

Cross-nation lifelong learning report



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Executive Summary

The UK does not need a single lifelong learning system, but its four nations need to learn from one another more systematically. Devolution has produced distinct approaches shaped by different funding models, institutions and national priorities.

Yet all four systems face the same fundamental challenge: enabling adults to access affordable, flexible and supported learning throughout their working lives.

This report, co-authored by the Quality Assurance Agency for Higher Education and the Lifelong Education Institute, has found that each UK nation has a distinct approach:

- Scotland has developed the strongest infrastructure through a tertiary approach to quality, consolidation of funding bodies and well-established articulation routes
- Wales has embedded lifelong learning within a coordinated tertiary system through a principles-based approach rooted in the nation's history since devolution;
- Northern Ireland combines centralised oversight with flexible initiatives such as Skill Up, while also navigating its distinctive relationship with the Republic of Ireland
- England's Lifelong Learning Entitlement represents the most significant reform of higher education finance, but funding flexibility alone will not create coherent progression routes or learner demand.

Higher education funding is the sharpest dividing line. England's loan-based LLE may encourage providers to develop modular provision, but it transfers greater financial responsibility to learners and offers many existing graduates only a limited residual entitlement. Scotland and Northern Ireland reduce tuition costs but face constraints on publicly funded capacity, while Wales combines tuition fee loans with stronger maintenance support. No nation has yet successfully combined affordability, flexibility and sufficient provision.

Cross-border movement by adult learners is likely to remain limited. The more significant implications concern employers operating across the UK, institutions receiving learners with modular credit, and the recognition and transfer of learning between systems. The stakeholder survey which informed this report also reveals a substantial implementation gap: only four of 47 respondents considered their organisation prepared for the LLE.

The priority is therefore coordination rather than uniformity. Governments, funders, quality bodies and providers should compare evidence, improve the portability of credit and connect lower-level, higher technical and employer-funded learning into clearer pathways. Lifelong learning will succeed only when adults can understand, afford and navigate the opportunities available to them.



No nation has yet successfully combined affordability, flexibility and sufficient provision.

Introduction

Education and skills policy is a devolved matter in the UK. While all four nations share common challenges, each is pursuing a distinct approach to lifelong education. England's Lifelong Learning Entitlement (LLE) is the most visible expression of this ambition. Yet it has been developed largely as an England-only reform, disconnected from parallel approaches in Scotland, Wales and Northern Ireland despite its likely cross-border implications. Where alignment does exist, it tends to reflect common reference points rather than deliberate cross-government coordination, with lessons at risk of being lost between the four systems.

This report compares the different approaches to lifelong education emerging across the UK. It considers what each nation can learn from the others, where divergence reflects legitimate differences in national circumstances and priorities, and where greater coordination could help address shared challenges. Its purpose is not to seek uniformity, but to encourage more systematic learning and collaboration across the UK.

The analysis draws on a review of the relevant literature, QAA's own regulatory data and quality assurance expertise, a survey of higher education stakeholders¹ across the UK, and interviews with senior stakeholders from the four nations. Together, these sources provide insight into how lifelong education policies are developing, how they are experienced by the sector, and where opportunities exist for closer cooperation.

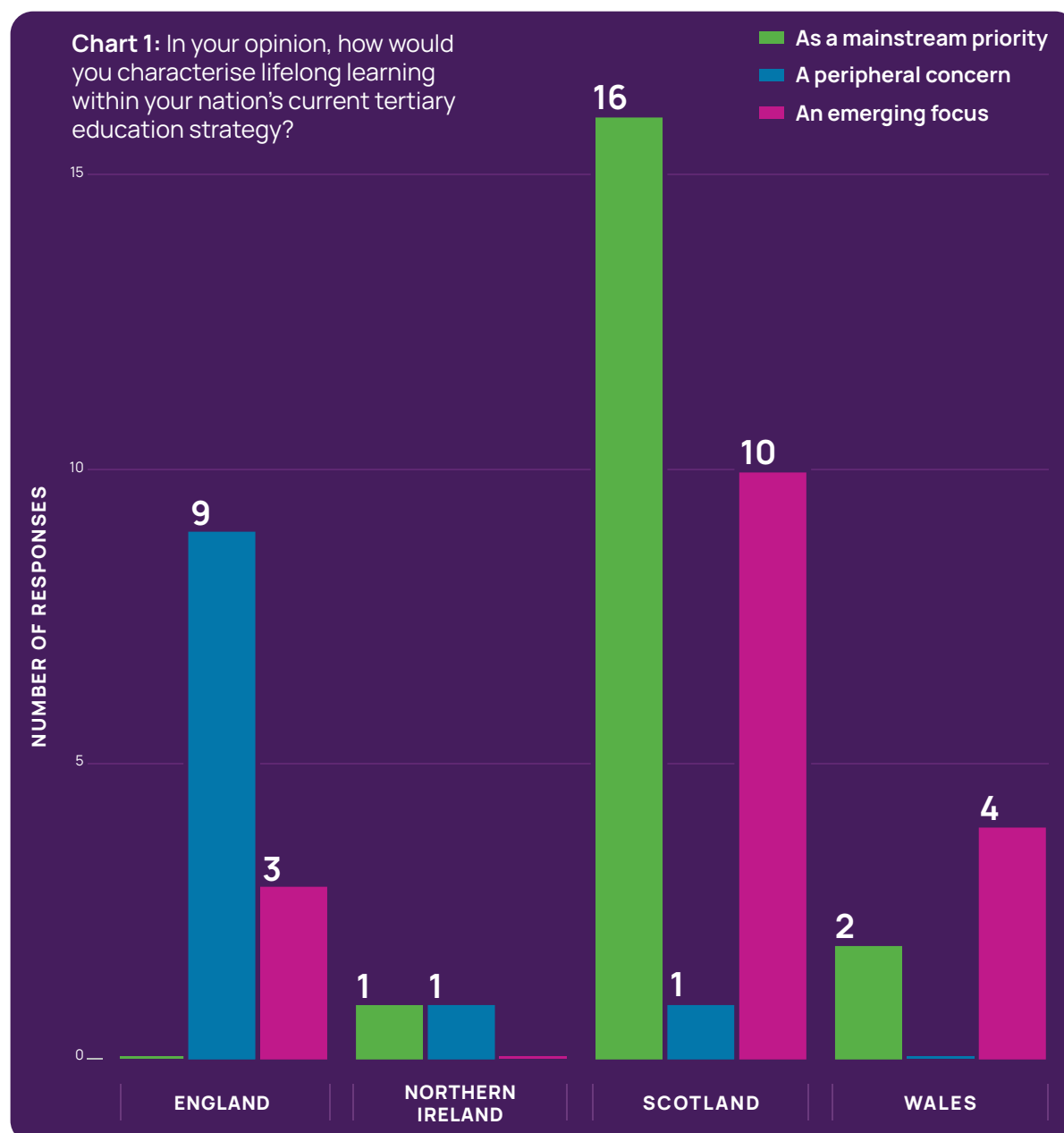


¹ QAA stakeholder survey, Lifelong learning across the UK nations (fieldwork to August 2026), n=49 (Scotland 28, England 13, Wales 6, Northern Ireland 2). Figures are indicative of respondents' views and are not weighted or representative; the small and uneven national base means findings for Wales and Northern Ireland in particular should be read as illustrative only. QAA/LEI colleague insight sessions and sector interviews (2026)

1. Four nations, four answers

Lifelong learning encompasses the education and training people undertake beyond compulsory schooling and throughout their adult lives, whether to gain qualifications, update their skills, change career or participate more fully in society. Across the UK, the concept has evolved from a broad commitment to adult education and widening participation into a more explicit policy response to economic change, workforce needs and longer working lives. It now embraces further and higher education provision, apprenticeships, professional development, modular and short-course provision, and routes that allow learners to build and transfer credit over time.

