



Department  
for Education

# Lifelong Loan Entitlement

**Government consultation response**

**March 2023**



# **Lifelong Loan Entitlement Government Consultation Response**

Presented to Parliament  
by the Secretary of State for Education  
by Command of His Majesty

March 2023



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## Ministerial Foreword



We are delighted to be introducing the next stage of our plans to bring about the Lifelong Loan Entitlement. Our skills revolution is a core part of this government's plan to grow the economy and provide a ladder of opportunity for everyone to get the education and skills they need for job security and prosperity.

We know that even without the unprecedented challenges faced in recent years, the UK needs to tackle its skills gap and boost economic growth. At the same time, the Fourth Industrial Revolution has brought about new jobs, new skills requirements and midlife career changes that traditional post-school education and training has not always championed.

The current student finance system needs to better support lifelong learning. That means supporting adults seeking high-quality training to improve their income who previously may not have known what finance they were entitled to. And it means championing social justice - helping disadvantaged people get qualifications that lead to good jobs by removing pre-existing barriers to education. This should also be the cornerstone of any education finance provided by government. The current student finance system needs to better serve those who need it most. If students are poorly advised at 18, and end up using their single serving of student finance on the wrong course, the result is people hemmed-in by choices made at a young age, struggling to improve their employability at a time when businesses are crying-out for skilled candidates. We need to adapt systems built for a different era to transform people's access to learning.

In 2020 we announced our ambition for introducing a Lifelong Loan Entitlement. This will offer financial support worth the equivalent of four years of post-18 education (£37,000 in today's fees) to use over people's working lives. It will allow modular learning of skills courses, enabling students to stop and start this training at a time that's right for them.

People will be able to study, train, retrain and upskill throughout their working lives, responding to life events, changing skills needs and employment patterns. Like getting on and off a train, they'll be able to alight and board their post-school education when it suits them, rather than being confined to a single ticket.

Lifelong learning is a key rung on the ladder of opportunity, and will help raise skills levels across the country and help address the lack of opportunities prevalent in some disadvantaged areas.

This consultation response sets out our intention to deliver a radical shift in the tertiary education system. We will remove the artificial division between funding for Higher and Further education, by unifying these student finance systems across levels 4, 5 and 6. All higher education courses, whether academic or technical, will be funded in the same way.

There will be a single application point for all student finance support for levels 4-6. This includes all courses previously funded through HE Student Finance, level 4 and 5 courses supported by Advanced Learner Loans, and Higher Technical Qualifications. We will also remove the restrictions on financing Equivalent or Lower Qualifications (within the allocation) to allow learners to respond to what the labour market needs now. Each learner's personal account will display their balance of remaining finance allocation, as well as information, guidance and eligible courses to guide their learning pathway.

We want to make sure all students receive the right amount of financial support to complete their studies, particularly those from disadvantaged backgrounds who need it most. That is why learners will be able to access maintenance loans for living costs, and targeted grants for all designated courses and modules the LLE funds.

As introduced through the Lifelong Learning (Higher Education Fee Limits) Bill earlier this year, the LLE will enable meaningful fee limits to be set on periods of study shorter than a year. What this means in practice is that modules and short courses, as well as traditional degree courses, will be priced consistently according to the amount of learning they contain. This will create a fair, more flexible system to help support and encourage more people into post-18 education.

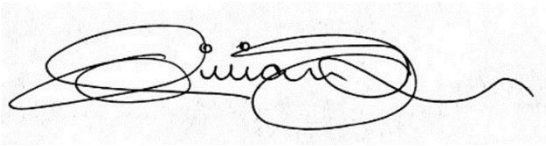
Quality of education is the golden thread that runs through all our technical education reforms. That is why we will take a phased approach to introducing the funding for modules, which will be able to be taken in sets or individually, to build to a full qualification. We will focus initially on job-specific Higher Technical Qualifications, and some technical qualifications at levels 4 and 5. We will later extend modular student finance to other courses at levels 4, 5 and 6.

We believe that this package of measures is essential to deliver the transformation in qualifications and skills acquisition that our businesses are crying out for and this country needs. Learners and employers alike will reap the rewards of a more flexible system that can adapt to changes in personal circumstances and the economy.

This consultation response is a major milestone towards a more dynamic and growing economy, where people are supported by government to train (and retrain) to get good jobs that lead to rewarding careers. We will continue to collaborate with providers and industry to support the full roll out of LLE from 2025.

We want to thank all those who took their time to respond to this consultation and engage with the department on an ongoing basis, especially all those who work so hard in our FE and HE sector to deliver the vital skills our students need. Your contributions will have a lasting impact in delivering the LLE. We look forward to continuing the hard work required to allow the launch of the new system from 2025, and to support learners to continue to acquire the skills they need to succeed in life.

The [full consultation document](#) is available on gov.uk.



**Gillian Keegan**

**Secretary of State for Education**



**Robert Halfon**

**Minister for Skills, Apprenticeships  
and Higher Education**

## Summary of Responses Received

Respondents were asked to select if they were responding as an Individual or on behalf of an Organisation. Not all respondents answered this preliminary question. Table i shows the breakdown across these respondent groups.

Respondent Groups	Number of responses	Percentage of all responses
Individual	914	72.9%
Organisation	183	14.6%
Not selected	156	12.5%

**Table i: Summary of respondent groups**

The respondent groups have been further broken down into stakeholder groups, as shown in Table ii. The majority of responses came from Individuals, with Unknown as the second largest group. Universities provided the largest proportion of academic based respondents.

Stakeholder Groups	Description	Number of stakeholders	Percentage of all stakeholders
Colleges	FE institutions and their staff	18	1.4%
Education and Training	Institutions involved in education and training	9	0.7%
Individual	Learners and interested parties that are not responding on behalf of an organisation	914	72.9%
Other organisations	Organisations that fall outside the scope of the above groups	31	2.5%
Sector bodies	Groups and sector bodies	43	3.4%
Unions	Trade unions	6	0.5%
Universities	Universities and their staff	76	6.1%
Unknown	No grouping was disclosed by the respondent	156	12.5%

**Table ii: Summary of stakeholder groups**

The majority of the questions in the consultation were optional. Annex A shows the number and proportion of responses to each question. The highest response rate received was for Question 7 which was answered by 92.1% of all respondents. This is substantially higher than the next most answered question (Question 1) with 18.9% of respondents providing an answer. The lowest proportion of responses was for Question 41, at 6.7%.

Given its link to LLE policy, this document also includes a response on HTQ modularity, which was consulted on through the HE reform consultation. This response will also be included in the response to the HE reform consultation. There were 160 responses to



these questions and of the 157 identifying whether the response was from an individual or organisation, 43 (27%) were from individuals with 114 (73%) from organisations.

## **Main Findings From the Consultation**

There were 1,253 responses received via the online consultation and via email. The majority of responses were provided by individuals (914). A total of 76 universities provided responses, with the remaining input being provided by colleges, unions, sector bodies, education and training providers, other organisations and those who chose not to disclose who they were.

The consultation consisted of 48 open and one closed question based around the three themes of the LLE: ambition of the LLE, scope of the LLE and supporting quality provision and flexible learning.

### **Theme 1 – Ambition of the LLE (questions 1-7):**

Respondents were generally positive about the high-level objectives and ambitions of the LLE. The overall view from respondents was that it would take time to develop and deliver modular courses that can enable learners to train, retrain, and upskill to reduce identified skills gaps, and courses should not necessarily be defined in terms of being 'academic' or 'technical'. Rather the LLE should seek to provide a wide range of training and qualification options which were relevant to industry/society, support learners and be accredited by existing mechanisms.

Creating an accessible and inclusive LLE would require consideration of how a learner's prior knowledge should be assessed. It was felt that relaxing Equivalent or Lower Qualification (ELQ) rules could remove a barrier to more returning to learning. Enabling learners' transfer between providers and pathways could be facilitated by a national framework to define credits, as well as clear routes for learners to exit with recognised qualifications.

To support the LLE in meeting its ambitions and be inclusive, it was felt that learners would need clear and easily accessible information to apply for student finance and make informed decisions on their learning journey. Any developed LLE portal would need to provide details on the course, finances and how to access impartial Information, Advice and Guidance (IAG). It would be important that information is available in different formats to support inclusivity and widen access, for example to those with low digital literacy abilities. Some respondents also felt that in order to be inclusive, the LLE would need to support availability and access of finance for learners, including those whose religious beliefs may prevent them from taking out loans with interest.

Lastly, measuring the success of the LLE in achieving its ambitions would require the long-term monitoring of learners' studies, pathways and outcomes.

### **Theme 2 – Scope of the LLE (questions 8-31):**

Respondents felt that, in line with the view that the LLE should be designed to support learners to train, retrain, and upskill throughout their lifetime, the LLE should be as flexible as possible and centred on learners' choice rather than employer needs, with as few restrictions as possible on its overall use, and with funding being accessible regardless of age.

Funding would be of key importance to providing fair and open access to the LLE, and for the delivery of courses. Both loans and bursaries would need to be available to support both access to learning as well as to encourage study in areas of identified skills gaps. It was felt that maintenance support should be accessible to all learners, and if means-tested this should focus on the learners and not the family income.

Providers noted that not all courses could be delivered through a modular approach, particularly those courses which are centred on currency and consolidation of knowledge. For those courses which do not follow a modular structure (such as medicine), continuing to provide yearly funding would be the most appropriate funding route.

Some respondents noted that the cost of designing and delivering modular courses would not always be proportional to the cost of a full course, and this should be taken into consideration during funding allocation.

It was felt that providing funding only to modules which are part of a wider course could support learners to understand the pathway they are on, and also reduce regulatory burden. However, it was recognised that this could remove some of the flexibility of the LLE, particularly as not all learning might be undertaken to achieve a specific qualification – some should be undertaken simply to upskill in a given area.

The consultation responses provided no clear view on whether a credit limit should be set per funding applications from learners. However, to support learners on their journey, the creation of an effective and efficient credit transfer framework could support study mobility and create the envisaged flexibility for learners to move between pathways and providers.

### **Theme 3 – Supporting quality provision and flexible learning (questions 32-48):**

Overall, the view was that delivering quality provision and flexible learning should, where possible, draw upon existing regulatory and quality infrastructure. However, consideration should be given to how the developed system could reduce the burden of duplicated reporting to different regulatory bodies. Both approaches would require the preservation and connection of learner data to support the delivery of the LLE.

Flexible learning within the LLE would need to be underpinned by the ability for learners to move between pathways and providers. However, this would require a clear approach to the assessment of prior knowledge (which is complex due to breadth of ways in which it is gained) as well as a credit transfer framework.

The time taken to achieve a qualification was also noted as part of delivering a flexible LLE. Consideration would need to be given to currency of learning, noting that for some courses where knowledge and skills are rapidly developing, the knowledge gained can quickly become outdated. Therefore, there may be a case for placing a time limit on the currency of knowledge. Also linked to the time taken to gain a qualification is the delivery of quality provision – as learners move between pathways and providers, respondents wanted to understand who would ultimately be responsible for the learners' outcomes.

## Full Government Response

The government is committed to reforming the student finance system to provide more flexible access to the post-18 education and training needed to meet the demands of the modern world, benefitting individual learners, the economy and society as a whole.

*“The LLE has huge potential to be transformative to educational opportunities and to provide genuine choice to learners across different qualifications and modes of study. Learners of all ages will benefit from greater flexibility and the ability to gain qualifications at various stages of their lives.”*  
(Sutton Trust)

*“The LLE proposes one of the most significant reforms in Higher Education. We support the principles of LLE in providing opportunities to learners to learn flexibly over their lifetime and to help meet the skills needs of the country.”*  
(Association of Colleges)

*“The introduction of the LLE is a welcome programme of reform. We believe these reforms can unlock opportunities for learners and deliver on the country’s skills needs.”*  
(Universities UK)

The government intends to introduce the LLE from the start of Academic Year 2025/26 (AY25/26) to provide a streamlined funding system for provision across levels 4 to 6. It will enable people to train, retrain, and upskill to meet the needs of the economy and advance their careers. The LLE will provide eligible learners with an entitlement equivalent to four years of HE study which they will be able to use for eligible full and modular courses across FE and HE providers. In addition, loans for living costs and targeted grants will be available in respect of all designated courses under the LLE, including part-time courses, subject to need. The new budget for targeted grants under the LLE will be agreed and set out at the next Spending Review, alongside further detail on the entitlements.

