

Russell Group response to DfE Lifelong Loan Entitlement consultation

1. Summary

- 1.1 The Russell Group supports the Government's plan to introduce a Lifelong Loan Entitlement (LLE) as part of its Lifetime Skills Guarantee and we are excited about its transformational potential for students, providers and employers. In order to deliver on the ambition of the LLE, guarantee high-quality provision and optimise investment, we recommend:
- (a) DfE conducts **further research into the type of demand** for modularised courses to best meet the needs of students and employers and, supported by the £10m allocated for the LLE in the Strategic Priorities Grant, **increase the scale of pilots pre-2025** to support a timely roll out of new courses.
 - (b) Ensuring modular provision seeks to **complement but not replace more traditional learning pathways**, recognising that some modules and courses will be better aligned with flexible cross-institution delivery than others.
 - (c) Identifying the **right level of funding to support the successful uptake and delivery of LLE across the sector**. This will include funding for the increased levels of wrap around support necessary to assist LLE learners, funding to support the additional costs associated with delivering modular provision and ensuring that perverse incentives are not introduced into the system that disincentivise high-cost, high value courses such as STEM subjects.
 - (d) Including **Level 7 modules or courses** as part of the LLE to retrain people and help the UK meet the growing need for master's-level skills. Study at this level delivers excellent returns for graduates and the Exchequer and would be easier to roll out on a modular basis as flexible, employer-led provision is already being delivered at Level 7. More generally, it is important the LLE helps to expand access to upskilling opportunities, a key area of demand from employers and learners for expanded modular provision.
 - (e) The Government works closely with the sector as well as the Designated Quality Body (QAA) to **align credit frameworks, credit transfer and accumulation mechanisms and student engagement processes**. These should build on already-established principles noting that there is currently no common language between institutions around modular provision. Development of common processes should not mean that all universities or all courses need to adopt modular approaches, as this is a matter for individual institutions to determine. We welcome further discussions with DfE on these areas as the LLE develops.
 - (f) Developing regulation for LLE that is risk-based and proportionate by using and streamlining **existing regulatory frameworks, or by exploring non-regulatory approaches where possible**. This approach can avoid duplicating efforts and additional burden and bureaucracy. The Government should engage as early as possible with the academic community and sector representatives when developing guidance on quality and compliance and should consider how the LLE will interact with existing regulatory frameworks, in particular the TEF.
 - (g) Opening the eligibility of the LLE out to a **wide range of learners**, supporting those from disadvantaged backgrounds to enter the system through **maintenance loans or grants** and ensuring that the LLE does not prevent the movement of students from England to universities in the Devolved Administrations which will have different funding arrangements.

2. Context

- 2.1 Russell Group universities provide a range of academic, technical and professional degrees. They work closely with colleges and businesses to deliver high-quality apprenticeships, Level 4 and 5 qualifications and flexible Level 6 and Level 7 provision that supports reskilling.¹ Through these collaborations they are creating opportunities to drive regional growth and address national and local skills gaps.
- 2.2 The Russell Group support the Government's ambition to grow high-level skills, to level-up opportunity across the UK and to better support people to access the training and education they need throughout their lives, and we welcome the opportunity to respond to the LLE consultation. We would also welcome any further engagement with the DfE to support the ongoing development of the initiative.

3. Testing demand and increasing the scale of pilots pre-2025 to support a timely roll out

- 3.1 We welcome the DfE's proposed approach of sequential changes that build towards a full roll out from 2025 but as the consultation notes, significant and complex changes will be required to develop and deliver LLE provision by 2025.
- 3.2 We encourage the Government to assess the demand from different students and employers for alternative forms of credit-bearing courses (modular courses). This will support providers to develop courses that best meet the needs of the learner and the UK economy.
- 3.3 We also welcome the announcement of an additional £10m announced as part of the Strategic Priorities Grant to increase skills provision at L4-6 ahead of the LLE launch. Given the ambitious timeline, we encourage the Government to use this **to contribute towards expanding the number and scope of the pilots leading up to 2025** so approaches and processes can be developed, tested and, in some cases, implemented ahead of 2025.
- 3.4 We welcome further discussion on how these pilots could be delivered by institutions, potentially to a specific cohort of learners who would particularly benefit from enhanced modular offerings, or, although not currently in scope, using modules at Level 7 where existing flexible provision can often easily be developed. We would also be interested in discussing the potential for regional pilots where providers could explore progression routes, in the context of local skills needs. Modular provision should complement more traditional learning pathways
- 3.5 It will be important that **any change to the funding system does not impact on the autonomy afforded to higher education institutions** through the Higher Education and Research Act 2017. Universities are best placed to understand which courses will be suited to modularisation and which require continuous learning and therefore are best suited to a more traditional learning structure.
- 3.6 Given that universities will deliver courses differently between institutions and over time, full modularisation of all traditional degree courses is neither desirable nor viable. If modularisation of all courses were to be enforced this would significantly increase the cost of teaching, with knock-on consequences for students in terms of the quality and value of courses that would subsequently be on offer. There would also be very significant challenges to fully modularising technical and vocational degrees in regulated professions - such as in medicine, dentistry, nursing, and architecture among others - given the requirements to

