**Lifelong Loan Entitlement – UVAC Draft Response**

**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 current level 4 to 6 offer is focused, for the most part, on large qualifications: HNC/Ds, Foundation Degrees and bachelor’s degrees etc. This offer is, in large part, provided because the individuals who take such qualifications and the employers who employ individuals with such qualifications value them. Greater flexibility in terms of the use of modules, credit and recognition of prior learning to support individuals to train, retrain and upskill throughout life is, however, to be welcomed. Accordingly, UVAC fully supports the introduction of the LLE.

In order to work effectively, the LLE must support the delivery of qualifications and modules that have value in the employment market. This calls for substantially more and better information on skills needs in the economy and information on how specific qualifications and modules develop the skills needed in the employment market. Individuals need to understand where qualifications can lead and the value of taking individual modules or a collection of modules. This requires more and better IAG, clear occupational maps outlining progression routes, information on how modules and specific qualifications support progression to a new job and the professions, information on salary returns and case studies that will help young people and adult learners make considered and appropriate choices. It would be useful to know how specific modules or combinations of modules can help an individual in a specific occupation to update their skills. Individuals need to know the currency a module or short course has in the labour market. There must also be clear information on how credit accumulation and transfer can work and how modules can (and cannot) be combined.

We are surprised and disappointed that little consideration has been given to how employers could be involved in providing financial and in-kind support for employees undertaking provision funded through the LLE. Many of the modular programmes funded through the LLE will be of considerable benefit to employers, particularly where programmes are taken by their existing employees and focused on retraining and upskilling. Should an employer be encouraged to make some sort of contribution, be this financial, in kind (e.g., time off for study) or through support for work-based learning? In the Spring Statement the Chancellor noted that: *“UK employers spend just half the European average on training their employees*. *Furthermore, less than 10% of the spending on training by UK employers goes to high-quality formal training offered by external providers.”*  - Spring Statement 2022 - P38. The Chancellor also noted *“The government will consider whether further intervention is needed to encourage employers to offer the high-quality employee training the UK needs.”* – Spring Statement 2022 – P39. There will be considerable costs in the implementation of a national credit accumulation and transfer system, provision of IAG, Recognition of Prior Learning (RPL), recognition of experiential learning and learning from work, recording achievement and learner support.

Should not employers be expected to contribute to these costs, given that the LLE will deliver considerable benefits for employers as well as individuals?

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

Lack of Awareness – Individuals, schools, careers advisors, providers and employers will need to know how the LLE works and the rules relating to credit accumulation and transfer system(s) which will need separate consideration alongside the LLE.

A Lack of Provision (e.g. shorter programmes and standalone modules) and Limited Use of Credit Accumulation and Transfer – We are unsure as to how providers will be incentivised and encouraged to offer shorter programmes, stand alone modules and make greater use and transfer of credit. For a provider it is far easier to design and deliver a three-year programme with a guarantee of funding. The provision of shorter programmes will involve additional costs re IAG, marketing, recruitment, enrolment, RPL, assessment, flexible delivery and recording of achievement. How will such costs be funded?

It is not clear how achievements funded through the LLE with one provider will be recorded and how other providers will have access to sufficient information on prior learner achievement to assess and plan an appropriate offer for individual learners.

Overcoming barriers to the effective use of the LLE will involve considerable investment in IAG, RPL (including entitlement to and a nationally agreed/mandated system of credit accumulation and transfer), employer engagement etc. over and above the cost of developing and delivering provision. As outlined in our response to Question 1, should employers not make some contribution to the costs of such provision, given that the LLE will deliver substantial benefits for employers?

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

The information currently proposed understandably focuses on finance e.g., LLE funding used, LLE funding available, active learning, funding the next course and a search function for the next course. Links to UCAS, and through UCAS to individual providers, need to be developed.

Links to information on the types of qualification and learning programme the LLE can be used to fund would be useful. Outline advice on making the best use of the LLE e.g. the research a learner may wish to undertake, skills needs, the range of options could be useful, links to occupational maps etc.

