

OTHM Centre Approval and Accreditation Policy



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1. Introduction

This policy sets out the additional requirements and conditions that apply to the approval, management, renewal and withdrawal of OTHM approved centres and qualifications.

It should be read alongside the OTHM Centre Approval Criteria, Centre Agreement, CASS Strategy, Centre Sanctions Policy and other published quality assurance policies and procedures.

The OTHM Centre Approval Criteria define the standards that prospective and approved centres must meet in relation to governance, staffing, resources, learner support, assessment, quality assurance and regulatory compliance. This policy supplements those requirements by setting out OTHM's operational expectations in areas where additional controls are necessary to manage regulatory risk, protect learners and maintain the integrity of regulated qualifications.

Centre approval and qualification approval remain subject to OTHM being satisfied that a centre continues to meet these requirements throughout the period of approval. OTHM may require evidence of ongoing compliance at any time through its quality assurance arrangements.

2. Centre Approval

Approval is granted on the basis of evidence provided during the centre approval process. Approved centres must continue to satisfy the OTHM Centre Approval Criteria throughout the period of approval. OTHM may request evidence of continued compliance at any time.

2.1 Ongoing Conditions of Approval

Approval is granted subject to the centre continuing to comply with the OTHM Centre Approval Criteria, the Centre Agreement and all applicable OTHM policies and procedures. Approval is not a one-time determination. OTHM will monitor ongoing compliance through External Quality Assurance, Centre Quality Reviews, investigations, risk-based monitoring and other quality assurance activities. Failure to maintain these requirements may result in quality assurance actions, sanctions or withdrawal of qualification or centre approval.

2.2 Notification of Change

Approved centres must notify OTHM in writing, using the Notification of Change form, before implementing any significant change that may affect the delivery, assessment or quality assurance of OTHM qualifications.

This includes, but is not limited to:

- changes to ownership or legal entity;
- changes to senior management or Head of Centre;
- significant staffing changes affecting qualification delivery or quality assurance;
- Changes to staff contact details;
- new delivery locations or countries of operation;
- changes to the primary delivery model (face-to-face, blended or online);
- changes to learner management systems or assessment platforms;
- changes to third-party delivery arrangements;
- any circumstance which could adversely affect learners or the integrity of OTHM qualifications.

2.3 Mode of Delivery

Centres proposing to deliver OTHM qualifications wholly or primarily through online or distance learning must demonstrate that they have appropriate systems, resources and controls to support the delivery, assessment and quality assurance of regulated qualifications.

As part of the approval process, the centre must provide evidence of its learner management and online delivery arrangements. This must include, as a minimum:

- the learner management system (LMS) or virtual learning environment (VLE) to be used;
- how learners will be enrolled, inducted and provided with programme information;
- how teaching, learning and learner support will be delivered and monitored;
- how communication between learners and the centre will be managed and recorded;
- how learner attendance, engagement and participation will be monitored;
- how assessment briefs will be issued and learner submissions securely received;
- how learner work will be authenticated and academic integrity maintained;
- how learner progress, assessment decisions and achievement will be recorded;
- how learner records and assessment evidence will be securely retained
- how the centre will ensure that learners have timely access to academic support, assessment feedback and complaints procedures.

Where synchronous / real-time teaching is proposed, the centre must also demonstrate how attendance will be monitored and recorded.

Centres delivering through online or distance learning should expect enhanced quality assurance oversight due to the additional risks associated with remote delivery. OTHM may undertake additional monitoring activities, request demonstrations of systems and processes, require access to the learner management system, or increase the frequency or scope of External Quality Assurance and Centre Quality Reviews where considered necessary.

Centres are responsible for ensuring that their online delivery arrangements continue to operate effectively throughout the period of approval. Significant changes to delivery platforms, learner management systems or methods of delivery must be notified to OTHM in accordance with the Centre Agreement and any applicable OTHM notification requirements.

Centres remain responsible for ensuring that learners can access appropriate academic support, assessment opportunities and quality assurance arrangements irrespective of the mode of delivery.

2.4 Centre Location

This policy sets out the requirements that Centres must meet in order to ensure that learners are not misled as to the location of approved centres, or the base of delivery of qualifications.

Centres must demonstrate a Meaningful Operational Presence in any country in which they claim to be based.

This policy applies to:

- all approved Centres delivering OTHM's qualifications;
- all prospective Centres seeking approval;
- all delivery models, including fully remote, hybrid, and international provision.