¹ Further information about technical education at our universities is available [here](#).

demonstrate to professional, statutory and regulatory bodies (PSRBs) that students have covered the entire content of a syllabus in order to gain licences to practice.

- 3.7 It is important that the traditional route of 3-4 year courses is protected to build on its strong demand and proven outcomes. Modular provision should complement more traditional routes to build a diverse landscape of high-quality provision and choice for students, such as those looking to upskill and reskill more flexibly.

4. Identifying the right level of funding to support the successful delivery of LLE

- 4.1 To ensure expected levels of university uptake and successful delivery of the LLE it will be important for the Government to support providers with the appropriate level of funding, and we welcome further, dialogue and consultations to discuss this. The level of funding required will depend on the detail of the proposal, but Government will need to consider the implications of ensuring high-quality delivery via flexible modes:

- (a) **Distinct wrap around support for students:** Some students using the LLE will require additional wrap around support. For example, LLE students may not have been in formal study or training for many years and could therefore require further literacy or numeracy support on entry. Likewise, individuals taking a series of short courses over several years may require extended academic and mental health and wellbeing support. LLE students may also require extended access to facilities and services, including careers advice, over uncertain time periods. It will be important that providers have the appropriate resources to deliver this supplementary support and so maximise positive graduate outcomes from LLE.
- (b) **Additional costs stemming from modular provision:** Delivering modular courses will generally involve reduced economies of scale and less predictable delivery cycles than for students studying longer courses. This is influenced by the costs for development, recruiting, onboarding, tracking, evaluation, and monitoring courses on a modular basis. Regarding content design, developing bespoke provision with employers module by module vs across a course will prove relatively costly, and existing modules will need adapting to be suitable as stand-alone provision.
- (c) **Additional funding for high-cost, high-value subjects:** There is variation in the cost of delivering different courses and between modules within courses. For example, it costs more on average to deliver lab-based STEM subjects than other classroom-based subjects. Appropriate and flexible financial support will therefore need to be distributed to ensure providers are not disincentivised from delivering higher-cost, high-value modules through LLE.
- (d) **Student fee limit:** If student fees are set using the maximum fee limits for undergraduate courses, we encourage DfE to use allocations that calculate funds at current cost levels.

5. Encouraging and supporting a broad range of learners

- 5.1 We encourage the DfE to conduct further market research to understand demand for modularised courses and develop progression and qualification pathways that are right for learners. This is likely to include supporting reskilling and upskilling opportunities as there is already strong demand from students and employers here.
- 5.2 In general, we recommend that the LLE can be accessed by the widest possible range of learners at the time that is right for them. We **do not support introducing limitations that prevent certain cohorts of students from accessing the LLE.**

- 5.3 It is important that a student who has the aptitude and desire to participate in higher education is not excluded due to their financial situation. **We would therefore welcome the inclusion for LLE learners of means-tested bursaries, grants and maintenance support.** These could be based on household income and personal circumstances which might create barriers to access, as LLE learners may need to take time off from paid employment whilst having fixed outgoings like mortgages, childcare and utility bills. Such support could also assist access to flexible learning for students with caring responsibilities or specific learning difficulties.
- 5.4 **For those learners with any form of disability we recommend that alongside the LLE they are allowed to apply for a disabled students allowance.** We recommend the Government liaise with the sector to consider the eligibility criteria to access this support in the context of lifelong learning.
- 5.5 We encourage DfE to ensure that introducing the LLE **does not impact on the movement of students between England and the Devolved Administrations** with different funding arrangements. As the LLE intends to support four years of funding for English students, this means those choosing to study in Scotland would not have access to funding for further study in later life, unlike students studying their undergraduate degree at English universities.
- 5.6 The Government will also need to consider carefully how to account for courses longer than 4 years – such as for medicine and dentistry and students completing a Foundation Year at level 4 or a Certificate of Higher Education lasting 1 year – to ensure these students can still access support for the whole of their course.