**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?**

This question is wrong and reinforces one of the problems the LLE is trying to solve. Higher Technical Qualifications (HTQs), such as Foundation Degrees are also academic qualifications. The QAA Foundation Degree Benchmark states that *“Foundation Degrees integrate academic and work-based learning through close collaboration between employers and higher education providers.”* Referring to an HTQ as different from an academic qualification undermines the value and prestige of an HTQ. Such language also reinforces barriers and undermines the ability of individuals to combine and move between different types of programmes. IfATE needs to demonstrate HTQs at levels 4 and 5 are based on high technical and academic standards. They must also have value in the employment market, be offered by a range of providers, including universities and be promoted as an appropriate option for individuals of all backgrounds. It is also key to demonstrate that HTQs articulate with and can lead to bachelor’s degree programmes. Finally, clear learner focused information on what the IfATE HTQ Quality Mark means should be provided. The LLE should avoid inadvertently bifurcating the market into vocational/technical qualifications as one route and academic qualifications as another, with different types of learners specific to one route or the other. As in apprenticeships, qualifications can be both vocational AND academic.

**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?**

A clear and regularly updated analysis of what skill gaps exist in the economy and overview of future skills needs is required. Blanket and sweeping statements are sometimes made regarding the prominence of skills gaps at levels 4 and 5, with little acknowledgement of skills gaps at level 6 (bachelor’s level) and 7 (master’s level). Analysis of skills needs at local level can often ignore or underplay very apparent public sector skills shortages – for example the need to recruit and train new nurses, allied/healthcare professionals and police officers.

The IfATE could usefully commission a national annual skills survey, providing an analysis of current and potential skills gaps and shortages in the economy, based around occupational pathways, at level 2 to level 7. National occupationally focused approaches to skills analysis are needed. Such analysis could be considered regionally/locally by metro mayors and LEPs and in approaches to the development of Local Skills Improvement Plans (LSIPs). While skills intelligence must be used in informing the development of provision it is important to recognise that predicting the detailed and precise skills needs of employers is very difficult – a flexible rather than rigid approach is needed.

Undoubtedly, one occupational area where skills gaps will be most pronounced will be in leadership and management. Skills surveys frequently identify poor management skills, particularly in SMEs, as an explanatory factor behind low UK productivity. Bizarrely, however, employers and providers have, in the past, been criticised when using skills programmes such as Apprenticeships to tackle management skills gaps and shortages.

IfATE, given its role in overseeing the development and revision of Occupational Standards, should have a fundamental role in encouraging providers to support upskilling. Appropriate approaches should be considered. IfATE could, for example, issue an *Occupational Skills Alert* when a key change was made to an Occupational Standard in response to technological change, legislation or the Net Zero/Green Jobs agenda. This could support providers to update or develop a new short course or module(s) in a specific area.

Regulators, such as the OfS, could usefully emphasise the importance of the delivery of shorter programmes, particularly in meeting the needs of under-represented cohorts. Government could encourage the development of measures and league table criteria to reflect the importance of delivery of relevant skills provision and innovation in the use of credit and different and flexible forms of delivery. Providers should also be encouraged to reward and recognise expertise in industry engagement and work-based, work-integrated, hybrid or flex learning and blended delivery.

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

Occupational Standards developed by employers working with Professional Statutory and Regulatory Bodies (PSRBs) and FE and HE providers under the auspices of the IfATE, provide a key tool to inform provision and ensure provision delivers the knowledge, skills and behaviours required to be occupationally competent. IfATE needs, however, to consider how it can be more proactive in ensuring that Occupational Standards focus on future skills needs and not just on the skills needed to be occupationally competent today.

Recognising current and encouraging the development of new innovative HE and FE partnership models will be key to any Government approach.

For key Degree Apprenticeship standards, UVAC has already introduced and has plans to introduce more Degree Apprenticeship Knowledge Networks focused on key occupations that support employers, providers and PSRBs to share good practice and update colleagues on latest developments. Such networking and support could be extended to other forms of provision by working with appropriate representative organisations to build capacity and knowledge exchange.