A meaningful comparison must begin with the distinctive features that have shaped each nation's approach. The following overview is not exhaustive; rather, it highlights how different policy choices, institutional structures and national circumstances are influencing the development of lifelong learning across the UK.



→ 1. Four nations, four answers

England: learner choice and employer demand

Adult learning across England

England does not have a single framework for lifelong learning. Instead, adults encounter several funding and delivery systems operating according to different principles. Provision at Levels 1 to 3 is supported principally through the Adult Skills Fund, statutory adult entitlements, Free Courses for Jobs, Skills Bootcamps and Advanced Learner Loans, with an increasing share of publicly funded provision commissioned by Strategic Authorities. Apprenticeships and the new Growth and Skills Levy organise training around the needs of employers and occupations, while higher education is financed largely through individual tuition fee loans. Alongside these publicly supported routes is a substantial independent market in which individuals and employers pay directly for vocational training, professional development and industry certification. England's approach is therefore neither wholly market-led nor centrally planned. It combines publicly commissioned provision at lower levels, investment in apprenticeships through an employer levy, and individual choice supported by loans in higher education. Skills England and the growing role of Strategic Authorities represent attempts to make this landscape more responsive to national, sectoral and local skills needs. However, the principal funding streams remain separate, with different eligibility rules, incentives and measures of success. Learners are expected to navigate between them even though they do not yet form a coherent lifelong pathway.

“Scotland is busy setting up a suite of stackable micro-credentials to be offered by both universities and colleges. England is leaving it up to individual providers to sort out what they want to do”

Academic/Teaching Professional
survey respondent

Higher education remains the most market-driven part of this system. The Higher Education and Research Act 2017 formalised a regulatory model based on provider competition, student choice and measurable outcomes. Providers depend heavily on enrolment and tuition-fee income for financial sustainability. They are also assessed within an outcomes-focused quality assurance approach, where providers' quality is measured in part through their rates of continuation, completion and progression. These incentives can work against the objectives of lifelong learning. Adults returning after a long absence from education may require more outreach, guidance and support, while short and modular courses generate less income than full qualifications, and some non-traditional student groups have lower continuation, completion and progression rates. Providers may therefore face higher costs and greater regulatory risk in serving precisely those learners whom lifelong learning policy is intended to reach.

This market approach has come into conflict in recent years with the significant emphasis placed on further and higher education's ability to close skills gaps and boost employability and growth, framed around the focus on “skills for jobs”.

The 2021 Skills for Jobs White Paper frames FE's purpose explicitly as giving people “the technical skills they need to get good jobs and boost the UK's productivity”. Successive Westminster Governments have been increasingly concerned that the market-led system is not delivering the level of education and the skills most aligned with the government's priorities. This has led to increasingly directive initiatives – such as the formation of Skills England – while maintaining a system governed by market ideology. This “skills” approach is also narrower framing than that of the other three nations: Northern Ireland's 2023 vocational education consultation named lifelong learning and reskilling as core purposes alongside productivity; Scotland's National Strategy for Economic Transformation frames skills around participation and progress in the labour market *and* leading fulfilling lives; and Wales's Hazelkorn Review emphasises citizen formation and social mobility alongside labour-market responsiveness. The “lifetime skills guarantee” from the Skills for Jobs White Paper has not materialised into a genuine adult-learning focus; what has emerged in its place is the LLE, for which there are real concerns the main audience will be traditional learners.



→ 1. Four nations, four answers

The LLE as the flagship higher education reform

The Lifelong Learning Entitlement is intended to address one of the central limitations of the existing higher education system in England: its organisation around a single, largely continuous period of study undertaken early in adult life. First announced as the Lifelong Loan Entitlement, it has developed into a new student-finance system through which eligible learners can access the equivalent of four years of tuition-fee support for higher-level education. From January 2027, it will fund full courses at Levels 4 to 6 and, initially, modules from Higher Technical Qualifications and selected Level 6 qualifications aligned with priority skills needs. It will also replace Advanced Learner Loans for eligible qualifications at Levels 4 to 6.

Its long-term significance lies in shifting the basis of higher education finance from academic years towards credits. In principle, this should allow people to study in shorter periods, pause and resume their education, combine learning undertaken at different stages of life and build modules towards larger qualifications. Standardised transcripts should make modular achievement more visible and portable. The LLE is therefore more than an adult-learning initiative: it is a reform of the student-finance system that will affect school leavers, part-time students, adult returners and people seeking to retrain during their working lives.

This wider reach is important. Most LLE funding is still likely to support full qualifications, including conventional undergraduate degrees. A new learner could use most of their entitlement on an initial three-year degree, leaving approximately one further year for subsequent study, while previous publicly supported higher education will normally reduce the entitlement available to a returning learner. Decisions made by young people at the beginning of their higher education may therefore affect their capacity to retrain later. The LLE creates the possibility of lifelong access to finance, but it does not reserve that finance for adult retraining.

Nor does the availability of a loan necessarily create demand. The LLE is principally responsive to learner demand: funding follows the choices made by individuals, and providers will develop provision where they believe sufficient numbers of learners will enrol. Government can influence those choices through eligibility rules and by restricting modular funding initially to priority subjects, but employers do not directly commission LLE provision. The model assumes that learners can identify which skills they need, understand the value of different qualifications and judge whether taking on additional loan debt will improve their prospects.

This may favour learners who are already confident in navigating higher education. Awareness of Higher Technical Qualifications remains limited, while the range of courses, modules and funding options can be difficult to understand. Finance will have limited effect if prospective learners cannot identify a credible route from their present qualifications and employment into better work.

Connecting learner and employer demand

The Growth and Skills Levy provides a contrasting form of demand. Apprenticeships are attached to employment and occupational standards, with employers selecting the training that their workforce requires. The reformed levy extends this principle through foundation apprenticeships and shorter apprenticeship units designed to meet specific skills needs. Unlike the LLE, these units are employer-led, job-related and do not require the learner to take out a tuition fee loan.

