms in Wales and Northern Ireland.
- **use connections in the Department for Education and Skills England to strengthen AVA engagement with Local Skills Improvement Plans and (Combined) Strategic Authorities**, to improve regional pathways, align the Diploma with labour-market priorities, and ensure that Access to HE contributes visibly to high-demand careers and graduate professions.
- **build on the findings of QAA’s *Transitions into and within Higher Education report*** commissioned by Medr⁶.

31 Together, we believe this programme of work positions Access to HE as a rigorous, flexible and future facing Level 3 qualification.

Acknowledgements

32 Access to HE delivers high quality, nationally consistent provision while widening opportunity for adults who are underrepresented in higher education. Its design, regulation and purpose embody both quality and equality of opportunity - making it a key contributor to access, participation and workforce development across the UK’s tertiary systems, and a

⁶ QAA (2025) *Transitions into and within Higher Education - An exploration of approaches and good practice*, available at www.qaa.ac.uk/docs/qaa/about-us/readiness-to-learn-report-dec-25.pdf?sfvrsn=7cdfaa81_12

central component of QAA's work as the expert quality body across the UK.

33 We thank all stakeholders - AVAs, providers, practitioners and sector bodies - for their contributions and for their ongoing commitment to Access to HE.

Contact

34 For any queries related to this publication, please contact Access to HE team - email: ahe@qaa.ac.uk.

Appendix A: List of Related documents

QAA (2024) *Consultation on changes to the Recognition Scheme*, available at: www.qaa.ac.uk/docs/qaa/access-to-he/access-to-higher-education-diploma-review-of-regulation-and-licensing-consultation-on-changes-to-the-recognition-scheme.pdf

QAA (2025) *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

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

QAA (2026) *International Access to Higher Education Diploma: Summary of consultation responses*, available at: www.accesstohe.ac.uk/news-events/news/Consultation_analysis.pdf

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