

The Access to Higher Education Monitoring Arrangements

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Introduction

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 in its charitable objects to provide advice to governments on 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.

2 In maintaining the means through which the Diploma is recognised by governments 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 Diploma, and includes a framework of requirements set out in documentation through which QAA permits Access to HE courses to be developed, validated and approved, and Diplomas awarded, by Access Validating Agencies ('AVAs') under licence (the 'Licence').

3 QAA will award and permit AVAs to maintain their Licence for these purposes on the basis that they agree to adhere to QAA's requirements in relation to the Diploma as set out in the following documents which make up the Recognition Scheme:

3.1 The **Standard Terms for the Licensing of Access Validating Agencies** ('Terms') which set out the terms that an AVA must agree to in order to become an AVA and maintain its Licence.

3.2 The **Access to HE Conditions** ('Conditions') which are the obligations an AVA must comply with (or demonstrate its ability to comply with) to become an AVA and to continue to comply with to maintain its Licence.

4 The Terms and the Conditions make clear QAA's ongoing requirements for the award of a Licence. The Conditions contain reference to requirements, expectations and arrangements which are set out in further documentation. This includes arrangements for licensing and monitoring (the 'Monitoring Arrangements'), *The Access to HE Grading Scheme*, *The Access to HE Diploma Specification* and Subject Descriptors. It also includes additional guidance which QAA may issue which sets out further information about how QAA may assess compliance with the condition, or to assist AVAs' interpretation of the requirements.

5 This document sets out the Monitoring Arrangements – the arrangements by which QAA monitors and assesses the compliance of AVAs with the Terms, the Conditions and the Recognition Scheme. This includes information about how regulatory judgements are taken and the various activities – both routine (general monitoring) and exceptional (enhanced monitoring) – and types of information on which we are likely to make judgements about compliance. Condition B3 of the Conditions makes clear the requirement for AVAs to comply with the requirements of monitoring activities as directed by QAA and which are set out in this document.

QAA approach to compliance and risk

6 In order to ensure that AVAs are able to meet the Terms and the Conditions of their Licence, QAA has a responsibility to undertake assessments which provide assurance that Diplomas are validated, delivered and awarded in a manner that is consistent with the requirements of its Recognition Scheme. This regulation is done to safeguard the quality, standards and reputation of the Diploma and secure its continued success.

7 Assessments of compliance are based on a variety of sources of information which is mainly collected through predetermined arrangements where the AVA submits certain information to QAA under certain circumstances. This includes where the need to provide information is cyclical and predictable, for example in the case of annual data returns or relicensing. Or, where the need to provide information arises because of a particular event or apparent risk of non-compliance, for example in the case of notifiable events or investigations. Sometimes QAA will also receive information about an AVA indirectly, for example from publicly available information or our Concerns Scheme. In each case, QAA will endeavour to assess this information against the requirements which are set out in the Recognition Scheme.

8 Further details about each type of monitoring undertaken in relation to the Recognition Scheme is set out below in this document. In every case, assessment of information gained through monitoring activity is intended to determine:

- whether there is evidence of an increased risk that an AVA is not able to comply with the Terms and/or the Conditions of its Licence or the other requirements of the Recognition Scheme; and
- whether there is evidence that an AVA has not complied or is not able to comply with the Terms and/or the Conditions of its Licence or the other requirements of the Recognition Scheme.

9 QAA's approach to the use of general monitoring is to identify areas where there is a risk of or actual non-compliance with its requirements and therefore enhanced monitoring activity or intervention may be required. Where general monitoring indicates that further action is or may be necessary, QAA will seek to utilise the enhanced monitoring and intervention arrangements available to it (see below) and determine how these should be applied on a case-by-case basis. QAA will prioritise engagement with the AVA to seek further information in the first instance and use this to inform its judgements about compliance and further regulatory activities.

10 QAA's approach to assessment and compliance is guided by the underpinning principles of its regulation as set out in paragraph 5 of *The Access to HE Conditions*. These principles state what QAA intends to achieve in its regulation of the Diploma. These are:

- to maintain the integrity of the Diploma
- to support students to progress to, and succeed in, higher education
- to ensure the relevance of the Diploma and support its growth.

11 Furthermore, QAA's approach seeks to place weight on the AVA's outcomes in relation to compliance with the requirements. This means that, where the manner or method of achieving compliance with a requirement is not specified, QAA would expect an AVA to achieve this in a way which is suitable to the operating context of the organisation provided that the outcome is compliant with the requirement. Examples of how QAA may interpret compliant and non-compliant behaviour in respect of each condition is set out in relevant guidance.