The two systems could be complementary. The Growth and Skills Levy can support immediate, employer-identified workforce needs, while the LLE can give individuals access to portable, credit-bearing learning that supports longer-term career development. An employee might, for example, undertake a short apprenticeship unit to meet an immediate technical requirement and subsequently use the LLE to progress towards a Level 4 or 5 qualification. Equally, modular higher education could provide progression for apprentices who want to build on occupational competence without committing immediately to a full degree.

At present, however, these possibilities are not designed as an integrated pathway. Apprenticeship units and LLE modules use different funding systems and are subject to different approval, assessment and quality arrangements. There is no general guarantee that learning funded through the levy will carry higher education credit or count towards an LLE-funded qualification. The system therefore risks developing two separate modular offers: one shaped by employer demand but not always supporting progression, and another carrying recognised academic credit but relying on individual learners to identify its labour-market value.

“I suspect the LLE will mainly benefit learners who are already confident in navigating the HE landscape and have the social capital to identify their own education and career path”

Senior Leader,
survey respondent

→ 1. Four nations, four answers

Building pathways from Level 3

A similar discontinuity exists between the LLE and provision at Levels 1 to 3. The LLE begins at Level 4, but many of the adults whom lifelong learning policy most needs to reach require a supported route through lower-level provision first. Adult Skills Fund qualifications, apprenticeships, independent vocational training and Access to HE Diplomas can all provide foundations for higher learning, but their connection to the LLE remains underdeveloped. Funding modular higher education will not, by itself, create progression where admissions arrangements, credit recognition, guidance and institutional partnerships are absent.

The Access to HE Diploma demonstrates what a more complete pathway can achieve. Eighty-three per cent of entrants are aged 21 or over, compared with 37 per cent of learners entering higher education with other Level 3 qualifications. Almost a quarter come from low-participation neighbourhoods and a similar proportion report multiple impairments, health conditions or learning difficulties. Despite this profile, Access to HE students achieve outcomes broadly comparable with those entering through A levels. Their success reflects not simply the availability of funding, but personalised guidance, integrated study-skills development, developmental assessment and strong pastoral support.

This evidence points to the central weakness in the current design. The LLE creates a potentially important financial mechanism, but finance is only one component of a functioning lifelong learning system. Its modular offer is initially narrow; funded modules must belong to an eligible parent course delivered by the same provider; and learners must normally undertake a module or bundle worth at least 30 credits. Modular provision at Level 7, where employers and adult learners may demonstrate significant demand for continuing professional development, is not part of the general offer. Although standardised transcripts should make achievement more transparent, they do not by themselves ensure that credit will transfer between institutions or accumulate into a qualification elsewhere.

The opportunity is to connect the LLE to the rest of England's skills system: Level 3 entitlements and Access to HE as entry routes; HTQs and modular higher education as stepping stones; and apprenticeships and the Growth and Skills Levy as sources of employer demand and workplace application. This would require clearer progression agreements, stronger information and guidance, recognition of prior learning and closer collaboration between colleges, universities, independent training providers, employers and Strategic Authorities.

Without these connections, the LLE may operate primarily as a more flexible method of financing existing higher education and may disproportionately benefit learners already equipped to navigate that system. With them, it could help create genuine pathways through which people move from lower-level and occupational learning into higher technical and professional education throughout their working lives. The difference will depend less on the existence of the entitlement itself than on whether England builds the supporting infrastructure needed to turn separate funding programmes into a coherent lifelong learning system.

England's approach exemplifies the tension between a market and demand led sector and the necessity of direction to reach disengaged learners and ensure skills gaps are closed.

Its distinction is not because it differs in ambition, but through its attempt to achieve that ambition within a marketised sector: the LLE asks a funding reform to do the work of a system, while other, successful lifelong learning routes are succeeding in spite of market logic. England's approach offers many lessons on achieving successful funding reform, but it would benefit from looking to Wales and Scotland to learn how to marry that with a more flexible and expansive system.



→ 1. Four nations, four answers

Scotland: Flexibility built on existing foundations

The Independent Review of the Skills Delivery Landscape, led by James Withers and published in June 2023, consolidated the approach to education funding in Scotland.¹ All post-school provision funding now sits within the Scottish Funding Council (SFC) and all student support funding sits with the Student Awards Agency for Scotland (SAAS). This situates college, university, research and innovation funding alongside funding for apprenticeships and national training programmes within one body. These machinery changes are important in codifying Scotland's approach to the full spectrum of learning. It is, however, too soon to tell if they will have a tangible impact on the success of lifelong learning: many of the proposals from the Withers Review which may have had a greater impact on lifelong learning, such as a commitment to foundation apprenticeships, were deprioritised amid concern about the sector's financial pressures.³

Scotland provides a useful lesson for the other UK nations about how far the foundational architecture around lifelong learning can create its success.

Scotland has built the most developed articulation and college–university progression infrastructure of the four nations. “Articulation” is the long-standing term for students entering degree study at a later stage using credit gained at a college, and the Scottish Government has made a standing policy commitment to grow it further. Approximately 8,675 students with an HNC/D progressed from college to university in 2023–24, though comparable data has recently been affected by collection issues.⁴ This approach has important implications for lifelong learning. 38% of Scottish college students in 2026 were 25 years and over.⁵ Where articulation is cohort-based, it functions relatively smoothly; but individual students who join a degree later through less formalised routes can arrive with differing levels of induction, orientation or support compared to students who started in Year 1 or progressed as a cohort. The processes exist, but they risk failing learners if accurate and timely information about the system is not actively communicated to those navigating it individually rather than through a pre-built pathway.

Scotland is the first UK nation to take a fully tertiary approach to quality, reviewing colleges and universities within the same method. Quality assurance sits within Scotland's Tertiary Quality Enhancement Framework (TQEF), with a clear vision for a more coherent and streamlined tertiary education system. To achieve the vision set out in the TQEF, the Tertiary Quality Enhancement Review (TQER) explicitly names driving parity of esteem across tertiary pathways as an objective. This is, in part, achieved by the embedded proportionality in TQER: a *tertiary* but not *uniform* approach. Given the third of college students who are 25 years or over, this is also important for lifelong learning. For the first time, this covers both degree-awarding powers and the activity of credit-rating the smaller building blocks of provision – a genuine adaptation of an existing framework to new, varied forms of provision, enabling learning that sits outside a traditional degree to be captured within the same method.⁶ By reviewing both colleges and universities, the method reviews both sides of a learner's progression through articulate, as all providers involved in joint articulation are reviewed using the same method.

Scotland's approach to lifelong learning is structural, as shown through the development of a single tertiary quality method, consolidation of funding infrastructure and well-established articulation routes. It provides a useful lesson for the other UK nations about how far the foundational architecture around lifelong learning can create its success, and what is needed alongside it to create genuine parity of esteem and access for learners throughout their lives.



