University Alliance response to the Department for Education's Lifelong Loan Entitlement (LLE) consultation

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About Us

University Alliance (UA) is the voice of professional and technical universities. We represent a group of 14 large to mid-sized universities working at the heart of their communities[1]. Alliance universities partner with industry and the professions to deliver the workforce of today and tomorrow through practical, skills-based learning and applied research.

LLE Strategic Aims and Objective

Q1. How can we best ensure that, compared to the current student finance system, the LLE will better support learners to train, retrain or upskill throughout their lifetime?

Alliance universities are enthusiastic about the opportunities presented by the Lifelong Loan Entitlement (LLE). We believe this presents a historic opportunity to rethink who post-18 education is for and how it can be experienced. If successful, it will enhance social mobility and opportunity, support the levelling up agenda and ensure that employers and the economy are supported by a skilled workforce that is fit for the future. To deliver on this, we believe change is needed in the way tertiary education is approached in the UK. Our University Alliance members are particularly well-placed to support this transformation. We are deeply embedded in our communities with rich employer connections across business,

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[1] Our members are Anglia Ruskin University, Birmingham City University, University of Brighton, Coventry University, University of Derby, University of Greenwich, University of Hertfordshire, Kingston University, Leeds Beckett University, Middlesex University, Oxford Brookes University, University of South Wales, Teesside University, and University of the West of England, Bristol.

industry, and public services. Our expertise is in skills-based education, and we are some of the largest providers of higher and degree apprenticeships and vocational training. Our student bodies are diverse, with large numbers of mature, part-time and commuter students.

Drawing on this expertise, we have come together to imagine how the LLE could be turbo-charged to truly deliver on its promise. Our UA LLE blueprint describes what Alliance universities believe needs to happen to achieve the objectives set out by government in its consultation on the LLE.

To be truly transformational, the LLE must be:

1. **Accessible.** Everyone should be able to access the education that will best support them to achieve their goals. Everyone should be supported to understand their options.
2. **Demand driven.** Educational offerings should meet learner demand and align with the needs of employers and communities.
3. **Outcomes-focused.** There should be clear and cohesive pathways to educational and career outcomes. All study options should provide value to learners in the form of formal award and recognition, and this should be well understood by employers.
4. **High-quality.** Learners should feel confident that they are receiving high-quality teaching. At the same time, innovation should be encouraged through a supportive regulatory environment and targeted funding.

We believe three key enablers are needed to turbo-charge the delivery of the LLE:

1. **Regional education hubs** – to function as a link between learners, education providers, local, regional, and national skills bodies, and employers.
2. **National Learner Record system** – to enable higher education providers to record the number of credits a learner has completed with them using a national database which is accessible to all higher education providers and relevant regulators such as the Office for Students (OfS) and Ofsted.
3. **Learner E-portfolio** – to enable learners to evidence the learning they have completed, and the skills gained in a way which is clear and easy to understand to employers.

Q2. What barriers might learners face in accessing/drawing on their LLE and how could these barriers be overcome?

The key barriers to accessing the LLE are likely to be related to a lack of funding, time, and information.

In UA's experience, by far the largest barrier to universities expanding their flexible provision is the student finance system, particularly the fee structure for part-time students. UUK research found that the most cited barriers to part-time study were also financial, notably the cost of tuition fees and the cost of living. Giving learners access to loans for

part-time and short courses through the LLE, including proportional maintenance loans, is likely to stimulate both supply and demand for this type of provision – particularly if the equivalent or lower qualification (ELQ) rules are relaxed. Nonetheless, many people will be averse to the idea of taking out loans and incurring debt, and the current cost of living crisis is likely to exacerbate this hesitancy. This is likely to remain the biggest barrier to LLE take-up. DfE-commissioned research has found that parents' and the public's understanding of the current student finance system is extremely patchy; it is vital that the terms and conditions of the LLE are communicated clearly to learners, so they can evaluate the financial risk involved in drawing on their entitlement.

Key non-financial barriers to study identified by UUK are related to the difficulty of fitting study into busy lives, notably work and caring responsibilities. Flexible and modular study delivered on a hybrid basis that is accessible outside of working hours will make it easier for learners to take up their LLE. However, there is little escaping the fact that studying takes time, and many people are time poor. Learners will need to be confident that further study will be worth their time and financial investment. Therefore, it is vital all study options under the LLE have clear and cohesive pathways to educational and career outcomes. They should provide value to learners in the form of formal award and recognition which is well understood by employers.