12 Where it is decided that further action or intervention is required, QAA will use intelligence gathered from its monitoring activities and AVA engagement to support its decision regarding the most appropriate course of action. In doing so, QAA will ensure that its response is both proportionate and relevant to the risk it is seeking to mitigate and will ensure that its actions are:

Prioritised – focusing on matters that pose a risk to students, stakeholders or the qualification guided by the principles of our regulation.

Proportionate – taking action that is proportionate to the 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.

Targeted – focused on addressing the particular risks that are posed as they relate to QAA's remit and requirements.

Transparent – QAA will clearly set out to the AVA the intervention process including the action it is looking to take and the reasons for this. Where appropriate, QAA will include details of the regulatory intervention on the AVA's profile on the QAA website. This will include an explanation of the reasons that the intervention has been applied and action the AVA is required to take.

Accountable – QAA will be accountable for the decisions that it takes and for explaining these to relevant AVAs and other stakeholders as required.

Regulatory judgements

13 Where a formal decision, or judgement, is made regarding the compliance of an AVA and subsequent need for intervention as a result of monitoring activity, such decisions will be taken in line with QAA's scheme of delegated authority (see below).

14 In order to promote standards and transparency in our regulation for all stakeholders of the Diploma, QAA will publish certain information about its judgements in respect of AVAs on its website. Information about regulatory judgements will only be published where:

- an AVA is subject to enhanced monitoring and investigation in relation to specific conditions
- QAA has applied an intervention to an AVA following an assessment of compliance.

15 In each case, QAA will publish:

- what the activity or intervention is;
- what condition(s) it relates to;
- a summary of the reason(s) for the activity or intervention; and
- where relevant, a summary of the action(s) the AVA is required to take.

16 In exceptional cases, QAA may take the view that it is not appropriate to publish some of this information, in particular, details concerning the reason for a given intervention or the activity required of the AVA. Such a view may be taken where outcomes are pending natural justice or another process where it would not be appropriate for information relating to it to be in the public domain.

Decision-making and accountability

Regulatory context and remit

17 The basis for QAA's regulation of the Diploma is non-statutory. It has held responsibility for the qualification since 1997 when the functions of the Higher Education Quality Council were passed to it.

18 QAA's charitable objects include the provision of advice to governments, as requested, on Diploma recognition. This means that only the courses that fall under our regulatory arrangements will be recognised by government for funding, where this is applicable. We also protect the qualification through registering and holding a number of trademarks, the Access to HE Trademarks. These functions and objects form the basis for QAA's scope of authority in regulating the Diploma.

19 The Recognition Scheme forms the framework of regulations and arrangements through which QAA has determined to exercise its responsibility for the Diploma, which it licenses AVAs to validate and approve.

Scheme of delegation and governance arrangements

20 Ultimate responsibility for QAA's work lies with its Board of Directors, including for all work and decisions taken in relation to the Recognition Scheme for the Diploma. However, in order for the Recognition Scheme to function effectively, the Board delegates its decision-making authority to relevant bodies or persons through QAA's Scheme of Delegated Authority. The use of enhanced monitoring and engagement and regulatory interventions will be subject to the requirements of QAA's own internal governance arrangements.

21 For decisions relating to the award of new, or withdrawal of existing AVA Licences, a decision is taken by the QAA Board on the basis of a recommendation by its sub-committee, the Access Regulation and Licensing Committee (ARLC). Therefore, where any decision affects the *award* or *withdrawal* of a Licence, a recommendation must be made by ARLC to the Board. Decisions about risk, monitoring and intervention as they relate to the operation of a Licence are taken by the Executive and Officers of QAA as delegated by the Board.

Appeals and complaints

22 QAA distinguishes between appeals and complaints. Appeals are specific challenges to judgements reached further to a recommendation to the QAA Board.

23 Following the appropriate [appeals procedure](#), an AVA (or an organisation who has applied to become an AVA) may appeal a recommendation to the QAA Board:

- that an AVA Licence should be refused;
- that an AVA Licence should be withdrawn; or
- regarding the time period of an AVA Licence.