A focus on work-based, digital, hybrid, flex and blended learning will help ensure that provision reflects latest industry practice. Similarly, appropriate employer staff need to be encouraged and supported to work with providers to adopt latest training and development approaches.

**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?**

We should not under-estimate the value of degrees in the employment market. Degrees in academic subjects, such as history are highly valued by employers and support many individuals to secure graduate level jobs. Many professions are degree entry and require a degree to gain professional accreditation and membership. The value of degrees is, in our view, underplayed in the consultation.

We would note that the needs of employers and individuals are not always the same. Short, customised training programmes may be of particular value to employers but may have limited transferable value for an individual. Accreditation of training programmes and the award of credit may be less important to employers than individuals. We are concerned that no safeguards have been proposed to protect individuals in circumstances where employers want an individual to use their LLE to update their skills. UK employers invest far less in the training and development of their employees than their European competitors. Employers should be expected to invest and train their employees if we want a high innovation economy like South Korea, Japan and Canada for example. We would not want to see circumstances where employers encouraged employees to use the LLE to fund training programmes and CPD that should be funded by the employer. Government needs to consider this issue carefully and then pilot and implement appropriate safeguards. A wider debate, led by Government, is also needed on the respective financial contribution individuals, the state and employers should make to training and retraining the new and existing workforce.

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

IAG will be more critical than ever. Individuals will need to be very clear about how a modular approach works and how this is supported through the LLE.

Providers will also need to support individuals who will move to another location and will want to combine modules from their first institution/provider with a second institution/provider while studying for a full qualification. This will mean a focus on:

- Providers developing systems for the mutual recognition of modules and credit between institutions. (Ideally this should be in-line with nationally developed framework that provides individuals with an entitlement to recognition.)

- A greater use of Occupational Standards at level 6 (as well as through HTQs at levels 4 and 5) to inform the development of programmes/qualifications.

**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.**

Yes. Existing HE programmes tend to focus on large qualifications, bachelor’s degrees, Foundation Degrees, HNC/Ds etc. Starting a bachelor’s degree that is the equivalent of three years full-time study represents a massive long-term time commitment. It also represents a large financial commitment. Offering standalone modules will represent a less daunting challenge and commitment for learners, particularly many people with protected characteristics. It is, however, important that as well as supporting individuals with protected characteristics to start programmes, the LLE ensures they have every opportunity to complete programmes and progress. Data on the use of the LLE by people with protected characteristics will need to be monitored carefully.

**Q7 – What barriers might learners with protected characteristics face in accessing/drawing 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?**

No comment.

**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.

**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. free loans count towards an individual’s four-year free 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.

**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?**

Such programmes are of critical importance and should be funded as currently, unless relevant PSRBs believe alternative approaches are appropriate. It is critically important that such courses are not less generously funded than currently. Detailed discussion and consultation with the NHS and appropriate PSRBs is needed.

**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?**

All HTQs should be in scope of the LLE. It is, however, very early days for the HTQ quality mark. We would, therefore, urge caution in determining that HTQs were the only ALL funded qualification to become eligible for the LLE.

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

We have concerns with this question. The individual is taking out a loan with Government. Despite an employer not being part of this transaction, employer-relevance is emphasised. Employer relevance is very likely to be in the interests of the learner, but employer and learner needs are not always the same. The development of transferable skills will be critical for an individual. As in our earlier responses we would argue that employers should be expected to make some contribution to programmes that develop the specific occupational skills their organisations need.

Employer relevance could include a demonstrated link to an occupational standard, approval by a PSRB or mapped to PSRB requirements. IfATE should also provide further guidance. Finally, we would note that while providers need to have regard to and use skills analysis, predicting the detailed and precise skills needs of employers is very difficult.

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

Yes. The credit model being proposed is designed to benefit individuals, employers and society/the economy. We cannot see how requiring medical degree courses etc. to conform to the modular funding approach would deliver any benefit. Courses could be excluded from any form of modular funding if a PSRB and employers made a convincing case that this was in the interests of individuals, employers, the profession and society/the economy.

