

Lifelong Loan Entitlement

LLE strategic aims and objectives

We would welcome a lifelong model that means a “lifetime” and not just a demographic of the population. This policy talks about upskilling a workforce and providing funds across a lifetime but it seems to be aimed at technical skills for post 18 education. We would strongly advocate for longer duration programmes (Medics, Architecture) and undergraduate integrated masters to be included as well as level 7 courses, which are currently not within scope.

We are supportive overall of this approach but have concerns on implementation should this increase complexity. It is of vital importance to us that any implementation of LLE aligns to existing sector frameworks rather than imposing additional frameworks.

The proposal suggests that the fund will support more flexible access to higher education but we also need to ensure that universities are set up in a way to be able to deliver in this modular, stand-alone way alongside long-duration courses. Equally, consideration should be given to additional support requirements for students studying at a modular rather than course level and ensuring funding levels are set accordingly.

The policy does not address the issues around Recognition of Other Learning (ROL). Currently students who want the PG Masters loan can only receive funding if they are studying a full masters (180 credits) from the outset. Students cannot have studied a PGCert or PGDip and be topping up and still receive funding. This type of regulation will need to be brought into line if UGs are to be able to study one off modules/credits and then top up to a full degree and/or transfer between institutions to do so.

There is also little mention of maintenance support in this policy or discretionary payments such as childcare allowance or DSA payments (which currently can be requested from Student Finance). We would recommend that maintenance support is included and tied to the credit value but at a level that allows mature learners and learners from all backgrounds to access higher education.

There is no information on when the student would go into repayment which raises concerns about the additional need for support funds for part time students (who might already be earning above the threshold).

Information for prospective students will need careful promotion to ensure that those from disadvantaged backgrounds who may be more debt-averse understand the principles/benefits and are encouraged to take advantage where appropriate. The greater requirement for students to independently manage their study pathway and trajectory in a fully modularised system should also be considered; high-quality advice and guidance will be required to ensure that coherence and worthwhile choices are made.

We are cautious about the focus on modules and credits, as there is no mention of limits on duration of study and when students would go into repayment. The vast majority of our student population would not be taking advantage of the additional flexibility that this change might offer. Consequently, it would be important to ensure that additional complexity for the majority is not brought in as an unintended consequence. A new funding system in which the requirement to confirm the specific programme of study is removed could simplify reporting to Student Finance. The concept of a “bank account” approach by which students could ‘buy’ X credits at Y level annually from Student Finance up to the maximum lifetime total would represent a simplification on application. Confirmation from the University that this matched their enrolment would continue to be necessary for the release of funding. This streamlined approach should be similar to the current funding system in that it should provide funds for

the whole duration of the course plus a gift year (including long degrees such as medical degrees). The policy is intended to cover FE, HE, HTQ, IoT and skills programme. Study at these different levels has differing costs and so the available funding per 1FTE study for each would need to differ – e.g. £20k per year at level 6 covering both fees and maintenance.

We consider the LLE model to strengthen the sector's ability to demonstrate value for money which is worth consideration in its implementation.

Scope of the LLE

We would expect all courses currently eligible for HESF funding, including foundation years, PGCEs and integrated masters to be within scope of the LLE. We would strongly favour extension of an LLE to level 7 study as well. Given the basis of the scheme is to ensure appropriate upskilling of the workforce, omitting such courses does not optimise the full potential and benefits of LLE. We are seeing an increasing expectation in some sectors that entrants hold level 7 qualifications; equally we have proportionately fewer students from low socio-economic backgrounds studying at level 7 (and 8) than for undergraduate degrees. We would greatly encourage inclusion of level 7 courses within the scope of the LLE to support widening participation.

The consultation delves into detail on matters of modular funding and maintenance and we find consideration of these matters at this early consultation period concerning; the priority should be on defining the purpose and scope of the LLE in the first instance. From there, we strongly recommend any measures put in place take into account current frameworks and regulations as a guiding principle and that all measures are proportionate. Whilst LLE offers up new opportunities for learners and for universities, we must remain mindful of the number of individuals who will opt to study in a fragmented way and scope accordingly. Equally, we must ensure that such learners are not disadvantaged by the system implemented simply for being in the minority and ensuring parity, fairness, inclusivity and appropriate support must be key considerations.

Credit recognition and transfer

It is of vital importance that the approach taken is consistent with existing frameworks and principles set out in the Higher Education Credit Framework.

The sector currently operates in a culture of complete autonomy and rightly so. Most HEIs are Degree Awarding Powers (DAPs) in their own right and, as such, have developed a range of regulations which are sector-recognised. It is up to each DAP to determine curriculum and assessments, degree algorithms and Recognition of Other Learning policies. Maintaining such autonomy is crucial to the sector. This, though, significantly limits the scope for a common credit framework, particularly one that is low-burden. Finding a common language between universities in relation to this must be proportionate to the demand for this style of learning.

The consultation places limited emphasis on tracking and recognising a learner's progression and attainment but we would also consider these to be of great importance and of interest to learners. It is important that learners, and particularly those from disadvantaged backgrounds, can maximise opportunities to build on their learning, receive informed advice to support choices and that academic achievements over an extended period and across institutions is officially recognised appropriately.