To support introduction of the LLE from AY25/26, the government is introducing primary legislation on Fee Limits in 2023. This will be followed by the revision of the current secondary legislation to reflect the changes outlined in this response. This will support the work of the Student Loans Company (SLC) in developing the systems required for providers and learners to access the LLE in time for its roll out, with learners being able to access their student finance accounts and make an application in the usual way from early 2025.

Education is devolved, and so the Government will work closely with partners in the devolved administrations in advance of LLE roll-out from AY25/26, to ensure policy continues to operate coherently across the United Kingdom.

## **Eligibility for funding**

The government will:

- Replace existing entitlements for HE student finance (HESF) and Advanced Learner Loan (ALL) funding with a fixed entitlement worth the equivalent of four years of HESF;
- Make this entitlement available to all new eligible learners and up to the age of 60;
- Make available a residual entitlement for returning eligible learners, calculated based on prior access to government-funded learning; and
- Introduce a robust compelling personal reasons mechanism to ensure learners affected by circumstances beyond their control can complete their studies.

The government is committed to providing individuals with **a loan entitlement to the equivalent of four years of post-18 education funding** (£37,000 in today's fees) to allow them to train, retrain, and upskill.

This fixed entitlement will replace the course-based entitlement for previous systems. These previous systems offered limited flexibility, with a student's entitlement differing depending on their specific course, their prior study and their ability to access one additional year's entitlement. The LLE introduces a single flexible entitlement, which learners will be able to use at will across their working lives on a range of designated courses and modules, as well as access to additional entitlement for priority subjects (outlined in the '[Courses in scope and ELQ restrictions](#)' section). This will simplify a user's access to finance, empower them to apply as they want, and ensure they retain access to extra funding for priority subjects.

The LLE will also include a mechanism, akin to the existing Compelling Personal Reasons (CPR) mechanism in HESF, designed to help ensure that learners affected by circumstances beyond their control can complete their studies. We will be providing further information and guidance on this before launch in AY25/26.

This entitlement will be available for all eligible learners, including both new and returning. Personal eligibility criteria will track existing HESF rules based on immigration status and residency. For those learners who have studied previously, they will have access to a "residual" entitlement, calculated on the basis of prior government-funded learning. We will set out the principles for this calculation as well as working examples with typical learners for autumn 2023.

LLE tuition loans will be available up to the age of 60. This will offer access to tuition loans for the vast majority of the working population, ensuring they can use the LLE to retrain, upskill, and make a significant contribution to the economy. It will also focus funding on those most likely to repay their loans. This will ensure government-based loan funding provides value for money, while introducing more generosity and flexibility into the student finance system.

## Courses in scope and ELQ restrictions

*“to ensure the LLE delivers for all learners, it is vital that restrictions such as the Equivalent or Lower Qualification (ELQ) exception rule are not carried over from the current finance system to the LLE, to ensure that people are not inhibited from training, retraining or upskilling as appropriate throughout their lifetimes.” (London Higher)*

*“the ELQ rules as currently constituted, would prevent many learners from taking advantage of the LLE to upskill.” (London South Bank University)*

*“One key barrier that learners could face in accessing their LLE is Equivalent or Lower Qualification (ELQ) restrictions.” (MillionPlus)*

The government will:

- Fund all courses formerly funded through HESF (see Annex C).
- Fund qualifications funded through ALLs at levels 4 to 6 with evidence of learner demand and employer endorsement.
- Cease ALL funding for new learners on qualifications at levels 4 to 6 from 1<sup>st</sup> August 2025 onwards.
- Remove the restrictions on Equivalent or Lower Qualifications (ELQ) study that currently exist.
- Make available additional entitlement for a limited number of priority subjects and longer courses.

Through the LLE, the government will unify the student finance system for all loan funded provision across level 4 to 6 study.

From the start of AY25/26, the LLE will fund a wide range of full courses including all full courses formerly funded by HESF (full list of course types at annex C), as well as those qualifications formerly funded through ALLs with evidence of learner demand and clear employer endorsement.

While a number of ALL funded qualifications will eventually become HTQs, some will not. The government recognises qualifications currently approved for ALL funding, but which do not meet the threshold for HTQ approval, are important in terms of the learners and employers they serve. Where there is a case and to ensure that we are funding high value provision, we will implement the following transitional arrangements for these qualifications to be in scope to be funded by the LLE:

- Qualifications which have been approved for ALL funding for a period of three consecutive years (since 1 August 2020) will be reviewed for demand in December 2023. Where there is no evidence of learner demand, the qualification will not be in scope for transfer. The outcome of the review will be confirmed in January 2024.
- For those ALL qualifications which are in scope for LLE transfer, and for any new ALL qualifications approved between January and April 2024, we will introduce two additional requirements for qualifications. The following criteria will need to be met:

1. That the qualification's **purpose and outcome statements** support **student progression** into employment and/or higher education and training.
2. That there is clear **employer endorsement** for the qualification. This could include existing professional body recognition, an existing inclusion as a mandated qualification in an apprenticeship or other types of endorsement.

Where these qualifications are technical in nature we will work with IfATE to draw on their existing processes for approval – and keep these under review.

Beyond these requirements:

- From January 2024 any Awarding Organisation (AO) submitting new qualifications for ALL approval will need to meet these new criteria. AOs with qualifications already approved for ALL and in scope for transition to the LLE, will need to evidence that their existing ALL qualifications meet these new criteria by 31 March 2024.
- We will introduce a moratorium from 1 April 2024 on any new qualifications coming forward for ALL funding so that the offer remains stable in advance of the transition to the LLE in 2025.

We will communicate details of how the post-moratorium gateway will operate for new qualifications by January 2024. Where new qualifications are technical in nature, our expectation is that IfATE will run an approval process to ensure alignment with employer need and demand.

The government will increase flexibility for people to use their entitlement on the retraining that meets their needs. Therefore, it will **remove the current restrictions on funding tuition fees for ELQ study**.

The government also intends to make available **additional entitlement for priority subjects and longer courses** in addition to an individual's core four-year entitlement. For example, learners will be able to access additional entitlement to study **a limited number of priority subjects**, such as medicine. This will ensure that learners can always gain skills in priority areas, regardless of remaining entitlement or previous qualifications. We plan to outline the courses eligible for additional entitlement for autumn 2023.

## Modules

*“Ensuring that the shift to a modular approach is fully thought through and coherent will be essential to the continuing robustness of the qualification concerned and to the quality of the learner experience. It will therefore be important to phase in the introduction of the new approach. Again, it will be essential that it is clear to learners from the outset whether the course they are considering can be studied module by module.” – University of Wolverhampton*

*“All course provision should be quality-assured and each unit of teaching/instruction should fit into an established quality control framework.” - ResPublica*

*“We welcome proposals that the LLE will fund high quality modular learning. The independent Workplace Training and Development Commission identified the need to create more accredited modular learning opportunities, accessible in local communities and delivered in an agile way, to enable people to upskill and reskill while balancing the needs of family and other commitments.” - British Chamber of Commerce*

The government will:

- Take a phased approach to providing funding for modules. On launch in AY25/26, new modular funding will only be provided for certain level 4 and 5 courses:
  - All **Higher Technical Qualifications (HTQs)**; and
  - Some **technical qualifications at levels 4 and 5 currently funded through ALLs** with clear line of sight to an occupational map and evidence of employer demand.
- Expand out new modular funding to broader level 4, 5 and 6 provision in **AY27/28 where we can be confident of positive outcomes** for learners.
- Require that LLE funded modules are:
  - Part of a designated full course (“parent course”) so that modules can be stacked towards full qualifications;
  - Have a single qualification level and credit value, which is the same as when the module appears in the full course;
  - A minimum of 30 credits for funding purposes, also allowing this to be achieved by “bundling” smaller modules together; and
  - Assessed and come with a standardised transcript on completion.

## Scope

The government will be taking a **phased approach to modular funding**, focusing on higher technical courses which have clear employer checks or where they address skills gaps to support learners into jobs which employers need. From the start of AY25/26, this will be initially targeted at:

- All HTQs (approved to deliver skills employers need); and,
- Technical qualifications at levels 4 and 5 currently funded through the ALL system which have a clear line of sight to an occupational map and employer support.

The Department will notify AOs of the criteria, process and evidence required to approve ALL modules in January 2024. DfE will then open the window for application in April 2024 with the window running until the end of May 2024. We anticipate communicating outcomes of the process, to AOs no later than the end of July 2024. Technical qualifications at levels 4 and 5 will be in scope where they are already approved for ALL funding, allow stand-alone delivery of modules (which must be at level of the overall qualification), provide certification of module achievement, and the award of credit to allow accumulation and/or transfer where appropriate.

A phased approach to modular funding focused on certain high value level 4 and 5 courses will allow us to test and learn from the approach, before extending, where appropriate, funding to modules of other high quality courses at levels 4, 5 and 6.

**Modular funding will then be opened up for AY27/28** for wider level 4 to 6 provision where we can be confident of **positive student outcomes**. We intend to launch a technical consultation on this next year, in order to specify how we will determine funding for wider modules.

### Criteria

Consultation respondents also noted and recognised the need to ensure that modular courses should meet an appropriate standard.

The government has considered responses and the need to balance flexibility, student outcomes and deliverability. Any new modular provision should also be of high quality and support wider progression to full qualifications. As such, all LLE funded modules must:

- **Be part of a designated full course e.g., “parent course”.**
- **Have a single qualification level**, which is the same level as when the module appears in the full course.
- **Have a credit value**, which must be the same as when studied as part of a full course.

In addition, we will require that modules meet **the following broad set of criteria** to access LLE funding:

- Modules must have a **minimum size of 30 credits for funding purposes**. The government considers this to be a suitable level to attract fees and maintenance loans as it represents a substantial enough package of learning, while still being much smaller and more flexible for training, retraining, and upskilling opportunities than the current one academic year (120 credit) minimum size offer for HESF.
- Modules of a smaller size can also be funded provided they are **“bundled” together** in a single entry from a parent course to meet 30 credits to allow sufficient flexibility for retraining purposes. For example, funding would be available for a 20 credit module and a 10 credit module of the same course combined. However, the government agrees that providers should have **autonomy on whether or not to modularise a course and that not all modules of courses should attract funding**. In cases where there are courses that are not currently structured around credit bearing modules, but that have high learner



and employer demand for modular funding, the provider or awarding body is free to consider restructuring the course into credit bearing modules.

- Modules **must be assigned a single qualification level** to determine whether they are eligible for funding. The scope of the LLE is only to provide loan funding for level 4 to 6 provision. While the government recognises that some courses include level 3 and/or level 7 modules, they would not be eligible for modular funding separately, but would still attract LLE funding when taken as part of a full course. This will also signal the level of higher learning completed and facilitate stacking of modules to full qualifications.
- Modules must be assessed and provided with a **standardised transcript** on completion to support credit transfer and facilitate labour market currency. The government will engage with providers and employers closely to ensure transcripts are fit for purpose.

These measures will support learners building up or “stacking” modules on pathways to full qualifications across their lives, while also giving them something tangible for individual modules. The government is considering ways to help facilitate a more streamlined user journey and the role of the Personal Account to help learners navigate the new modular system.

### Higher Technical Qualifications

In the **HE Reform consultation** the government proposed three options for **how modularity could be achieved within HTQs**. It also explored how these approaches would align or conflict with OfS and/or university requirements, what other approaches might be considered and whether any changes should be applied to qualifications already approved as HTQs. As these proposals are relevant to the LLE design, we are providing the government response and the analysis of the responses to these in this document. This will be replicated in the full government response to the HE Reform consultation<sup>1</sup> in due course, with additional detail at that time if necessary.

The Government has considered consultation responses to the HTQ proposals, and explored this further through stakeholder roundtables. HTQs are already approved by IfATE against employer-led occupational standards. This ensures sufficient coverage and assessment of the knowledge, skills and behaviours that are needed for an occupation and that employers require and so it will not be necessary to introduce additional requirements with respect to the modularisation of these approved HTQs. Qualifications submitted for approval are also required to provide evidence of employer collaboration in their development and plans for future employer reviews.