Whilst the LLE is a very welcome development, there is no doubt that it will add a great degree of complexity to the HE system which could function as another significant barrier to take-up. As far as possible the design of the LLE should aim to simplify and streamline this landscape. Moreover, quality information, advice, and guidance (IAG) will be the cornerstone of a successful LLE, and it needs to be accessible in person as well as online.

Q3. What information and guidance should be displayed in a lifelong learning account to support learners to understand their options for using their LLE?

It is vital that the lifelong learning account is user-friendly for learners of all ages and abilities; extensive user testing will be vital to ensure this. Accounts should signpost learners to high quality, impartial IAG provided by organisations such as the Student Loan Company (SLC), UCAS and the national careers service. Whilst the online account will be an essential starting point for many learners, we believe that in-person advice and local outreach will be needed if the LLE is to reach those who will most benefit from it.

UA is advocating for the creation of regional education hubs that would be responsible for coordinating schools, employers, job centres and other local influencers to ensure they are working to provide potential learners with accurate information about the opportunities available to them. They should also have small centres, based in existing structures such as an education provider or a job centre, where learners can come for in-person advice. Advice should cover not only a learner's initial learning opportunities, but also advice on how modules or qualifications they have already completed could be stacked to lead to a larger qualification. Learners should be able to return to their education hub repeatedly.

Q4. How can we best ensure that the LLE will enable learners to access technical as well as academic courses at levels 4 to 6?

The design of the LLE and accompanying IAG infrastructure needs to ensure that learners can access both technical and academic courses, or a combination of these. Most higher education courses are in fact already made up of a blend of technical and academic elements. However, what is novel about the LLE is to be able to mix and match modules from different providers in further education colleges and universities, some more explicitly technical or academic at different levels, and access student finance including maintenance support in order to do this.

The most effective means of ensuring learners access the study that is best suited to their needs and future employment prospects is to deliver high quality IAG, ideally both online and in person.

Q5A. How can we best ensure that the LLE will encourage FE and HE providers across the country to offer provision that closes the current skills gap and supports future upskilling?

FE and HE providers already collaborate with each other and employers across the country to close key skills gaps. However, this works more effectively in some places than others. The LLE offers a huge opportunity to incentivise more of a focus on upskilling. To make this happen, demand needs to be assessed at national, regional, and local levels to ensure the nation's workforce has the right skills for the future, while accounting for varying skills and learning needs across the country. It is essential that national and local skills mapping exercises feed into each other and are interpreted together. We recommend that regional education hubs should pull together insights from the likes of the Future Skills Unit, LSIPs, LEPs and direct engagement with employers and PSRBs to support higher education providers in understanding and responding to skills needs at national, regional, and local levels. Alliance Universities, with their close industry and civil links, are experts in this area and could support this work.

Market research should be conducted in local communities to understand prospective learner demand. This could be facilitated by education hubs, who would develop wide networks within their regions and would have direct contact with prospective learners.

Education hubs should be responsible for supporting higher education providers to deliver an offer which meets the needs of communities. They should work with education providers to ensure that provision keeps up with industry developments and learner demand.

Q5B. How can we facilitate collaboration between FE and HE providers and employers, to ensure that provision keeps up with industry developments?

There is a great deal of existing collaboration between FE and HE providers and employers that the LLE can build on. For example, this three-way collaboration is explicitly built into the 21 Institutes of Technology (IoTs). Alliance universities have long worked in partnership with FE colleges to ensure a local seamless pathway of employer-responsive education and

training, that learners can access throughout their lives. For example, the [Teesside University College Partnership (TUCP)](#) delivers a shared vision of driving regional economic growth through a networked approach to delivering higher-level skills, ensuring that the location and nature of provision directly responds to regional industry needs across the Tees Valley. Similarly, the [University of South Wales](#) is using its partnerships with further education to support a joined-up focus on future skills and innovation, combining resource, engaging with industry, and sharing access to facilities and expertise.

As outlined above, the creation of regional education hubs would create the infrastructure and incentives to ensure that FE and HE providers collaborate with each other and local employers to ensure provision is up to date and meets national and local skills needs.

