



# The right ambition, the wrong solution? How the Lifelong Learning Entitlement can deliver a high-quality learning experience

*The Lifelong Learning Entitlement (LLE) offers a way to grow lifelong learning and enable more flexible provision in higher education. It has the potential to revolutionise how higher education is accessed and valued. But in its current form, the policy is limited and is not rooted in the evidence and practice needed to bring this ambition to life. This paper sets out what changes can be made to realise the LLE's potential and deliver the vision of a widespread, skills rich, lifelong learning system.*

## Introduction

The LLE will provide learners in England with a tuition fee loan entitlement equivalent to four years of post-18 education - £37,000 in today's fees.<sup>1</sup> From 2025, this loan will be used for full qualifications and for modules of some 'job-specific' technical qualifications. From 2027, this will be extended to Level 4-6 - both for full courses and at a modular level where the Government can be confident of positive student outcomes. A minimum of 30 credits can be funded - whether one module or multiple modules bundled together. These modules must, at present, be part of a full 'parent' programme.

The idea is that by enabling learners to access bite-sized chunks of higher education, proportionate upskilling and reskilling can take place throughout a person's education and career journey, and this is a welcome aim. But the potential impact of the policy is limited by its detail which is formulated on some misguided assumptions about the higher education experience. Accessing a module of a wider parent programme is unlikely to offer the same benefits when studied on a standalone basis as it would when taken as part of a full course. Modular delivery must therefore look different.

The evidence for learner demand for this type of learning, funded by loans, is limited, as is the desire to transfer between different providers over a lifetime. The arbitrary threshold of 30 credits is rigid and is greater than some modules within existing degree programmes that learners are expected to draw from. It is likely that the Department for Education's impact assessment also significantly underestimates the amount of time, resource and cost for a

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<sup>1</sup> [www.gov.uk/student-finance/new-fulltime-students](http://www.gov.uk/student-finance/new-fulltime-students)

provider to deliver LLE-funded modular provision, calling into question the incentives to deliver learning on a modular basis.

Behind these issues is the false equivalence drawn between modular delivery of full qualifications and standalone modules. While degrees are often described as modular, this is in reference to the elements of which they are composed. But these elements are often progressive, building on previous learning outcomes, and so are not discrete or standalone in reality. They are therefore also not designed to induct or exit the learner from study in the way that a true standalone module needs to do. This distinction is also apparent between part-time learners (who are accessing potentially modular qualifications but not on a full-time basis) and modular learners (who are accessing modules on a time commitment determined by their credit value).

The Quality Assurance Agency (QAA) is firmly in support of the vision behind the LLE. However, in its current format, the policy detail could hinder rather than help the growth of lifelong learning, offering a limited solution to a multi-faceted problem. This paper demonstrates how the 'policy shackles' can be released to maximise its potential and realise the vision of effective lifelong learning.

## **The devil is in the detail - what works, and what doesn't, in the current policy?**

### **What works?**

#### **It identifies the right problem**

England is experiencing significant skills gaps, poor productivity, recruitment difficulties and barriers in access to training to upskill or reskill later in life. The dominant course of study involves 18-year-olds accessing a three-year undergraduate degree, with less room for flexibility or manoeuvre later in life.

The benefits of an undergraduate degree are varied, far-reaching and globally recognised. But it is not the only valid option within post-compulsory education, and the choices made at undergraduate level will not always reflect the skills and knowledge a learner needs later in their career. Similarly, not all skills gaps or employer-specific needs require a full qualification, and there is limited availability of 'bite-sized', tailored learning. Crucially, the funding mechanisms are much scarcer than they are for those accessing a full higher education qualification. The LLE fundamentally addresses this.

#### **The changes to the funding system facilitate greater access**

The disparities in funding between those undertaking full qualifications or degrees and those who do not require such long-term and intensive learning necessitate changes to the system.

Under the LLE, tuition fees will be based on credit value, which means a learner will never pay more for a smaller chunk of learning than they would if it were scaled up to a full qualification. This is a welcome move, although will have financial implications for providers. To solidify this, secondary legislation should acknowledge that the definition of credit is and should remain sector owned. QAA is the custodian of the [Credit Framework for England](#) which defines one credit to be 10 hours of notional learning, in agreement with the sector. The definition of 'notional learning' is broad, encompassing, but not limited to, direct and indirect learning,

independent study, online and in-person provision. It is crucial this breadth of definition is retained within the LLE.

The introduction of the course year concept into legislation is also necessary and welcome. Providers at the forefront of more flexible provision already offer varying start dates throughout the year, and this is an important step in embedding greater flexibility of provision and loan funding beyond the default academic year.