**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?**

This could be problematic as modules may be 15, 20, 30 or 60 credits. 20 credit modules would not fit into the model proposed by Government. A minimum credit value of 20 credits would help, with a minimum amount per funding application of 20 or 30 credits.

**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?**

UVAC does not have a strong view on this question.

**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).**

We need something transformational in this space and a national level of coordination to shift the policy narrative around credit. The LLE should not be reliant on a system that differs from provider to provider. What is needed is a FE/HE credit framework for England that is binding. The role of such a framework is important as it can structure recognition of credit on a national basis. The aim should be to use credit to empower a process of enabling people to gain recognition and progress. To date, the reliance on provider autonomy and an institution’s own policy of recognition falls short of every learner having their prior learning recognised and remains fundamentally unfair. Empowering the way in which credit is used will provide increased flexibilities and greater access to provision that supports lifelong learning.

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

See our response to Q16. Most HEIs have policies to recognise, but very few enact these consistently, because there is no OfS directive. Current practices in traditional HE (with Apprenticeship being the exception because funding compliance requires it) will require a change to the conditions for OfS registration to make it explicit. The Skills for Jobs White Paper sets out how enabling recognition of RPL is far more like an entitlement which flexes up the system, which hitherto has not recognised skills or credit as efficiently as possible. The result has been a piecemeal approach to the recognition of credit in HE, which in turn has put pressure on the public purse.

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

This would depend on how effectively a modular approach was developed and expanded. At its best, individuals from all backgrounds, including disadvantaged backgrounds, would have far more opportunities to study at a time and pace that met their needs and circumstances. Employers could be more engaged in advising on modules and combinations of modules that developed the skills or updated the skills that new and existing employees needed. We know from experience that higher education qualifications are seen as a major long-term commitment (which they are) and can be off putting to many individuals, particularly individuals from some disadvantaged backgrounds. There are, however, risks. A Foundation Degree or bachelor’s degree will be of greater value than the sum of their ‘modular’ parts. Of course, in some cases, specific modules (based on their design and content) will have significant standalone value. We would though want to see individuals from all backgrounds being encouraged and supported to complete a full programme/qualification.

**Q19. How can the LLE promote and encourage flexible study across England,**

**Scotland, Wales, and Northern Ireland?**

Existing UK frameworks that do not significantly diverge should be used. The acceptance and endorsement of major employers and PSRBs will be important. Institutions in the devolved administrations could, through appropriate regulators, be encouraged to use Occupational Standards at levels 4 to 6 to inform the development of vocational, technical and professional programmes. This could help provide a common reference for occupationally focused programmes/qualifications.

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

We would suggest the following:

- How are the additional costs of managing and running the system in institutions/training providers funded? (e.g., IAG, initial assessment, RPL, additional registry and quality assurance costs, provision of refresh programmes for modules an individual has previously completed that need updating, certification and record keeping).

- How we encourage and support individual institutions and providers to accept credit and modules awarded by other institutions/awarding bodies? (There are very real issues here regarding institutional autonomy, the different focus and coverage of programmes, institutional standing and internal quality requirements). In some cases, it may be entirely appropriate for an institution not to accept credit or modules from other institutions/awarding bodies. Institutions may be constrained by quality assurance regulations and the focus of prior learning may not fit with focus of the degree and other modules an institution/provider offers. This should not, however, prevent a policy shift in the narrative around the use of credit and how it is applied.

- How do we ensure employers do not “encourage” individual employees to use their LLE to undertake training programmes that an employer should fund? (Rules and guidance need to be developed).

- How do we ensure individuals are supported to choose and take modules that lead to a full qualification and support them in their career aspiration? (This will require IAG and substantial student support and support for former students).

- How do we ensure that we do not have a system where ‘advantaged’ groups disproportionately use the lifetime entitlement for full qualifications and ‘disadvantaged’ groups disproportionately undertake a modular approach that frequently does not lead to the achievement of full qualifications?