This policy addresses the issue of 'Geographic Masking' which occurs when a centre uses a business address, purely for the purposes of marketing, while its actual operations, including programme management, assessment, and student support are located in a different jurisdiction. This practice is misleading to users of qualifications and conflicts with Condition B5.2 of the Ofqual General Conditions.

B5.2 An awarding organisation must not (and must take all reasonable steps to ensure that any person connected with it does not) advertise or promote its qualifications in a manner that is likely to be misleading to Users of qualifications. (Ofqual Handbook, Condition B5)

The OTHM Centre Approval process (and subsequent ongoing Quality Assurance processes) ensure that Centres can demonstrate a meaningful operational presence in any country in which they claim to be based. This policy applies particularly to Centres operating wholly or primarily through online or distributed delivery models.

Meaningful Operational Presence

In order to demonstrate a meaningful operational presence, approved centres will normally:

- Maintain official physical premises
- Maintain a website with a local URL / domain
- Ensure that contact emails are based on local domains
- Ensure that the Head of Centre (or other sufficiently senior staff member) is based in the relevant jurisdiction
- Hold a local business bank account
- Be a registered legal entity in the relevant jurisdiction
- Publish (to learners) where teaching and assessment staff are primarily located
- Show how any region-specific and subject sector-specific accreditation requirements have been managed

Centres must not:

- Describe themselves as “based in” a country solely on the basis of:
 - a registered office or postal address
 - a recruitment or agent presence
- Imply that delivery occurs in a country where teaching, assessment, and support are not substantively controlled;
- Provide information that could lead a reasonable person to assume a different jurisdiction of delivery or oversight than is actually the case.

Centres must ensure that marketing and learner-facing materials accurately describe the delivery model (e.g. online, distributed learning); and do not imply a geographic presence that is not supported by operational reality.

2.5 English Language Requirements

This policy sets out the responsibilities of approved centres for ensuring that learners and centre staff possess the English language capability necessary to deliver, assess and undertake OTHM qualifications.

This policy should be read alongside [OTHM's published English Language Expectations statement](#), which defines the minimum English language requirements for learner admission.

This policy applies to all approved centres delivering OTHM qualifications and to:

- all learners registered on OTHM qualifications;
- all teaching, assessment and internal quality assurance staff;
- all individuals acting on behalf of the centre when communicating with OTHM.

Centres must ensure that learners admitted to qualifications taught and assessed in English satisfy the published OTHM English language requirements prior to enrolment and registration.

Centres are responsible for:

- assessing learner English language capability in accordance with OTHM's published English Language Expectations;
- retaining appropriate evidence to demonstrate how each learner met the required standard;
- making this evidence available to OTHM upon request.

Centres remain responsible for ensuring that learners possess sufficient English language ability throughout their studies to participate effectively in teaching, assessment and quality assurance activities.

Centres must ensure that all teaching, assessment and internal quality assurance personnel have sufficient English language proficiency to perform their roles effectively.

This includes the ability to:

- accurately interpret OTHM qualification specifications, assessment requirements and associated guidance;
- deliver teaching and assessment in accordance with OTHM requirements;
- assess learner work written in English;
- understand and implement actions arising from External Quality Assurance reports and other quality assurance communications;
- communicate effectively with OTHM in spoken and written English;
- provide accurate information, documentation and evidence requested by OTHM within required timescales.

OTHM qualifications are regulated UK qualifications and are taught and assessed in English.

Accordingly:

- all summative assessment evidence submitted for OTHM qualifications must be produced in English unless expressly permitted within qualification-specific requirements;
- all learner evidence presented for External Quality Assurance, sampling, investigations or any other quality assurance activity must be in English;
- all correspondence, documentation, records and communications submitted to OTHM by centres must be provided in English.

Where supporting documents originate in another language, OTHM may require an accurate English translation.

Centres must provide evidence of compliance with this policy as part of the centre approval process.

Evidence may include, but is not limited to:

- learner English language assessment procedures;
- learner English language records;
- staff qualifications or other evidence demonstrating English language competence;
- recruitment and induction procedures;
- quality assurance records.

Compliance with this policy will be monitored through:

- Centre Approval;
- External Quality Assurance activities;
- Centre Quality Reviews;
- investigations;
- risk-based monitoring; and
- any other quality assurance or regulatory oversight undertaken by OTHM.

Centres must provide any information or evidence requested by OTHM to demonstrate ongoing compliance.