Q5C. How can we help FE and HE providers to provide modules and courses that offer real value to employers and improve employment prospects for learners?

Employers must be embedded in every stage of the process. This should include opportunities for employers to be involved in the direction and delivery of learning, for example:

- Local employers should have a strong influence over the education and training offered. Regional education hubs should regularly conduct local employer engagement exercises to keep up with emerging skills needs and to help employers understand the range of qualifications on offer.
- Employers should have the opportunity to be involved in the design of provision, and both employers and higher education providers should be responsible for identifying areas of potential for the co-development of modules and courses. Alliance universities are already doing this successfully in a number of areas such as degree apprenticeships and skills bootcamps.
- Employers should have the opportunity to be involved in the delivery of modules and courses. There should be an ambition for modules to include contact with employers. This could range from work placements being included as part of a module, to employers contributing guest speakers or mentors.
- Employers should be encouraged to contribute to the skills and training of their employees. Employer investment in employee training is low in the UK: investment per employee is only half the average across the EU, for example. There is a risk that the LLE could further disincentivise employer investment in training, with employers instead asking staff to use their LLE entitlement. Employers should be encouraged to see funding staff education and training as a way of incentivising staff to undertake training that meets their needs. The relationships developed with employers through education hubs could be one route through which to encourage this, especially if employers can see that education offers are aligned to their needs.
- As part of this, LLE funding should be considered alongside other skills funding mechanisms such as the apprenticeship levy.

Q5D. How can providers support and facilitate learners gaining qualifications through modular study?

Modular study must be accessible to students with a wide range of lifestyles and circumstances. This includes students who may be in full or part time work, working freelance or self-employed, unemployed or have caring responsibilities. Students should be able to fit studying in around other responsibilities and should be able to access modules which meet their needs without needing to relocate.

Teaching modes should be flexible to meet the needs of all learners, with hybrid, in-person and digital learning opportunities available. In-person learning enables practical, hands-on learning and ensures accessibility for those with low-levels of digital literacy or no internet access. Online learning is essential in allowing those in work or with caring responsibilities to easily slot learning into their schedules and is easier to engage with for learners with accessibility needs.

Teaching schedules should be varied to support those who are in work or have other responsibilities, with evening and weekend teaching available. Lectures and seminars should be recorded where possible so learners can review them later if needed, though there should be an expectation that learners will attend most of these sessions live.

Mature learners, learners who are in work or learners with other responsibilities are less likely to be able to relocate to study. We do not envisage that many learners would be willing to relocate to study a single module. Therefore, higher education providers should assess the needs of their local community and ensure that they have an offer which meets those needs. This should be facilitated by regional education hubs.

Q6. Do you think the move to the LLE will have any particular impacts on people with protected characteristics? If so, which groups and in what ways? Your answer could include information about both the potential challenges and the positive equality outcomes of this policy.

There is a potential for the LLE to be truly transformative for people who have been unable or unwilling to access traditional full-time higher education in the past. Many people underrepresented in higher education have protected characteristics, for example women with caring responsibilities and disabled people. The key to ensuring the LLE will work effectively for all is to ensure that teaching modes are accessible to students with a wide range of lifestyle and circumstances. The DfE and OfS should monitor the take-up of the LLE on equality grounds to ensure it is reaching a wide range of learners and not inadvertently excluding certain groups.

Q7. What barriers might learners with protected characteristics face in accessing/drawing on their LLE and how could these be overcome? Your answer here could include previous consideration of an alternative student finance product for students whose faith has resulted in concerns about traditional loans.

Learners with protected characteristics face many of the same key barriers as other learners outlined in Q2 related to lack of funding, time, and information. Disabled students and those with caring responsibilities may face constraints limited to mobility, which is why it is essential that teaching modes are accessible to students with a wide range of lifestyle and circumstances.

It is crucial that the LLE is designed in a Sharia compliant manner and that it does not inadvertently exclude Muslim learners.

Scope of the LLE

Q8. Should all level 4 to 6 courses which are currently designated for HESF funding be treated as automatically in scope for the LLE? If not, why not, and what additional criteria for inclusion should be considered?

Yes.

We strongly agree that all courses currently designated for HESF funding should be automatically in scope for the LLE.