24 A complaint is an expression of dissatisfaction with services QAA provides or actions QAA has taken. If an AVA is not satisfied with the outcome of any action or judgement taken by QAA in relation to any activity not listed above, the correct course of action is to follow [QAA's complaints procedure](#). The first step of this process asks that in the first instance AVAs should contact the Officer with whom they have been dealing to try to find a resolution. Please therefore contact ahe@qaa.ac.uk in the first instance if there are concerns or questions regarding AVA monitoring.

Fees and application of charges for monitoring activities

25 Term 13.7 of the *Standard Terms for the Licensing of AVAs* sets out that the AVA agrees it will 'contribute a specified annual fee as determined by QAA to the costs of maintaining and developing the Recognition Scheme'. This contributory fee is intended to ensure that QAA is able to operate and discharge its responsibilities in respect of the Access to HE Diploma, including general monitoring and relicensing of existing AVAs. The method by which this fee is calculated is set out in guidance. AVAs are notified individually in writing of their fee calculation on an annual basis following the confirmation of QAA's budget for the forthcoming year.

26 Under the Terms, AVAs may be required to pay additional fees for any activity falling outside the AVA general monitoring processes. Fees for monitoring activities will be calculated on the basis of an estimate of resource and time required to carry out the relevant work for enhanced monitoring investigations, and the subsequent implementation of interventions where this is deemed necessary. These calculations may vary on the basis of apparent complexity or risk in relation to a given case which may affect both the time and resource required to complete the activity. Rates are liable to be subject to year-on-year inflationary increases.

27 Where this is applicable to an AVA subject to enhanced monitoring (investigation) or intervention, an estimated schedule of fees will be stated clearly in correspondence notifying the AVA of the activity. Payment will be due on receipt of an invoice from QAA following completion of the activity.

Fees payable for licensing

28 Fees for the assessment of a licensing application are payable for new Licence applications only. AVAs who are submitting an application to renew their Licence are not subject to additional fees for this activity.

Licensing and Licence renewal

29 Licence and Licence renewal applications are a substantial source of the information we collect about AVAs on an ongoing basis and provide QAA with the opportunity to undertake an assessment of the AVA's ability to comply with our requirements in a holistic manner.

30 Judgements made and recommended at the point of licensing may be used to inform ongoing monitoring in the following ways:

- Determining the length of the Licence period and the frequency of future relicensing assessments.
- Determining whether any interventions may be applied at the point of award where it is identified that action must be taken in order for the AVA to mitigate the risk that it is not able to comply with the requirements of the Licence. For example, a formal notice or specific condition.

31 Detailed guidance about the AVA Licence is available separately in *The Access to HE Licensing Arrangements*.

General monitoring

32 General monitoring is broadly defined as monitoring activity which is predictable, planned or not undertaken on the basis of an assessment of risk.

33 Occasionally, information we receive and assess during the process of general monitoring may highlight concern about the AVA's ability to comply with the requirements of its Licence, or that further information is required for assurance in this regard. In this case further engagement with the AVA will be sought and if there are sufficient grounds for concern, a decision may be taken to initiate enhanced monitoring or intervention processes.

34 Types of general monitoring are set out below.

Annual monitoring and data return

35 AVAs are expected to participate in an annual monitoring cycle. Annual monitoring submissions are intended to:

- provide assurance to QAA that AVAs continue to meet the requirements of the Recognition Scheme on an ongoing basis during the period of their Licence; and
- provide QAA with the information it requires about Access to HE courses, students and their progression in order to support its strategic oversight of the qualification and ensure it can meet its charitable objective to provide advice on the Diploma to governments.

36 Written notice will be provided for each submission which sets out details of the data specification, timeframes and instruction for submission. Where possible, QAA will aim to ensure that the number of submissions points per year is kept to a minimum. Annual monitoring will normally require the following information to be submitted to QAA:

- an annual statement of compliance, required in Condition A2.3
- an annual statement of financial viability which covers a period of two academic years and signed, audited financial statements for the previous year which provides evidence that the AVA is able to comply with Condition A3
- data relating to characteristics, registration and outcomes of students registered on Diplomas in the previous year
- data relating to the progression of students registered on Diplomas in the previous year.

Notifiable events

37 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, negatively affects or could negatively affect an AVA's ability to meet the Terms of its Licence or comply with the Conditions.

38 Further information in respect of QAA's expectations of AVAs in relation to the reporting of notifiable events may be found in [guidance](#).

