

Consultation Paper

Proposals for Changes to the Access to Higher Education Diploma Specification

Proposals at a glance

This consultation sets out QAA's proposals for changes to the Access to Higher Education Diploma Specification.

This consultation seeks views on:

- unit size and configuration
- Diploma titles and content.

The proposed implementation date for changes to the Access to HE Diploma Specification is 1 August 2024 and will apply to students registered to commence their course from 1 August 2024.

Audience

This consultation is open to anyone who wishes to make a response; however, it is likely to be of particular interest to:

- colleges and training providers (and their representative bodies) who either currently, or in the future wish to, deliver the Access to HE Diploma
- students (and their representative bodies)
- higher education and further education providers (and their representative bodies) who accept Access to HE Diploma students onto courses at Level 4 or above
- Access Validating Agencies (and their representative bodies)
- funding bodies
- Professional, Statutory and Regulatory Bodies
- employers.

Consultation arrangements

Duration

This consultation will be open for six weeks from 1 November 2022 to 13 December 2022, 23.59 hours, BST.

Responses

Please respond to the consultation by using the following link:

[QAA Access to HE Diploma Specification Consultation](#)

You are asked to provide a comment or explanation for each of your responses so that we can better understand the reasoning behind each response.

If you require an alternative means of responding, please contact us via ahe@qaa.ac.uk

Webinars and roundtable events

We will be arranging roundtable events for the following groups to enable questions and discussions about the proposals:

- university admissions staff
- students.

If you would like QAA to set up such an event for a particular sectoral group, we would be pleased to do so. Please contact us via ahe@qaa.ac.uk

Data Protection and Privacy Statement

Details of how we use and manage your data can be found [on the QAA website](#).

Introduction

The Access to HE Diploma

The Quality Assurance Agency for Higher Education (QAA) is responsible for arrangements for the formal approval and quality assurance of Access to Higher Education (HE) Diplomas. The *QAA Recognition Scheme for Access to Higher Education* (the Recognition Scheme) provides the framework of structures, mechanisms and regulations through which QAA exercises this responsibility.

The Access to HE Diploma is a qualification regulated by the Quality Assurance Agency for Higher Education (QAA). It is a Level 3 credit-based qualification, comprising units of assessment expressed as learning outcomes and assessment criteria. The credit requirement for the achievement of any Access to HE Diploma is 60 credits, with 45 of these credits coming from units which are concerned with academic subject content at Level 3 and graded; the remaining 15 credits come from ungraded Level 2 or Level 3 units.

The purpose of the Diploma is to provide academic preparation for higher education study for adults who, because of social, educational or individual circumstances may have achieved few, if any, prior qualifications. Access to HE courses are particularly targeted at socially disadvantaged groups that are underrepresented in higher education. This academic preparation takes the form of academic knowledge and understanding in one or more subjects and development of academic skills needed to undertake and succeed in study at higher education level.

At the heart of this qualification is flexibility, widening participation and meeting local needs:

- The flexibility of this qualification supports the mission of further education to be responsive to the needs of local communities, while also contributing to skills formation in key occupational areas. The majority of Access to HE students choose to study subjects in these areas.
- Access to HE Diplomas are included in scope for legal entitlement of full funding (under Adult Education Budget (AEB) for students aged 19-23 studying their first Level 3 qualification.
- Some Access to HE Diploma applicants will be eligible to apply for the government-funded Advanced Learner Loan to help with the costs of their course in England. On successful completion of higher study, the balance of any Advanced Learner Loan is written off by the Student Loan Company.
- The Diploma provides a cost-effective way to support the widening participation agenda.

A learner entering university through the Access to HE Diploma is more than twice as likely to be over 25 and from a disadvantaged background than a learner entering with other qualifications. Access to HE students are also more likely to have a declared disability or come from an ethnic minority background than students entering from other routes.

QAA's regulatory role

QAA's regulation of the Access to HE Diploma applies to England, Wales and Northern Ireland; a separate scheme operates in Scotland.