**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?**

Individuals of all ages need to upskill and reskill if workforce productivity is to be increased. Age restrictions would totally undermine the impact the LLE could have on social mobility and would be totally inappropriate. From experience of working on vocational programmes with UVAC’s 80 plus HEI members, we know that individuals from disadvantaged and under-represented cohorts benefit from progression at later stages of their working life. Such opportunities should be developed and facilitated through the LLE. As with Apprenticeships, the focus should be on an individual’s personal and professional stage of life and not age.

**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.**

Yes - A whole programme will in most cases be of greater value for an individual than the sum of the modules making up the whole programme. Undoubtedly, in some cases individual modules will support an individual to update their existing skills in light of changing industry practice, legislation or technology. Use of modules to do so should be allowed – but consideration needs to be given as to the circumstances in which this should be funded by an employer. In most cases individuals will gain most from completing a full qualification. The suggested rule regarding full qualifications may also help (but will not totally avoid) situations where employers want employees to fund training programmes that an employer should normally be expected to fund.

The LLE should be implemented as a system to support individuals to gain a full qualification flexibly and over time. Advice and guidance on the use of the LLE should emphasise the value of full qualifications and discourage the use of individual modules that are not on track to a full qualification, unless it can be demonstrated that a new module(s) support an individual in their career objectives. Specific examples of what is of value/appropriate and what is unlikely to be appropriate should be provided. For example, an individual with an engineering Foundation Degree or bachelor’s degree developing into a management role could find a number of modules from a Bachelors Management Degree of value.

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

PSRB endorsement and approval will be important. Providers also need to be encouraged and supported to use Occupational Standards in the design and approval of level 6 vocational/professional programmes. IfATE working with providers could do far more to support and facilitate providers developing and delivering level 6 programmes to use Occupational Standards. Networks of providers such as SEEC (https://seec.org.uk) should be encouraged and supported, as should the work in this area of representative organisations. UVAC for example would be interested in working with our 80 HEI members to explore collaboration between providers in raising awareness among individuals and employers.

**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?**

The Government (or key Government agencies) need to be clearer on what skills gaps and shortages it believes need to be tackled through the LLE to raise UK productivity and for the UK to become a high-innovation economy. For several years UVAC has suggested that the IfATE or the Department for Business, Energy and Industrial Strategy (BEIS) undertake and publish an annual skills audit, detailing where current and future investment in skills provision is needed. Although such forecasts and data would be useful and could help guide LEPs, metro mayors, providers and employers and the development of LSIPs, a substantial amount of flexibility is required to meet individual and employer need. The LLE is, of course, a loan and the individual using the loan should have the key role in deciding on what they spend their LLE.

Good quality IAG will be critical and information on future skills needs and the provision that supports individuals to gain highly skilled jobs will be critical. As we have noted in other sections of our response, Government is arguing that the LLE should meet the needs of employers. This is entirely appropriate. It does, however, raise the question as to what Government and learners can expect in terms of a financial and in-kind contribution from employers. As the Chancellor outlined in the Spring Statement:

*“UK employers spend just half the European average on training their employees. Furthermore, less than 10% of the spending on training by UK employers goes to high-quality formal training offered by external providers.”*  - Spring Statement 2022 - P38

It would seem inappropriate for employers to expect individuals to use their LLE to fund training provision many would argue should be paid for by an employer.

We are surprised, given the Chancellor’s Spring Statement, that no consideration has been given as to how employers could provide support (financial and in kind) for the LLE system.

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

As in our response to earlier questions, Government needs to consider restrictions (or safeguards) that prevent employers from pressurising employees to use the LLE to fund training programmes, formed for example, from individual or collections of modules, that an employer should fund. That is, the LLE should not act as a discouragement to employer investment in the training and development of new and existing employees. Government needs to be clear what training and development employers should fund and what learning should be supported through the LLE.

In terms of individual use, we would suggest as few restrictions as possible were introduced.

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

No comment.