Participation in pilot schemes and information gathering exercises

39 QAA may, from time to time, request the assistance of AVAs with certain initiatives for which the collection of particular data is useful or necessary, participation in which may, or may not be, compulsory and subject to notice under Condition B2, or request under Condition B4.

40 Examples of such monitoring activity may include, but are not limited to:

- submission of feedback and data in the course of a pilot programme initiative, such as for a new Subject Descriptor
- collection of information relating to specific courses – for example, requests for information regarding the progression of students on Diplomas designed for progression to Medicine which can be shared with partner organisations to support higher education admissions
- collection of additional information on the basis of themes emerging from other routine data submissions – for example, where there are apparent changes in the student demographic profile over time.

Other intelligence and information

41 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, which leads it to form a view that an AVA may not be compliant with the Terms and requirements of its Licence.

Access to HE Concerns Scheme

42 [The Access to HE Concerns Scheme](#) provides staff, students or other parties with the opportunity to raise concerns about:

- the delivery and management of a particular Access to HE course;
- the way in which an AVA is undertaking its responsibilities in relation to the Diploma; or
- an AVA meeting the regulatory requirements as set out in QAA's Recognition Scheme.

43 Concerns are eligible to be investigated by QAA once the individual submitting their concern has followed all published procedures without satisfactory resolution at the Provider (if applicable) and AVA. There is no fee for a submission under the Concerns Scheme.

44 Where the outcome of an investigation under the Concerns Scheme identifies risk of or actual non-compliance with the terms of the AVA's Licence and requirements of the Recognition Scheme, this may lead to further investigation or intervention. Where the concern is particularly serious or complex, QAA may choose to open an investigation under enhanced monitoring in parallel with the concern.

Enhanced monitoring

Investigation

45 For QAA's purposes in monitoring the compliance of AVAs with the Recognition Scheme, an investigation is a form of enhanced, non-routine, monitoring. An investigation case may be opened where, through its other monitoring activity:

- QAA identifies an increased risk of potential non-compliance with the Terms or one or more of the Conditions; or
- where actual non-compliance with the Terms or the Conditions is identified.

46 The decision to open an investigation can be taken by the Access to Higher Education Diploma Manager, or the Director of Regulatory Services. The investigation will be assigned a lead case officer (who may be either of roles named above, or any other QAA staff

member) and the AVA will be notified in writing of the investigation. This letter will typically outline:

- the concern(s) identified, including the scope of and rationale for the investigation;
- details of any further information required or queries from the case officer in relation to the investigation;
- an invitation to further engagement with QAA; and
- a schedule of estimated fees.

47 It is recognised that the course of an investigation and subsequent timelines are dependent on a number of factors including the nature of the issues at hand. Expected timeframes for conclusion of the process therefore may vary. However, where the outcome is not dependent on key information which depends on a future event, we would expect an investigation to take approximately 12 weeks. QAA will confirm any changes to estimated timescales in its correspondence with the AVA.

48 Unless otherwise notified of an appropriate and suitably senior alternative person, QAA will assume that the Responsible Officer is the key point of contact for communications relating to the investigation. A suitable alternative person may include a Head of Access to HE, for example, where reasonable justification can be given for this by the AVA.

Information gathering

49 QAA will expect to engage with the AVA to ensure officers have all the necessary information required to undertake a full assessment of the concerns in scope. Information gathering will usually take place via meeting, telephone call, email or correspondence. Unless otherwise necessitated or agreed and to manage costs for all organisations, investigations will be conducted remotely, via desk-based assessment and primarily by the nominated QAA case officer.

50 In line with the Terms and the Conditions, it is expected that AVAs will cooperate fully with all reasonable requests for information.

Assessment and outcomes

51 A desk-based assessment of the available evidence will be conducted by the nominated case officer and an investigation report produced containing:

- a summary of the background and scope of the investigation based on QAA's concerns in relation to specific requirements of the Recognition Scheme;
- an assessment of the evidence against the requirements of the Recognition Scheme in scope;
- recommendations and outcomes; and
- a table of evidence, and further relevant information appended where necessary.

52 Possible outcomes of the investigation process include:

- No further action required – following review of the evidence, no substantiated risk of or actual non-compliance was found and no further action is required by the AVA;
- Intervention recommended – formal notice;
- Intervention recommended – specific condition; or
- Intervention recommended – formal sanction.

53 In each case, the recommendations of the case officer will require approval by the Access to Higher Education Manager and/or the Director of Regulatory Services at QAA. Where the recommended intervention is a formal sanction which affects the award of the Licence (see below), recommendations will need to be put to the appropriate decision-maker for a decision to approve the change.

