



## Our response

**Question 1: Do you agree with our list of potential changes to the delivery of higher education in England as a result of the implementation of the LLE? Are there other changes that could arise that you think we should consider when developing our approach? Please explain your answer.**

1. We welcome the OfS' approach to policy development, particularly the call for evidence before a more formal consultation is launched. The Lifelong Learning Entitlement (LLE) will bring about significant change for universities and students. It is an exciting opportunity to revitalise lifelong learning and reverse the decline in flexible study and mature student numbers.
2. Given the size of this reform, regulation will also need to change. However, there are several unknown factors surrounding the implementation of the LLE reform. These uncertainties include the final product design, level of demand, extent of change required within universities, learner motivations, and the financial viability of provision. Given this uncertainty, the Office for Students will need to be reflective and responsive in the coming years to adapt to new and potentially unexpected developments on the LLE.
3. While change to regulation will be necessary, it is essential to ensure that changes to regulation do not disrupt the existing dominant modes of study, such as the full-time three-year undergraduate model which is likely to remain the preferred choice for many learners. So, while change is needed, it must be proportionate.
4. We believe that the outlined changes are largely correct. There are some additional points, and nuances to existing ones which we have detailed below:
  - a. One of the uncertainties related to this change is the scale at which these developments will take hold. For example, with changes in funding, we do not yet know the volume of students that will engage in multi-provider or concurrent study over time. Given the flexibility in the current LLE design, the OfS will need to develop a system that accounts for learners studying in a highly mobile way, even if the numbers of these learners is small.

- b. Students increasingly building up modular study to attain a qualification or award over a prolonged period of time either within the same institution or across multiple providers.
- c. Students at short notice may increasingly deaccelerate and accelerate their study intensity. For example, students initially planning to study a full-time course but transitioning to part-time or modular study. Similarly, more students may pause their study.
- d. Given the above, providers will be required to increasingly keep track of more complicated student journeys, credit transfer arrangements and levels of guidance.



### Question 3: Do you agree that a measure of ‘completion’ would be an appropriate part of delivering our general policy aims for the implementation of the LLE?

12. If the OfS were to introduce a student outcome measure drawing on its three existing measures, then we would agree that completion would be most appropriate. Regulation of modular provision will need to be an iterative process. It is right to build on already recognisable data sets, and we believe completion of a course can be applied to modular study. If a student enrolls on a course, it is reasonable for them to expect to complete it.
13. Providers will collect and analyse this data anyway. When institutions are analysing the outcomes of full courses they do so through looking at this data at the modular level to pinpoint areas of strength and weakness. Despite this adding a specific completion measure, and the data splits that emerge from this will generate administrative burden. To better understand this, the OfS must produce a burden impact assessment once its proposals are formulated.
14. When reviewing how the definition of completion needs to change, the OfS should consider
  - a. The volume of tracking and monitoring placed on providers. The current indicator is already complex, and this is likely to increase with multiple onboarding and offboarding of students.
  - b. How to measure the completion of bundled credits (for example, two 15 credit modules).
  - c. Comparisons between different modules will be difficult since the length of study and credit value may vary.
  - d. Like other areas of regulation, the OfS should consider the context of



measures for full-time awards are based on the long-term collection of data and recognised definitions. Therefore, the base to develop something for modular provision would take time. There is a question of the extent to which progression data would provide meaningful data of a module and then whether such an approach is proportionate.

- c. Under the LLE, learner pathways are likely to be increasingly complex, with learners moving between providers and studying over a longer period of time. Requirements to collect and report extensive data in this way are likely to require many providers to update their student record systems. Given the uncertain level of engagement in offering modular provision this could disincentivise providers.
- d. The current configuration of the B3 conditions includes multiple data splits. The volume of learners studying on a modular basis would need to be sufficiently large before the OfS can develop a statistically significant measure.
- e. The OfS should introduce a benefit-doubt approach when defining positive outcomes. For example, with the intended removal to equivalent or lower qualification rules the OfS should positively regard any level of further study. Retirement and caring should also be captured as a positive outcome for consideration for all graduate activities at the census date.
- f. It is uncertain how data would be pulled together for a learner studying across multiple institutions. For example, over which point in time after completing a module would





and are designed to provide positive outcomes for employers. Similarly, PSRBs have an important role across many disciplines to set standards. We would encourage the OfS to work with these processes that are currently in place. This will be particularly important when considering the currency of qualifications and progression opportunities for learners over time.

22. Consider how the reflective questions in the HE Graduate outcomes dataset can be used. This is a good opportunity to pilot the use of this data set as a source of regulatory intelligence on an experimental basis. Practically this may mean introducing a grace period while the graduate reflections dataset is developed.

23. As the OfS considers its response to this call for evidence it may also wish to explore the following points:

- a. Given the increasingly large range of institutions on the OfS register, they could consider a maturity model to bound how modular delivery is regulated. This could mean that providers with a track record of regulatory compliance are able to deliver on a modular basis through the assurance that delivery of their parent course is compliant. Newer providers or providers not involved in the delivery of the full qualification may need to provide additional evidence until such a time that