With very few exceptions, HTQs are already modular by design and credit bearing. Modules of HTQs should be particularly attractive to those who may need to upskill in a particular area without the immediate need for a full course of study. To build on this and further support flexible study, the government will ask IfATE to refine the HTQ approval process in accordance with the following in readiness for the introduction of the LLE from AY25/26:

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<sup>1</sup> <https://www.gov.uk/government/consultations/higher-education-policy-statement-and-reform>

- To be approved as an HTQ, a qualification should be modular in design and have a credit value assigned to the modules, unless, by exception, there are good reasons why a modular design is not appropriate in individual cases.
- As with other modules, to be eligible for modular funding under the LLE an HTQ module must be assessed and provided with a standardised transcript on completion to facilitate labour market currency or progression to the full HTQ qualification, and support credit transfer.
- Alignment with this refined process will not be applied to existing HTQs until the point at which the qualification, or the occupational standard is reviewed, whichever is earlier.

## Supporting quality

*“Modularisation raises complexities with regards to continuation, completion and progression. In addition, the challenges each learning establishment face, with the need to be flexible, to accommodate the individual modules selected by students.*

*Respectively, these same challenges, are applied to quality assurance processes/regulation.” (Greater Manchester College Group)*

*A simplified system would benefit everyone but it needs to be robust. We think giving responsibility to the Office for Students for overseeing the LLE is crucial.” (Linking London, hosted by Birkbeck, University of London)*

The government will:

- **Unify the regulatory system for providers at levels 4 to 6** offering LLE funded provision, with a requirement for registration with the OfS – so that there is consistent oversight of providers accessing a streamlined funding system.
- Ask the OfS to introduce **a third registration category** to suit the needs of providers who are not currently on the OfS register and have typically offered ALL provision, the details of which OfS will consult on shortly.

### Regulatory approach for providers

The government is committed to ensuring robust controls on access to public funding. As the LLE will be the single mechanism to provide finance to learners at levels 4 to 6, we want to ensure consistent oversight and regulation of providers, and work towards regulatory convergence.

The government has asked the OfS to progress work to develop a new, **permanent third registration category for the start of AY25/26**. We want to ensure that providers currently delivering ALL-funded provision and not currently OfS registered have sufficient time to engage and help shape the arrangements for that new category. We are asking the OfS to consult on introducing this new category, including the initial and ongoing conditions that would be applicable. We have asked the OfS to ensure that the obligations imposed by the registration conditions are appropriate to the benefits of registration. This will be based on the following:

- Initial conditions for AY25/26 – a streamlined and proportionate approach for non-OfS registered providers with ALLs funding agreements that draws on existing evidence supplied to DfE, the Education and Skills Funding Agency (ESFA) and/or the Office for Standards in Education, Children’s Services and Skills (Ofsted).
- Ongoing conditions of registration – a proportionate approach that is appropriate for the providers registered in the new third category from AY27/28 onwards, and a transition period during AY25/26 and AY26/27 that continues to draw on the existing accountability arrangements in place for these providers. This will support the transition and ensure there is time for providers to engage, familiarise and understand the OfS’s requirements, before any ongoing conditions are in force for providers registered in the third category.

### Regulatory measures for modules

The government has also considered how to adapt existing regulatory measures to accommodate the introduction of funding for modules. We want to avoid placing undue burden on providers wishing to offer modular learning, whilst ensuring learners access high quality learning experiences for shorter periods of study.

To do this, we recognise the importance of creating outcomes metrics for modular study which build upon the existing course metrics and outcomes data available where possible. The OfS has previously announced<sup>2</sup> that it will begin engaging with the sector in summer 2023 on developing student outcome measures for modular provision, including considering how to measure completion, employment outcomes and progression to further study.

Overall, the Government does not anticipate that further primary legislation will be required to implement the changes set out above in relation to supporting quality.

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<sup>2</sup> Consultation on new approach to regulating student outcomes: Analysis of Response ([officeforstudents.org.uk](https://officeforstudents.org.uk))

## Maintenance and targeted grants

*“Maintenance support is important as part of the LLE as older learners may incur extra costs such as childcare as part of their training.” (Birkbeck, University of London)*

*“All students should be eligible for maintenance support if they need it, and should have access to meaningful funding covering realistic basic living costs.” (Association of Managers of Student Services in Higher Education)*

The government will:

- Offer loans for living costs and targeted grants for all designated courses and modules. The new budget for targeted grants will be agreed and set out at the next Spending Review, alongside further detail on the entitlements.
- Continue to take account of information that providers and learners already provide to determine the maintenance calculation for courses and modules.

The government recognises the importance of loans for living costs and targeted grants for learners with child and adult dependants and for learners with disabilities. We believe that loans and grants should continue to be available to support access and participation in learning leading to positive outcomes. We are building towards this by putting the HESF package for HTQs on a par with degrees from AY23/24, including access to part-time maintenance loans.

To support flexible access, we will expand maintenance **loans for living costs and targeted grants**, making these available in respect of all designated courses and modules under the LLE, including those currently funded by ALLs and those studied part-time. The new budget for this will be confirmed at the next Spending Review, alongside further details of the entitlements – including qualifying conditions and thresholds for intensity and duration of study. Entitlements under the current system may be reviewed in some areas to ensure an expanded system remains affordable. As per the current system, distance learning courses will continue to be out of scope of maintenance support, but the government’s intention is that the existing exemptions will roll over.

Respondents to the consultation felt that maintenance support should take into account a learner’s personal circumstances rather than just the length of time they are studying. The government is clear that maintenance support should be reflective of time in study, representing a contribution towards living costs where learners’ ability to earn is reduced and there are greater costs as a result of study, as well as taking into account personal circumstances that impact their needs.

For this reason, the maintenance calculation will continue to take account of weeks of study, course credit value, household income and location of study. Further details as to how the calculation will work will be provided prior to the launch of LLE in AY25/26.

## **Fee limits**

*“We agree that there should be a consistent way to extend fee limits to provision under the LLE. In doing so the cost of studying in a modular way should be proportionate to traditional study.” (Universities UK)*

*“Tuition fee limits for all courses should be based on the number of credits of study involved regardless of whether they are full-time courses, part-time courses, or modular courses.” (The Open University)*

*“The HE sector and the majority of providers have for many years had a common understanding of credit.” (Birkbeck, University of London)*

The government:

- Will use credits to set fee limits, as previously announced.
- Is introducing legislation, through the Lifelong Learning (Higher Education Fee Limits) Bill for new powers to set fee limits on a consistent basis for modules and full courses.

The government has already indicated that it would take forward measures to enable the **application of fee limits** in a consistent way across provision in the LLE, including modules. Drawing on the responses from the consultation, the government has decided that **credits will be used** to determine fee limits (and fee loan funding) for both courses and modules, as recommended by the Augar Panel. This means that the loan amounts for the ALL-funded courses transferred into the LLE will be calculated on a cost per credit basis going forward. Higher limits to total loan funding may apply where they do currently in exceptional circumstances.

However, in line with responses, providers will continue to have full autonomy over whether or not to modularise any given course or whether to make it credit bearing. The Lifelong Learning (Higher Education Fee Limits) Bill, which was introduced on 1 February 2023, will enable the Secretary of State to determine a default number of credits applicable to courses which are not credit bearing.

Additionally, the government agrees that it will be beneficial to retain the ability to set fee limits based on fixed annual financial amounts per course year, as at present. The Lifelong Learning (Higher Education Fee Limits) Bill includes provisions enabling fee limits to be set on both an annual and per-credit basis. The government will set out further detail in regulations as to how to determine which courses use which system and what the fee limits will be for all qualifying courses and modules.

Through changes to the Higher Education and Research Act 2017 (HERA) introduced by the Bill, the Secretary of State will be able to:

- set fee limits according to the number of credits in a course year;
- set maximum chargeable credits per course year, for fee limit purposes;
- set limits on the cost-per-credit of courses and modules; and
- determine when the fee limit should be set per-year instead of per-credit.

## Credit transfer

*“The shared principles of credit within UK higher education mean that credit arrangements at other providers are well understood and accepted.” (Arts University Bournemouth)*

*“Credit transfer and recognition is an important element of a flexible and responsive education system that can meet the needs of students and employers...Providers should be encouraged to facilitate recognition of modular credit, while accepting that this may not always be appropriate for the most integrated programmes. We should draw from existing systems that facilitate credit transfer...” (Universities UK)*

The government will not impose credit transfer arrangements, but instead seek to facilitate credit transfer through other methods including through introducing the requirement for providers to provide a standardised transcript on completion of modules, and through information, advice and guidance and Personal Account functionalities where possible.

The consultation responses indicated strong support for agreed mechanisms to facilitate credit transfer.

The government recognises that having clear **credit transfer mechanisms** in place could be a positive contributor to delivering the beneficial flexibility that the LLE seeks to achieve.

The government was always clear that it would seek to facilitate credit transfer, not impose it. However, as set out above, the government intends to introduce the requirement for providers to give **standardised transcripts** to learners on completion of their modules in order for them to be designated for LLE funding. Stakeholder engagement indicated that this mechanism would support effective credit transfer. The government will also consider how the Personal Account can facilitate this activity through behavioural nudges.

The government will continue to consider the mechanisms necessary to further facilitate and stimulate credit transfer, informed by responses to this consultation and continuous stakeholder engagement. The government is considering whether to maintain a record of achievement to facilitate credit transfer and is considering the role and design of the LLE **Personal Account** within this.

The government wants to ensure that student funding policy continues to operate coherently across the UK while seeking to realise the opportunities that the LLE presents to improve further and higher education delivery and funding. It recognises that having clear credit transfer methods in place could be a positive contributor to delivering the beneficial flexibility that the LLE seeks to achieve. We will continue to work closely with the Devolved Administrations to seek to achieve this flexibility, deliver LLE and maintain a coherent student funding policy across the UK.

## **Repayments**

The Government will:

- Provide that the repayment terms and conditions for LLE-funded courses and modules taken outside of a full course will be repaid under Plan 5 terms and conditions. Loans taken out prior to the LLE will be repaid under the terms and conditions that apply to those loans in the relevant regulations.
- Ensure that cancellation of loans for modules will be treated in the same way as loans for full courses and qualifications.

The government has committed to making the student finance system fairer for learners and taxpayers. As announced in February 2022, for all new courses starting from 1 August 2023 onwards, student loans will be issued on new 'Plan 5' terms and conditions<sup>3</sup>.

Plan 5 loan borrowers will benefit from a reduction in interest rates to the Retail Price Index only. This means that, under the new terms, borrowers will not repay more than they originally borrowed over the lifetime of their loans when adjusted for inflation. Graduates who earn less than the repayment threshold (which will be £25,000 for Plan 5 loans in financial year 2026-27) will not be required to make any repayments at all. And at the end of the loan term (40 years for Plan 5) any outstanding loan debt, including interest accrued, will be written off at no detriment to individual borrowers. No commercial loans offer this level of protection.

The government wants to ensure that the LLE provides value for money to learners, the education sector, and the taxpayer. Therefore, under the LLE, write-off of loans for modules will be treated in the same way as loans for full courses and qualifications, ensuring that learners are not disincentivised from these types of study. The statutory repayment due date for each loan (or a bundle of loans where multiple loans are taken out for the same course) will be set at the April after completion of, or withdrawal from, a full course, or module when taken outside of a full course. The existing system for determining the statutory repayment due date for loans for part-time study will continue to apply.