Q9. Specifically, do you think that the following courses, which currently attract HESF, should be incorporated into the LLE, under the same repayment terms as other provision (i.e., fee loans count towards an individual's four-year fee entitlement)?

- **A foundation year integrated into a degree course**
- **PGCEs**
- **Integrated Masters (3 years undergraduate plus 1-year Masters)**

If not, please explain why?

Yes.

We agree that all the above courses should be incorporated into the LLE.

Q10. What arrangements should be made under the LLE for courses which are over four years and are currently eligible for student finance – including medicine, dentistry, and architecture?

It is vital that courses over four years that are currently eligible for student finance be included in the LLE. In fact, we are not convinced that four years is the appropriate length of time for the LLE to cover. There are many vital higher education qualifications longer than this (including medicine, dentistry, and architecture), and the LLE should have mechanisms to fund courses for their entire length. There is a compelling case for the LLE to fund the degree length plus one year. This would enable learners to upskill and retrain in keeping with the lifelong learning ambition.

Q11. We are proposing that all HTQs should be in scope of the LLE. Should approval as an HTQ be the sole route for qualifications that are ALL-funded to become eligible for the

LLE? If not, why not, and what alternative route(s) would be appropriate? Please include detail on the process and eligibility criteria that would be used in any alternative route.

We agree that all HTQs should be in scope of the LLE, as should other popular level 4 and 5 qualifications such as Access to HE courses, and employer backed HNCs and HNDs.

Q12. In particular, how could employer-relevance be tested as a basis for LLE eligibility?

We are not in favour of requiring providers to evidence employer relevance as a basis for LLE eligibility. This would add an unnecessary extra layer of regulation that would disincentivise many higher education providers from taking part in the LLE. A great deal of provision is already professionally accredited by PSRBs. In our view the existing higher education regulatory regime is sufficient to ensure both quality and relevance. However, as outlined above, regional education hubs could play a key role in bringing together providers and employers to develop new provision to meet local skills needs.

How will modular funding operate

Q13. We are aware that some courses (e.g., medical degree courses, some ALL-funded courses) are not currently structured around individual credit-bearing modules. Should such courses be excluded from any form of modular funding, and if so on what grounds and criteria?

We do not think any courses should be excluded automatically from the LLE. It should be up to providers, working together in conjunction with relevant PSRBs, to determine whether it is appropriate for a course to be provided on a modular basis.

Q14. We are seeking views on whether to set a minimum amount per funding application equivalent to 30 credits. This is not a minimum module size, as smaller modules could be "bundled" together to meet the minimum application amount. What are your views on this proposal?

We are supportive of this proposal and of the principle of setting a minimum amount per funding application. However, we note that many popular, employer-backed micro-credentials carry 20 credits, and it may be this is a more appropriate minimum amount to ensure greater flexibility and take-up of the LLE.

Q15. Which (if any) courses should be funded per-academic year (i.e., using the same basis as the current-HESF-system), and which courses should be funded according to the number of credits in the course?

This decision should be left to the discretion of providers, as in Q13.

We do not propose to answer questions 16 and 17.

Q18. What impact could modular study have on study mobility across the UK?

There is already a high degree of mobility across the UK, with significant numbers of English students opting to study in Scotland and Wales, and to a lesser extent Northern Ireland (and

vice versa). It is also relatively common for students to move from an FE college to a university (though not as common the other way round), with articulation agreements in place between colleges and universities to facilitate this movement. For example, the University of Hertfordshire has had a consortium with four FE colleges for over 20 years and estimates between 15,000- 20,000 of its graduates started their journeys in those colleges. It is less common for university students to change providers once they have started a degree course. Movement between providers is likely to become more common under the LLE, though it will not be appropriate or desirable for all learners.

Q19. How can the LLE promote and encourage flexible study across England, Scotland, Wales, and Northern Ireland?

As the LLE is an England-only policy, there is a risk that it will make it less attractive and more difficult for students to move between the devolved nations of the UK to study. The DfE should work closely with the devolved administrations to try to ensure it does not have this effect. As far as possible the LLE should draw from and use existing frameworks that do not significantly diverge across the different nations – with a significant role for the Quality Assurance Agency for Higher Education (QAA), which operates on a UK-wide basis.

Lifetime Entitlement

Q20. What should be the most important considerations when determining how the lifetime entitlement will work?