OTHM reserves the right to require additional evidence where it is not satisfied that learner or staff English language capability has been appropriately demonstrated.

2.6 Management of Total Qualification Time and Guided Learning Hours

OTHM qualifications are assigned Total Qualification Time (TQT) and Guided Learning Hours (GLH) in accordance with the requirements of the Regulated Qualifications Framework (RQF) and the Ofqual General Conditions of Recognition.

For the purposes of OTHM qualifications:

- Total Qualification Time (TQT) represents the total notional number of hours that a typical learner could reasonably be expected to require to achieve the qualification. TQT comprises Guided Learning Hours together with independent study, preparation, assessment and other directed learning activities undertaken outside the immediate supervision of teaching staff.
- Guided Learning Hours (GLH) represent the time during which a learner receives immediate guidance, instruction or supervision from a tutor, lecturer or other appropriately qualified member of staff.
- One credit usually represents 10 hours of Total Qualification Time.

The published TQT and GLH assigned to an OTHM qualification are determined by OTHM and must not be altered by centres.

Principles

The published TQT and GLH assigned to an OTHM qualification are notional estimates based upon the learning and assessment requirements of a typical learner. They are intended to support programme planning and to provide an indication of the expected size and intensity of a qualification. They are not intended to represent the exact amount of time that every learner must spend undertaking learning activities.

Centres retain flexibility in the design of their programmes, provided that learners are given a realistic opportunity to achieve the learning outcomes and assessment criteria, and that the integrity, validity and standards of OTHM qualifications are maintained.

Centre Responsibilities

Centres must design and manage programmes of study that are broadly consistent with the published TQT and GLH for each qualification.

As a minimum, centres must demonstrate that:

- programme structures, timetables and assessment schedules are appropriate to the size and level of the qualification;
- learners are provided with sufficient opportunities for Guided Learning to support achievement of the qualification outcomes;
- learners receive clear direction regarding independent study and other learning activities contributing towards the published Total Qualification Time;
- staffing levels, learning resources and learner support arrangements are sufficient to support the proposed delivery model;
- assessment planning and learner support arrangements provide learners with a realistic opportunity to successfully complete the qualification.

Centres are not required to demonstrate that every learner has received exactly the published number of Guided Learning Hours. However, centres must be able to demonstrate that the overall programme design is appropriate for the qualification and reflects the published GLH and TQT in a reasonable and proportionate manner.

Where a delivery model provides significantly less Guided Learning than would normally be expected, the centre must be able to justify how learners will continue to receive appropriate support and how qualification standards and assessment validity will be maintained.

Delivery Models

OTHM recognises that qualifications may be delivered through classroom-based, blended, online, workplace or other appropriate delivery models.

Centres may adopt alternative delivery models as long as they remain capable of delivering the qualification in accordance with OTHM requirements and the published qualification specification.

Where online or distance learning is used, Guided Learning may include live online teaching, tutorials, webinars or other activities where learners receive immediate guidance or supervision from appropriately qualified staff.

Self-Study Delivery Models

Centres may propose delivery models that incorporate little or no planned Guided Learning, including self-study programmes, where these are appropriate to the qualification and learner cohort.

Such delivery models require explicit approval by OTHM and will normally be subject to enhanced scrutiny during the centre approval process and ongoing quality assurance activities.

Before approving a self-study model, OTHM will expect the centre to demonstrate:

- robust learner recruitment and initial assessment processes that identify whether learners possess the academic, language, digital and independent learning skills necessary to succeed without regular tutor-led teaching;
- structured learning materials and learning resources that appropriately support independent study throughout the published Total Qualification Time;
- suitable learning platforms and mechanisms through which learners can obtain academic clarification or support where required;
- appropriate arrangements to protect assessment authenticity, learner identity and academic integrity; and
- effective arrangements for monitoring learner engagement, progression and achievement.

Approval of a self-study delivery model does not remove the centre's responsibility to ensure that learners have a realistic opportunity to achieve the qualification or reduce the centre's responsibility to maintain the integrity of assessment.

Quality Assurance and Monitoring

OTHM will review how centres have interpreted and implemented TQT and GLH as part of Centre Approval, External Quality Assurance, Centre Quality Reviews and other risk-based quality assurance activities.

This review will focus on the suitability of the centre's overall programme design rather than compliance with a prescribed number of teaching hours. OTHM may review programme timetables, schemes of work, delivery plans, learner support arrangements, virtual learning environments, learner feedback and other evidence where necessary to determine whether learners are receiving an appropriate educational experience.