## What doesn't work?

### **The eligibility and scope of modules included within the LLE is too narrow**

In the current policy, modules are only eligible for funding if drawn from a parent programme and consisting of a minimum of 30 credits - either alone or bundled. This is where the policy detail diverges from its ambition most explicitly.

The option for learners to stack modules and build towards a full qualification should be an option within the LLE. It is, however, limiting to only allow modules that are drawn from parent programme. Instead, the policy should offer a balance between the ability to build towards a full qualification on the one hand, and, on the other, the flexibility and value offered through standalone modules and short courses that hold employer recognition. Recognising that a full qualification is not always the best, desired or necessary route for a learner is crucial to the LLE's success, and limiting funding to modules that form part of a full programme falls short of this.

Micro-credentials and short courses are an important part of current higher education provision that students engage with and benefit from. Despite their role in delivering the vision of lifelong learning, they are considered out of scope under the LLE. QAA's [Good Practice Guide for Micro-credentials and Small Qualifications in Scotland](#) argues for tailored provision with clear learning outcomes. There is much to be learned from existing micro-credential provision and to be gained from facilitating funded access to it through the LLE. In the policy's current iteration, students would only be able to get LLE funding for existing micro-credentials if they were embedded into full parent programmes or stacked together to create a full programme. This could diminish their appeal and limit engagement from providers offering this type of provision, particularly independent providers who have long been active in this space.

The 30-credit minimum threshold - which equates to 300 hours of notional learning - is another barrier to the LLE's potential. 30 credits is often larger than modular components of many existing full qualifications, meaning they cannot easily be offered in isolation under the LLE. Our work on micro-credentials indicates that popular one-off 'modules' tend to be significantly smaller in credit size. Furthermore, 300 hours of notional learning (30 credits) is already higher than the volume of 'off-the-job training' an apprentice is expected to undertake over the course of a full year, demonstrating its significant size. The minimum size of fundable modular learning suggests a misunderstanding about the nature of, and demand for, modular learning.

### **The pathways for progression through one's lifetime are unclear**

The policy ambition of the LLE rests upon the concept of credit transfer, where credit acquired in one provider is recognised by another provider. Whether this will work in practice, at the scale envisaged, is unclear. Credit transfer is possible within the current system, but mechanisms that facilitate it - such as amalgamating prior learning into a capstone module, or a consortium

approach where providers agree to recognise each other's credit - are not heavily used. There is limited demand currently, and the processes facilitating transfer can be burdensome for both provider and learner. The concept of credit transfer also runs counter to the regulatory approach taken in England since the *Higher Education and Research Act 2017*. Regulatory oversight of the sector has been designed to respond to diversity, to enable innovation and to encourage a proliferation of providers serving different local needs and demographic profiles. The strength of this diversity in England means seamless transfer between providers is not easily achieved or, in some cases, desirable.

The LLE provides the opportunity to accumulate credit at one provider throughout a learner's lifetime in a flexible manner that suits them. This is smoother to facilitate than credit transfer and, given limited evidence of demand for credit transfer, may be more applicable to how learners will use the LLE in practice. It also has the potential to address some of the barriers causing lower take-up of part-time learning options. This pathway should be emphasised more in the policy debate.

Getting this right also has the benefit of establishing the foundations for expanding the LLE to postgraduate education. Much reskilling and upskilling currently takes place at the postgraduate level and enabling learners to access this provision through the LLE would improve accessibility and ensure a learner's education journey is truly lifelong.

### **Credit is not well understood**

Credit also needs to hold currency in the labour market to enable progression. The concept of credit as an 'award' of learning is not well understood by employers. The sector has a responsibility to ensure that employers understand what knowledge and skills learners acquire in a module. A [QAA-funded project](#) led by the University of Huddersfield, looked at using skills profiles to demonstrate skill acquisition. The profiles focus on course-specific and transferable knowledge (know-of), skills (know-to) and dispositions (qualities). The project provides a great example of how learning can be articulated in a language that learner, provider and employer understand, at a level where no formal qualification is typically awarded.

## **Implications for quality**

### **How do you measure quality within the LLE without increasing burden?**

In the current regulatory approach, providers' quality is externally assessed via a focus on outcomes using metrics on continuation, completion and progression. The English regulator - the Office for Students - has rightly recognised that these conditions are less relevant in a modular context and are requesting evidence on how to adapt them to the LLE.

#### **Continuation**

It would not be appropriate to measure continuation when modular learners are not expected or required to progress through years of study.

