

## CONSULTATION SUBMISSION

# Lifelong Loan Entitlement consultation

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## LLE AMBITION

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?

The Lifelong Loan Entitlement (LLE) has the potential to be a transformative policy, allowing opportunities for learners to train, retrain and upskill. MillionPlus is extremely supportive of the LLE agenda and keen to help drive its development. As universities who have significant experience in the areas targeted by the LLE, such as in teaching mature learners and in delivering vocational courses, MillionPlus universities are well-placed to support the implementation of modular learning. MillionPlus members are also well represented among those taking part in short course trials.

MillionPlus has formed a task and finish group focused on the LLE and will look to continue to engage with the Department to input on the detail of how to make these proposals work. The group is engaging with the Quality Assurance Agency and considering what a framework for the LLE could look like. We are pleased to hear that the Government intends to continue to engage closely on LLE implementation following this consultation and hope that our response to this consultation can be the starting point of an on-going discussion.

In order for the LLE to reach its full potential, MillionPlus believes there are a number of key factors which need to be addressed. These are:

- comprehensive information, advice and guidance for learners on their options;
- early and thorough engagement with employers;
- broad eligibility criteria for courses;
- simple regulation, which does not add unnecessary additional burden on providers;
- full funding for learners, including maintenance support and removing ELQ restrictions.

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

One key barrier that learners could face in accessing their LLE is Equivalent or Lower Qualification (ELQ) restrictions. ELQ affects eligibility for student finance for higher education and also funding for qualifications at a range of different levels. MillionPlus has previously called for the relaxation of ELQ restrictions to better support 'second chance' learners and address the decline in mature students.<sup>1</sup> We maintain this position and believe the removal of some of the ELQ restrictions is critical to make a success of the LLE. A key part of the target market for the LLE is those looking to re-skill and up-skill. By definition, re-skilling often entails

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<sup>1</sup> [https://www.millionplus.ac.uk/documents/Forgotten\\_learners\\_building\\_a\\_system\\_that\\_works\\_for\\_mature\\_students.pdf](https://www.millionplus.ac.uk/documents/Forgotten_learners_building_a_system_that_works_for_mature_students.pdf)

training yourself in a new area, that can be at the same or even at a lower educational level than is held by the individual. The main focus should be on the benefits can be accrued by the individual and across society i.e. through productivity gains, through re-skilling, rather than a fixation on at what level of education people have previously taken.

More generally, the issue of student finance is of great importance in terms of making more flexible options competitive with traditional qualifications. Student maintenance will need to be extended for more flexible learning pathways to support the LLE. This is arguably the one factor that will have the single most impact on demand for more modular learning. Clearly in England the finance package available has severely impacted on part-time and mature learning, and this could go some way to mitigate the precipitous drops in mature and part-time study.

Addressing these potential barriers will be critical for the LLE to meet its full potential and meet the policy aims set out within the consultation.

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

In terms of the lifelong learning account, it will be important that the interface of the portal is accessible and clear for all potential learners. While the mechanics of delivering the LLE may be complex, it will be critical that from a learner's perspective, that simplicity is key.

Beyond the portal itself, for the LLE to be a success IAG will be critical. Prospective students will need solid information, advice and guidance to ensure they know what they are eligible for through the LLE and what is on offer. UCAS can play a role here in terms of helping to improve information for prospective students but IAG should not be limited to UCAS for students, as there are multiple channels that higher education providers make with students outside of UCAS.

As a key part of the target market for the LLE is mature learners, IAG needs to go beyond the traditional routes, thinking about IAG in the broadest possible terms. There is a wider comms campaign that needs to be led from the top of government to make sure this initiative gets a high profile and is widely known. But engagement with employers is also a vital piece of work that needs to go alongside the policy development. If employers are not suitably aware of the LLE, how it can be used, and how to inform and instruct employees on this, then it could amount to minimal impact.

As part of understanding the IAG needs, there needs to be more research done on the potential demand for the LLE. MillionPlus supports the implementation of the LLE wholeheartedly, but there is at present a lack of knowledge of where the latent demand actually is. There is some skepticism within the sector as to whether the government's expectations of demand will be matched by a demand from learners. It is clear the the LLE is a worthwhile initiative, but more insight is needed on where demand may come from, so work can be targeted and the LLE can be developed in such a way that is clearly focused and produce good results.

### 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?

Modern universities are leaders in delivering technical as well as academic courses, although it should be recognized that these are not necessarily distinct. Many courses offer both technical and academic elements and it would not support the aims of the LLE to draw a false dichotomy between the two.

However, more generally the LLE can benefit learners to access technical as well as academic courses through as wider remit as possible, with a broad offering in terms of course eligibility. This will allow up-skilling which meets the broad variety of needs from the labour market.

#### 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?

It is clear that both higher education and further education providers have a key role to play in making a success of the LLE. It will be important to support a culture of collaboration not competition between higher and further education, particularly as many of these collaborations are likely to be between local stakeholders. MillionPlus universities represent the part of the university sector that works most closely with further education colleges and therefore have built close working relationships with a number of FE providers, which they will be able to draw upon in offering modular learning.

It will be vital that the development of the LLE does not add any unnecessary extra burden on providers. This will simply add more burden for providers which will make the whole system less dynamic and ultimately inhibit progress and negatively affect the learners it is seeking to support. Existing frameworks of regulation should be used where appropriate – there is no need to re-invent the wheel here. This is especially pertinent when one considers that there is a new regulation approach coming in from the OfS imminently through the quality and standards consultations. Adding more policy and regulatory reform while higher education providers are only just adapting to these changes will risks being chaotic and simply adding another bureaucratic layer onto the system. Higher education providers should be the principal determinants of credit and modules. An overly centralised system of credit would be counterproductive. There should be no additional regulation unless absolutely necessary.