Where a delivery model appears inconsistent with the published TQT or GLH, or where learner outcomes, quality assurance findings or other evidence indicate that reduced Guided Learning may be adversely affecting learner achievement or assessment validity, OTHM may require the centre to provide further justification, revise its delivery arrangements or implement additional quality assurance actions.

Persistent failure to provide learners with a realistic opportunity to achieve the qualification, or delivery arrangements that undermine the validity, reliability or integrity of OTHM qualifications, may result in sanctions or withdrawal of qualification or centre approval in accordance with OTHM policies.

3. Additional Qualification Approval

At the point of initial centre approval, centres may apply for approval to deliver a maximum of 10 OTHM qualifications.

Centres wishing to deliver additional qualifications after approval must submit an application for additional qualification approval. Approval must be granted by OTHM before learner recruitment or enrolment can commence for any additional qualification.

Under normal circumstances, OTHM will only consider applications for additional qualification approval once the centre has successfully completed at least one full delivery cycle for an existing approved qualification. This includes the completion of teaching, assessment, internal quality assurance, external quality assurance and certification of learners.

Applications for additional qualification approval will be evaluated against the centre's current performance and compliance history, together with its ability to deliver the requested qualifications. As part of this process, OTHM will review, where applicable:

- staffing arrangements, in accordance with the requirements set out in the OTHM Staffing Requirements document;
- the adequacy of physical, technical and learning resources relevant to the qualifications requested;
- learner support arrangements;
- previous quality assurance outcomes, sanctions and compliance history;
- the centre's capacity to maintain quality across an expanded qualification portfolio.

Applications will also be assessed against the relevant requirements of the OTHM Centre Approval Criteria applicable to the qualifications requested.

Approval of additional qualifications is at OTHM's discretion and may be subject to additional conditions, evidence requirements or quality assurance activity where this is considered necessary to protect the integrity of OTHM qualifications.

4. Renewal of Centre Approval

Initial centre approval is granted for a period of 5 years. Before the expiry of the approval period, OTHM will undertake a review of the centre's performance to determine whether approval should be renewed.

The review will consider the centre's overall performance throughout the approval period, including, but not limited to:

- learner registration activity;
- certification activity;
- External Quality Assurance (EQA) requests, outcomes and actions;
- Centre Quality Review outcomes;
- learner complaints received by OTHM;
- sanctions applied by OTHM; and
- evidence of malpractice, maladministration or other compliance concerns.

As part of the review, OTHM may request updated evidence demonstrating continued compliance with the OTHM Centre Approval Criteria where considered necessary.

Following the review, OTHM will determine one of the following outcomes:

Automatic Renewal

Centres may be approved for automatic renewal where OTHM is satisfied that the centre has consistently demonstrated compliance with its conditions of approval and there is sufficient evidence of delivery activity during the approval period to provide confidence that the centre continues to operate effectively.

This decision requires not only the absence of significant quality or compliance concerns, but also sufficient learner registrations, certification activity and quality assurance engagement to enable OTHM to make an informed judgement without requiring a full reapproval process.

Centres approved for automatic renewal will not be required to submit a full Centre Approval Application. Prior to the commencement of the new approval period, the centre must submit an updated Centre Staffing Profile and any other information reasonably requested by OTHM to ensure its records remain accurate and current.

Renewal Subject to Centre Approval Application

A centre may be required to complete a full Centre Approval Application where there is no evidence of significant quality or compliance concerns, but the volume or nature of centre activity during the approval period has been insufficient for OTHM to gain adequate assurance that the centre continues to meet all approval requirements.

This may include centres with low learner registrations, limited certification activity, insufficient External Quality Assurance activity, or prolonged periods of inactivity.

Submission of a Centre Approval Application does not imply that concerns exist regarding the centre's compliance. It enables OTHM to undertake a full reassessment before granting a further period of approval.

Not Approved for Renewal

A centre will not be approved for renewal where the evidence available to OTHM demonstrates that the integrity of OTHM qualifications has been, or may have been, compromised, or where the centre has demonstrated an inability to maintain ongoing compliance with OTHM's conditions of approval.

In reaching this decision, OTHM may take account of persistent or serious quality assurance concerns, repeated failure to comply with OTHM requirements, unresolved sanctions, substantiated malpractice or maladministration, significant learner protection issues, or any other evidence indicating that continued approval would present an unacceptable regulatory or reputational risk.