6. Broadening LLE eligibility out to Level 7

- 6.1 To ensure LLE successfully meets its objectives to facilitate and incentivise retraining we strongly encourage the Government to **widen eligibility of the LLE to Level 7 modules and/or courses:**
- (a) The nature of many jobs is changing and higher qualifications are becoming a necessary requirement. The LLE would be an effective mechanism to help the UK meet the growing need for master's-level skills².
 - (b) In the UK in 2021, 13% of 25–64-year-olds held a master's degree or equivalent at the highest level, this was lower than the EU22 average of 16%³. Including Level 7 as part of the LLE will help to ensure that the UK is building a sustainable and internationally competitive domestic workforce.
 - (c) Level 7 provision does not currently include a high proportion of students from low socio-economic backgrounds⁴. By introducing LLE at Level 7 this will help widen participation and support the levelling up agenda.
 - (d) A third of working age individuals already have a degree or equivalent qualifications and 80% of the 2030 workforce is already working today.⁵ Flexible Level 7 provision will need to play an important role in upskilling the future workforce, for example, as technology advances, trained workers will need to update their skills.
 - (e) Although including Level 7 would increase the total amount required to fund LLE as the amount available to students for a Level 7 course would need to at least match the current

² The study predicts that by 2027 16.2% of the workforce will have a master's degree or doctorate, an increase from 7.7% in 2007. **Source:** [Working Futures 2017-2027: Long-run labour market and skills projections Headline report](#), DfE, 2020

³ Education at a glance, OECD, 2021

⁴ The IFS reports that 41% of those that have continued from undergraduate education to study a master's degree will come from an area in the top POLAR quintile. **Source:** [The earnings returns to postgraduate degrees in the UK](#), DfE/IFS, 2020

⁵ [UK Skills Mismatch in 2030](#), Industrial Strategy Council, 2019

- Masters Loan levels, study at this level delivers excellent returns for graduates and the Exchequer. Graduates completing master's courses at Russell Group universities can typically expect to benefit the public purse by an additional £78,000 over the course of their working lives, on top of the benefits associated with completing an undergraduate degree⁶.
- (f) Flexible, employer-led provision is already being delivered at Level 7 and could be easily expanded to support early rollout of the LLE. For example, the University of Manchester has worked with the Christie Hospital and the National School of Healthcare Science to co-create a new Level 7 postgraduate certificate in clinical data science.

7. Supporting quality provision through proportionate regulation

Supporting risk-based regulation

- 7.1 All proposals around the LLE should be developed with the principle of risk-based and proportionate regulation in mind, as per the Higher Education and Research Act 2017, to minimise unnecessary bureaucratic burden.
- 7.2 We encourage the OfS to explore the data sets and reporting measures it already requires of providers, rather than unnecessarily expanding regulation at a modular level. **The Government should use and streamline existing regulatory frameworks established by the OfS. This can avoid duplicating regulatory efforts and prevent wherever possible the introduction of additional burden and bureaucracy.**
- 7.3 We support Government in using a streamlined approach to LLE regulation as a chance to support improved alignment of regulation across both HE and FE providers. A focus on increasing coherency of data requirements and not duplicating data collection exercises, for the purpose of quality and compliance checks, is critical to support viable LLE delivery.
- 7.4 When developing guidance on quality and compliance, Government should engage as early as possible with the academic community and sector representatives. Providers will need time to align course design, quality assure new modules, and market new offerings within the currently established UCAS cycle.
- 7.5 We would encourage the OfS to consider how the LLE will interact with existing regulatory frameworks, in particular the Teaching Excellence Framework. We believe every student is entitled to the same minimum quality of provision. However, the treatment of LLE students if they are counted in the TEF will need to acknowledge that continuation and progression rates may appear significantly different for a modularised learning journey.
- 7.6 We have already raised concerns⁷ with the OfS about the burden associated with regulation at the course level; based on that experience, there is obvious concern regulation at the modular level will only increase burden and bureaucracy on high-quality providers. As the approach to regulating LLE is developed we would like to see this being done much more collaboratively with providers.

Building on existing credit frameworks

- 7.7 We suggest any approach should complement the existing frameworks used by providers. **We recommend Government works closely with the sector as well as the Designated Quality Body to align with already-established principles, as developed in the Higher**

⁶ High-quality teaching and learning at Russell Group universities [delivers £20.7 billion to the UK economy](#).

⁷ [Russell Group response to TEF and student outcomes consultations](#), March 2022

Education Credit Framework⁸. We would welcome the opportunity for the Russell Group to engage directly with Government on this matter.