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<sup>3</sup> <https://www.gov.uk/repaying-your-student-loan/which-repayment-plan-you-are-on>



## Personal account

*“A portal containing all course information, including credit values, and learners’ achievements would be necessary to confirm any prior credit achievement.” (Liverpool Hope University)*

*“IAG and clear communications will be crucial to support learners and providers especially during the first few years of the implementation of LLE.” (Association of Colleges)*

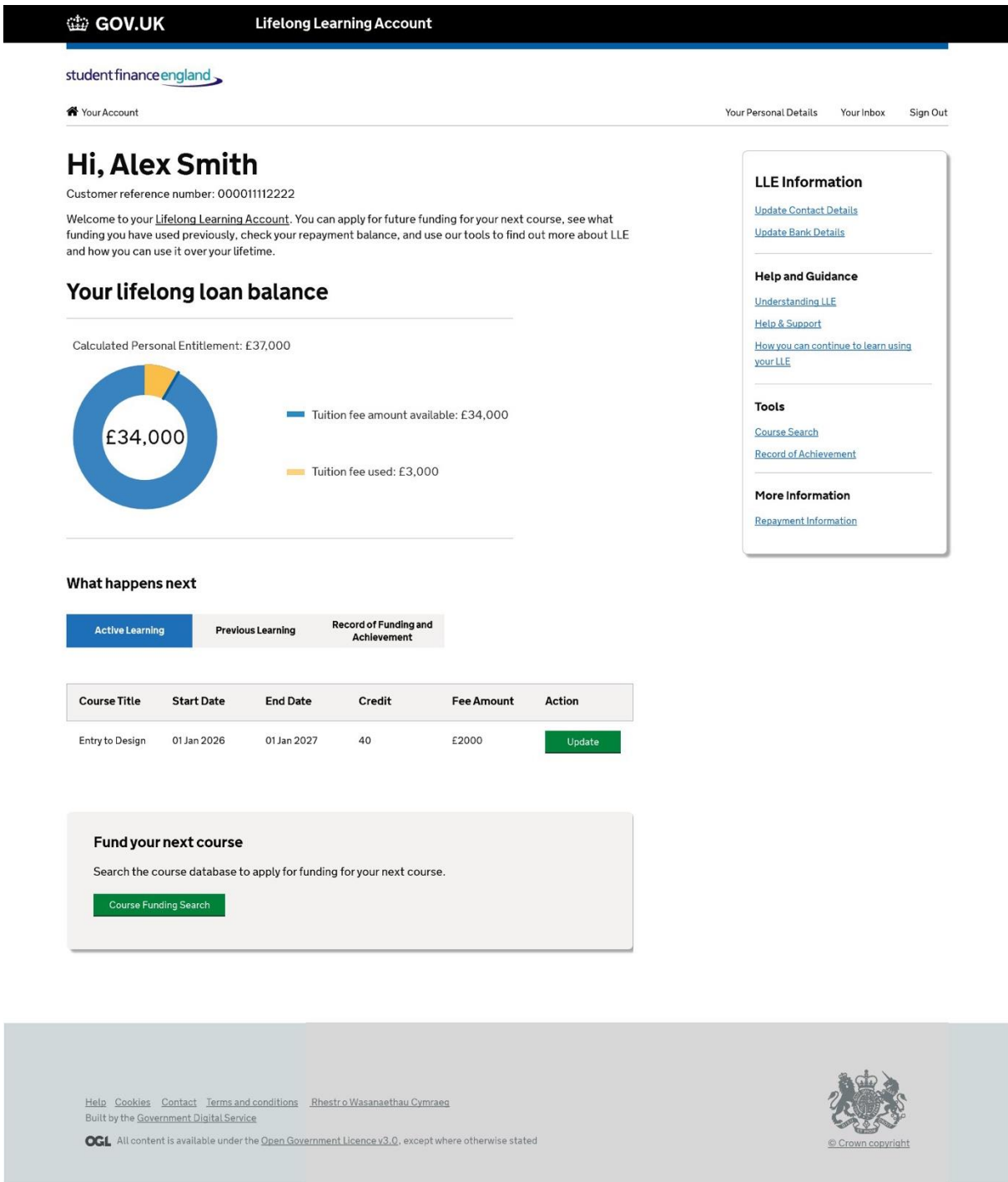
*“Uptake and use of the LLE by adult learners and its success will hinge on the provision of high quality and timely information, advice and guidance to learners so that they make the right study choices and use the funds to best effect.” (Birmingham City University)*

The government will:

- Provide a personal account to support learners in their application for loan funding, to help them understand how they are spending their entitlement and to inform their learning choice.

The government wants to ensure that people can easily navigate options about what to study and how to fund it and therefore key to the LLE will be the introduction of a **personal account**. This account will allow learners to see their loan entitlement, access information on their repayment balance, receive clear signposting of the courses and modules they can use their entitlement on, and have access to information and resources to help them make informed choices on how they spend this entitlement.

Like a bank account, their personal account will show their indicative loan “balance” and allow them to apply for the loans and grants for fees, maintenance, and additional support that their chosen form of study attracts. Through their account, learners will be able to see all the designated courses and modules they can use their loan balance on, and access information and services to help them decide what the right course or module is for them to propel themselves into learning and further their career aspirations.



**Figure 1. Example of a personal account for a learner accessing their LLE**

The diagram presents a draft visual representation of how the personal account could look for a learner who is accessing their LLE. The account will clearly outline the individual’s entitlement, how much entitlement they have used and how much entitlement they have available. The visual illustrates that a learner can search the SLC course database and then apply for funding for their chosen level 4 to 6 course. It also highlights LLE Information, and Help and Guidance sources which may be available to support the learner in using their account. How the account looks and its wider functionality, such as the ability to record a learner’s record of achievement, will be subject to extensive user research and testing, making sure that the account is user friendly and simple to use.

The consultation responses clearly indicated the need for learners to be provided with coherent and accessible information to make informed choices about their learning journey. The government is exploring how to design the personal account to link to **Information, Advice and Guidance support (IAG)**, considering provider needs and mindful not to duplicate existing information and/or other systems. These systems and other mechanisms under consideration will ensure that learners have a high quality learning experience and can build up their study towards a full qualification.

The government will also consider whether and how the personal account might best use other existing resources to present relevant information about available courses and pathways to learners.

## **Alternative student finance**

*“As the LLE is still a loan, this is likely to deter some people who have faith considerations unless an alternative product is available that is Shariah compliant.”  
(National Association of Student Money Advisers)*

The government remains committed to delivering an Alternative Student Finance (ASF) product. However, this will not be delivered at LLE launch in AY25/26.

The Government understands the concerns held by some Muslim students and their families about student finance and is pleased to confirm that we remain committed to delivering a Shariah-compliant alternative student finance (ASF) product. We want all learners with the potential to benefit from a higher education to be able to do so.

The Government is procuring advice from experts in Islamic finance and will be working with the Student Loans Company (SLC) to better understand timescales for delivery of an ASF product under the LLE. Our aim is that students will be able to access ASF as part of the LLE as soon as possible after 2025. An update on ASF will be provided by late 2023.

The Government will further continue to undertake significant engagement ahead of implementation of the LLE to ensure that solutions are evidence-based and directly address the barriers faced by a diverse cohort of students. As part of the ASF delivery project, we will undertake a Shariah certification process in line with Islamic finance industry norms.

## Next Steps

1. Ongoing sector engagement has been and will continue to be an integral part of delivering the transformation of student finance that the government aims to achieve.

Beyond this consultation response, the government is aware of the need for clear and comprehensive IAG and we will work with key organisations and delivery partners, such as the SLC, to support providers in implementing changes, learners in making informed decisions, and employers in recognising the value of the LLE.

This IAG will be supported by extensive stakeholder engagement, targeted communications, and promotion to potential future learners and others, ensuring the right information is communicated at the right points to aid delivery of the LLE.

2. Following the publication of this consultation response, the Government will publish further detail in Autumn 2023 on: **courses eligible for additional entitlement**; and the principles for the calculation of **residual entitlement**.
3. The government will also work with providers of **Advanced Learner Loans (ALLs)** to embed the changes proposed here.
  - a. For qualifications:
    - i. In December 2023, there will be a review of those ALL-funded qualifications which have been funded for the past three consecutive years. The outcome of that review will be announced in early 2024. For those ALL-funded courses, Awarding Organisations will need to provide evidence that they meet two additional requirements by 31 March 2024.
    - ii. Any new qualifications submitted by AOs between January-April 2024 will also need to meet these criteria.
    - iii. A moratorium will then be introduced from 1 April 2024 on any new qualifications coming forward for ALL funding to ensure stability of the offer.
    - iv. We will announce details of the post-moratorium gateway for new qualifications by January 2024.
  - b. For modules:
    - i. The government will be in contact with AOs in early 2024 to notify them of the criteria, process and evidence required to approve ALL modules, for applications for LLE funding to be submitted between April 2024 - May 2024. Outcomes of the process will be communicated no later than the end of July 2024.
    - ii. Wider expansion of modular funding will be opened up for AY27/28. The government will launch a technical consultation on this next year.
4. The Office for Students (OfS) will consult on the development and introduction of a new third registration category, to enable providers to engage and shape the arrangements. This consultation will be published in due course.
5. An update on ASF will be provided by late 2023.

# Analysis of the LLE Consultation Questions

This section provides a breakdown of the responses received for each LLE consultation question.

## Theme 1: LLE Ambition (questions 1-7)

In this section we asked for views on how to improve the current student finance system, the barriers of accessing the LLE, what IAG is needed to support learners, how to ensure the LLE supports FE and HE providers to create provision that closes the skills gap, and how we can best achieve value through flexible provision.

### Question 1

**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?**

Respondent group	Number of responses	% of responses for this question
Individual	79	33.3%
Organisation	155	65.4%
Not selected	3	1.3%

**Table 1**

Respondents noted that the limit of 4-years' worth of funding may not cover a learner's aspirational journey and that learners should be able to gain skills that are needed both locally and nationally. Respondents noted that the relaxation of ELQ policy, along with providers recognising learner study across multiple pathways, and modular-based courses over a period of time could create the flexibility needed to remove some of the barriers to learning.

Respondents raised the need for clear information that is easily accessible and broad enough to allow learners to make informed choices regarding their learning, while providing specific detail on qualification level, course pathway, potential outcomes/future opportunities, and the terms and conditions of available loans.

Respondents noted that whilst the LLE would create a much more streamlined funding system, there should be consideration of making funding accessible to all providers, providing access to LLE funding for postgraduate qualifications and to ensuring accessibility to maintenance loans and to Sharia-compliant loans.

It was also noted that strong employer and provider relationships was key to helping employers create a skilled workforce and supporting providers to understand both the demand and specific training needs of employers.

## Question 2

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

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses for this question</b>
Individual	73	32.3%
Organisation	151	66.8%
Not selected	2	0.9%

**Table 2**

Respondents felt that the key barriers would be: the time required to develop and deliver modular courses; employers' support to give learners the study time; and current ELQ requirements.

Other barriers noted were debt aversion, lack of clarity over learning pathways, digital inequality, and lack of alternative student finance. It was felt that the LLE would need to support learners to make informed decisions, to understand interest rates for example, as well as on the pathway and qualification they have selected. The LLE would also need to consider those with no or little access to digital commodities, and those whose religious beliefs prevent them from taking out loans with interest.

## Question 3

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

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses for this question</b>
Individual	55	27.5%
Organisation	144	72.0%
Not selected	1	0.5%

**Table 3**

Most respondents commented that the LLE account should be designed simply with clear and readily accessible information, mindful of those with limited or no digital access. The LLE account should include learners' previous courses and history, current course enrollment (including potential course outcome), learning pathway and signposting to other available courses. Many respondents also commented that the LLE account should include impartial IAG.

## Question 4

**How can we best ensure that the LLE will enable learners to access technical as well as academic courses at levels 4 to 6?**

Respondent group	Number of responses	% of responses for this question
Individual	53	28.7%
Organisation	131	70.8%
Not selected	1	0.5%

Table 4

Respondents felt that the LLE should provide clear pathways to bridge the divide between academic and technical routes, with a wide range of training and qualification options to support learners' aspirations. Providers should also reflect regional or national demands, and the quality of the LLE courses should be obtained through accreditation and appropriate bodies. Clear guidance for both providers and learners would also be needed to understand how a course would be defined and credits transferred.

However, it was noted that defining the options as 'technical' or 'academic' failed to recognise the employment value that each may have.

## Question 5A

**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?**

Respondent group	Number of responses	% of responses for this question
Individual	50	26.8%
Organisation	136	72.7%
Not selected	1	0.5%

Table 5A

Respondents agreed that skills gaps are most effectively captured at regional level through consultation with employers, and that developing a clear picture of the skills gaps should draw upon existing knowledge captured within Local Skills Improvement Plans (LSIPs) and Local Enterprise Partnership (LEP) schemes as well as the Unit for Future Skills.

There was support for national research into skills gaps within industry, in consultation with employers and learners. This research could support FE and HE providers to develop relevant courses to close skills gaps, and approaches for fair access to the LLE for those from under-represented backgrounds.