One of the most important considerations will be how to guarantee that this entitlement will genuinely be available across an individual's lifetime, and how to build public confidence that that is the case. What mechanisms can be put in place to try to prevent a future government from dismantling the entitlement or watering it down? If people are not confident that it will be available in the future, there may be a rush to use it up all at once, which will put pressure on deliverability and defeat the purpose of the LLE.

A second key consideration will be how to ensure access to high quality IAG for learners at all stages of their lives which enables them to make the best use of their lifetime entitlement.

Further eligibility criteria

Q21. What, if any, age-related restrictions should be in place for the LLE that would impact on an individual's ability to access their loan entitlement?

We do not support any age-related restrictions for the LLE, as these go against the fundamental purpose of a lifetime entitlement.

It is unclear to what extent people with existing higher education qualifications who have already taken out UK student loans will be able to access the LLE. To support the retraining and upskilling agenda, as many learners as possible should have access to the entitlement.

Q22. We propose that we only fund individuals taking modules that are derived from a full course. Do you think that there should be restrictions in place so that borrowers should not be able to use their whole entitlement on a succession of individual modules which are not on track to a full qualification? We would welcome views on what these restrictions could be.

We believe there are three primary motivations for learners when choosing to study: skilling, upskilling, and reskilling. There should be options available through the LLE which cater to each of these. Therefore, all standalone modules funded through the LLE should be required to be part of a pathway to a qualification. However, this may not require the module to be lifted straight from an existing qualification. Providers should be given the freedom to adapt and develop modules in response to demand and to ensure that learners studying standalone modules have the best possible experience.

There should be options for learners to 'level-up' and combine credits from a number of standalone modules into a larger level 4, 5 or degree qualification (including level 7). Learners should have access to clear IAG which helps them understand how they could stack their learning.

Q23. In a system where modularised study is widespread, how we can we ensure that learners and employers understand what programmes of study deliver the skills that employers need?

The UA blueprint for the LLE sets out a vision for a demand-driven LLE with regional education hubs at the heart to act as a link between learners, education providers, local, regional and national skills bodies and employers. The hubs would bring together these key stakeholders to:

1. Provide information, advice, and guidance (IAG) to learners
2. Support providers to understand learner and employer demand
3. Facilitate collaboration between providers at all levels and employers.

They would ensure that the LLE is designed with skills at the forefront and that both learners and employers are well informed and engaged.

Q24. When considering restrictions by level and subject, how could the government ensure that the LLE is used for high-value learning that meets the needs of employers and the economy?

We are not in favour of restrictions by level and subject. We strongly support extending the LLE to level 7, as it does not make sense to operate a separate funding and loans system for master's level study, which is crucial to upskilling. In the future government should consider extending the LLE to all levels of higher education, so it could also include doctoral study at level 8. Given the UK's ambitions around R&D and becoming a science superpower, doctoral level study should be made as accessible as possible, and at the very least not conflict with the LLE system.

To ensure that all options available to learners are high-quality, the Lifelong Loan Entitlement should only be available for study undertaken at, or validated by, a higher education provider registered by the Office for Students. This will reduce the need for additional regulatory mechanisms.

Q25. Are there other restrictions we should consider on the use individuals can make of their entitlement?

No.

We believe there should be as few restrictions as possible to incentivise delivery and take up of the LLE. To maximise learner choice, modules, or full qualifications at levels 4, 5, 6 and 7 should be covered under the LLE. To facilitate flexibility and learner choice, greater flexibility will need to be introduced to the funding system. This includes removing Equivalent or Lower Qualification (ELQ) rules which prohibit access to student funding for second degrees or certification, removing rules requiring a study intensity of 25 per cent or greater of a full-time equivalent course, and removing the requirement to follow a full course for a specified qualification.

Maintenance

Q26. Do you think a future system should include a facility for provider-based bursaries, which providers allocate directly to students?

Yes.

We support the inclusion of provider-based bursaries in the LLE system, along with other types of bursaries. Government-based bursaries, for example the NHS Learning Support Fund for nursing and allied health students, should also be enabled to incentivise take up of strategically important provision, particularly where there are skills shortages. We also believe it is crucial to include employer-based bursaries so that employers can contribute to maintenance costs in certain cases.