## Completion

It will be important for providers to monitor how many learners are completing modules when assessing the success of the modular learning experience. Current completion measures include the acquisition of a qualification. Under the LLE, the definition of completion for a modular learner will need to reflect the appropriate context. QAA's [Micro-credentials Characteristics Statement](#) considers a key element of a micro-credential to be that it offers an award but not a qualification. This approach should be reflected in the regulation of the LLE. The example of skills profiles is of value here to enable a more relevant demonstration of the skills and knowledge acquired and would hold greater currency in the labour market.

## Progression

It would not be beneficial to hold providers and learners to the same progression metrics having completed a module as is the case for those who are completing a full degree. The motivations of learners engaging with modular provision under the LLE will be far broader than traditional learners. They might wish to undertake modular study for a range of reasons: deepening their skillset for an existing job; progressing within an organisation; moving into a new role or sector; or a myriad of other ways people can progress through their education and career journey.

It is fair to expect that a learner undertaking a full higher education qualification should be able to access certain forms of further study or employment upon completing that qualification. But it is less realistic to expect this of a small unit of modular learning, especially if that does not reflect the original intent of the learner.

## Alternative measures

Using existing measures to regulate quality at a modular level would greatly increase regulatory burden, something we would warn against. But it is important that providers have effective oversight of their modular provision and how it delivers for modular learners. Assessing and asserting confidence in a providers' internal quality assurance systems would be a more effective way of seeking reassurance that providers are developing high-quality modular provision. This should be delivered through an independent quality body.

Learner satisfaction measures could also be used to provide greater insight on the learner experience. Whether at a provider or sector level, this would help capture the experience of modular learners. Where there is sufficient data, disaggregated modular learner data could also support oversight - similar to the split between full-time and part-time students in the current dashboards. This would enable divergences between modular, full-time and part-time learners to be acknowledged and addressed.

## What should the modular learning experience look like?

Using indicators in QAA's Definition of Quality, the table below outlines examples of adaptations that providers might need to make to deliver a high-quality modular learning experience.

Indicator of high-quality	Adaptations for modular learners
<p><b>Staff and students are professionally and academically thriving</b></p> <p><i>Staff and students are trained, resourced, supported and developed in both course-specific and broader professional, academic and interpersonal skills</i></p>	<p>Broader skills support, such as critical thinking and argument construction, are currently delivered on a timeframe intended for learners accessing a full programme. This would need to be adapted to ensure all learners have access, and expanded to recognise that many returning modular learners may not have accessed higher education in several years.</p>
<p><b>The learning experience is relevant and challenging</b></p> <p><i>Teaching is current, rigorous and purposeful; students are encouraged to learn and reflect independently, and there is clear alignment between content, delivery methods and learning outcomes</i></p>	<p>The most effective balance of the curriculum, particularly between breadth and depth, will look different for modular learners. Foundational knowledge and familiarity with content and delivery methods cannot be assumed.</p>
<p><b>Everyone within a provider seeks to improve quality</b></p> <p><i>A culture of continuous improvement runs through a provider, with monitoring and evaluation embedded</i></p>	<p>This applies to all provision but will need to be expanded and tailored in providers offering modular provision through the LLE, particularly in the adjustment period as they evaluate what works well. This tailoring will be crucial for modular provision where there is not the same scope for providers to demonstrate improvement over multiple modules.</p>
<p><b>All students get a fair chance</b></p> <p><i>Students experience no unnecessary barriers, with all elements of the student journey fair, transparent, consistent and proportionate</i></p>	<p>Those accessing learning through the LLE should not experience additional barriers and crucial to this is ensuring learners have the prior education needed to access specific modules, and the support required to succeed. This wraparound support is potentially one of the biggest resource implications of the LLE.</p>
<p><b>External expertise is sought and used</b></p> <p><i>External expertise is employed effectively to protect standards and assure validity, durability and mobility of qualifications</i></p>	<p>External expertise and adherence to external reference points becomes even more important to ensure the mobility of credit and the currency it has with other providers and employers.</p>

Indicator of high-quality	Adaptations for modular learners
<p><b>Assessment is a tool to support and evidence learning</b></p> <p><i>Assessment supports students to apply the knowledge and skills learned in a relevant context, aiding students' learning, effectively measuring against learning outcomes in an accurate and consistent manner and encouraging academic integrity</i></p>	<p>Feedback becomes harder to apply during standalone modules if a learner has not progressed through previous iterations of assessment and feedback. Modular learners must have some opportunity to present and receive feedback on their work before their end-point assessment, even if informally.</p>
<p><b>Students are partners in the academic experience</b></p> <p><i>All students, irrespective of personal characteristics, location, mode of delivery, level of study, or subject, are meaningfully engaged and have the opportunity to be part of decisions that affect the learning experience</i></p>	<p>Modular learners must be represented through mechanisms to share their views and inform decisions. The format and facilitation of this representation must reflect the varying demographics, needs and capacity they possess in contrast to those enrolled full-time.</p>
<p><b>Students progress onto meaningful futures</b></p> <p><i>Measurement of outcomes demonstrates progression in learning abilities, interpersonal skills and career advancement</i></p>	<p>The concept of progression may look different under the LLE and 'career advancement' will encompass much greater variation as higher education is expanded to include more of those already in work.</p>