Many respondents noted that the LLE would need to be flexible to learners' needs, both in terms of qualifications and learning pathways, taking account of multiple intakes of learners throughout the academic year. Respondents also raised that the ability to move between pathways would need to be underpinned by clear definitions, rules, and criteria for how qualifications and credits can be transferred between providers, with providers working collaboratively together to support this.



Some respondents suggested the creation of new smaller qualifications to increase flexibility and maintain learners' motivation.

## Question 5B

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

Respondent group	Number of responses	% of responses received for this question
Individual	43	24.4%
Organisation	132	75.0%
Not selected	1	0.6%

**Table 5B**

It was noted that although collaboration between FE and HE providers already occurs, local skills gap data should be used to jointly develop provision of relevant courses.

Some respondents noted the importance of the use of incentives to support collaboration and avoid unhealthy competition between FE and HE providers and employers. Both regulators and funders should also be mindful of barriers that may stifle innovation or the flexibility for partners working together.

Additional suggestions centred on drawing together external partners with FE and HE with respondents specifically mentioning Employer Representative Bodies (ERBs), Local Enterprise Partnerships (LEPs) and Industry watchdogs/representative groups.

## Question 5C

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	45	25.4%
Organisation	131	74.0%
Not selected	1	0.6%

**Table 5C**

Many respondents commented on the need to use pilot studies to investigate the breadth of issues associated with setting up and maintaining the LLE. Specific examples of where the respondents saw value in the use of pilot studies included: assessing local demand and need for courses, investigating how learners could access information about the LLE and specific courses.

It was felt that, ultimately, the DfE should focus on ensuring the LLE was sustainable for providers.

## Question 5D

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

Respondent group	Number of responses	% of responses received for this question
Individual	39	23.1%
Organisation	129	76.3%
Not selected	1	0.6%

**Table 5D**

Respondents commented that an efficient mechanism for credit transfer would be needed to facilitate learners to access modules across different pathways and providers. They considered it important to develop a credit framework with clear guidelines in order to facilitate the LLE, but recognising the currently limited learner transfer, and that true demand for credit transfer is currently unknown.

A number of responses suggested that whilst providers can ensure that modules build up to clear exit qualifications, the LLE should not require all qualifications to be studied in modular fashion.

Other suggestions included:

- IAG to support learners in making informed decisions about the modules they chose to study.
- Clear explanation of pathways and outcome to ensure learners understand what qualification they could achieve.
- Where appropriate, alignment of courses to professional standards.

## Question 6

**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.**

Respondent group	Number of responses	% of responses received for this question
Individual	61	31.3%
Organisation	133	68.2%
Not selected	1	0.5%

**Table 6**

It was recognised that the LLE could have a positive impact on certain groups of people such as carers, those from deprived backgrounds as well as those with certain protected characteristics, by giving them the flexibility they need to undertake learning to achieve higher level qualifications. However, an increase in modular provision could also lead to a reduction in wrap-around support. Providers would need to adapt their practice to

continue to be able to meet learner's needs and support them through their study in a more responsive way, but this would likely increase providers' cost.

The majority of respondents highlighted the need for readily accessible marketing, IAG and communications, as well as the ability to accurately monitor learners' studies, pathways and outcomes to understand the LLE cohort.

## Question 7

**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 (ASF) product for students whose faith has resulted in concerns about traditional loans.**

During the consultation analysis it became evident that a large number of responses to this question provided identical or very similar answers. A single representative example of the identical responses was retained, as shown below, the text in square brackets has been added for clarity.

*"6,042 potential Muslim students per annum choose to forgo a university education entirely due to lack of ASF. 6,933 students (15.5% of annual intake<sup>4</sup> [of Muslim students]) self-fund their education due to lack of ASF. Of the 36,230 students (81% of annual intake [of Muslim students]) who use conventional finance to fund university tuition fees per year, 29,708 students (82% of loan recipients) feel scripturally conflicted. 71% of annual total [of Muslim students] (31,757 students) feel discriminated against by lack of availability of ASF."* Similar responses to that outlined above, which had been altered to include personal opinions were retained within the analysis. After taking into account the identical responses, 851 (68%) unique stakeholder responses were available for analysis, as outlined in Table 7.

Respondent group	Number of responses	% of responses received for this question
Individual	626	73.6%
Organisation	122	14.3%
Not selected	103	12.1%

Table 7

A common theme was the ability to access finance which is interest free in order to encourage those for whom accessing loans that attract interest goes against their religious beliefs.

Some respondents also noted that short courses may not allow sufficient time to identify and put in place wrap-around support for those needing it – for example literacy, numeracy, mental health and wellbeing as well as careers advice - which could ultimately impact upon student outcomes.

The Government response to this issue is addressed on page 25 within the Full Government Response section.

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<sup>4</sup> 'Annual intake' refers to the total number of new undergraduate entrants to university per year.

## Theme 2: Scope of the LLE (questions 8-31)

In this section we asked for views on what type of course should be eligible for funding, how to implement modularity into the system, the parameters of funding entitlement, and what type of maintenance offer learners should have access to.

### Question 8

**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?**

Respondent group	Number of responses	% of responses received for this group
Individual	55	29.7%
Organisation	128	69.2%
Not selected	2	1.1%

Table 8

The majority of respondents agreed that all level 4 to 6 courses which are currently designated for HESF funding should automatically be in scope for the LLE. Some respondents suggested a removal or relaxation of current ELQ restrictions to support learners who are upskilling / retraining into a new career.

Some respondents noted the LLE needs to ensure that new courses meet an appropriate standard e.g., that set by the OfS, Professional Statutory Regulatory Bodies (PSRBs) or professional standards framework.

### Question 9

**Should a foundation year integrated into a degree course, Postgraduate Certificate in Education (PGCEs), and integrated Masters (IM) be incorporated into the LLE, under the same repayment terms as other provision.**

**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)**

Respondent group	Number of responses	% of responses received for this question
Individual	45	25.9%
Organisation	127	73.0%
Not selected	2	1.1%

Table 9

The overall responses suggested that the courses included in the question are important in their own right and should be funded, whether within the LLE or through another system. Many respondents suggested that it would be better to incorporate these into the LLE to avoid making the funding system overly complicated.

Some respondents commented that the stated LLE's four-year fee entitlement could potentially limit learners accessing courses such as PGCEs and Integrated Masters (IM). For example, a learner who undertook a foundation year and then a three-year course may not have sufficient funding within the LLE to complete a PGCE. Equally, completing an IM course would use up an entire entitlement. To address this, many respondents suggested that graduates should be able to access some form of funding opportunities. This would support the LLE ambition to enable learners to upskill throughout their working career.

*Foundation year (FY)* - Respondents highlighted the importance of FY in widening access to learning. Some respondents believed FY should be included for simplicity, whilst others felt that since FY is a level 3 qualification it should not be included within the LLE. Some respondents noted that a FY and three-year degree would use up the proposed four-year entitlement. As such, a few respondents suggested alternative funding mechanisms for FY which would not impact the LLE entitlement.

*Integrated Masters (IM)* - The responses for incorporating IMs into the LLE were mostly positive, suggesting this would create a simple process that could be easily accessed. Respondents also reported that some level 6 modules can be counted towards a level 7 qualification, therefore, not including level 7 modules in the LLE could be confusing for providers. On the other hand, it was felt that if the LLE was to include IMs it could be perceived as unfair for those who have not chosen the IM route. A further downside of having IMs in the LLE was felt to be that learners would not be able to do a placement year or repeat a year, even if they have compelling personal reasons, as they will have used their full entitlement on the IM.

*PGCE* - Some of the responses suggested that PGCEs should be incorporated into the LLE. Others repeated concerns that the inclusion could limit the PGCE course to those whose undergraduate degree was only three years. As such, those who studied a FY or IM course would be prevented from taking a PGCE if it were included within the LLE and those who studied a three-year course and then a PGCE would have no remaining LLE entitlement.

## Question 10

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	47	28.1%
Organisation	119	71.3%
Not selected	1	0.6%

Table 10

The majority of responses supported the inclusion of courses which are longer than four years in the LLE, but with increased duration to cover the whole length of the course.

Respondents noted that this approach would facilitate and widen access and that setting a limit of four years would impact learners who cannot self-fund the remaining time of their studies.

A few respondents provided additional suggestions for courses over four years including:

- A removal or reduction in the interest on loans taken out after the fourth year.
- Using LLE funding for four years and alternative government funding for the remaining time (e.g. a bursary or not counting placements years within the LLE entitlement).

## Question 11

**We are proposing that all Higher Technical Qualifications (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.**

Respondent group	Number of responses	% of responses received for this question
Individual	27	18.5%
Organisation	118	80.8%
Not selected	1	0.7%

**Table 11**

Many respondents to this question only provided input as to HTQs being in scope of the LLE. Whilst some responses noted alternative routes for ALL-funded courses, not all provided detail on why alternative paths should be included nor gave detail on the process and eligibility criteria required in an alternative route to solely using HTQs.

The majority of the respondents felt that all HTQs should be included in the LLE, but they did not think that being approved as an HTQ should be the sole route for eligibility for the LLE. The main reason was the potential loss/discontinuity of alternative level 4/5 courses which are both valued and in demand.

There was a minority of respondents who specifically stated that HTQs should be the only route for qualifications that are ALL-funded. This was given within the context that such a move would simplify the funding route.

Of those responses which highlighted alternative pathways, the most commonly cited were Access to Higher Education courses and HNCs. The reason for continuing to include these courses was to increase access to learning. A minority also noted that some courses, such as vocation or arts-based courses should also be included as a pathway. This was given within the context that such courses may not be considered as an HTQ.

## Question 12

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

Respondent group	Number of responses	% of responses received for this question
Individual	23	16.4%
Organisation	116	82.9%
Not selected	1	0.7%

Table 12

The majority of respondents did not think that employer-relevance should be the basis for LLE eligibility. Many respondents commented that the LLE should be designed to support a learner, and that the learner should have free choice over skills/knowledge they wish to gain. Some respondents also raised concerns that including employer relevance in the LLE could lead to short term focus on what skills and courses are required.

However, suggestions on how employer relevance could be tested centred on the use of existing accreditation pathways and employer endorsement. Some respondents commented that employer relevance could be achieved using existing validation and accreditation processes. This included the use of: PSRBs and their professional standards and working with plans/bodies in a local area (e.g. LEPs, LSIPs, FE/HE partnerships). A minority of respondents thought employer endorsement could be used. Engaging employers in the design and testing of LLE courses would help both providers and employers understand the relevance of a course and determine if the course outcomes meet their needs.

## Question 13

**We are aware that some courses (e.g., medical degree courses, some ALL-funded 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?**

Respondent group	Number of responses	% of responses received for this question
Individual	34	23.6%
Organisation	109	75.7%
Not selected	1	0.7%

Table 13

Many respondents acknowledged that not all courses can be delivered through credit-based modules, but a few respondents said that non-credit based courses can create complexity for learners wishing to transfer to an alternative course.

For those courses which cannot be easily translated into modular courses (such as medicine) the reasons given for not becoming modular centred on the currency and consolidation of knowledge as well as the ability of providers to plan workflows for professional student placements.

A few respondents commented that the LLE could focus on short courses and not extended studies which require consolidation of knowledge (such as medicine or architecture). The majority of respondents expressed the view that courses which are not structured around credit-based modules should continue to be funded.

## Question 14

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	28	18.4%
Organisation	123	80.9%
Not selected	1	0.7%

Table 14

Those respondents who agreed with a 30 credits limit per funding application - which could be achieved through undertaking two or more courses - argued that this would provide economies of scale necessary to deliver modular courses as well as sufficient amount of learning for learners.

Of the wide range of reasons given for not having a 30-credit limit per funding application, the majority centred around (1) limitations to learners, and (2) limitation on providers.

However, other respondents noted that setting a 30 credits limit – which is equivalent to around 3 months full time study – would be a significant time commitment for learners, which could be a barrier for learners.

A few providers also commented that setting a limit of 30 credits could limit providers’ ability to offer micro-courses and reduce their ability to flexibly meet the demand for skills training

## Question 15

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	19	15.1%
Organisation	106	84.1%
Not selected	1	0.8%

Table 15



The majority of responses received repeated some of the early discussion from Question 13 on courses which cannot easily be taught on a modular basis.

