

Over the Department of Education (DfE) consultation on the lifelong learning entitlement (LLE)

Universities UK (UUK) is the collective voice of 140 universities in England, Scotland, Wales, and Northern Ireland. Its mission is to create the conditions for UK universities to be the best in the world, maximising their positive impact locally, nationally, and globally. UUK acts on behalf of universities, represented by their heads of institution.

LLE strategic aims and objectives

1. How can we ensure that we are not competing for the same finite resources from the LLE as other sectors, and that we can ensure that we are not competing for the same finite resources from the LLE as other sectors, and that we can ensure that we are not competing for the same finite resources from the LLE as other sectors?

The introduction of the LLE is a welcome programme of reform. We believe these reforms will

these reforms we think the LLE can work if the design process draws from existing regulatory and quality assurance mechanisms

To achieve this ambition, we believe the following changes are needed to the student finance system

The LLE must galvanise interest from all potential learners in society. Learners should enter an education system with opportunity and flexibility at its heart. Broad and consistent eligibility criteria should allow learners to choose how and where they engage with education. In practice this means setting out wide eligibility criteria to ensure all potential learners can benefit from these reforms.

To achieve a step change in learner access we must put information, advice and guidance at the heart of the LLE. While taking advantage of new flexible delivery modes, learners must also have progression pathways. Careers advisers and the LLE portal must effectively communicate the opportunities to learners. This will require an information campaign backed by ongoing support for providers, on knowing what you can study, where and how, treating the entitlement as empowering not a restricted allowance.

We want to ensure that

tuy

providersto identify anddeliveron learnerneedsandmeet demand
with provision

It's important that sectoragenciesare readyandpreparedto dealwith students
studyingone moduleasmuchasa full degree.Forexample,the role of [UCAS WpStt\(9\)TeWp0](#)

Financial concerns were cited most often as reasons why lost learners chose not to take up part-time higher education. We heard that 44% of respondents highlighted the cost of tuition fees, with 42% noting the cost of living. When asked what would encourage them to take up part-time higher education in the future, 29% of lost learners said that a government loan to pay for short courses would encourage them to study part-time in the future. Similarly, 27% of lost learners said government loans for living costs would encourage them. Given the above, the LLE has the potential to make headway in meeting some of the needs of learners. The challenge will be communicating this offer. It's also likely that the current cost of living crisis is likely to deepen hesitancy to draw out a loan.

Access to maintenance support should be a key consideration making changes to the student finance system. Financial support must adapt to meet the needs of adults and those in employment. The concept of taking out a loan also acts as a barrier given the prevalence of debt aversion among adult learners. Adults who take out their loan later in life in theory have less of their work-life left to pay back the loan. It would be right to consider whether targeted grants could be used to encourage engagement from mature learners. Messaging around this will be crucial. There still is a widespread misunderstanding about what happens to a learner's debt if the loan is not fully repaid. Potential learners also do not have a strong understanding of the expectation of how parents or guardians contribute. The government should use the LLE as an opportunity to reset its communications to explain the student finance



The portal should

Include a clear and transparent means to show learner's remaining entitlement. The account may display this through credits or a monetary amount.

Indicate eligible means for the student to spend their entitlement. This may include progression opportunities to build into a qualification or other modular opportunities.

Have clear links to impartial information, advice and guidance. This may include providers, the student loan company and UCAS.

Function as a record of historic and ongoing qualifications. We think the portal should include a transparent ledger of previous study and calculations of the entitlement reducing.

Include a connection to the Student Loan Company portal, which details loan repayments.

Learners without basic levels of digital literacy or access to technology will struggle to access their lifelong learning account if other formats are not made available to them.

Higher education providers will often be the first point of information for students. Alongside a student interface, it's important that providers have access to a portal they can appropriately support and inform potential and current students.

We do not believe it would be appropriate for the portal to be administered by a third party. We think it will play an influential role in shaping student decision making and must be safeguarded against behaviour that is not in the student's interest.

