



## Positive outcomes for students studying on a modular basis - QAA's response to Office for Students' call for evidence

This is QAA's response to the Office for Students' (OfS') call for evidence seeking views about how the OfS could measure student outcomes resulting from flexible or modular study under the Lifelong Learning Entitlement (LLE).

### Question 1

**Do you agree with our list of potential changes to the delivery of higher education as a result of the implementation of the LLE? Are there other changes that could arise that you think we should consider when developing our approach? Please explain your answer.**

**The list:**

- **Providers using the flexibility offered by the LLE to change currently full-time courses in more modular delivery;**
- **Providers using the flexibility offered by the LLE to reshape their current part-time courses;**
- **Providers offering their modules from full courses on a standalone basis funded by the LLE;**
- **Providers increasingly offering modules that include many that are not funded under the LLE**
- **Students increasingly studying at more than one provider at the same time;**
- **Students increasingly choosing to transfer between providers to build their modular study into whole qualifications;**
- **Students increasingly studying in different departments, or subject areas, within the same provider;**
- **Students increasingly studying on a modular basis with reduced focus on gaining complete qualifications.**

We broadly agree with the list of potential changes, which reflect the policy intentions of the LLE. Whether these changes will transpire in practice is less clear. While many details are yet to be confirmed, it is crucial that the regulator considers the variety of approaches providers, learners and employers may take once the LLE is implemented.

## **How providers and learners will respond**

The list understandably assumes that providers will implement the LLE. However, in the policy's current iteration, it is not guaranteed that providers will make these changes, be able to meet the timeline for these changes, or whether they will be made in a consistent manner across the sector.

In the current iteration of the policy, there is a danger that providers are not sufficiently incentivised to begin offering provision on a modular basis alongside their current full-time and part-time provision. There is little evidence of demand from learners, and the resource required to implement single module delivery and provide wraparound support is significant. It is likely that the Department for Education's impact assessment of the time and cost involved in implementing the LLE significantly underestimates the undertaking required from providers.

In the current funding landscape, it is unlikely that all providers will seek to implement adapted provision under the LLE. The regulator should be prepared for this and for uneven implementation across the sector. A more nuanced consideration of how providers will respond is therefore required in determining the most effective regulatory approach.

There is also limited evidence of demand from learners for this approach. While it is clear why the list assumes learner demand, it is likely that this may be less than expected or intermittent across the sector and the regulatory approach should reflect this.

## **The full sector landscape**

Micro-credentials and short courses are an important part of existing higher education delivery. While these are considered out of scope of the LLE, there are lessons to be learned from this provision. An additional potential change to the stated list is that providers will convert non-credit-bearing short courses and micro-credentials into credit-bearing modules that can be funded through the LLE. This would involve either embedding them into existing full programmes or stacking them together to create a full programme. We think this unlisted change is more likely than an increase in module offerings not funded through the LLE - the micro-credentials and short courses sector is not well served by current LLE policy.

## **Credit transfer and multi-institution study**

The policy ambition of the LLE relies upon learners having the credit acquired in one provider, recognised by another provider. Credit transfer is possible within the current system, but providers are not generally encouraged to enable it. It is a burdensome process for both learners and providers and there is limited learner demand for it. Mechanisms to allow this, such as amalgamating prior learning into a capstone module or a consortium approach where providers agree to recognise each other's credit, are not utilised to a significant degree and there is currently no evidence that this would change under the LLE. Providers should retain ultimate autonomy over their admissions, but good practice in credit transfer should be shared between providers to facilitate a smoother process that would support the policy ambition behind the LLE.

The list refers to the possibility that learners will study at more than one provider at once. This is technically an opportunity provided through the LLE, but it is unlikely to occur in practice and should not necessarily be encouraged. Higher education confers a broader experience than just the course content and a sense of belonging is central to achieving this. Learning among different institutions simultaneously may limit that. The 30-credit threshold has also been criticised for being too large and too high a commitment for many learners. Our work on micro-credentials indicates that popular one-off 'modules' tend to be

significantly smaller in credit size. Undertaking multiple credits at different institutions would increase this burden.

### Consideration of the role of qualifications

The reduced focus on gaining complete qualifications is welcomed and something we believe should be encouraged as part of the LLE. However, this must be reinforced with relevant quality metrics which acknowledge this flexibility and do not hold providers accountable for measurements that are not necessarily included within LLE provision.