The overarching view was that yearly funding is most applicable to courses which do not follow a modular structure, and that providers should be best placed to decide this. Furthermore, learners should have a clear understanding of how courses are funded, and sufficient information should be available for them to access the funding for the course they want to study.

## Question 16

**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, Office of Qualifications and Examinations Regulation (Ofqual) credit conditions).**

Respondent group	Number of responses	% of responses received for this question
Individual	14	11.4%
Organisation	108	87.8%
Not selected	1	0.8%

Table 16

The majority of respondents who answered reported using either the OfS credit table or the Quality Assurance Agency (QAA) Higher Education Credit Framework, where 1 credit equals 10 national learning hours. It was also noted that some credit frameworks (e.g. QAA's) are also able to be recognised abroad.

Other specific frameworks mentioned by respondents include:

- Credit Accumulation and Transfer Scheme (CATS)
- National higher education qualification and credit frameworks
- Scottish Credit and Qualifications Framework (SCQF)
- Credit and Qualifications Framework for Wales (CQFW)
- Ofqual Conditions of Registration
- Engineering Construction Industry Training Board (ECITB)
- Qualification and Credit Framework qualifications (QCF)
- European Credit Transfer and Accumulation System (ECTS)

## Question 17

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

Respondent group	Number of responses	% of responses received for this question
Individual	12	10.4%
Organisation	102	88.7%
Not selected	1	0.9%

Table 17

Providers mainly reported complying with frameworks through regulatory guidance and regulations and using a range of processes. It was explained that frameworks are referenced at the point of course creation and are monitored over time, some of which include inspections e.g., by OfSTED.

Of all the examples for internal processes used, the most frequently cited was that of internal quality assurance.

## Question 18

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

Respondent group	Number of responses	% of responses received for this question
Individual	24	16.3%
Organisation	122	83.0%
Not selected	1	0.7%

**Table 18**

Only a minority of respondents directly addressed the potential impact of modular study on study mobility and those who felt that the LLE would have a positive impact on study mobility noted the need for an effective mechanism for credit transfer.

The many respondents who did not directly answer the question commented that an effective credit transfer mechanism would be needed to create flexibility for the learner to transfer between providers and pathways. Creating this flexibility should not only focus on geographical location. It was noted that moving locations for study may not be practical for all learners, but having the flexibility to transfer between providers could increase learners' flexibility to choose a certain delivery approach or level of qualification.

## Question 19

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

Respondent group	Number of responses	% of responses received for this question
Individual	24	18.3%
Organisation	105	80.2%
Not selected	2	1.5%

**Table 19**

Respondents commented that encouraging flexible learning across the UK would need an agreed mechanism for credit transfer and recognition of prior learning. Such a mechanism could draw upon existing frameworks. To support the transfer of credits, both providers and learners would need access to an agreed data set to enable accurate tracking of modules studied.

A few respondents mentioned funding as being important to encourage flexible learning, and that understanding a learner’s eligibility for finance would require clear guidelines on how to account for the differences in funding arrangements across the nations.

## Question 20

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

Respondent group	Number of responses	% of responses received for this question
Individual	70	34.5%
Organisation	131	64.5%
Not selected	2	1.0%

**Table 20**

Some respondents noted that a clear credit transfer mechanism would be needed to provide the flexibility for learners to transfer between providers and pathways.

The availability of courses should also allow for providers to respond to demands of a changing workforce. Engaging and working with employers to develop relevant courses would be important, but learner choice should be maintained to create a flexible LLE.

Some respondents noted that an ASF would be needed for learners whose religious beliefs may prevent them from taking out loans with interest.

Respondents also noted the need for clear IAG in a wide range of formats and with information supporting learners to make informed decisions on all aspects of their learning (courses and finance).

A minority of respondents stated that the LLE should ensure support for learners with specific needs (e.g., caring responsibilities or those with disabilities).

## Question 21

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	44	25.3%
Organisation	129	74.1%
Not selected	1	0.6%

**Table 21**

The majority of respondents felt that there should be no age limit on accessing the LLE. A wide range of reasons were given for this, including:

- That this would not comply with the Equality Act (2010)
- That placing an age restriction would go against the ‘lifelong’ claim
- That differences in personal circumstances mean individuals will want to access the LLE at different times in their lives.

A small minority of those respondents acknowledged that this could lead to retired individuals undertaking learning leading to skills that would not be used in employment.

The small minority of respondents in favour of setting an upper age limit suggested that a limit at pensionable age, or at an age which reasonably allows for the learner to repay the loans taken out. For a lower limit, 18 was proposed to give learners the flexibility to choose between training or a more traditional university-based route. It was noted by these respondents that accessing the LLE at a (relatively) young age could result in learners having no access to funds for training, retraining, and upskilling in the future.

## Question 22

**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.**

Respondent group	Number of responses	% of responses received for this question
Individual	40	23.8%
Organisation	127	75.6%
Not selected	1	0.6%

Table 22

Overall, there was a balanced number of respondents agreeing and disagreeing to the concept of funding only those taking modules that are derived from a full course. The views expressed were often within the context of the level of study and the intended outcome of the study being undertaken.

Respondents in support of a restriction noted that the requirement for a module to be part of a full course could support the student in understanding the pathway they are on, and the qualification that they are working towards, thus supporting learners achieving a qualification. It was understood that modules taken from accredited/designated courses can be assumed to be already regulated, and therefore it would reduce the burden of setting up and going through the process of regulating fresh courses.

Respondents opposed to a restriction felt that this may disadvantage learners who may not be studying to gain a qualification, but to increase their skill in a specific area. It was commented that placing a requirement for modules to be taken from full courses could reduce the flexibility of the LLE not only for learners, but also for providers who could not readily offer new courses.

## Question 23

**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?**

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses received for this question</b>
Individual	29	18.8%
Organisation	124	80.5%
Not selected	1	0.7%

**Table 23**

Many respondents felt that the LLE should focus on the learner and support their aspirations. Some respondents commented that the longer term needs of the learner may be different to the shorter-term skills requirements of their employer. A few respondents noted that learning can be undertaken for its own sake and that courses often deliver both generic skills as well as specific (industry related) skills.

Some respondents felt that engaging with employers could support providers in the designing and delivering of courses. Engaging with employers could also help the employers themselves develop their understanding of what skills and knowledge learners will gain from undertaking a course. Employers' understanding could also be achieved through PSRBs endorsement, accreditation against professional standards and referencing against employability skills.

Some respondents commented that IAG would be important for employers and learners to understand which courses would be applicable to help them meet their aspirations. It was noted that career services work with learners, providers, and employers and could support different aspects of the delivery of skills that employers need.

## Question 24

**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?**

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses received for this question</b>
Individual	26	16.9%
Organisation	126	82.4%
Not selected	1	0.7%

**Table 24**

The majority of respondents commented that there should be no restrictions on the use of the LLE, in order to encourage learning of all kinds, not necessarily that which is high value learning.

Some respondents noted that assuring the quality of a course could be achieved through current approaches and that high value learning is undertaken by the OfS.

A few respondents noted that defining training as high value could remove flexibility within the LLE as learners would not be able to undertake courses not considered to be of sufficient “value”.

## Question 25

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

Respondent group	Number of responses	% of responses received for this question
Individual	21	16.4%
Organisation	106	82.8%
Not selected	1	0.8%

**Table 25**

The majority of respondents felt that there should be as few restrictions on the LLE as possible. The view was that placing restrictions on the LLE could undermine its flexibility. Three main themes emerged:

- Restrictions on course types, whereby it was felt that employers should be prevented from pressuring employees to use their entitlements to fund training programmes which should be funded by employers.
- Removal of the ELQ rules, which were thought to be contrary to the flexibility intentions of the LLE.
- Currency of the course, where it was felt that some time restriction was needed for courses that can quickly lose their currency in the labour market (such as computing and engineering).

## Question 26

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

Respondent group	Number of responses	% of responses received for this question
Individual	56	30.9%
Organisation	123	68.0%
Not selected	2	1.1%

**Table 26**

The majority of the respondents were in agreement with provider-based bursaries. The two main reasons given for the use of bursaries were to:

- Support and encourage learners who have financial barriers.
- Encourage study in areas where there are identified skill gaps.

A minority of respondents commented on the need for financial parity in bursaries to prevent differentiation of a bursary offer between organisations.

## Question 27

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	41	24.6%
Organisation	125	74.9%
Not selected	1	0.5%

**Table 27**

Not all the responses answered the question of whether maintenance fees should be proportional. Some responses focused on the costs associated with providing part time courses. Those responses that did answer the question had a common theme that maintenance support should consider a learner's personal circumstances (such as reduced employment when studying part-time, caring responsibilities and costs associated with starting a course) rather than the length of time they are studying for. Such an approach could widen access to the LLE.

Other respondents highlighted that the costs associated with delivering modular courses was not always in direct proportion to the delivery of a full course. Specific examples included additional administrative burden and ensuring sufficient learner support is available, particularly for those returning to study.

Also noted by respondents was the varying costs of courses, such as those that use laboratories costing more to run than other courses. Respondents flagged that if funding were proportionally allocated, it could disincentivise providers from offering higher cost courses.

## Question 28

**Are there courses or circumstances for which maintenance should not be offered (e.g. where students are studying below a certain level of intensity)?**

Respondent group	Number of responses	% of responses received for this question
Individual	36	23.7%
Organisation	115	75.6%
Not selected	1	0.7%

**Table 28**

The majority of respondents suggested that maintenance support should be available to everyone, irrespective of their chosen course, study intensity (part-time or full-time), or personal circumstances. Such an approach could remove potential barriers and widen access to the LLE.

A minority of respondents suggested a minimum course requirement of 30 credits to access a maintenance loan.

## Question 29

**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?**

Respondent group	Number of responses	% of responses received for this question
Individual	32	20.5%
Organisation	123	78.8%
Not selected	1	0.7%

**Table 29**

Overall, the majority of respondents agreed that the means-tested elements should be reconceptualised with the most common approach cited being to test the learner's individual income, not a family income. Many respondents commented that adult learners in employment may have to reduce their working hours in order to study and may have caring commitments. A few respondents noted that such a change could also support learners who are estranged from their parents.

## Question 30

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

Respondent group	Number of responses	% of responses received for this question
Individual	31	19.5%
Organisation	127	79.9%
Not selected	1	0.6%

**Table 30**

The majority of respondents commented that maintenance support is key to providing equal and fair access for all learners to the LLE. It was noted that maintenance support will be of particular importance to those with caring responsibilities, or those who reduce their working hours to undertake study. A few respondents gave the view that maintenance support could be linked to other financial support systems, such as Universal Credit.

A minority of respondents mentioned that maintenance loans should be available to a limited extent, that it should be available at an equal weight to the course cost, and that it should be proportional to the duration and mode of study. Clear IAG would need to be available to learners due to finances playing a key role in learners' stability and mental health.



## Question 31

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?

Respondent group	Number of responses	% of responses received for this question
Individual	43	25.4%
Organisation	125	74.0%
Not selected	1	0.6%

Table 31

There was no support for variation of a maintenance offer by course type other than healthcare.

In contrast, respondents showed strong support for variation of the maintenance offer to reflect the learners' own circumstances. Many of the responses mirrored the characteristics stated within the questions (age, income, and caring responsibilities) as being key factors that should be taken into consideration. Additional factors raised as being important were:

- geographical location (e.g. London weighting);
- dependents (separated out from wider caring responsibilities);
- personal healthcare responsibilities.

The use of income to determine the level of maintenance offered gave the widest range of views. Some respondents felt that savings should be included (in addition to income) whilst others felt that a base level of maintenance should be offered to all regardless of income.

## Theme 3: Supporting Quality Provision and Flexible Learning (questions 32-48)

In this section we asked for views on what regulatory changes are required to introduce the LLE, any identifiable opportunities to simplify the current system, how we can support new innovative provision, what quality assessment and regulation of levels 4 and 5 could look like, and credit recognition and transfer.

## Question 32

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

Respondent group	Number of responses	% of responses received for this question
Individual	22	15.6%
Organisation	118	83.7%
Not selected	1	0.7%

Table 32

Two key themes emerged: reducing bureaucracy whilst maintaining quality, and assessment and transferring credits.