An idea that we think the DfE should explore is to adopt a concept of 'home-institution'. This could operate as an alternative to the portal as an additional location of support. In this instance, a particular institution would take on responsibility for the student record and be a point of student connection and advice. Learners would have their home institution allocated based on where they are geographically near or if they have a history of associated study. Providers taking this on would need additional administrative support, but it would bring a point of focus for learners studying over long periods of time.



5c. How can we help FE and HE providers and employers to meet the needs of employers and learners?

The needs of employers are front and centre of sector's provision. However, the needs of employers and learners are multiple and complex. The provision of higher education must reflect this and respond flexibly to changing employer needs. We are strongly in favour of more piloting as we build towards the LLE law (1) (i) 2 - 31.18 (l) 2 (dTw 18.2)

In addition to piloting the following areas require consideration

Modular provision must be sustainable for providers. The fee level should be proportionate to a full qualification. However, the government should explore how to support the additional administration to transfer credits, provide wrap around support and deliver high cost modules. There are significant uncertainties for planning teams this is largely due to the unknowns around learner demand.

We should avoid overly burdensome regulation around the LLE so providers have space and time to develop responsive qualifications working with employers. Course approval and programme reviews already have extensive input from employers. OfS monitoring of student outcomes provides strong assurances to learners and employers.

The government should support the Student Loans Company (SLC) to adapt to the changes the LLE will bring. This includes the volume and diversity of applications for loans for fees, potentially at a new fee rate, with which it will have to navigate. SLC will have to do this alongside applications for maintenance which

5d. How can providers facilitate learners gaining qualifications high modularly?

We think this will be an important aspect to the success of these proposals. Learners should have pathways to progress and achieve qualifications if that is what they wish to do. Modules funded through the LLE should be able to build into a larger qualification, we detail our views on this further in question 22.

Practically providers can ensure that modules build up to exit qualifications. This gives clear currency to learners of their achievement. Currently providers may issue certificates or diplomas to recognise study. For some providers they may wish to explore named awards or credit intervals providing more step off points for learners. A named award would also signal the value of learning to employers. Providers can do this drawing on existing mechanisms and a flexible LLE design frame.

Providers also have a role to play in imparting information, advice and guidance related to modular study. The LLE's design will affect how easily this can be done. Clear, consistent and wide eligibility criteria will deliver on the needs of learners the best. Learners will also want assurances of the outcomes should they undertake modular study. Over time the sector has built up considerable evidence of the added value for learners studying full time undergraduate courses. We will need to build a similar level of robust information around modular study. This will help generate demand for modular study and show the value to employers.

When learners arrive and study on a modular basis the support and internal systems in place must help modular study. For many providers delivering modular learning at scale would mean making changes to the student record system. For example the government should consider what role organisations such as the Higher Education Statistics Agency (HESA) and the Joint Information Systems Committee (JISC) could have in supporting providers to make these changes. We would also support JISC exploring the merits and challenges associated with creating a unique learner identifier. Such an identifier would be necessary to support learners studying across multiple providers.

who are registered and approved to safeguard investment from the taxpayer and the interests of students.

9. Specifically, do you think that the following courses, which are currently funded by HESF, should be included in the LLE, under the same entitlement system (i.e. fee entitlement for an individual for a year)?

A foundation year integrated into a degree course

PGCEs

Integrated Masters (3 years undergraduate plus 1 year Masters)

We think it's right that the above courses count towards an individual's entitlement. We think that the future skills and education system must support a plurality of different routes for learners.

We support the inclusion of PGCEs.

The inclusion of foundation years and integrated masters raises interesting questions about the scope of the LLE. However, on balance, we support the inclusion of both given they are part of the current HESF system it would be wrong to exclude them from the LLE. Doing so would overcomplicate the funding system for learners. We recognise that learners may use their entitlement at once, however this should be for learners to decide.

Policy related to foundation years will need to be mindful of the proposed changes in the HE Reform consultation. If foundation years were excluded from the LLE, this would prevent learners without prior qualifications from embarking on tertiary education, impacting the most disadvantaged in our society. The discussion of foundation years in the HE Reform consultation will generate significant uncertainty about their future – the result of these reforms must support a plurality of study routes. Where there is demand and providers deliver strong outcomes it would be wrong to restrict foundation years. It's unclear if funding foundations years separately would meet the wider ambition to fund the funding system.