- 7.8 The Government should not attempt to enforce a modularised approach to HE on the sector, but instead use non-regulatory approaches to promote sector engagement and collaboration. In developing a common framework, Government should preserve the autonomy⁹ afforded to higher education institutions through the Higher Education and Research Act 2017. For example, the adoption of a common credit framework should not mean that all courses must fall within this framework; this being a matter for individual institutions to determine.
- 7.9 **Institutional autonomy is also vital for universities to continue innovating with curricula design and programme delivery beyond any national credit framework.** At present, beyond the traditional undergraduate and postgraduate pathways there are a number of alternative routes into higher education, particularly for students looking to undertake short courses. By engaging with HEIs that already offer short-courses Government will be able to construct the LLE and a credit framework around existing curricula offers, reducing the burden on providers who might otherwise have to re-design their offerings to ensure student access via the LLE. Courses may often be developed in partnership with business or industry or designed to complement a learner's continued professional development. We encourage Government to ensure it has a holistic view of the range of existing provision across HE as it designs the LLE to avoid the unintended consequence of reducing student choice or opportunity.
- 7.10 All Russell Group universities already offer a variety of short-courses or modules, and in some instances these are designed to be stacked. However, there is currently no common language between institutions around modular provision. **We encourage the Government to coordinate and co-develop a credit framework approach with the sector (including colleagues in the devolved administrations) as soon as possible. Any approach should ensure ongoing flexibility for providers over the scoping, content and delivery of courses and modules.**
- 7.11 We encourage the Government to work with the sector to understand how credit transfer and accumulation currently works, in order to draw on common practice when it develops future guidance. Credit transfer is used regularly within a provider's internal frameworks to allow a student to move between courses, but it is less common for a student to move between providers. Credit transfer in this instance is often determined on a case-by-case basis and co-ordinated directly between the two institutions. It is more common practice that credit transfer is negotiated between FE and HE institutions working in partnership with each other. These partnerships are usually in regional clusters, however, some best practice may be drawn from these clusters in order to scale-up credit transfer arrangements.
- 7.12 In a situation where a student is transferring between institutions, particular thought should be given to Government's approach to recording and tracking a learner's progression, in higher education, and how prior learning will be recognised. **We recommend Government invest in the infrastructure to support the recording of attainment at a national level, allowing for a personal learner record that can be easily accessed and understood by students (and by universities and employers).** Government should also work closely with the Designated Quality Body to confirm arrangements for awarding powers in the instance where a student may choose to stack modules/credit from multiple providers building toward a parent qualification.

⁸Credit Framework for England, QAA, Accessed March 2022

⁹“to determine the content of particular courses and the manner in which they are taught, supervised and assessed”
Section 2(8) HERA <https://www.legislation.gov.uk/ukpga/2017/29/section/2/enacted>

7.13 By effectively recording and recognising prior learning a student will be able to make the most out of their educational journey. For example, if a student chooses to stack modules or accumulate credit over a long period of time, effective recognition of prior learning will ensure they are not duplicating their knowledge or transferring onto a module that has certain knowledge or skill pre-requisites. Even so, many courses are designed with knowledge accumulation at their centre, and course design naturally differs between institutions and over time; an entirely modularised approach to all HE courses is therefore unlikely to be viable, nor desirable, and would risk losing the pedagogical benefits of traditional 3-4 year degree courses.

UK-wide and international comparability

7.14 We welcome the opportunity of English students being able to access the LLE and therefore more flexible and personal pathways into higher education. However, adequate consideration needs to be given to the international reputation of the framework and how credit transfer might be recognised abroad by both higher education providers and employers. We have already expressed concerns with the OfS on the removal of references to the Quality Code^{10,11} as a regulatory tool ensuring a common understanding of 'quality' across UK higher education. The UK-wide comparability of standards across any established credit framework should be considered carefully and with early engagement of the devolved administrations being critical.

Student Engagement

7.15 We encourage the Government to consider the most effective method of student engagement when developing its credit framework. Beyond the minimum quality requirements, as set out by the proposed B2 condition, development of a national credit framework should involve students in co-development to ensure the best possible outcomes.

7.16 This principle of student engagement should run throughout the development of the LLE. This will ensure courses and progression routes are designed in a way that places the learner at the heart of LLE provision. **We encourage the Government to engage in more targeted consultation activities with the type of learner most likely to engage in modular/credit based learning.** Part-time, mature learners or those already in employment have different learning and access needs in comparison to most students on a more traditional higher education pathway. Government should ensure the LLE is designed to be as flexible and accessible as possible to learners whilst supporting the highest-quality outcomes.

April 2022

¹⁰ [The UK Quality Code for Higher Education](#)

¹¹ [Russell Group response to OfS consultation on quality and standards, September 2021](#)