It was felt that the LLE should make use of existing regulatory and quality infrastructure to support the provision of high quality courses in order to prevent additional bureaucracy. It was noted that existing infrastructure already contains a robust set of quality criteria and that, as Higher Education Institutions (HEIs) are already regulated, the existing mechanisms for quality assurance should be used. Processes used to ensure quality for modular courses should be proportionate and consistent.

Respondents also felt that consideration should be given to how modules will be assessed and credits transferred, understanding the need to maintain quality. It was felt that by ensuring the LLE is financially sustainable, providers would be able to develop innovative courses and provide the support learners need.

It was noted that clarity would be needed on how credits will be accumulated and transferred between providers and courses. It was suggested that future guidance should draw upon current common practice and that it should help learners to tailor their learning, choosing modules at the appropriate level.

It was also noted that new courses would be required which would provide an opportunity to review how competencies are assessed. It was felt that the range of assessment methods of the current apprenticeship scheme could be learnt from, and that technology and automation could be used to support assessments in both vocational and academic subjects, removing the reliance on end of year exams.

### Question 33

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

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses received for this question</b>
Individual	17	12.7%
Organisation	116	86.6%
Not selected	1	0.7%

**Table 33**

Noting that one of the aims of the LLE is to enable learners to move between courses and providers, giving them a less linear route to gaining qualifications, respondents wanted clarity on who would be responsible for learners' outcomes when these have been achieved over multiple providers.

Many respondents noted that the current approach for measuring continuation and progression is not compatible with shorter or modular courses. For example, under the LLE, a learner may not complete a whole course, but stop once the learning objectives they require have been covered or take many years to gain the required number of credits for a degree.

It was suggested that learner outcomes could be measured through the use of longitudinal measures of course effectiveness, or greater use of student survey data on graduate outcomes.

## Question 34

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

Respondent group	Number of responses	% of responses received for this question
Individual	18	13.5%
Organisation	114	85.7%
Not selected	1	0.8%

Table 34

Respondents noted that the LLE should draw upon existing regulation and quality infrastructure. In addition to this view, respondents noted that a different approach to regulation would be needed to support the modular delivery of courses. It was felt that if the burden of delivering modular courses was to become too heavy, this would disincentivise providers. As such, it was felt that the quality regulation system developed for the LLE should minimise any burden on providers in terms of complexity and cost of delivery.

Some support was expressed for developing measures for modular learning that take into consideration the learners and courses being taken, for example if the course is being taken as a standalone course or as part of a wider qualification. Extending this, some respondents noted the need to have a representative measure for non-completion.

## Question 35

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

Respondent group	Number of responses	% of responses received for this question
Individual	15	11.6%
Organisation	113	87.6%
Not selected	1	0.8%

Table 35

Two approaches were outlined by broadly equal numbers of respondents: the alignment of reporting requirements between regulatory bodies or the creation of a single regulator. Some respondents noted that there was an opportunity to reduce providers reporting burden, for example by removing duplicate reporting or aligning the reporting requirements between existing regulatory bodies.

Other respondents commented that the regulatory regime could be simplified through the creation of a single regulator through the simplification and consolidation of the current regulatory system. This could also, it was noted, reduce the reporting burden on providers.

Conversely, other respondents highlighted the opportunity for the simplification and consolidation of the regulatory system to create a single tertiary system. It was felt that

this could remove the current overlap between different regulators and then, for example, reduce the burden of duplicate reporting requirements across different regulatory bodies.

### Question 36

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

Respondent group	Number of responses	% of responses received for this question
Individual	17	13.6%
Organisation	107	85.6%
Not selected	1	0.8%

**Table 36**

Many respondents stated that creating new and innovative courses would be challenging unless a supportive (and proportionate) regulatory environment was put in place and extensive piloting of the LLE was undertaken. A small number of respondents to this question noted that the FE/HE market is very competitive and as such is already innovative.

As reported in previous questions, respondents expressed concern that excessive regulation could stifle innovation by creating a risk averse environment in which novel courses are not created or run.

To identify the need for courses, respondents suggested the following:

- The development of strong coalitions and partnerships with industry, resulting in a clearly defined set of employer and student requirements to address local skills shortages.
- Extensive programme of LLE pilots (which have their own evaluation process) to identify demand.
- A review of credit transfers and credit-based funding to stimulate demand and allow for the potential of an increased number of learners transferring between providers.

### Question 37

**We welcome views on how quality assessment and regulation could best work for level 4 and 5 technical education within the wider LLE context.**

Respondent group	Number of responses	% of responses received for this question
Individual	15	13.0%
Organisation	99	86.1%
Not selected	1	0.9%

**Table 37**

Not all responses received to this question related to assessing the quality of a course, rather the comments provided related to assessment of learning. Of the relevant results,

three themes were identified: simplification of the regulatory regime; quality assessment; and HTQs.

Some of the respondents noted the opportunity the LLE provided to streamline the administrative burden, through either the streamlining of regulatory bodies/creation of a single regulatory system or through more collaborative working between bodies such as the DfE, OfS, and IfATE.

Respondents provided a range of ways in which quality assessments could be undertaken. No single approach was mentioned substantially more than another. The breadth of suggestions are outlined below:

- Draw upon lessons learnt through the quality assessment for apprenticeships and courses aligned with professional bodies.
- Use existing regulatory frameworks (e.g., exam boards, external examiners, professional awarding bodies).
- Ensure learners have right of redress should they have concerns over their results/method of assessment.

Many of the respondents noted that there is no standard credit size for HTQs. Consequently, HTQs in the same area of study with a quality mark would not necessarily have the same credit size. It was felt that HTQs should align with the credit framework, with some respondents noting that HTQs should follow a modular approach.

## Question 38

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

Respondent group	Number of responses	% of responses received for this question
Individual	18	13.2%
Organisation	117	86.0%
Not selected	1	0.8%

**Table 38**

Some respondents noted that whilst credit transfer already occurs, currently the true demand for credit transfer is unknown. The main barrier to credit transfer (on admission, or between courses and providers) is that the credit transfer process is not simple. Examples of complexities include:

- Translating industry qualifications into knowledge and skill set.
- Ensuring that all learning objectives are met for an awarding body.
- Ensuring that course content is sufficiently similar to support a transfer between providers.

A few respondents noted that the complexities of a credit transfer mean requests are managed on a case-by-case basis. However, it was noted by some respondents that lessons can be learnt from the current credit transfer agreements in place. This knowledge could be used to simplify the transfer process and thereby encourage their use.

## Question 39

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

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses received for this question</b>
Individual	14	11.5%
Organisation	107	87.7%
Not selected	1	0.8%

**Table 39**

Many respondents noted the need for a simplified system of credit transfer between providers, underpinned by a framework which provides a consistent credit definition to support credits allocation according to a set of principles, providing recognition of modules, with cross-providers operability in mind, and possibly with regional based agreements.

It was felt that clear guidance was needed on how credits' values should be combined across different providers to support learners' understanding of their achievements.

It was noted that, whilst prior learning is already acknowledged by providers (Accreditation of Prior Learning Policies), recording of both prior and current learning would be required to facilitate effective transfer, and understanding/assurance by the importing providers of the pre-requisite level of knowledge gained.

Lastly, it was felt that the required information for credit transfer - such as course studied, credits obtained and learner outcomes - should be in a single place that both the learner and provider can access.

## Question 40A

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

<b>Respondent group</b>	<b>Number of responses</b>	<b>% of responses received for this question</b>
Individual	14	11.3%
Organisation	109	87.9%
Not selected	1	0.8%

**Table 40A**

Most respondents agreed that a mutually recognised framework would be essential to support effective credit transfer between providers, and that whilst some credit transfer agreements already exist, it is still necessary for academics to be assured of a learner's prior knowledge. Respondents acknowledged that the current process to credit transfer is not always simple. As such, they noted that the creation of a recognised framework could:

- Complement and draw upon current frameworks used by providers.
- Provide guidance on the comparability of credits across qualifications, creating a shared understanding of credit values.

- Support a smoother transition between providers.
- Enable learners to clearly articulate the value of their skills and knowledge.
- Support a consistent approach to the award of credits and demonstration of equivalence.

It was acknowledged that agreeing on such a framework would require buy-in from learners, regulators, awarding bodies and providers.

## Question 40B

### Is a single credit framework a precondition for easy credit transfer?

Question 40B comprised of two parts:

- A yes/no answer to if a single credit framework a precondition for easy credit transfer
- An open (free text) question.

The yes/no section of Question 40B received 112 answers (63 answered 'Yes', and 47 answered 'No').

Respondent group	Number of responses	% of responses received for this question
Individual	16	14.2%
Organisation	96	85.0%
Not selected	1	0.8%

Table 40B

Respondents were almost equally split in their view of whether a single credit framework should be a precondition for easy credit transfer. Whilst there were opposing views on a single credit framework being a pre-requisite, many respondents noted that a single framework could simplify the transfer of credits. Respondents with both viewpoints also commented that creating a single credit framework could be challenging, notably around agreeing upon the standardisation of credits.

## Question 41

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

Respondent group	Number of responses	% of responses received for this question
Individual	7	8.3%
Organisation	76	90.5%
Not selected	1	1.2%

Table 41

Specific examples of bespoke arrangements to support credit recognition and transfer include:

- Agreements with international partners which can include entry requirements, processes, and module mapping between providers.
- Midlands Credit Compass is a credit recognition and transfer system which enables students to switch between universities, take a break from their studies, or move away from their current place of study through an agreed switch of HEI.
- Advanced Standing and Articulation Agreements with other providers.
- Degree apprenticeship programmes / direct entry onto level 5 to 6 of a degree through credit via Recognition of Prior Learning for recognised providers.

## Question 42

**Which features of credit accumulation, such as size (that is a minimum number), or subject, should apply to a credit recognition and transfer policy?**

Respondent group	Number of responses	% of responses received for this question
Individual	10	9.1%
Organisation	99	90.0%
Not selected	1	0.9%

**Table 42**

Of the responses to this question, the main topic noted was the need to understand if the learning which has already taken place is relevant and provide the skills and knowledge needed to succeed in the new course/provider. Some respondents noted that determining this requires academic input to make the final decision.

Commonly reported features considered for a credit transfer included:

- subject being studied (which determines the rate of knowledge and skill change);
- how the course will be studied, assessed and entry requirements;
- the length of the course applied for;
- currency of the transferred credits (date at which they were achieved);
- the level of study;
- learning/module outcomes;
- any requirements of professional, statutory, or regulatory bodies.

Varying views were expressed about the inclusion of a minimum credit size within any policy. A few respondents expressed the view that no minimum credit size should be set. Conversely some respondents felt that a minimum credit size of 10, 20 or 30 credits should be applied. The reason for providing a minimum credit size was to remove the disconnected gathering of credits.



## Question 43

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

Respondent group	Number of responses	% of responses received for this question
Individual	18	13.7%
Organisation	112	85.5%
Not selected	1	0.8%

Table 43

Most of the responses highlighted the need for a time limit on the currency of modules. Views varied on the time length of the currency for a module, but there was consensus that the time that modules stay current will vary between subjects for the following reasons:

- STEM/Digital/Medicine/Nursing/Teaching have rapidly evolving curriculums and will have a shorter relevancy than other subjects.
- Modules linked to employability are likely to lose relevance and therefore applicability to employers.

Comments highlighted that determining how long a module remains current would be linked to regulators, professional bodies, and providers. Where there is a need to limit the length for which a module is considered to be current, it was suggested that this should be clearly articulated to the learners so they are aware of the implications linked to this.

The opposing view - not setting a time limit - was seen in only a small proportion of respondents. The views expressed centred around the principle that for a module to genuinely be part of LLE it should not become out of date. Specifically, this approach could create barriers to entry for many people (e.g., carers, those with financial constraints on their study).

## Question 44

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

Respondent group	Number of responses	% of responses received for this question
Individual	14	11.9%
Organisation	103	87.3%
Not selected	1	0.8%

Table 44

Many respondents noted that providers (both HE and FE) have approaches and procedures for recognising prior learning such as the Accreditation of Prior Experiential Learning and Recognition of Prior Experiential Learning. It was noted that these policies and procedures could be built upon as they are able to be tailored to an individual. However, within this topic it was repeatedly noted that the breadth of ways in which learners gain experience makes it difficult to consistently recognise prior learning, and that it is not expressed as credits.