Q27. Should maintenance support, like fees, be proportional, so that e.g., modules which amount to one-quarter of a full-time year of study carry an entitlement to one quarter of the maintenance support that the latter does?

Yes.

Maintenance loans should be available to all learners studying for any length of time at any level, even for standalone modules. The amount should be calculated as a percentage of the funding available for a full degree. In addition, we would support the reintroduction of targeted, means-tested maintenance grants for learners with income below a certain threshold. The criteria should take account of any dependents the learner may have. Financial support could be made available across the board, for a truly open and accessible lifelong learning offer, or limited to subjects which are identified as priorities by employers. Examples of where this has already been done effectively include the NHS Learning Support Fund for key nursing and allied health courses.

It is important that the design of the LLE and the maintenance system ensures that modular study is not more or less costly than studying full-time. However, the system must also be sustainable for higher education providers. It is important for government to understand that modular provision is generally more expensive to deliver than full time provision. In addition, some modules and courses are more expensive to deliver than others due to the specialist staff, equipment and facilities required. These issues need to be addressed, for example through the OfS strategic priorities grant.

Q28. Are there courses or circumstances for which maintenance should not be offered (e.g., where students are studying below a certain level of intensity)?

No.

Maintenance support should be offered to as wide a range of learners as possible to incentivise take-up of the LLE. It will be particularly crucial given the current increase in the cost of living.

Q29. Currently means-tested elements of the maintenance system relate to family income. Should this be reconceptualised for a system with more adult participation, and if so, how?

Yes.

The maintenance support formula needs to be carefully redesigned in the context of the LLE to ensure it does not disadvantage certain groups of learners, for example students with dependents. It also needs to consider the fact that a learner's income may be reduced once they undertake study. Individual disposable income may be a more appropriate measure for a system with more adult participation.

Q30. To what extent do you think maintenance support would be a consideration for learner access to, and progression through, LLE funded courses?

The student finance system should incentivise people to study, particularly those in most need of upskilling or retraining. It should not be financially unviable for anyone to study. In-work learners who would need to reduce work hours to study, or unemployed learners, may feel especially worried about covering living costs while studying. We know that lack of access to funding is the biggest barrier to study, and Sutton Trust research has shown the number of part time learners collapsed due to the funding reforms in 2012. Therefore, we are in little doubt that maintenance support will be crucial to the success of the LLE.

The student finance system should be seamlessly linked in with other financial support systems. For example, a person claiming universal credit should not be penalised if they undertake part-time learning while job-seeking. If an unemployed person goes into full-time learning, they should be able to transition onto a student maintenance loan or grant.

Q31. Do you think a maintenance offer should differ by course type, mode of study (e.g., part-time), or learner circumstances such as age, income, or caring responsibilities?

No.

The maintenance offer should not change by mode of study. Access to maintenance support should be study mode blind.

However, there should be scope for the maintenance offer to vary by course type, as the Government could use maintenance grants (in place of the standard loans) to incentivise take-up of strategically important provision (as it has done successfully with key nursing and allied health courses through the NHS Learner Support Fund).

Learner circumstances should be relevant when assessing income for the purposes of maintenance. Means testing based on family income is not appropriate for mature learners. As outlined above, individual disposable income may be a more appropriate measure for a system with more adult participation. This should take into account any dependents and other key factors affecting disposable income.

Quality assessment and regulation

Q32. How can we support flexibility whilst maintaining high quality provision through the introduction of the LLE?

Learners and employers should be confident that the education and training on offer is high-quality. To ensure that all options available to learners are high-quality, the Lifelong Loan Entitlement should only be available for study undertaken at, or validated by, a higher education provider registered by the Office for Students. This will reduce the need for additional regulatory mechanisms.

As far as possible existing quality assessment and regulatory systems should be used for the LLE, with as little duplication as possible. To support flexibility, it is vital that any barriers are addressed, and regulation is proportionate.

Q33. How should the approach to quality change to support the introduction of the LLE?

Regulatory approaches need to be adapted to support flexibility in higher education. A significant barrier to universities offering more flexible provision now is the impact this can have on an institution's quality metrics, notably the Teaching Excellence Framework (TEF). Continuation rates for learners accessing short courses and modules tend to be lower than for full-time courses. Conversely, these learners may score more highly on other metrics such as satisfaction and progression, particularly if they are already in employment.