**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, irrespective of the provider delivering the modules.

**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)?**

Yes. It would be inappropriate for an individual working full-time while following a LLE funded programme to have access to maintenance support but should be possible for those who are not working full-time. In contrast, individuals following a full-time study programme should have access to maintenance. We would anticipate that there will be a significant take-up and use of programmes involving work-based and blended learning. For such programmes individuals work and receive a salary so maintenance support would not be needed. Where an individual needs time off for study, we would hope that employers would be encouraged to provide such support. While maintenance support may not be appropriate in many cases there are many other forms of student support that are critical, and that Government must consider funding. Such support for individuals includes provision of IAG, initial assessment, RPL including experiential learning mentoring etc.

**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 system should be reconceptualised. Maintenance support should relate to individual income and savings and potentially target certain cohorts of students e.g. carers, individuals with a disability.

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

This would depend on the type of programme. For work-based and blended programmes learners would in most cases be earning a salary. Maintenance support would therefore not tend to be an issue.

We are disappointed that employer support for employees undertaking LLE funded courses has not been considered in the consultation. If an individual was following a technical or vocational programme that would benefit the individual’s employer, should not a contribution (time off for study, initial assessment, contribution to books/study) and even a direct financial contribution to the cost of the programme be encouraged?

**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?**

Yes - work-based and similar programmes are different from programmes where individuals study full-time – as our response to earlier questions. We would anticipate there will be a significant take-up and use of programmes involving work-based and blended learning. For such programmes individuals work and receive a salary so maintenance support would not be needed. Where an individual needs time off for study we would hope that employers would be encouraged to provide such support and the LLE system facilitated such a contribution.

Income/savings and caring responsibilities would seem to be appropriate criteria. We cannot understand why age would be an appropriate criterion. Surely, an individual aged 20, 30 or 40 with limited income/savings would be supported.

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

Flexibility should be seen as a feature of a quality programme. Customisation in design and delivery should enhance the value of the programme for an individual and employer. Flexibility in delivery (distance, online, hybrid, flexi, work-based, blended) should support individuals from different backgrounds (including underrepresented cohorts) access and benefit from the programme. In terms of specific action for Government consideration should be given to the following:

- Provision of IAG – for technical, vocational and professional programmes individuals need to know how best to use their LLE, the pluses and minuses of the choices they make.

- What support should an employee expect from an employer when undertaking an LLE funded programme.

- How to ensure the LLE is not used to fund training programmes that an employer should reasonably expect to fund.

- A flexible national RPL/credit system – individuals need to understand how RPL works and how credit and modules gained from one HEI/AO can be used (or not used) to contribute to a programme and qualification delivered/awarded by another HEI/training provider and AO.

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

UVAC believes that the quality approach for HEIs should be based on the existing regulatory and quality infrastructure i.e., the Office for Students and QAA credit framework. Evolution and adjustments may be needed but change and proposed future intervention must not discourage provider innovation.

We believe there should be no change in the respective quality organisations (OfS/QAA, Ofqual, Ofsted, ESFA and IfATE) responsibility for provision supported by loans delivered by type of provider. There are, however, changes needed to quality assurance, in particular a greater focus on:

- Expertise in IAG, initial assessment, use of RPL, credit accumulation and transfer and registry approaches to recording credit.

* Expertise in teaching, engagement of industry experts, work-based and blended learning, use of Occupational Standards.
* The value to individual learners of standalone modules supported through the LLE.

A greater focus on modular learning will undoubtedly lead to fewer individuals completing full qualifications. Many individuals will also take a considerable time to complete a full qualification. A key development needed will be for quality assurance bodies to determine how they ensure the value of standalone modules for individual learners.

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

For HEIs, OfS is THE appropriate regulator to monitor the use of the LLE system, although as in our response to Q33 there are specific areas where the current approach needs to be reviewed. It is also important that OfS approaches are developed closely with key stakeholder organisations, the IfATE being an important case in point.

We do not believe any radical changes are needed to the respective responsibilities of OfS/QAA, Ofqual, Ofsted, ESFA and IfATE.