The awarding bodies for the Access to HE Diploma are known as Access Validating Agencies (AVAs). QAA licenses AVAs to develop, quality assure and award QAA-recognised Access to HE Diplomas to students, who apply to over 1,200 courses, in a wide variety of subjects. QAA adopts a risk-based approach to AVA annual monitoring. The method is based on the AVAs' capacity to deliver quality assurance and reliable standards.

There are over 340 providers of Access to HE courses who deliver courses to over 40,000 registered students and recommend students to the AVAs for the award of Access to HE qualifications. The Diploma can be studied full-time, part-time and via distance learning.

AVAs are required to make submissions to QAA each monitoring year demonstrating compliance with the licensing criteria. Oversight of QAA's regulatory role is provided by the Access Recognition and Licensing Committee (ARLC), which reports to QAA's Board. The ARLC considers whether AVAs are fit to operate and award the Diploma.

Each year QAA collects and publishes data about the Access to HE Diploma and those students who complete the qualification. The data demonstrates how the Access to HE Diploma promotes social mobility by encouraging people from disadvantaged backgrounds into higher education. It also demonstrates the importance of the Access to HE Diploma as a pathway to enhance UK productivity, by helping to prepare individuals for the workplace, especially in sectors with skills shortages. [Real-life case studies](#) and [Access to HE Statistics](#) are available from the Access to HE website.

The review of the Access to Higher Education Recognition Scheme

Elements of the QAA Recognition Scheme are reviewed periodically. A full review of the Access to Higher Education Diploma Specification took place in 2011 and resulted in the

current Access to Higher Education Diploma Specification that was first delivered in September 2014. QAA is now conducting a new review of the Recognition Scheme. This consultation makes proposals related to the Diploma Specification as part of the Recognition Scheme. Further consultations will take place with regard to the Licensing Arrangements and the Grading Scheme.

One of the intended outcomes of this review is to ensure a parity of learning experience and equity of opportunity and achievement for our students. While we remain confident of the quality and standards of individual Diplomas and providers, we have observed that students may have different experiences and outcomes. For example, some Diplomas are made up of mostly 9-credit units while others are predominantly made up of 3-credit units; some Diplomas with the same title offer a wide range (choice) of units whereas others have less choice and are more restrictive; some Diplomas have units which are assessed on a one unit/one assessment basis whereas others have multiple assessments.

A second intended outcome is to ensure there is greater clarity of purpose for the qualification that allows students, higher education providers and other stakeholders to see more easily how the Diploma will help students to progress to higher level study.

Recent policy changes in the Level 3 qualifications arena highlight the expectation that such qualifications will be distinct, of high quality and improve progression for Level 3 students. This review is aimed at ensuring that the Access to HE Diploma continues to offer high-quality opportunities for widening participation and progression to higher education for adult students, and can position itself next to, inter alia, T Levels and A Levels for adults as an alternative qualification with equal academic standing, equity of opportunity and parity of outcomes.

Between March and October 2022, QAA has sought expert opinion in drafting the proposals outlined below and has set up an advisory working group for the review of the Access to Higher Education Diploma Specification. The membership of this working group is listed at Annex A.

Consultation proposals

Structure of the Diploma

We are not proposing any change to the overall size of the Diploma. The Diploma will remain a credit-based qualification of 60 credits, of which 45 credits will be at Level 3 and will be graded as Pass, Merit or Distinction with the remaining ungraded credits at either Level 2 or 3. The maximum number of credits which can be transferred under Credit Transfer will remain at 30 credits (half the total available) and can be made up of either graded or ungraded credits.

We have not proposed changes because we believe this structure and overall grading of the qualification is widely understood by Access to HE providers, higher education providers and AVAs. Ungraded Level 2 and Level 3 credits provide an 'easing in' for students who have not studied for a number of years and it allows students to 'step on and step off' where necessary; it allows some flexibility in course design to play to existing strengths within providers; it has the potential to facilitate credit accumulation and transfer (CATS) and, as funding of other qualifications moves towards micro-credentials, keeping the credits may further allow flexible learning.