Unemployed learners would pose a higher risk for universities, who may be more incentivised to take on these types of learners if they were reported and captured differently in the quality metrics than full-time students.

Q34. What, if any, regulatory changes might be needed to support a modular system?

Innovative approaches to flexible learning and credit accumulation and transfer and an expanding demographic of learners will require new approaches to HE regulation. The recent focus on continuation and completion has incentivised providers to prioritise full

time provision. Plans to include these metrics in B3 conditions could therefore disincentivise institutions from truly embracing the modular delivery and flexible entry requirements required to make the LLE a success. Government and the OfS should consult with providers to develop new metrics to assess the quality of flexible and modular provision.

OfS's data-intensive approach to regulation also does not lend itself well to modular provision, as it will increase the cost of delivery. A risk-based solution needs to be found to ensure regulation of modular provision is robust but not disproportionate.

Q35. Are there opportunities to simplify the regulatory regimes that will operate under the LLE?

There is a real risk that regulation of the LLE will exacerbate an increasingly crowded and complex regulatory space, with providers having to navigate the requirements of OfS, Ofsted, ESFA, IfATE and many sector specific PSRBs. The LLE will not be viable for providers to deliver if it requires more regulation. The introduction of the LLE offers a unique opportunity to streamline existing reporting systems and reduce burden.

Q36. How should government look to facilitate new and innovative provision while supporting high quality provision?

Government can stimulate the conditions for innovation by ensuring the regulatory burden is proportionate and lending financial support to pilots and other 'sandbox' activity for providers wishing to experiment in course design and delivery.

There are likely to be significant development costs involved for institutions in setting up new ways of teaching to facilitate the delivery of single modules as standalone learning experiences. There will be additional administrative costs associated with recruiting and processing a larger number of separate student intakes on to standalone modules every year. There are also difficulties in projecting demand for standalone modules. Given this, there is a risk that providers could be financially disincentivised from developing modular provision. Getting funding levels right will be essential in ensuring that high-quality modular provision continues and grows. As a minimum, fees, and maintenance levels should be proportionate to a full qualification, with pro-rata teaching grants for high-cost modules.

Level 4 and 5 quality assurance

Q37. We welcome views on how quality assessment and regulation could best work for level 4 and 5 technical education within the wider LLE context.

As awarding organisations universities already assess each module individually to make a judgement on whether the learning outcomes have been achieved and award credit. We are concerned the other measures outlined in the HE reform consultation would add burden and complexity to the system without a clear added value to learners and employers. Rather than a blanket approach to all higher technical qualifications (HTQs) there should be a risk-based approach and a degree of responsiveness based on feedback from PSRBs and demand from employers and learners. PSRBs will need to play an essential role in a flexible study

model. DfE and the Institute for Apprenticeships and Technical Education (IfATE) should start by looking at HTQs with PSRB implications and working closely with PSRBs and providers to determine if there are fundamental issues with achieving occupational competence through 'stackable' modules (e.g., due to duration or placements). Some of these qualifications might only be suitable for standalone modules (e.g., for the purpose of CPD or as a taster of a larger award), in which case there are already well-established processes for PSRB's working with HEIs to record CPD. They are also already hardwired into OfS regulation (e.g., losing PSRB regulation is a reportable event).

For HTQs where occupational competence can be achieved through 'stackable' modules, IfATE could produce guidance on a modular structure for each HTQ, but there should not be an enforced common structure. There should be a risk-based approach that takes account of existing regulatory processes and QAA's 2021 Credit Framework for England. There also needs to be more assessment of demand from learners for credit transfer within HTQs and therefore where guidance and regulatory approaches need to be prioritised.

Credit recognition and transfer

Q38. What are the barriers to encouraging greater credit recognition and transfer between providers?

Government should build on what works already and draw on the experience of past and existing systems that facilitate credit transfer such as the QAA's 2021 Credit Framework for England. The former polytechnic sector had well developed systems of credit transfer to allow for student mobility. There is also much to learn from the experience of the Open University over decades, alongside the experiences of FE Colleges who have experience of supporting open access education linked to employers.