² The independent review, titled 'Fit for the Future: developing a post-school learning system to fuel economic transformation' and published in June 2023, examined Scotland's skills delivery landscape and national public bodies.

³ <https://wonkhe.com/blogs/all-about-scotlands-newly-passed-tertiary-education-and-training-act/>

⁴ <https://collegesscotland.ac.uk/documents/briefings-and-publications/publications/2645-keyfacts-2026/file>

⁵ <https://collegesscotland.ac.uk/documents/briefings-and-publications/publications/2645-keyfacts-2026/file>

⁶ <https://www.qaa.ac.uk/docs/qaas/reviewing-he-in-scotland/tqer-guide-for-institutions.pdf>

→ 1. Four nations, four answers

Wales: Lifelong learning as the founding principle

Lifelong learning is baked into the Welsh education system as a foundational principle, dating back to the title of the 2001 post-devolution paper *The Learning Country: A Comprehensive Education and Lifelong Learning Programme to 2010*.⁷ The establishment of Medr as a single body responsible for further education, higher education, apprenticeships and adult learning together is therefore the culmination of over two decades of policy, rather than a new departure. Under the Tertiary Education and Research (Wales) Act 2022, tertiary education is defined in an age-inclusive way for all those over the age of 16, and “promoting lifelong learning” is the first of Medr’s eleven statutory strategic duties. This is embedded across live policy decisions (such as Medr’s Apprenticeship Programme consultation) and even in Medr’s infrastructure, including the name of its core data system and of the relevant Welsh Government directorate, the “Skills, Higher Education and Lifelong Learning Directorate”. One gap remains underneath this ambition: unlike in Scotland, college provision outside higher education has no equivalent statutory quality framework to the National HE Quality Assessment Framework and UK Quality Code that cover higher education. The establishment of Medr and close working between QAA and Estyn in Wales addresses this to some extent, but the gap adds an additional barrier to the comparability and transferability between FE and HE and Wales and other UK nations.

7.9%
of working-age adults
in Wales have no
qualifications at all

A comprehensive approach to the learning journey is necessary in Wales, where the baseline for adult qualifications is challenging. 7.9% of working-age adults in Wales have no qualifications at all, and 67.4% are qualified to Level 3 or higher, with greater regional disparities exacerbating these figures in some areas. The Welsh Government’s targets run to 2050; an indication of how far the current position sits from its ambitions. Compared with the rest of the UK, Wales is at the lower end of adult attainment measures and funding for adult learning has historically been subjected to cuts, although the September 2025 Written Statement, “Our Commitment to Adult Education and Lifelong Learning” commits to an investment of more than £80m in part-time and adult learning. The current flagship initiative for adult learning is Personal Learning Accounts: short, flexible, fully funded sub-degree courses in skill-shortage areas for employed adults earning below the Welsh full-time median wage (approximately £34,000 in 2023–24). Nearly 30,000 adults have benefitted since the launch in 2019, and a 2023 evaluation found them effective at drawing employed adults back into learning.

This focus on adults is complicated by Wales having the highest rate of young people not in education, employment or training (NEET). While an issue for all four nations, this is particularly acute in Wales. The proportion of young people aged 16 to 24 in Wales who were NEET was 15.1% in the year ending June 2025, an increase of 3.6 percentage points over the year.¹⁴ Medr frames these as two sides of the same problem: today’s NEET population plausibly becomes a meaningful share of tomorrow’s lower-qualified adults, disengaged from learning.¹⁵ On the most recent figures the challenge has intensified sharply, with the combined 16–24 NEET measure rising through 2025 to levels last seen around 2013.¹⁶ Despite a continuing commitment and radical reform in the creation of Medr, Wales’s efforts are therefore challenged by a worsening, not stable, baseline.

Wales’s approach to lifelong learning is principles-based, longer standing and arguably more deeply embedded than any other UK nation. It can provide clear lessons for other UK nations on building ambition and architecture, but it faces the same delivery challenges those other nations do. Despite a commitment of over two decades, the qualifications gap continues to widen and it remains to be seen if the establishment of Medr and the tertiary approach can solve this problem.

⁷ <https://education-uk.org/documents/pdfs/2001-learning-country-wales.pdf>

⁸ Medr, Strategic Plan 2025–2030 (2025); Tertiary Education and Research (Wales) Act 2022.

⁹ <https://www.medr.cymru/wp-content/uploads/2025/03/Medr-Strategic-Plan-2025-2030.pdf>

¹⁰ <https://www.gov.wales/levels-highest-qualification-held-working-age-adults-2025.html>

¹¹ <https://epi.org.uk/publications-and-research/uk-nations-education-and-training/>; <https://www.gov.wales/written-statement-our-commitment-adult-education-and-lifelong-learning>

¹² **Medr (2025)** Programme Specification: Personal Learning Account. Available at: <https://www.medr.cymru/wp-content/uploads/2025/05/Programme-Specification-Personal-Learning-Account-Medr-Version-English.pdf>

¹³ **Welsh Government (2022)** £3m skills boost to the digital and green sector [news release]. Available at: <https://www.gov.wales/3m-skills-boost-digital-and-green-sector>; **Maughan, C. / Wavehill (2023)** *Evaluation of Personal Learning Accounts: Final Report*. Welsh Government, GSR report number 61/2023. Available at: <https://www.gov.wales/evaluation-personal-learning-accounts>

¹⁴ Education Policy Institute / SKOPE (University of Oxford) (2024) *Post-16 education and training in the UK nations: a comparative analysis*; **Welsh Government (2025)** Young people not in education, employment or training (NEET): July 2024 to June 2025

¹⁵ Medr (Commission for Tertiary Education and Research) (2025) *Strategic Plan 2025–2030*.

¹⁶ **Welsh Government (2026)** *Young people not in education, employment or training (NEET): 2025*

→ 1. Four nations, four answers

Northern Ireland: Navigating multiple systems and borders

Northern Ireland has uniquely centralised oversight and delivery of lifelong learning through the Department for the Economy. Its six regional colleges are subordinated directly to the Department, a genuinely structural difference from the other three nations, all of which route funding through at least one arm's-length body.

Political instability has constrained the ability to implement much action on lifelong learning. The acute constraint of there being no functioning Executive is no longer an issue, but the delivery problem persists; audit reports have found the Skills Strategy showing limited progress towards its strategic goals, with the proportion of the working-age population qualified to Level 2/3 falling year on year, and adult participation in education and training falling alongside it. Adult learning participation in Northern Ireland is low, lagging behind the rest of the UK significantly and behind OECD averages further still. Against that, Northern Ireland's Skill Up programme — an accredited, entry-level-to-Master's, short-intervention model delivered through FE and HE — is a rare example of flexible provision explicitly designed around removing barriers to participation rather than assuming demand will follow supply, though its future beyond an initial funded period remains uncertain.