Proposal One: Unit sizes to remain as 3, 6 and 9-credit units but with the introduction of upper and lower limits on the use of 6 and 9-credit units

The credit value of a unit can be 3, 6 or 9-credits. Units of any other size are not permitted. Currently, there is a variation in the use of 3, 6 and 9-credit units within Access to HE Diplomas. Some Diplomas are predominantly 3-credit units; others, predominantly 9-credit units; the rest are in between with some Diplomas not offering either a 6 or a 9-credit unit. This does mean that currently the learning experience and skills development for learners may differ depending on the credit value of units that make up the Diploma.

We believe that for adults returning to education, or starting their first Level 3 qualification, bite-sized learning in the form of 3-credit units is important in developing the confidence, knowledge and skills for successful academic study. The inclusion of 6 and/or 9-credit units provides opportunities for students to develop and use skills associated with both small and larger units, thereby supporting their transition to higher education where credit sizes, on average, range from 10-20 credit units in the first year. We believe it is important that all Diplomas offer students these opportunities.

We are proposing to amend the Diploma Specification to introduce the following upper and lower limits on the use of 6 and 9-credit units:

- There will be a minimum of at least one 6 **OR** one 9-credit unit in each Diploma.
- There will be a maximum of **18** credits that can be made up of 6 or 9-credit units.

Our reason for proposing this change is because we believe that it will ensure that all Access to HE Diploma students have the opportunity for both bite-sized learning and to develop the skills associated with larger credit units. We consider the change will retain flexibility in Diploma design at a local level, will ensure the Diploma remains flexible across different subject areas, and can reflect the delivery priorities of providers.

Question 1a

Do you agree that the Diploma should offer a minimum of either one 6-credit unit OR one 9-credit unit to develop the skills required for larger units of learning to support the transition to higher-level study?

Yes (comment required)

No (comment required)

Alternative answer: Are you proposing an alternative minimum, and, if so, what is that minimum and why are you proposing this?

Question 1b

Do you agree with the proposal that there will be a maximum of 18 credits that can be made up of 6 or 9-credit units?

Yes (comment required)

No (comment required)

Alternative answer: Are you proposing an alternative maximum, and, if so, what is that maximum and why are you proposing this?

Diploma titles and content

Proposal Two: Strengthening the link between Diploma titles, content and progression aim

In the introduction we stated that, at the heart of the Diploma qualification, is flexibility, widening participation and meeting local needs. AVAs and their providers are adept at putting together coherent Access to HE Diplomas. However, we believe the flexibility that is allowed in titles and content is what has led to higher education providers reporting challenges in terms of understanding what applicants from different AVAs and/or providers have covered in terms of content and learning, teaching and assessment practice for Diplomas of the same, or similar, title.

Some Diplomas allow a choice of units in a variety of subject areas, for breadth and/or interest, but these are not necessarily related to the Diploma title or the progression aim. We have observed examples where it would be possible for a combination of units to be selected by a student that would minimise the volume of subject-specific content aligned with the Diploma title, versus other units in other subject areas.

For higher education courses where there are specific subject entry requirements and/or prospective students are applying for highly competitive courses, there is the potential for Diploma students to either not meet the specific subject entry requirements or not be able to compete effectively for a higher education place against students with other Level 3 qualifications. We believe this represents an unacceptable situation where a student may be disadvantaged if they have studied an Access to HE Diploma versus other Level 3 qualifications.

We have existing licensing criteria¹ and regulatory guidance² on titling and content. We intend to revisit our regulatory guidance to ensure there is a clearer and more transparent link between Diploma titles, content and progression aim, and in future will use our powers under the existing criteria if we continue to have concerns.

We also recognise that there is a need to balance regulation in this area with the desire from providers and AVAs to maintain flexibility in the design of Diplomas and how they can be marketed. We have decided that it would be inappropriate to implement an 'approved' list of Diploma titles with associated defined content. This would require significant additional regulation, an additional (pre-validation) approval process, and could present an unnecessary barrier to emerging new subject areas or titles.

Considering all the above, we consider that in order to encourage and support compliance in this area, we are proposing one change with the aim of strengthening the link between Diploma titles, content and progression aims.

Proposal Two: We will introduce subject descriptors to apply to students registered to commence their course from 1 August 2024. In the first instance, this will apply to Diplomas allied to nursing and health professions,³ other occupational areas will follow in subsequent years.