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

We fear that rather than simplifying regulatory regimes, duplication could occur and complexities in quality assurance could result from the introduction and operation of the LLE. Degree Apprenticeships arguably represent the most innovative skills programme introduced by Government in generations. Regrettably, however, providers and employers must comply with duplicate quality assurance/regulatory organisations; OfS, IfATE, Ofsted. We believe a similar risk may be posed for HTQs. We would hope that rather than imposing several quality assurance/regulatory organisations on providers and imposing an unnecessarily bureaucratic burden on providers, quality assurance/regulatory organisations were required by Government to collaborate, with for HEIs OfS taking the lead role.

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

The key determinant should be how providers, agencies and Government ensure provision delivers for individuals.

**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?**

Existing quality assurance systems should be used, and the responsibilities of existing regulators maintained and respected. Greater collaboration is, however, needed and regulators need to understand the respective roles and systems of all relevant organisations. Levels 4 and 5 technical education is a key part and should be a growing part of the offer of OfS regulated higher education providers. Here OfS (and QAA) need to develop a closer relationship with the IfATE. OfS (and QAA) working with IfATE need to outline how regulation relates to providers delivering quality marked HTQs and modules from quality marked HTQs. OfS also needs to be more active in defining how progression from HTQs to the final year/final modules of a bachelor’s degree can be supported and facilitated.

We should also note a significant problem with the IfATE’s approach to the HTQ quality mark and the introduction of the LLE. Through the LLE the Government wants to facilitate the acceptance of and greater use of credit and credit transfer. Regrettably, the IfATE has not agreed a standard credit size for an HTQ. Qualifications of different sizes, even those based on the same Occupational Standard, can theoretically be awarded the quality mark. This will be challenging for individuals and employers to understand. It will also present a barrier for providers wanting to support progression from HTQs to bachelor’s degrees. Bachelor’s degrees have a size of 360 credits, from a Foundation Degree with a size of 240 credits progression is easy to understand. 120 credits are needed equating to the equivalent of one year’s full time study to allow for effective progression/top-up.

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

Degree programmes are more than the sum of their individual parts. Rightly there is variation in the coverage of different degrees in the same occupational area that reflect the needs of different employers, differences in the expertise of institutional staff etc. In this respect diversity is a strength. Combining modules from several different institutions to gain a full qualification may be appropriate and meet the needs of a learner. Conversely it may not.

Most HEIs have policies to recognise credit, but very few enact these consistently. This results in a piecemeal approach to the recognition of credit in HE, which in turn puts pressure on the public purse. We need something transformational in this space and a national level of coordination to shift the policy narrative around credit. The LLE should not be reliant on a system that differs from provider to provider. What is needed is an FE/HE credit framework for England that is binding. The role of such a framework is important as it can structure recognition of credit on a national basis. The aim should be to use credit to empower a process of enabling people to gain recognition and progress. To date, the reliance on provider autonomy and an institution’s own policy of recognition falls short of every learner having their prior learning recognised and remains fundamentally unfair. Empowering the way in which credit is used will provide increased flexibilities and greater access to provision that supports lifelong learning.

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

The LLE should support credit recognition and transfer because it funds modules. For this to a happen, however, a nationally agreed/mandated system of recognition and transfer is needed. This would require Government investment to develop. There are several ways in which it can further support credit recognition and transfer between providers:

* By demonstrating how credit recognition and transfer can support providers to recruit under-represented and disadvantaged learner cohorts
* Outlining how innovative approaches to credit recognition and transfer can support providers to engage employers and meet the needs of employers

As we have outlined in responses to earlier questions there are institutional/provider costs associated with credit recognition and transfer. The LLE system must allow providers to cover the costs associated with credit recognition and transfer.

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

This depends on the extent to which individuals will seek to combine credit from Ofqual regulated qualifications, with credit from OfS regulated qualifications and vice versa. A key issue is the need for individuals to understand the rules and the rationale for the rules. We would seek to encourage transfer where this raised quality, met individual and employer need and supported social mobility.