The DfE will need to consider the implications for learners studying both a foundation year and an integrated masters, something that is common for engineering students. In such circumstances the LLE should fund the whole qualification and must not restrict progression from learners.

10. What arrangements should be made under the LLE for courses which are not eligible for student finance – including medicine, dentistry and architecture?

years— after all these courses support graduates to be work ready and meet employer needs but this needs clarifying.

In Scotland, honours degrees normally last four years, and integrated masters programmes last five years. This could advantage some students, for example, those who might wish to undertake a teaching qualification after a four-year course. In this circumstance, it would be appropriate 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.

11. We are proposing that all HTQs should be in scope of the LLE. Should all HTQs be eligible for the LLE? If not, what criteria should ALL HTQs have to become eligible for the LLE? If not, what criteria should ALL HTQs have to become eligible for the LLE? Please include detail on the proposed eligibility criteria that should be used in any alternative.

We support that all HTQs should be in scope of the LLE. We do not have a strong view on whether HTQs should be the route for Advanced Learner Loan (ALL) funded qualifications to become eligible for the LLE. However, we would note that it is important to make the qualification market easier to navigate for students. Given that the Institute's rollout of occupational standards is not complete, there is a risk that sectors may be missing, limiting which courses learners could study. Access to HE courses are strong examples of courses that would benefit from being studied in modular way. We would support their inclusion.

Ultimately, decisions on what is eligible for the LLE should return to where there is demand from students. Where providers can evidence a demand, it would be inappropriate to restrict provision.

12. In particular, would employer relevance be used as a basis for LLE eligibility?

We do not support measures to stipulate employer relevance as a basis for LLE eligibility. Attempting to define employer relevance is likely to create unintended consequences. Predicting the future needs of employers is notoriously difficult. Instead, in a more modular learning model, we should encourage flexible programmes which provide transferable skills.

These reforms should support a learner throughout their life, this should recognise that what employers want now may not best suit learners in the future. We believe that developing stronger relationships between providers and employers at local and national levels and encouraging a dynamic and responsive system support by guidance, frameworks and agreements is more likely to lead to success than a blanket and detailed regulation focused on immediate skills needs. We must avoid creating narrow, short-term skills pathways for learners but build a system that will anticipate, respond to and meet future skills needs that genuinely support lifelong learning. We believe that the OfS approach to quality and standards should give reassurance to employers and learners of the high standards and rigorous assessment course monitoring goes through.

A driver for LLE is the skills required by the economy, not individual employers. So for example the economy and indeed the planet might need more people skilled around sustainable construction, but that does not mean that all construction companies would recognise that.

As in our answer to question 5c, we believe there is ~~valued~~ local piloting which supports collaboration, tests demand and teases out operational barriers. Pilots should be open minded about where the demand exists and rigorously evaluated.

As detailed in our recent report [Busting graduate job myths](#), there has been a switch in the graduate labour market away from specific vocations towards transferable business services that are not subject to demand. When considering the needs of employers, we must not just focus on the sectors in which there are job vacancies, we must look at the jobs individuals are in the sectors at a00051t-3 (p)1 (en)o 08(o)2

coherently into the 30 credit size. We recognise that there is a balance between supporting substantive and meaningful proportions of learning that can be

frameworks as a reference point. Some providers may use subject benchmark statements in the design and review of qualifications. The course aims cover the collective content of the courses, from which providers develop learning outcomes for individual modules. Providers then consider the amount of credit and level of study required for learners to achieve the outcomes and the assessment methods. Courses are then monitored and reviewed over time.

Another way providers assure compliance with the frameworks is through bringing in independent academic experts in the form of external examiners. External

cases— basing the entitlement on credits over a monetary sum would support this aim.

Where possible, the entitlement should use existing regulations and processes to avoid generating additional burden. As within HESF, the individuals who undertake study in qualifications that go beyond four years should be granted an additional entitlement.

Recognising the learning of students and supporting progression will be important. Of course just because each module could lead to a full qualification does not mean this will be appropriate for the learner in question. For example they may change their area of interest and wish to study multiple levels and modules. This would be entirely appropriate and in line with the ambition of the LLE.