What is a subject descriptor in the context of the Access to HE Diploma?

The aim of subject descriptors will be to describe the nature of study for Access to HE Diplomas in specific subject areas. Subject descriptors would be expected to be used as

¹ Licensing Criteria 43,44 and 60

² [Access to HE Diploma Specification](#)

³ Nursing and related health profession courses account for just over 50% of the current student registrations.

reference points in the design, delivery, validation and review of programmes. Their aim is to provide general guidance. Descriptors are not intended to represent a national curriculum or to prescribe set approaches to teaching, learning or assessment. They would continue to allow for flexibility and innovation in course design within a framework agreed by the subject community.

We have previously introduced the Subject Descriptor for Medicine, and the benefits observed and evidenced have been increased numbers of Diploma students progressing to medical schools, a level playing field in terms of applying for university places irrespective of which AVA or provider students have studied at, and a reduction in the number of units being maintained by providers and/or AVAs. We would like to see the same benefits for other students through the use of additional subject descriptors particularly in high demand subjects and/or where there are specific subject-related entry requirements for progression to HE. While the Subject Descriptor for Medicine is prescriptive, this is necessarily so because of the nature of the subject area. We consider it likely that in the majority of other subject areas, a subject descriptor will be broader in scope.

Subject descriptors will be constructed to facilitate continued flexibility in curriculum design, but within specified parameters. We do not intend that they will be highly restrictive in content and will allow the development of Diplomas to meet local needs while also providing greater assurances to higher education receiving institutions about the nature of the content by subject area.

Question 2

Do you support the introduction and timing of a nursing and health professions' subject descriptor to apply to students registered to commence their course from 1 August 2024?

Yes (comment required)

No (comment required)

Please elaborate on your answer and state what alternative, if any, you would propose and why?

Equality Impact Assessment

QAA is an independent charity working to benefit students and higher education (including those on the Access to HE Diploma). The *Equality Act 2010* applies to the majority of the providers of the Diploma and, therefore, within this consultation we wish to consider the impact on students (both positive and negative) of the proposals outlined above, including those who are deemed to have a protected characteristic,⁴ and to consider any impact on students from different socio-economic groups. For information, within the overall project plan we have set biannual reviews for Equality Impact Assessments.

With that in mind please respond to the following questions based on the proposals outlined above.

⁴ The characteristics that are protected under the 2010 Equality Act are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Question 3

Are there any potential impacts (positive or negative) on students that may relate to their protected characteristics?

Yes (comment required)

No (comment required)

Question 4

Are there any steps that could be taken to mitigate any negative impact on students in relation to their protected characteristics and/or promote or improve any positive impact?

Yes (comment required)

No (comment required)

Regulatory Impact Assessment

QAA recognises that some of the proposals may have a cost or resource impact on providers and/or AVAs, with some lesser impact on HE providers. Some of the proposals will implicitly require changes to the design and delivery of the Diploma, the extent of which will vary depending on the current design and protocols in place for existing provision. QAA has tried to anticipate and minimise any additional burden arising from these proposals, but some regulatory impact is inevitable. QAA remains committed to working with providers and AVAs to minimise the impact wherever possible and will continue to seek expert opinion from the working groups on how to do this.

If you have not already done so in the responses provided, we are inviting you to comment, from the perspective of your own organisation, on the regulatory impact (cost, resources, timing and benefits) of each of the proposals.

Free-form answer (not compulsory)

Annex A

Working Group Membership

Diploma Specification Working Group	
2 x AVA representatives	<ul style="list-style-type: none">• OCN London• CAVA
2 x FE/provider representatives	<ul style="list-style-type: none">• DistanceLearningCentre.com• Morley College
3 x HE representatives	<ul style="list-style-type: none">• University of Lincoln• Aston University• Bangor University⁵
Other	<ul style="list-style-type: none">• Ofqual• Institute for Apprenticeships and Technical Education (IfATE)• UCAS• BFELG

⁵ One member will be representing their higher education institution and is the Chair of the Access Qualification Development Group and a member of the Access Recognition and Licensing Committee.

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QAA manages the national framework for the recognition and regulation of Access to HE Diplomas. www.qaa.ac.uk