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

**• Yes/No  
• Please explain (free text)**

Yes – What is currently missing is a legal lever that ensures consistency of approach to recognition. Apprenticeships have opened the door to thinking about credit differently, which means that if providers can do it for Apprenticeships then why not for other forms of HE? What is also missing is an ‘entity’ to ensure recognition and transfer happen consistently and fairly. Work is needed to establish common standards, an enabling mechanism and potentially an organisation to support the system.

Credit is based on notional learning hours. One credit equates to 10 notional learning hours for both Ofqual and OfS regulated qualifications. Detailed guidance on how credit transfer works is also needed.

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

No comment.

**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?**

National guidance is needed. If an individual is awarded modules by a range of institutions, which institution awards the full qualification e.g., a bachelor’s degree? For reasons of quality assurance and institutional reputation, HEIs have specific rules on the amount of credit that can be awarded for prior learning, for individuals entering a programme e.g., bachelor’s degree.

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

Yes, but this should not be a top-down process. If a full qualification is designed to develop and accredit competence, then modules will have a time limit. The knowledge, skills and behaviours needed for occupational competence will change over time. The time limit will vary between subject and occupation. PSRBs should be able to advise in some cases. A provider should be required, through an RPL process, to ensure modules are current or where new modules need to be taken, to update prior learning. This of course has implications as to the cost of a full qualification. Providers will be able to provide guidance at the start of individual modules.

**Q44. How can prior workplace or experiential learning be more consistently**

**recognised for credit?**

Government should emphasise the value of accrediting and awarding credit for prior workplace or experiential learning. Evidence of the value for individuals and employers of the accreditation of prior workplace or experiential learning should be outlined. The accreditation of prior workplace or experiential learning and award of credit helps HEIs develop programmes that are tailored to the needs of individual learners and employers. Such approaches will be of value where HEIs work with employers to determine the skills their employees need to develop to raise productivity and develop and deliver programmes on this basis.

Quality codes and statements undoubtedly have a role. More recognition of and support for consortia of providers, such as SEEC and UVAC that have undertaken work to recognise credit and experiential learning is needed. There is a role for staff development (to a national standard), greater transparency in the purpose of and system for how prior and experiential learning are assessed and credit awarded is needed. HE systems for the assessment of experiential learning need to be developed/expanded and crucially the delivery of the system needs to be properly resourced. This raises the question as to how a learner could use their LLE to fund the cost of recognising and accrediting prior learning. We would argue that this was entirely appropriate, but safeguards would be needed to protect the interests of the learner and the integrity of the system.

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

PSRBs will often have expertise in this area. PSRBs do not, however, cover all level 4 to level 6 occupations and their expertise and status in occupational areas varies. PSRBs will be key partners, but much of the expertise in the recognition of prior workplace and experiential learning rests with HEIs and their representative bodies. Indeed UVAC, along with several other organisations has conducted extensive research in this area and outlined proposals for a national system. Any approach to facilitating greater recognition of prior workplace or experimental learning should draw on the expertise of all relevant organisations, PSRBs, HEIs, Awarding Bodies and employers.

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

Yes. As an example, the Chartered Management Institute (CMI) estimates that there are 2.4 million “accidental managers” who have entered management roles without the appropriate skills and training to do so effectively. Poor management skills are undoubtedly a key explanatory factor for the UK’s poor productivity. Accidental managers will have developed some skills through practice, working with mentors and other managers. Approaches to the accreditation of prior workplace learning could identify where modules could be undertaken to address skills gaps.

Working with PSRBs and HEIs/providers, IfATE could usefully identify four or five occupational areas (including management) where there was an appetite for the accreditation of prior workplace learning and where most benefits could be realised. Pilots in these occupational areas could be used to test and determine how a national system for the accreditation of prior workplace learning and which respected institutional autonomy, allowed flexibility and innovation could be implemented.

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

Collected by whom (HEI/Awarding Organisation/though national LLE system)? How accessed and by whom (HEI/AO/training provider, individual, employer)?

**Q48. How can the process be more transparent?**

Agreement is needed on a national system. This should be developed by OfS/QAA working with Ofqual, HEIs, Awarding Organisations, training providers, employers and appropriate national bodies such as UVAC.

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

No