We recognise that many employers see courses at level 7 as important for upskilling and retraining. For now we believe it's right to focus on level 6 within the LLE reform programme. We have reached this position based on the already complex programme of reform that is needed to get level 6 operating. Widening the scope

Maintenance

26. Do you think a future system should include a facility for providers to base bursaries which are allocated directly to learners?

We recognise that under ALL learners are unable to access maintenance loans but can access limited financial support through a bursary funded by their provider.

With the LLE encompassing all courses level 4 and above it is right that students should be able to access loans for maintenance. These learners should attract access and participation funding to higher education institutions and this could be used for a variety of purposes, including bursaries.

We can see how bursaries would have a strong impact and can help reach learners who are debt adverse towards loans. However, should one of the aims of these reforms be to create greater parity across further education and higher education there may be benefit in a more unified approach to maintenance support. It is unclear from these proposals what the proposed scope of provider bursaries would be, for example, which providers, students and courses. Would this operate alongside or

Ultimately, delivering on a modular basis must also be sustainable for providers. This must be understood in the context of the higher cost of part-time provision. Meeting this cost is an important purpose of the current Part-time Student Premium, which is an element of the Strategic Priorities Grant (along with full-time access funding and priority subject funding).

The following risks must therefore be mitigated

The cost of modular delivery will exceed that of full-time provision for providers. This is partly due to the additional administration required. We also know individuals re-entering formal study may require additional academic and study skills support upon entry. This includes wrap around support such as careers guidance, counselling and access to facilities.

High-cost courses and modules would need further support. For example those that use labs or specialist equipment. Therefore, levying a fee from the qualification may not completely compensate where the take up of particular modules is more prevalent than others. A high level of unpredictability initially about learner demand for short courses could impact the subsidy model that higher education providers operate. There is a risk that providers are disincentivised from offering expensive courses. We think these challenges could be mitigated through the strategic priorities grant, over developing models for differential fees.

It seems likely that the distinction between the current full-time and part-time fee caps should be abolished in the LLE, with the introduction of one basic cap, it will still be necessary to distinguish 'part-time' (including modular) for the purpose of Strategic Priority Grant support. A suitable definition in the LLE flexible world would be that part-time is 'any course of study that is specifically designed to enable the student to vary their intensity of study and is not normally a fixed-term commitment for the duration of the course'.

28. Are there circumstances in which maintenance should not be offered (e.g. where students living below a certain level of intensity)?

Our view is there should not be any restrictions on the point at which learners can access maintenance support. These reforms must account for the variety of circumstances learners come from.

We recognise that maintenance support at 30 credits may not be appropriate for all learners. This is why information, advice and guidance will be important. However, we would underline that the purpose of these reforms is for learners to train, retrain and upskill. To drive such change, we must accept that the existing funding arrangements have not been sufficient for some learners. Given the wider cost of living crisis, access to maintenance will be a key enabler to study.

**29. Can it mean - the element of the maintenance form
relate to family income. Should this be recognised for
form in the application, and if so?**

Yes, it would be appropriate for the DfE to revisit this model. The concept of household income could be used to recognise that the learner may be generating income. However, it is important to note that upon undertaking study an individual's income may change due to reduced hours.

30. To what extent should maintenance be linked to general illness

considered for these learners. Access to maintenance support should be study mode blind, this change will be instrumental in taking advantage of new forms of learning and reversing the decline of mature learners.

Regulating flexible and modular in

32. How can flexibility in maintaining high quality in the LLE?

Providers must have space to innovate and meet the needs of learners. This will require trust. Higher education institutions already navigate a heavily regulated environment which provides assurances of high quality provision for learners. The introduction of the LLE should use these existing mechanisms while recognising the reduced level of scrutiny needed.

consistently to set fee levels. Students can therefore be confident that the modules they are undertaking - while potentially different in content and delivery - are broadly equivalent from the perspective of quality

We support for the continued use of the QAA credit framework for England, wty

resources away from delivery undermining quality. It also needs to enable flexibility to allow providers to be responsive to changes in student preferences and local or national skills needs in an agile way.