What most clearly differentiates Northern Ireland, however, is its all-island relationship with the Republic of Ireland. The Wales and NI Microcredentials Framework, recently published by QAA, has been deliberately aligned with the recommendations on microcredentials adopted by the Council of the EU in 2022, specifically so that it is compatible with collaborative cross-border microcredential development and delivery across Northern Ireland and the Republic. An all-island approach is not simply a matter of coordinating policy across a political border, as is broadly the case between the UK's four nations. It requires reconciling two separate qualifications systems — each with its own award classes and quality assurance body — neither of which currently maps formally onto the other, even as both QAA's framework and QQI's own consultation move, independently but in parallel, toward compatible principles. Northern Ireland is, in effect, navigating two distinct cross-border relationships at once: one with the rest of the UK, and a structurally quite different one with the Republic of Ireland.

Northern Ireland's approach is one shaped more by context than by policy. Where Wales and Scotland have actively chosen a systems-based, tertiary model, Northern Ireland's position is largely the product of centralised structures, chronic instability and a unique geography rather than a consistent strategic vision. The result is a nation that, by necessity, is looking to learn lessons from other UK nations on lifelong learning but has the most complex and unique context in which to bring them to life.



Adult learning participation in Northern Ireland is low, lagging behind the rest of the UK significantly

¹⁷ Department for the Economy (Northern Ireland), Skills Strategy for Northern Ireland: Skills for a 10x Economy (2021); Northern Ireland Audit Office, Developing the skills for Northern Ireland's future (September 2024).

¹⁸ QAA, Draft Microcredentials Framework for Wales and Northern Ireland (2026); Council of the European Union, Recommendation on a European approach to micro-credentials for lifelong learning and employability (2022).

2. Funding lifelong learning

The financing of higher education is perhaps the most significant difference between the four national systems. It shapes what learners pay, how institutions are funded, the availability of places and whether adults can obtain support to return to education. The four nations are therefore not simply using different mechanisms to finance similar provision: their funding settlements create different opportunities and barriers to lifelong learning.

In England, higher education funding largely follows the learner. The maximum full-time undergraduate fee in 2026–27 is £9,790, normally financed through an income-contingent loan. The Lifelong Learning Entitlement extends this model by giving a new learner access to up to £39,160 of tuition-fee support for full qualifications and eligible modules. By linking finance more closely to credits, it could give providers a stronger incentive to develop shorter and more flexible provision.

Scotland takes a fundamentally different approach. Eligible Scotland-domiciled students studying for their first full-time undergraduate qualification at a Scottish institution do not normally pay tuition fees, which are funded through the Student Awards Agency Scotland. This removes the direct tuition cost for eligible learners, but provision remains constrained by the public funding available and the number of funded places. Scotland does not currently offer an equivalent individual entitlement that can be drawn down for modular study throughout a working life.

Wales retains tuition fees and loans but combines them with more extensive maintenance grants, including support for eligible part-time learners. This matters for adult participation because living costs, childcare and reduced earnings can be greater obstacles than tuition fees alone. However, Wales does not currently have an equivalent to the LLE through which learners can access a defined lifetime allocation for modular higher education.

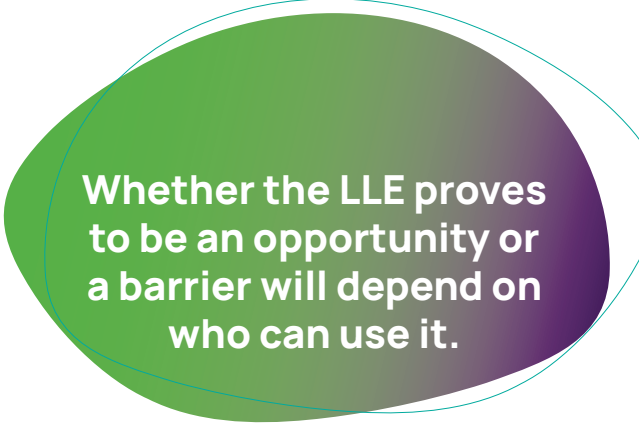
Northern Ireland combines substantially lower fees with tighter limits on capacity. In 2026–27, an eligible Northern Ireland student studying at a public institution within Northern Ireland can access a tuition-fee loan of up to £4,985, compared with up to £9,790 if studying elsewhere in the UK. This makes remaining within Northern Ireland more affordable, but the cap on publicly supported university places restricts access and contributes to outward student movement.

The central difference is therefore a trade-off between price, flexibility and capacity. Scotland and Northern Ireland reduce the tuition cost faced by learners but rely more heavily on limited public budgets. England places more responsibility on individuals, but the LLE could provide a scalable source of finance for modular provision and give English institutions an early advantage in developing flexible courses. Wales occupies an intermediate position, combining tuition-fee loans with stronger maintenance support and a more coordinated tertiary structure.

Whether the LLE proves to be an opportunity or a barrier will depend on who can use it. Although repayments are income-contingent, willingness to take on further debt cannot be assumed among adults with existing financial and family commitments. Nor does every adult receive a new four-year entitlement. Previous publicly supported higher education is deducted: at 2026–27 fee levels, someone who has already completed a typical three-year degree would normally have £9,790 remaining, equivalent to approximately one further year of study. Previous support received in another UK nation also counts towards this calculation. A learner whose tuition was paid by SAAS in Scotland, for example, would still have those years deducted if they later became eligible for the LLE in England.

The LLE may consequently offer its greatest benefits to future generations of learners who can plan their education around a flexible entitlement from the outset. Its immediate value to the existing graduate workforce may be more limited. Conversely, free or lower tuition elsewhere in the UK will not produce a lifelong learning system unless sufficient funding is available for adult places and flexible provision.

No national model therefore resolves the problem on its own. England offers greater potential flexibility but places more financial responsibility on the learner; Scotland and Northern Ireland offer lower-cost participation but face tighter capacity constraints; and Wales provides stronger support with living costs without yet creating a modular lifetime entitlement. The test for all four nations is whether their funding systems can combine affordability with flexible access and sufficient institutional capacity to enable adults to return to learning throughout their working lives.



Whether the LLE proves to be an opportunity or a barrier will depend on who can use it.

3. What can the nations learn from one another's approaches to lifelong learning?

All four UK nations recognise the economic and, to some extent, social imperative of lifelong learning. Their approaches are therefore best characterised as four different answers to the same problem.

The single, most significant policy differences between the four nations is the funding mechanisms that drive lifelong learning. England has, in the LLE, the most developed funding reform of the four nations through a credit-based loan entitlement that results in a student finance system which actively enables flexible study. But the focus on the funding system has been to the detriment of the broader architecture needed to embed lifelong learning within policy and the sector. Scotland and Wales, by contrast, are yet to develop such a significant funding *reform* but have consolidated the funding *infrastructure* through the SFC in Scotland and Medr in Wales.