The responses acknowledged that this is a complex process, and that achieving consistency in awarding credits for prior experience will not be easily achieved. Nevertheless, this question elicited a range of views and ideas for the recognition of learning as credits:

- providers and employers could work together to develop frameworks to share current practice on recognising prior work for credit;
- draw upon best practice seen within the apprenticeship schemes;
- use a range of competency-based tests to provide evidence of skills / knowledge;
- improve the measuring and recording of skills and knowledge gained within the workplace;
- use referee or employer endorsements to support learners' submissions of skills.

## Question 45

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

Respondent group	Number of responses	% of responses received for this question
Individual	13	11.2%
Organisation	102	87.9%
Not selected	1	0.9%

**Table 45**

The consensus in response to this question was to work with PSRBs who have experience of recognising professionally gained experience and assessing portfolios of professional work.

It was suggested that by bringing together PSRBs and HEIs, there could be a transfer of knowledge and best practice to:

- Facilitate and develop recognition of skills capture and Continuing Professional Development (CPD) recording processes.
- Learn about best practice in the capturing of workplace and experiential learning within the apprentice schemes.
- Develop an understanding of the equivalency of skills, qualifications, and occupations or roles.

Providers should also engage and work with employers to learn about the approaches they use to capturing prior knowledge and skills.

## Question 46

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

Respondent group	Number of responses	% of responses received for this question
Individual	13	12.3%
Organisation	92	86.8%
Not selected	1	0.9%

**Table 46.1**

Whilst some specific courses were listed, the majority of respondents focused on the wider context, noting that overall vocational, technical, and professional courses would benefit the most.

Other respondents stated that no distinction should be made as all courses could benefit from having some form of accreditation of prior workplace learning. No negative views relating to this topic were received.

Specific named courses which could benefit from accreditation of prior workplace learning were:

- Instrumental Teaching
- Green Technology
- Animal Care
- Education
- Music
- Business Administration
- Leadership / Management
- Agriculture
- Legal
- Performing Arts
- Catering and Hospitality
- Hair and Beauty
- Digital Skills
- Environmental Science
- Finance / Accounting
- Engineering
- Nursing

## Question 47

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

Respondent group	Number of responses	% of responses received for this question
Individual	11	11.6%
Organisation	83	87.4%
Not selected	1	1.0%

Table 47

Many respondents considered that the most beneficial approach would be the use of existing data (streamlined). It was noted that learners often have many identifying numbers (e.g., a Unique Learner Number, Personal Learner Record Number). A collaborative approach between agencies could result in a learner having a single portfolio that is continually updated as the learner goes through education, training, and skills improvement.

Other examples of type of information to be collated included:

- Academic attainment (modules, credits achieved / grade, date of learning, learning pathway, method of assessment, learning outcomes and course content).
- Fitness to practise records (if relevant to course).
- Student support (including health and wellbeing).
- Fees.

Some respondents noted that data sharing frameworks and protocols would be required to enable learner's data to be accessed throughout the learning process.

Data collation should also be the responsibility of the learner. For example, learners could retain a copy of their programme of study so they can provide evidence of their learning in the future. The learner should, it was noted, be able to provide information on work-based learning, including sector of employment, roles and responsibilities held.

## Question 48

How can the process be more transparent?

Respondent group	Number of responses	% of responses received for this question
Individual	11	10.9%
Organisation	89	88.1%
Not selected	1	1.0%

Table 48

Many respondents noted that learners will have to access their entitlement over many years and as such clear and transparent IAG would be required on:

- The options available to learners for accessing training and education to achieve their aspirations.
- How to access their learning passport/records.

- Potential currency of the modules they are sitting which could impact their ability to transfer these modules in later years.
- Transfer agreements between providers (where applicable) so learners understand if and how they can transfer credits, modules, and pathways.

However, respondents were also clear that such a system should not add additional bureaucratic burdens on providers. To support this, examples included the development of:

- A single data repository accessible by learners and providers showing qualifications, skills and credits.
- A clear national framework for credit recognition and transfer.

## Analysis of the HTQs Questions in the HE Reform Consultation (questions 25 - 28)

This section provides a breakdown of the responses received for each HTQ question in the HE Reform consultation.

### Question 25

**We want to ensure that under a flexible study model, learners studying HTQs still develop occupational competence. We also want the quality and labour market value of individual higher technical modules to be signalled. Which of the approaches below, which could be introduced separately or together, do you prefer for delivering these aims, and why?**

- a) Introducing requirements for each module to be individually assessed and/or for students to complete a summative assessment at the end of a qualification.**
- b) Awarding bodies submit qualifications with a modular structure and the Institute carry out an assessment of the quality of individual modules to provide assurance of their value to learners and employers.**
- c) An Institute/employer-led process to develop a common modular structure for HTQs, to support credit transfer and labour market currency of modules.**

For option (a), in general, it was felt that delivering a final summative assessment would add complexity and cost to HTQs and make them less, rather than more, flexible. There were fears about such an approach driving over-assessment and an over-atomisation of assessment. It was also noted that summative assessments can easily be negatively skewed for people who have learning differences.

For option (b), stakeholders felt that having the Institute endorsing individual modules could be impractical, resource intensive, and unnecessary. It may also pose problems if awarding bodies were required to ensure learning outcomes were distilled into separate modules, as some learning is woven throughout a qualification. Others felt it could lead to disengagement with the programme, as it would make HTQ approval too complex and challenging. That said, some felt that in comparison to option c, it better recognised the autonomy of awarding bodies and was therefore preferable out of the two choices.

For option (c), whilst many felt a structured, centralised framework of modules would support credit transfer, such an approach was seen as stifling creativity and autonomy and would make it difficult to respond to regional-based needs and emerging skills needs. There were also practical issues with redesigning existing qualifications and questions about how this would benefit employers or learners.

### Question 26

**How would these approaches align or conflict with OfS and/or university course approval requirements?**

The majority of respondents stated that the proposals would significantly conflict with current OfS regulatory requirements and university requirements, with the loss of autonomy and freedom of design. OfS conditions, QAA benchmarks, Apprenticeship

standards were reported as potential areas of conflict, along with over burden from the Professional Bodies and OfSTED perspective. Many thought that the current system is sufficient and existing university programme processes are satisfactory. Universities have an extensive design process and already consider other external factors including professional body standards when developing qualifications. The benefits to the approaches were seen as potentially streamlining systems, which could ensure consistency, clarity, and reduce burdens. There was a comment around the work that the QAA and IfATE are already undertaking in relation to the development of external quality assurance for end point assessments for integrated degree apprenticeship provision, which could be aligned to HTQs. There was a minority view that to streamline the system there might be an argument to have one body to oversee regulation and one body for quality assurance.

## Question 27

### **Are there any other approaches we should consider?**

Responses to this question fell into one of several themes: more involvement with employers, less regulatory burden, credit transfer, relationship with apprenticeships, and funding. It was also suggested that universities, or providers with degree awarding powers should automatically receive a HTQ quality mark where external engagement in the development of their qualifications can be demonstrated.

To understand and address local skills gaps and training needs it was suggested that more involvement and collaboration of the existing mechanisms should be utilised, such as the Unit for Future Skills, LSIPs, and LEPs.

## Question 28

### **How should any of these approaches be applied to qualifications already approved as HTQs?**

Many of the respondents who answered this question considered that they had provided a response through previous answers, were not sure, or stated that they did not wish to comment (58 respondents / 50%). The remaining responses to this question included specific suggestions for implementation of HTQs, requests for reduced bureaucracy, and comments on timescales. Respondents discussed the implementation of a variety of approaches. The most frequently mentioned suggestions were that such approaches could be applied when HTQs or occupational standards are reviewed, or when reapproval is needed for HTQs. Some suggested that those HTQs that have already been improved could be used as a case study or template for the development of a common modular structure. There were further suggestions of a transitional period (3 to 5 years) or mapping exercises.

## Annex A: List of Organisations That Responded to the Consultation

Al-Khair Foundation	National Union of Students UK
AMOSSHE (Association of Managers of Student Services in Higher Education)	NCG Newcastle University
Arden University	Newham Muslim Forum
Arts University Bournemouth	Nottingham Trent University
ASCL	Office of the Independent Adjudicator for Higher Education
Association of Colleges	Phoenix Insights
Association of Employment and Learning Providers (AELP)	ResPublica - Lifelong Education Commission
Aston University	Royal Society of Chemistry
Birkbeck, University of London	Shaw Trust
Birmingham City University	Sheffield Hallam University
British Chamber of Commerce	Social Market Foundation
Brunel University London	Sutton Trust
Capital City College Group	The Chartered Society of Physiotherapy
Careermap Ltd	The Construction and Built Environment Education Advisory Committee (CBEE)
Chair, Free Churches Education Committee	The Engineering Council, and the Engineering Accreditation Board
Chartered Management Institute	The LTE Group
Council for Dance, Drama and Musical Theatre	The Manchester College
Coventry University Group	The Open University
Cranfield University	The University of Law
Edge Hill University	The University of Leeds
	UCAS



Engineering Construction Industry Training Board (ECITB)	UCL
Fair Access Coalition and Fair Education Alliance	Unison
Fig & Olive Academy	Universities Association for Lifelong Learning (UALL)
First Intuition	Universities UK
First Intuition Ltd	University Academy 92
GLA	University Alliance
Greater Manchester College Group	University Centre Leeds, Luminate Education Group
Greenwich Students' Union	University of Birmingham Islamic Society
GuildHE	University of Birmingham Islamic Society
Harper Adams University	University of Birmingham Islamic Society
Hexlsior	University of Derby
Independent Higher Education	University of East London
Institute of Directors	University of Greenwich
Islamicfinanceguru.com	University of Hertfordshire
Jisc	University of Huddersfield
Kingston University	University of Lincoln
Learning Curve Group Limited	University of Portsmouth
Linking London, hosted by Birkbeck, University of London	University of Reading Student Union
Liverpool Hope University	University of Salford
London Higher	University of Southampton
London South Bank University	University of St Andrews
Loughborough University	University of West London
Make UK	University of Wolverhampton
	University of Worcester

Manchester Metropolitan University	University Vocational Awards Council (UVAC)
Middlesex University	
MillionPlus	York St John University
NASMA (National Association of Student Money Advisers)	
National Deaf Children's Society	

Other organisations that requested for their responses to remain confidential have been excluded from this list.

## Annex B: Abbreviations

Abbreviation	Definition
ALL	Advanced Learner Loans
ASF	Alternative Student Finance
CATS	Credit Accumulation and Transfer Scheme
CPD	Continuing Professional Development
CQFW	Credit and Qualifications Framework for Wales
DfE	Department for Education
ECTS	European Credit Transfer and Accumulation System
ELQ	Equivalent or Lower Qualification
ERB	Employer Representative Bodies
FE	Further Education
HE	Higher Education
HEI	Higher Education Institution
HESF	Higher Education Student Finance
HTQ	Higher Technical Qualification
IAG	Information, Advice and Guidance
IfATE	Institute for Apprenticeships and Technical Education
IM	Integrated Masters
LEPS	Local Enterprise Partnership
LLE	Lifelong Loan Entitlement
LSIP	Local School Improvement Plan
NLP	Natural Language Processing
Ofqual	Office of Qualifications and Examinations Regulation
OfS	Office for Students
PGCE	Postgraduate Certificate in Education
PSRB	Professional Statutory Regulatory Bodies
SCQF	Scottish Credit and Qualifications Framework
QAA	Quality Assurance Agency
QCF	Qualification and Credit Framework qualifications

## Annex C: List of Course Types

Advanced Certificate

Advanced Diploma

Bachelor Degree

Bachelor Degree with Honours

Bachelor Degree with Honours with QTS

Bachelor Degree with QTS

Certificate in Education

Certificate of Higher Education

Diploma in Education and Training (DET)

Diploma of Higher Education

Foundation Degree

Graduate Certificate

Graduate Diploma

Higher National Certificate (HNC)

Higher National Diploma (HND)

Integrated Masters Degree

Level 4 Diploma

Master of Architecture

OCN Level 5 Extended Diploma

Postgraduate Certificate in Education

Postgraduate Healthcare

Postgraduate ITT with QTS

Professional Graduate Certificate in Education

Scottish Masters



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