### Question 2

**Do you agree that these are appropriate policy aims for the OfS in relation to the implementation of the LLE? Are there other aims that we should consider? Please explain your answer.**

**The aims:**

- **Protecting students by ensuring positive outcomes from study on a modular basis**
- **Protecting taxpayers' investment by ensuring a minimum level of quality, including outcomes, and minimising the potential for the misuse of public funding by providers and students;**
- **Protecting the reputation of higher education in England during a period of change and growth in new approaches to delivery;**
- **Providing clarity and transparency about our regulatory approach such that registered providers can comply, innovative and grow;**
- **Ensuring we can take regulatory action where appropriate for individual providers that do not meet our minimum expectations.**

The LLE offers an opportunity to consider a more expansive approach to the regulation of higher education. While we would not necessarily disagree with any of the policy aims outlined, it is possible that their focus obscures other important factors.

We were encouraged to see the policy aim around protecting the reputation of higher education in England. We also agree that positive outcomes are an important aim. However, current definitions of positive outcomes do not readily apply to modular learners. We expand on this further in response to the later questions. We would welcome consideration from the regulator about the modular learning experience in addition to outcomes, and the ways in which this can be captured, supported and enhanced.

While important, the focus on minimum levels of quality risks undermining the opportunity for providers to explore and innovate in their offers of modular learning. An approach which fosters support, improvement and innovation would best serve the sector and its learners as they adapt to this new format of provision. This supportive role should be reflected in the policy aims.

### Question 3

**Do you agree that a measure of ‘completion’ would be an appropriate part of delivering our general policy aims for the implementation of the LLE?**

It will be important for providers to monitor how many learners are completing modules when assessing the success of the modular learning experience. Whereas the current completion measure includes acquirement of a qualification, the definition of completion for a modular learner will need to reflect the appropriate context. The proposed list of potential delivery changes rightly considers the reduced emphasis of qualifications and most modules will not lend themselves directly to a qualification. Indeed, 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.

Some learners currently undertaking micro-credentials or short courses for continued professional development prioritise the skills acquired throughout the learning of the course over completion of the final assessment to acquire the whole award. Alternative measures of completion that are not solely assessment focused and reconsider the role assessment can play may therefore be useful. For example, the University of Huddersfield has led a QAA-funded [Collaborative Enhancement Project that considers using skills profiles to demonstrate the various skills acquired](#). This would enable a more expansive conception of completion and assessment and could hold greater currency in the labour market by using language employers understand.

The LLE will represent a significant upheaval in delivery across providers and the regulatory approach must reflect and support this to ensure providers are encouraged to engage. For any new regulatory measures or metrics, we therefore encourage the use of a grace period, and contextualisation while providers respond to what is working, and what is not.

### Question 4

**How should we approach measures of ‘progression’ for students undertaking one or more modules? For example, when should we seek to measure the outcomes of modular study for a student?**

Naturally, it doesn’t make sense to hold providers and learners to the same progression metrics having completed a module as is the case for those who have completed 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 progress through their education and career journey.

It is fair to consider 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 isn’t as realistic to expect this of 30 credits of learning, especially if that does not reflect the original aim of the learner.

Because this is a new form of delivery and the evidence on demand and learner motivation is currently limited, we recommend collecting evidence on sector response, learner demand and progression routes before determining outcome measures. The regulator should work with learners, employers and providers to gather this evidence.

## Question 5

**Are there other measures that we should consider as we think about how to deliver our policy aims? What measures do providers currently use to understand outcomes for students studying modules?**

The measurement of quality should be expanded to enable providers to fully engage with the LLE offer, for modular learners to receive a high-quality experience, and for modular provision to be of most value to those learners.

Regulating quality at a modular level under the current system 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 the internal systems a provider uses to assure and improve this provision would be more effective.

Learner satisfaction measures could also be used to provide greater insight. 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 detected and addressed.

Some providers use demand measures as success indicators for short courses. While these demonstrate important evidence around demand, quality itself cannot be solely measured through these metrics.

Our main recommendation is a proportionate, agile approach which recognises both the need for oversight and the extent to which providers will need to adapt and innovate to offer a high-quality modular experience while retaining high-quality provision for full-time and part-time students.

## Further information

QAA recently published a briefing paper as part of our [Future of Quality in England](#) policy series which outlines how simple changes to the LLE could help to unlock its full ambition. [The paper](#) argues that the eligibility and scope of modules included within the LLE is too narrow, and that pathways for progression throughout a learner's lifetime are unclear.

Published - 29 November 2023

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