Scotland's approach offers a clear example of the importance of structural foundations. The consolidated approach through the SFC, the most developed articulation routes within the four nations and the first fully tertiary quality method provide the infrastructure needed to guide learners through tertiary education throughout their lives. But, without an individual mechanism such as the LLE, there is a risk that Scotland succeeds at the sector level, or on a cohort basis, but misses the individual incentives needed to support learners to retrain and upskill across their lives. In this respect, the strength of the approaches taken in Scotland and England mirror the vulnerabilities in the other.

There are many alignments in Wales and Scotland's tertiary approaches, but the starting points are different. Wales is consolidating a journey it has been on since devolution and Scotland has more recently introduced a tertiary approach. Wales offers the lesson on ambition and embeddedness, a principles-based approach to something that forms a foundational pillar on the nation's approach to education and skills. This through-line has enabled significant reform and illustrates the importance of principles and overarching strategy to the other UK nations. But Wales also serves as a cautionary tale for the other nations about the limits of assuming ambition can deliver outcomes. Despite this through-line, Wales continues to have low baseline adult qualifications and high NEET rates, demonstrating that commitment is not always sufficient in a fast-developing world.

Despite the somewhat diverging approaches, the challenges in achieving progress are shared. Front-loaded systems which prioritise provision for under 25-year-olds remain the norm everywhere. Most of the public funding continues to be directed at young people rather than adults already in (or out) of work. This has resulted in disengaged adults being the least well served group in every nation, despite being recognised as a priority in each nation's skills strategy.

The same specific gaps recur regardless of which model a nation has chosen: admissions and readiness-to-study remain unresolved practical challenges everywhere; quality assurance mechanisms, regulations and provider information systems designed for full qualifications continue to strain under genuinely flexible, stacked-credit models wherever they are tried; and visibility, as well as funding and design, limits how far well-intentioned provision actually reaches the learners it is meant to serve. The frameworks differ, but the underlying problem, and much of what would solve it, does not. This has real consequences for lifelong learning. UK-wide evidence on adult learning's impact on employment shows participation raises the likelihood of being in work – with the largest gains, of several percentage points, for those with no prior qualifications and no measurable effect for those already qualified at Level 4 and above. Reliance on out-of-work benefits falls on a similar pattern, dropping by 8 percentage points for those with no qualifications.¹⁹

Whatever else divides the four nations, none of them has yet built a system that reaches this population well. England leads on funding-instrument design but lags on system coherence and reaching disengaged learners; Scotland leads on structural architecture but has not yet proven that structure converts into access; Wales leads on embedded ambition but is losing ground on delivery; Northern Ireland trails on entitlement and stability but is uniquely advanced in confronting cross-border incompatibility. This does, however, have tangible value for learning from one another. Each nation's central weakness has, somewhere in the other three, a working example of how it might be addressed if they can look beyond the divergences of their approaches.



¹⁹ Learning and Work Institute (2025) *Lifelong learning and skills for longer lives*, funded by Phoenix Insights. London: Learning and Work Institute.

4. Are students crossing borders?

Cross-border student mobility is low almost everywhere in the UK, but the reasons differ sharply by nation, and treating “low mobility” as a single phenomenon would be a mistake. Roughly 96% of English students and 93% of Scottish students study within their home nation; in Wales the figure is closer to 70%, and in Northern Ireland around 80%.²⁰

Scotland's free tuition for the first undergraduate degree of a Scottish-domiciled student fosters in-nation retention: a Scottish student who leaves Scotland to study forfeits a substantial financial benefit. In turn, Scottish universities charge students from the rest of the UK the maximum fee allowed for UK students, in effect using that income as one source of cross-subsidy for the teaching and learning for Scottish-domiciled students.

Wales's comparatively higher outward mobility is best explained by system size, and the perceived benefits of studying outside Wales for some students. England and Scotland both offer such a wide range of institutions and courses within their own borders that most students have little practical need to look elsewhere. Wales's smaller system means a larger proportion of its students will want or need a course, or an institution, that Wales itself does not offer. Proximity between much of England and Wales (notably East Wales) increases the porosity of the border.

“Aside from purely online or distance-learning courses, I do not anticipate significant student mobility between Scotland and England that makes use of the LLE. The target mature student demographic seems unlikely to uproot families and jobs.”

Survey respondent, Scotland



²⁰ Higher Education Statistics Agency, Higher Education Student Statistics: UK, 2024/25 – Where students come from and go to study (2026).

→ 4. Are students crossing borders?

Northern Ireland faces the same smaller-system pressure. Lower home tuition fees act as a retention mechanism as they do in Scotland, but in the Northern Ireland this is often outweighed by the opportunities leaving can offer. Analysis of HESA's enrolment data shows that Northern Ireland's mobility pattern is distinctive in two further ways. First, the flow is strongly one-directional in a way it is not for Scotland or Wales. Northern Irish institutions draw only around 1200 UK-domiciled students from outside Northern Ireland.²¹ Second, part of the outward flow is attributable to capacity constraint: the Maximum Aggregate Student Number, a cap on publicly funded undergraduate places that has applied specifically to Northern Ireland and Republic of Ireland-domiciled students since 1994, means Northern Ireland's universities can offer far fewer places than the number of qualified local applicants each year.²²

For lifelong learning specifically, however, the traditional student mobility picture matters less than it first appears. Working adult learners with mortgages, jobs and family commitments are, in practice, extremely unlikely to travel long distances for the sake of a single short module. Where mobility does happen for this group, it tends to be local – between neighbouring institutions, or across a nearby border where two institutions sit close together.

This has already become challenging for providers in South-East Wales in particular, where existing provision across the border in English cities such as Bristol has created scenarios where LLE funding cannot be accessed, despite the provision being based in England, and thus causing the providers to rethink their existing provision. This was a strikingly consistent theme in both interviews and survey responses.

Employers operating across UK borders, however, do not share the sense of national educational boundaries that providers and policymakers work within. A single large employer with major sites on both sides of the England–Scotland border, moving staff between locations as routine business, encounters genuinely conflicting educational funding and delivery systems for what is, from its own perspective, simply one workforce. Senior leaders raised the same example independently – one citing BAE Systems, with major sites in both Preston and the West of Scotland – underscoring that this is a lived operational problem, not a theoretical one.