54 The completed report will be sent to the AVA alongside a letter outlining any next steps. On receipt of the completed report, the AVA will have a period of **10 working days** to review it for factual accuracy and to notify QAA of any comments or concerns.

55 Outcomes will be monitored or enforced as set out in the report. Where a breach of the Terms or the Conditions is identified and is significant such that a formal sanction such as withdrawal of Licence is considered, AVAs will normally be given a period of 30 days to remedy this from the date the report is received by the AVA, as per paragraph 16.1 of the Terms.

Interventions

Formal notice

56 A formal notice is a written notice issued to the AVA by QAA which sets out action(s) required of the AVA to mitigate risk of, or actual, non-compliance with the requirements of the Recognition Scheme. A notice will be issued where, in QAA's opinion, such risk or breach will reasonably be remedied by the AVA actioning the requirements of the notice and further intervention or sanction is unnecessary at that time.

57 Condition B3 sets out the requirement for AVAs to comply with requirements of monitoring activities as directed by QAA. Formal notices will be addressed to the AVA's Responsible Officer and set out:

- the concern(s) QAA has in relation to the requirements of its Recognition Scheme;
- the action(s) required by the AVA to mitigate the concerns outlined;
- if applicable, any requirement for the action(s) to be approved by QAA prior to implementation; and
- a timeframe for the implementation of any action(s) and the specified time, manner and form for the reporting of such implementation to QAA.

58 A formal notice will usually be issued following an engagement with the AVA in order to verify or gain further information regarding a concern. Sometimes a notice may be issued without prior engagement, particularly where QAA can be confident of a breach of the Terms and/or the Conditions. For example, where it is evident that an Access to HE Trademark has been misused, or there are obvious errors in information held publicly about the Diploma.

59 The duration of enhanced monitoring following the issue of a formal notice will be subject to the nature of the risk and action(s) identified and be set out in the notice. For example, a notice may set out a single action which can be addressed relatively quickly by the AVA. In contrast, a notice may set out an action plan with reporting intervals over a period of time.

60 Once the action(s) specified have been completed and QAA is assured that any risk or concern is sufficiently mitigated, QAA will confirm to the AVA in writing that this is the case.

61 If an AVA fails to comply with a formal notice, this is likely to lead to further intervention.

Specific condition

62 A specific condition is an additional ongoing requirement which may be placed on an AVA. The specific condition will be intended to mitigate a specific risk posed and may set out particular activities that the AVA is required to undertake or is prohibited from taking by QAA to ensure the Terms and/or the Conditions are met. The specific condition may be implemented:

- where QAA is of the view that the AVA presents a specific risk which is not covered wholly or in part by the existing Conditions or other requirements as set out under the Recognition Scheme;
- where additional action or requirements are deemed necessary on an ongoing basis or over an extended period of time in order to provide QAA with assurance; or
- in order to mitigate an increased risk of, or actual, non-compliance with the Terms or the Conditions.

63 In exceptional cases, where there is sufficient concern about the impact of unmitigated risks relating to non-compliance with QAA's requirements, a specific condition may be used alongside a restriction or temporary suspension of the Licence.

64 A specific condition may be lifted from a Licence when QAA is satisfied that there is no longer a compliance risk in relation to the requirements in question, or that the risk is sufficiently mitigated such that additional requirements are no longer proportionate.

65 If the AVA fails to comply with the requirements of a specific condition, is unable to sufficiently mitigate a risk of non-compliance or continues not to comply with QAA's requirements, formal sanction may be applied.

Formal sanction

66 When all other measures under QAA's monitoring arrangements as outlined above have failed to ensure that the AVA is able to comply with the requirements of its Licence, or the risks to students, stakeholders or the qualification are particularly significant, QAA may take action to restrict, suspend or withdraw an AVA's Licence.

Restriction of Licence

67 Where considered appropriate to do so, and proportionate to control any risk to students, stakeholders or the qualification, QAA may decide to place temporary restrictions on an AVA's Licence as set out in paragraph 14 of the Terms. A restriction on its Licence would aim to temporarily limit the AVA's use of the Diploma in its operations as permitted by award of the Licence in a specific way.