**What does a high-quality short course or module look like?**

The elements of a high-quality short course or module will look different depending on whether the module is taken as part of a wider programme or in isolation. The following list is not exhaustive, and the inclusion and implementation of these principles will vary across provision.

**Design and delivery**

- Modules stand alone as a unit of learning, although they can complement other modules where relevant. They incorporate induction and exit for learners taking them in isolation.
- Modules cover a focused area of learning with a specific range of skills or competencies covered.
- Module design includes clear outcomes, with attainment of these demonstrated through relevant assessment.
- Delivery methods are appropriate. Online learning can be beneficial for modular provision, but some more practical learning is sometimes best accommodated by in-person delivery.

## Wraparound support

- Entry requirements are clear and accessible for both the module and the full programme from which the module is drawn if applicable. When modules are intended to be taken progressively, the progression pathway and any consequent, additional requirements are clear.
- Processes are developed which detect and address education or experience gaps which may benefit from additional support in recognition of the wide range of potential learner characteristics.
- Modular learners have equivalent access to professional services as full-time learners studying for full qualifications. This includes mental health support, academic support and career support.
- Modular learners are able to engage with their Students' Union on academic representation, advice and extracurricular activities.

## Progression

- Clear and accurate records of achievement are available for learners to demonstrate what has been acquired through the module.
- Where modules are relevant to specific professions, employers and relevant PSRBs are engaged to ensure current needs are met and learning is credible.

## What could the LLE look like to best deliver a high-quality learning experience?

Learners can access <b>taxpayer funded loans</b> for <b>bite-sized chunks of learning</b>		
The minimum threshold for accessing the loan is <b>10 credits</b> .	The loans can be used to fund <b>full programmes, modules, short courses and micro-credentials</b> .	Providers are encouraged to offer a <b>suite of options</b> that serve learner demand.
Every learner is provided with a <b>clear transcript</b> and a <b>skills profile</b> to demonstrate to both providers and employers what learning they have undertaken. This will be kept in an <b>individual learner account</b> .	The <b>level of regulation and the metrics used</b> to assess quality are <b>proportionate</b> and <b>relevant</b> to the provision.	Providers are encouraged to <b>work closely with employers</b> to offer bite-sized chunks of learning that <b>address specific skills gaps and employer demand</b> .
Learners have <b>access to clear and impartial information, advice and guidance at all stages</b> of their higher education journey and can plan their learning accordingly.		
Providers are <b>encouraged to account for prior learning and work together to establish best practice for credit transfer</b> . This will enable learners to either work towards a full qualification or access a suite of modular learning most relevant to them.		



## Case study: The Irish Universities Association 'MicroCreds' project

MicroCreds is a five-year project led by the Irish Universities Association (IUA) in partnership with seven providers. The project establishes a coherent National Framework for quality assured and accredited micro-credentials. IUA partner providers are collaborating to develop, pilot and evaluate the building blocks of lifelong learning. The aim is for MicroCreds to address the barriers to participation in lifelong learning, including time constraints for learners and inflexibility in current programme provision and delivery. The MicroCreds platform, built by Curio, enables both learners and employers to access the suite of micro-credentials available to address their skills needs.

Content adapted from <https://microcreds.ie>

## Recommendations for policymakers

There is significant scope for impending secondary legislation to deliver on the wider ambitions for lifelong learning, embed greater flexibility and deliver in practice.

### 1 **Balance the option of working towards a full qualification with accessing a suite of standalone modules**, by:

- removing the requirement for modules to be drawn down from parent courses
- lowering the threshold of 30 credits to 10 credits.

### 2 **Facilitating greater collaboration with the sector**, by:

- enabling the sector to retain authority on the definition of credit by referring to a sector-owned definition in any future legislation
- consulting providers on the barriers, resources and capacity involved to present an accurate impact assessment
- consulting with providers offering short courses or micro-credentials to gather best practice and evidence on learner demand.

### 3 **Using evidence to determine how quality is measured**, by:

- collecting evidence on sector response, learner demand and progression pathways before producing proportionate and relevant quality measurements.

Published - 2 November 2023

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Registered charity numbers 1062746 and SC037786  
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