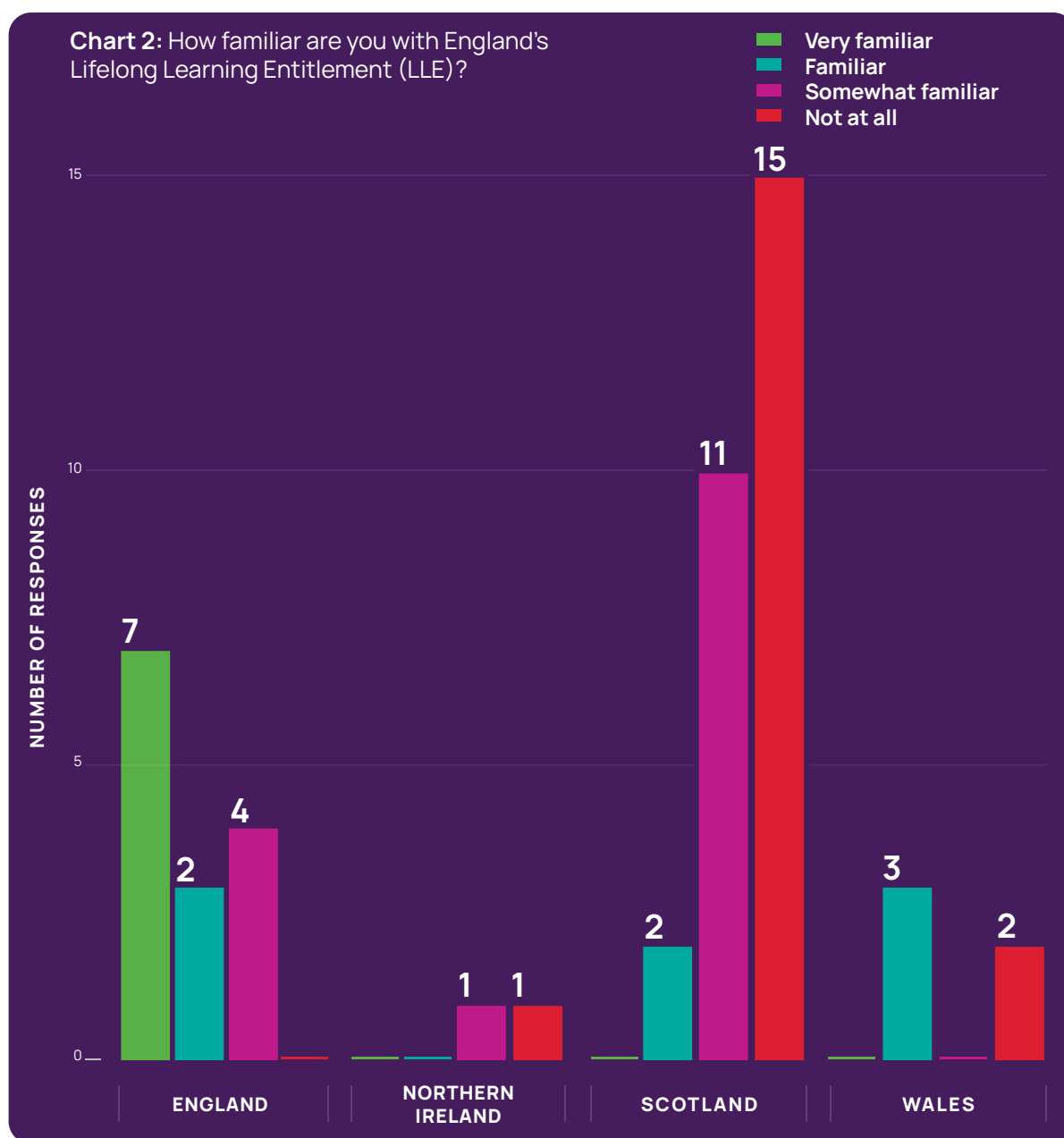
²¹ Higher Education Statistics Agency, Higher Education Student Statistics: UK, 2024/25 – Where students come from and go to study (2026).

²⁰ FactCheckNI, "Does Northern Ireland have a shortage of university places for local people?" (November 2025).

5. Cross-border implications of the LLE and tertiary reform

Familiarity with the LLE outside of England is low

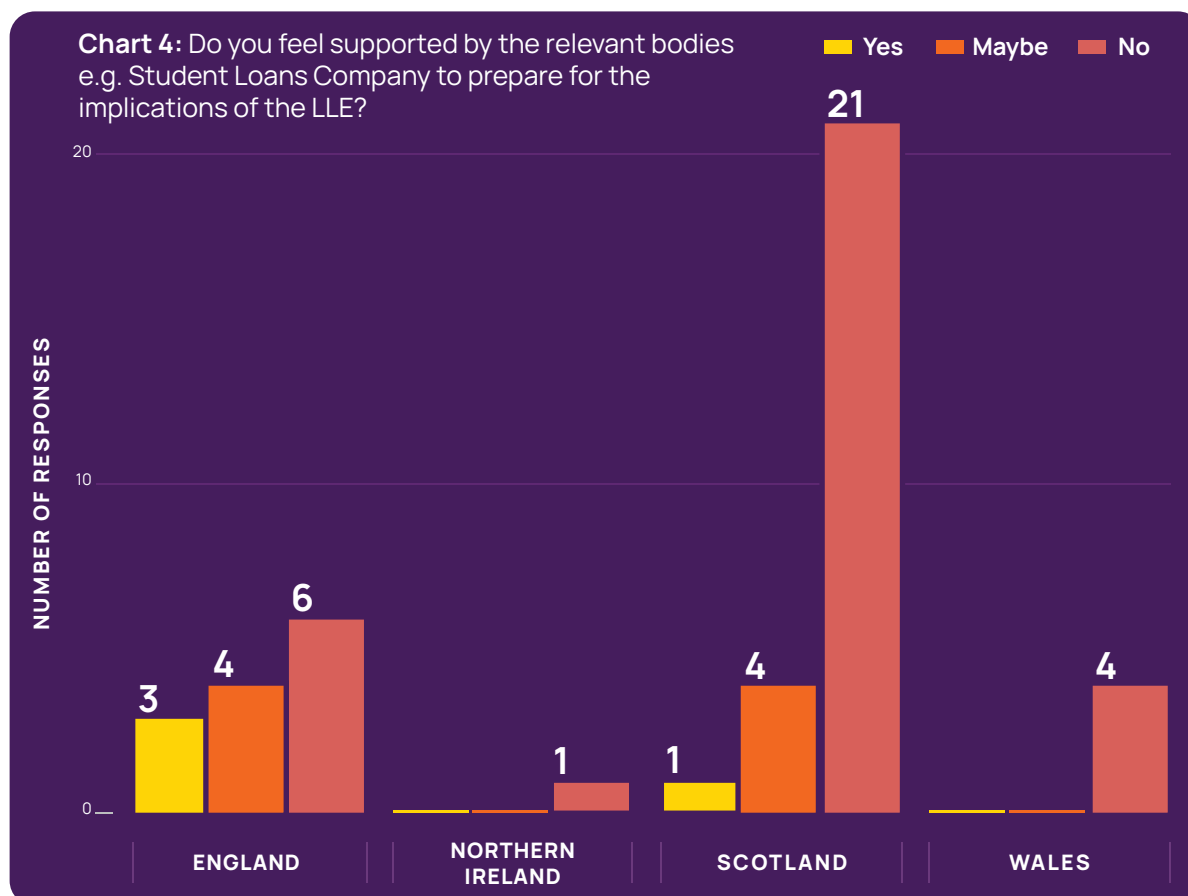
Awareness of the LLE outside of England is very limited, even as the underlying philosophy of lifelong learning remains central to other UK nations' education goals. The survey data presented above is corroborated by further sector engagement, where only those with a significant interest in flexible learning, such as QAA Cymru's Microcredentials Strategic Interest Group are familiar with the detail of the LLE.