68 The specific terms of the restriction will be set out clearly in writing to the AVA, including any action required in order to remove the restriction, timeframes for completion and next steps for monitoring. Types of restrictions may include, but are not limited to:

- the registration of students on specific Diplomas, Access to HE courses, or at specific Providers;
- advertising and listing new courses on QAA's Access Course Database;
- the approval of new Providers; or

- the award of Diplomas to students registered on one or more Access to HE courses.

69 Where an AVA does not comply with the restriction, continues to fail to adequately mitigate identified risks or to comply with any other requirements set out in the Terms or Conditions of its Licence, full suspension or withdrawal of the Licence may be considered.

Suspension of Licence

70 Where considered appropriate to do so, and proportionate to control any risk to students, stakeholders or the qualification, QAA may decide to temporarily suspend an AVA's Licence as set out in paragraph 14 of the Terms. A suspension would prevent the AVA from using the Diploma in its operations as permitted by award of the Licence in full for a limited period of time.

71 A Licence may be suspended if QAA considers it appropriate to take action which will immediately reduce the impact of compliance concerns on students, stakeholders or the qualification. During the suspension, the AVA will not be permitted to use its AVA Licence which includes the following activities:

- validate and approve Access to HE courses
- register students on Access to HE courses
- award Diplomas
- with the exception of currently running Diplomas and Access to HE courses with actively enrolled students for the purposes of public information, advertise or otherwise promote its Diplomas, or use Access to HE trademarks to do so.

72 It is expected that the AVA will undertake immediate remedial action during the suspension. Action will be required of the AVA under a specific condition of which the AVA will be notified in writing, including expected timescales for resolution. A suspension will be lifted at the point that QAA is assured that compliance concerns and associated risks are sufficiently mitigated or resolved.

73 The AVA should, at the earliest opportunity after being notified of the suspension of its Licence, inform its Providers that its AVA Licence is suspended and the expected duration of the suspension. It should also notify students in writing if their award or progression is likely to be affected by the suspension.

74 QAA would expect to engage regularly with the AVA for the duration of its suspension and to work with the AVA to ensure that the intervention remains proportionate and targeted.

Withdrawal of Licence

75 QAA may decide to withdraw an AVA's Licence where the risks of AVA non-compliance with the requirements of the Recognition Scheme is significant such that the use of any other sanction would not be sufficient, or where the use of other sanctions has proven insufficient to mitigate risk or remedy non-compliance.

76 QAA will normally only look to pursue the withdrawal of an AVA's Licence where:

- the AVA's Licence has been restricted or suspended, and the AVA has not been able to sufficiently remedy or mitigate the risks identified following these sanctions;
- the AVA's Licence has been previously restricted or suspended, and the AVA fails to comply repeatedly with the same or different requirements of its Licence; or

- QAA judges that there has been non-compliance with the requirements of the Licence which is severe or persistent to the extent that other interventions would not be sufficient to remedy it.

77 As per paragraph 16 of the Terms, in certain circumstances QAA reserves the right to terminate the Licence at any time on written notice to the AVA with immediate effect.

78 Further information about the Licence withdrawal process may be found in [The Access to HE Licensing Arrangements](#).

Intervention monitoring

79 The use of enhanced monitoring or intervention measures by QAA will normally precipitate a period of increased monitoring and engagement activity with the AVA in order to ensure that such measures are effective in mitigating the risks identified.

80 The way in which this will be carried out may vary on a case-by-case basis and subject to assessment of the risks identified. The requirements for such monitoring will be clearly communicated to the AVA in writing, and set details of information required and timescales in line with information requested under section B of the Conditions.

81 QAA will hold information about enhanced monitoring of AVAs and interventions for the duration of the time an AVA holds a Licence. Over the course of time this information will inform QAA's holistic view of the AVA's ability to comply with its requirements and the extent to which the award of a Licence to an AVA represents a significant risk to the reputation of the qualification, QAA's Recognition Scheme or QAA. Monitoring information may be used by QAA to inform assessments of risk in relation to interventions.

82 Monitoring information may also be used to inform assessments of risk in relation to licensing or renewal Licence applications. This may impact the length of the renewal Licence and inform decisions to award the Licence with additional requirements such as a formal notice or a specific condition.

83 Where QAA has sufficient concern that it intends to withdraw the AVA's Licence because its concerns cannot be remedied, the Licence will be withdrawn at that point and will not be considered as a refusal to renew the Licence. However, if the AVA's Licence is withdrawn and it chooses to apply for a new Licence, that application may be refused.

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