Where a centre is not approved for renewal:

- OTHM will provide the centre with the reasons for its decision;
- OTHM will identify, where appropriate, the issues that must be addressed before any future application will be considered; and
- applications for centre approval will not normally be accepted for a minimum period of six months from the date of the renewal decision.

The expiry of a centre's approval period does not create an entitlement to renewed approval. Renewal remains subject to OTHM being satisfied that the centre continues to meet its approval requirements and is capable of maintaining the standards expected for the delivery of regulated qualifications.

5. Withdrawal of Centre and Qualification Approval

OTHM may withdraw approval for an individual qualification or for a centre where it is no longer satisfied that the centre is able to deliver OTHM qualifications in accordance with its conditions of approval or where continued approval is no longer justified.

Approval may be withdrawn voluntarily, through the Centre Sanctions process, or as a result of prolonged inactivity.

5.1 Voluntary Withdrawal

A centre may request the voluntary withdrawal of one or more approved qualifications, or of its centre approval, by notifying OTHM in writing.

Requests will be considered alongside the centre's current learner registrations, certification activity and any outstanding quality assurance actions. Approval will only be withdrawn once OTHM is satisfied that appropriate arrangements have been made to protect the interests of registered learners and that all outstanding obligations have been met.

5.2 Withdrawal Due to Inactivity

Approved centres must generate sufficient evidence of satisfactory programme management to support the continuation of qualification and centre approval. This evidence is obtained through learner registrations, certification activity, External Quality Assurance, Centre Quality Reviews and other quality assurance activities.

Where an approved qualification remains inactive, OTHM may withdraw approval because sufficient evidence cannot be obtained to demonstrate the centre's ongoing capability to deliver and manage that qualification.

Qualification approval may therefore be withdrawn where:

- no learners have been registered within 12 months of initial qualification approval (including following initial centre approval); or
- following previous delivery of the qualification, there has been 24 consecutive months during which no learners have been registered and no certificates have been claimed.

Where a centre can demonstrate credible and evidenced plans to commence or recommence delivery in the near future, OTHM may, at its discretion, grant an extension to the approval period. Such requests will only be considered by exception and should be discussed with the OTHM Quality Assurance Team before the inactivity threshold is reached.

OTHM will conduct periodic audits of qualification activity across all approved centres. Where inactivity meeting the above criteria is identified, OTHM will notify the Centre Contact in writing, advise that qualification approval is liable to be withdrawn and, where appropriate, provide the centre with an opportunity to discuss any exceptional circumstances before a final decision is made.

Withdrawal due to inactivity is an administrative approval decision and does not, in itself, imply poor performance or non-compliance. However, where inactivity is accompanied by quality assurance or compliance concerns, withdrawal may instead be managed through the OTHM Centre Sanctions Policy.

5.3 Withdrawal Through the Centre Sanctions Process

Qualification approval or centre approval may be withdrawn where a centre fails to comply with the OTHM Centre Agreement, this policy, or other mandatory OTHM requirements.

Withdrawal through the sanctions process will normally occur following serious or persistent quality assurance or compliance concerns and will be managed in accordance with the OTHM Centre Sanctions Policy.

Qualification approval may be withdrawn where non-compliance is limited to a particular qualification or subject area. Centre approval may be withdrawn where the evidence demonstrates significant or repeated non-compliance across the centre's approved provision, or where continued approval presents an unacceptable risk to the integrity of OTHM qualifications.

5.4 Effect of Withdrawal

Once qualification or centre approval has been withdrawn, the centre must immediately cease advertising, recruiting or registering learners for the affected qualification(s), or for any OTHM qualifications where centre approval has been withdrawn.

Where learners remain registered at the time of withdrawal, OTHM will determine appropriate arrangements to protect their interests in accordance with its regulatory obligations and published policies.

Withdrawal does not remove a centre's responsibility to cooperate with any ongoing investigation, quality assurance activity or learner protection arrangements.

6. Regulatory References

- A5** – Availability of adequate resources and arrangements
- A6** – Identification and management of risks
- A8** – Malpractice and maladministration
- B5** – Representations regarding qualifications
- C2** – Arrangements with Centres
- E4** – Ensuring an assessment is fit for purpose can be delivered
- E5** – Assurance that qualifications comply with conditions
- G5** – Registration of Learners
- H2** – Centre Assessment Standards Scrutiny

7. Version Control

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