We believe the OfS is the suitable regulator to monitor the LLE system. However, going forward there are a number of areas where the OfS will need to review its practice.

The OfS should consult and review on the appropriateness of student outcome measures for learners studying under the LLE. For example, at what point would it be

A key way for the government to facilitate new provision is to set out an extensive programme of pilots which locates demand as detailed in answer to question 5c. Clearly articulated employer and student demand will support higher education institutions to deliver the qualifications most needed quickly.

credit, while accepting that this may not always be appropriate for the most integrated programmes. We should draw from existing systems that facilitate credit transfer such as the QAA's Credit Framework for England. We recognise that some barriers are collectively in the control of the sector, there are others where government intervention would be helpful.

The lack of a clear understanding of demand is currently a key barrier. While frameworks and policies can enable transfer, they do not on its own actively promote transfer. This is because studying across different institutions as overtime will only be right for some learners. However, for many learners it will not be. An understanding of which learners would benefit from and/or would like greater transfer opportunities would be valuable.

Without a common framework the onus on navigating the credit transfer policies lands with the learner. The LLE is an opportunity to provide clearer advice and guidance to learners about options to transfer.

A key strength of a responsible sector is its diversity. However, with specialisation it means that there is institutional variation in course content and structure. This means that although the discipline, level and size of credit may in theory fit it may still not be appropriate for a learner to transfer. For example, the students transferring courses may not have covered similar content to have the necessary skills e.g. in using a particular type of software. The student will either therefore have to spend additional time with self-directed learning to overcome any gaps in their knowledge or a university provide additional one-one support that in reality could be equivalent to an entire module in and of itself.

The current admissions timetable does not easily lend itself to credit transfer. Similarly, there is a significant time and resource pressure on admissions staff to assess the equivalence of study. This is compounded by the lack of detail often displayed on transcripts and the learner record. At present, credit transfer between institutions is largely done on a case-by-case basis. The challenges on building economies of scale does not incentivise the creation of a more comprehensive transfer system.

There are many examples of credit transfer agreements already taking place through articulation arrangements and partnerships. We should learn the lessons of what has worked well in these instances. UUK would welcome case studies and examples of practice that currently work well and recommend the DfE or OfS undertake a review of existing practice. This should include exploring how challenges were overcome and the development of guidance to support

There may be some scope to explore how pedagogical best practice related to the recognition of credit can be shared. Currently the focus on transfer involves matching module level learning outcomes. This can be a time consuming and complex process. There may be scope to exploring whether in some instances programme outcomes can be matched instead. Drawing and sharing practice across the sector in this area could dramatically reduce the burden associated with transfer.

39. How can the LLE credit recognition and transfer be improved? (Including the Welsh Administration).

We would support exploring what scope there is to introduce regional based agreements on credit transfer. Groupings of local institutions would come together to recognise credits (based on academic infrastructure) in certain areas such as business, digital, engineering and manufacturing. We believe some initial investment would be needed to pilot this approach, build networks and make necessary changes.

There are existing equivalencies between the Scottish, Welsh and English frameworks (for example, see the [QAA's guide to comparing qualifications in the UK and Ireland](#)). For England these are based on FHEQ rather than the English credit framework, but the credit framework uses the FHEQ levels and provides compatible definitions of credit.

T



45. How might government, in partnership with professional bodies, facilitate recognition of prior workplace or experiential learning?

As noted previously, we think there is scope to bring higher education institutions together with PSRBs to facilitate recognition. PSRBs already have often well established processes for recording CPD for those already in the profession. Existing frameworks could be built on to facilitate recognition to credit.

46. Are there any subjects which would particularly benefit from accreditation of prior workplace learning?

Higher education institutions currently assess accreditation of prior workplace learning for a range of subjects.

47. What data should be collected to facilitate credit recognition and transfer?

N/A

48. How can the process be improved?

We think that providers have a responsibility to ensure that learning opportunities to transfer and have their credit recognised are clearly accessible. Given learners will be navigating their entitlement throughout their life it is important providers are transparent with learners about how the currency of their learning could change overtime potentially impacting on their ability to transfer. Where providers have transfer agreements with other institutions it is right that these are published and clearly accessible to potential learners.