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

Employer engagement will be a critical element of the LLE. Modern universities work closely with employers to create a variety of pathways into higher education that lead to future employment, including more recently through development of degree apprenticeships. Through this work, and their wider focus on employability, MillionPlus universities have built strong relationships with employers, particularly those in their local area. This local experience built between HE and FE providers and employers will provide key building blocks to draw from to ensure modular learning links to industry developments.

#### 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?

The key drivers of ensuring modules and courses are of value to employers will be:

- Clear IAG for learners about the role of the LLE
- Working collaboratively with employers through development of the LLE

We should explore models of dual accreditation with industry and potentially kite-marking for modules from PSRBs and professional bodies.

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

Transferability of credit is going to be very important in the LLE so that learners can move seamlessly between institutions. This needs to be done through a bottom-up approach, whereby institutions can

develop their own system of credit and then sign up for a credit transfer system. This is something that the MillionPlus LLE task and finish group are looking to develop ideas around and would be open to piloting as this agenda progresses. We should explore ways in which learning outcomes could be mapped between institutions to enable efficient accreditation/recognition of prior learning.

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.

The LLE has the potential to have a very positive impact on opening the higher education system to groups whose numbers have declined over recent years, including mature students. It would best achieve these goals by ensuring the system is as open as possible. As the LLE is implemented, there should be monitoring of who is accessing the LLE entitlement and whether it is reaching the intended audience and growing access to further and higher education.

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.

Barriers remain for students based on ethnicity or socioeconomic status. The government should act upon previous commitments to create a Sharia-compliant student finance system to ensure that maintenance is not a barrier for Muslim communities.

## **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. The LLE will be most successful where it offers breadth in terms of course offering. While there may be additional challenges around courses which are accredited by PSRBs, it should not be assumed these will be insurmountable and therefore they should be treated as in scope.

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)

MillionPlus would support the inclusion of integrated foundation years within 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?

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.

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

This will depend to some degree on the type of course. The key role that PSRBs play in shaping post-18 provision needs to be acknowledged, as accrediting bodies could be both potential blockers and facilitators of a modularized system that seeks to promote credit transfer.

It will be important for employer-relevance to not act as a gatekeeper for the LLE, as this risks short-term employer needs driving all HE provision. This would be highly impractical and imply a wholesale shift in regulatory control.

Q13. We are aware that some courses (e.g. medical degree courses, some ALLfunded 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?

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?

MillionPlus supports the proposal for minimum 30 credit.

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?

Q16. Do you/does your provider currently use a credit framework or follow credit rules, and if so which framework or rules do you/they use? (e.g. OfS credit table, Ofqual credit conditions).

Q17. In brief, what internal processes do you/they have to ensure compliance with the framework or rules?

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

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

Utilising existing frameworks which have consistency across the different nations will help to support flexible study across the UK. A consortium approach to the design and delivery of LLE provision could facilitate mobility and flexibility for students.

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

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?

MillionPlus would not support age restrictions for the LLE, as this would risk going against the stated purpose of the LLE. This would risk developing an unnecessary divide between full-time and modular study and therefore limiting it's opportunities.

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.

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?

We can use industry kite-marking and (where applicable) PSRB accreditation to provide efficient, recognisable and robust identification of skills and level.

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?

Consideration of local and regional labour market needs through dialogue between HEI, FE and employers should be a priority, as opposed to devising wider or national restrictions.

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

To meet the aims of the LLE, the principle should be to impose as few restrictions as possible on individuals, allowing learners to make informed decisions around the best options for them.

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

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.

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.

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?

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

Sufficient maintenance support will play a critical part in learner's decision making around modular funding.

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?

A successful LLE system needs a maintenance scheme tailored to student need, rather than mode of study. One key consideration should be recognition of the financial impediments to those adult learners who are most likely to benefit from re-training.

## **SUPPORTING QUALITY PROVISION AND FLEXIBLE LEARNING**

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

Given the significant work that has gone into developing quality processes in higher education, MillionPlus supports the use of existing regulatory frameworks and infrastructure for ensuring high equality provision.

However, clearly these processes will need to be considered to ensure they are proportionate for modular learning.

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

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

The current B conditions of regulation in England would be inappropriate for LLE, due to the nature of a modular system. In particular, none of the three main metrics in B3 are fit for purpose in a modularised LLE environment and this will need to be recognized in the approach to regulation. It should also be recognized that the LLE will have an impact on the National Student Survey.

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

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

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.

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

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

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

Q40B. Is a single credit framework a precondition for easy credit transfer?

Q41. If relevant, please provide details of any bespoke arrangements you have with other providers that support credit recognition and transfer.

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?

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

Time-limits on currency should be negotiated at a subject level and may be informed by PSRB input, where appropriate. If we were to adopt a consortium approach, we could agree appropriate time-limits in areas of rapid change (such as digital innovation) while maintaining longer time-limits for other areas as appropriate. The sector should explore means by which students could update their learning through assessment-only routes from time to time in order to refresh credit, particularly in areas of rapid technological change.

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

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

HE and FE should work directly with employers and professional standards bodies to provide criteria for recognition of prior or experiential learning.

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

Q47. What data should be collected to facilitate credit recognition and transfer?

Q48. How can the process be more transparent?

Q49. Would you like us to keep your comments confidential?

No