Q39. How can the introduction of the LLE support credit recognition and transfer between providers? (Including those across the Devolved Administrations)

For the LLE to be truly transformational and reach its full potential, there must be a clear credit and awards system that is easy for everyone to understand and provides learners with recognition for their prior learning. QAA's 2021 Credit Framework for England, which sets out guiding principles around credit for providers, should be adapted to form the basis of a new formally recognised integrated credit and qualifications framework for England. The new credit and qualifications framework should include a clear and shared terminology for the recognition of single standalone modules at levels 4, 5 and 6 and for the full range of academic and technical qualifications on offer. A single module should have value as a standalone award, and this should carry the same title regardless of the awarding institution (e.g., a Level 4/5/6 certificate). This should be underpinned by the appropriate level descriptor and estimated learning hours.

There are existing equivalencies between the frameworks of Ireland, England, Wales, Scotland and Northern Ireland frameworks which should be built upon to support credit recognition and transfer across the devolved administrations.

It should be easy for students, higher education providers and employers to see the learning and individual has completed and the qualifications and awards they hold. A National Learner Record System should be established as part of the new online LLE accounts for students modelled on the National Pupil Database (NPD). It should enable higher education providers to record the number of credits a learner has completed with them using a national database which is accessible to all higher education providers and relevant regulators such as the Office for Students (OfS) and Ofsted. The system could also include support required by learners and any entitlements they may have to ensure consistent student support when moving between providers. This would facilitate a much easier transfer of learners between higher education providers, making it easier for learners to 'stack' modules leading to a more substantial qualification, enhance student support and significantly reduce the administrative burden on providers and the regulator. It would also provide a smoother process for the learner, reducing the need for them to register on multiple systems.

Q40A. How far does successful credit transfer depend on mutually recognised credit frameworks?

Mutually recognised credit frameworks are indispensable to successful credit transfer.

Q40B. Is a single credit framework a precondition for easy credit transfer? Yes/No

No.

A single credit framework is highly desirable for easy credit transfer but not necessarily a precondition. Credit transfer is not new and has been happening across the sector for decades. However, as outlined in Q39, we believe the best solution would be for QAA's 2021 Credit Framework for England to be adapted to form the basis of a new formally recognised integrated credit and qualifications framework for England.

We do not propose to answer question 41.

Q42. Which features of credit accumulation, such as size (that is a minimum number), or subject, should apply to a credit recognition and transfer policy?

This will vary widely depending on the subject, course and institution and must be determined by the professional judgement of the relevant admissions tutor.

Q43. Should there be a time-limit on how long modules stay current? Should this vary by subject?

No.

It should not be up to government to determine this. The currency of modules should be determined on a case-by-case basis by higher education providers in conjunction with PSRBs and employers where appropriate. It is likely to vary by subject.

Q44. How can prior workplace or experiential learning be more consistently recognised for credit?

A flexible and innovative approach must be taken to higher education admissions to ensure that learners with a range of prior qualifications and experience are able to access the education and training they need at the appropriate level to advance them meaningfully. Providers should assess whether on-the-job experience, for example, may qualify a learner for entry at a higher level. They should be encouraged to set their entry requirements in a way which recognises prior learning to open higher education up to a range of learners. Alliance universities already have highly developed systems for this, for example the University of Hertfordshire's Accredited Prior Experiential Learning (APEL) framework.

QAA Scotland has developed a national framework of recognition of prior learning. A national framework for England would enable a more consistent approach to the recognition of prior learning.

Q45. How might government work with professional standards bodies to facilitate recognition of prior workplace or experiential learning?

Deep PSRB engagement is essential to the success of the LLE. PSRBs already work closely with higher education providers to facilitate recognition of prior workplace or experiential learning.

Q46. Are there courses/subjects which would particularly benefit from accreditation of prior workplace learning?

The accreditation of prior workplace learning is already deeply embedded across many courses, subjects, and institutions, for example at Alliance universities. For more information, see the University of Hertfordshire's Accredited Prior Experiential Learning (APEL) framework.

We do not propose to answer question 47.

Q48. How can the process be more transparent?

At a minimum, providers need to publish clear information about their policies on credit transfer and recognition of prior workplace or experiential learning. For maximum transparency and consistency, a formally recognised integrated credit and qualifications framework for England should be developed, along with a national framework of recognition of prior learning. Much can be learned from the experience of the devolved administrations, who have already done much of this work.

Q49. Would you like us to keep your comments confidential? Yes/No

No.