5. Cross-border implications of the LLE and tertiary reform

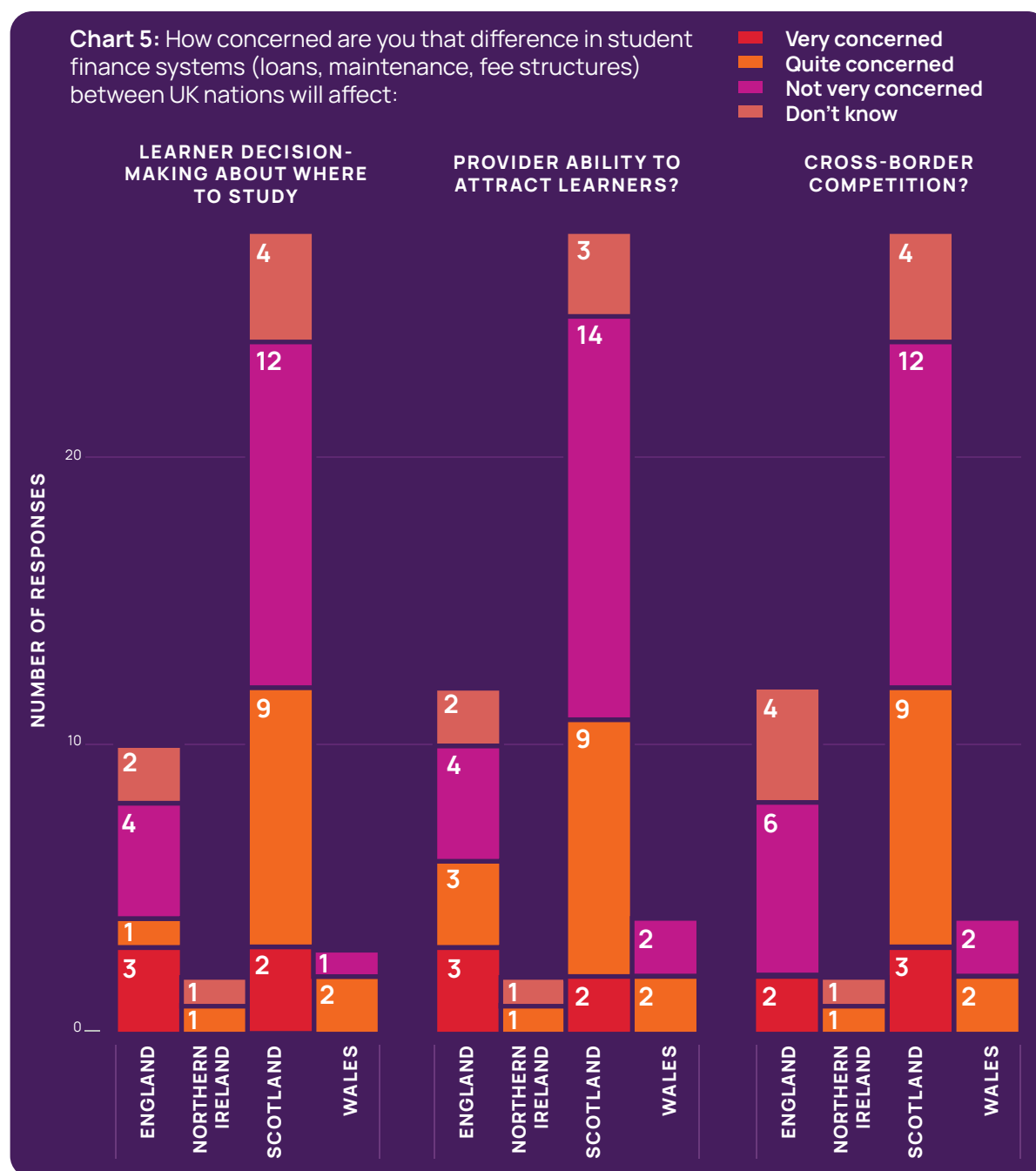
Institutions do not feel prepared or supported

QAA's survey suggests the sector is, so far, strikingly unready for all of this. For a policy whose applications open shortly after this report is published, that is a substantial readiness and support gap. While most concerning in England, providers who enrol English domiciled students are required to submit their course information to the Student Loans Company in an additional format to accommodate the LLE, and devolved nations providers are therefore already impacted by the policy. Further friction is risked if, in future years, learners with modular credit begin applying to institutions elsewhere in the UK too.



5. Cross-border implications of the LLE and tertiary reform

Notably, respondents were markedly less alarmed about finance-driven cross-border distortion, tending to be “not very concerned” that differences in loans, maintenance and fee structures would reshape learner decisions or provider competition, which is consistent with the understanding that adult learners rarely travel for modules.



However, this should not mean that the broader learnings from the LLE cannot translate in the other UK nations. The question of demand remains prominent, and other nations will (and should) be looking to England to see how these patterns materialise and how the sector responds. How providers respond to the quality assurance of modular learning – and how this delivers regulatory compliance – will also provide useful learnings. Finally, employer behaviour and how well employers respond to learners who have undertaken modular learning will also be important. Higher education may be devolved, but employers are not.

Conclusion

The four nations share a commitment to lifelong learning but are pursuing it through markedly different systems. Scotland has emphasised tertiary integration, articulation and common quality arrangements; Wales has made lifelong learning a statutory organising principle through Medr; Northern Ireland combines centralised oversight with the distinctive demands of its all-island context; and England is using the Lifelong Learning Entitlement to introduce greater flexibility into an individualised, market-based funding system. These differences reflect legitimate national priorities, institutions and political choices. The problem is not divergence itself, but the limited coordination and exchange of evidence between the four systems.

None of the nations has yet created a fully coherent lifelong learning system. Public funding remains weighted towards initial education and younger learners, while adults seeking to return, retrain or progress frequently encounter fragmented routes, uncertain recognition of prior learning or experience and limited guidance. Flexible provision is developing, but the supporting infrastructure has not always kept pace. Admissions, learner support, quality assurance, data systems and provider regulation are still largely designed around complete qualifications undertaken in a continuous period of study.

The LLE is the most substantial attempt to change this model. By funding credits and eligible modules as well as full qualifications, it could enable learners to study at different points in their lives and encourage English providers to develop more flexible provision. Its significance extends beyond adult learning: it will reshape how school leavers, part-time students and adult returners access and use higher education finance. However, it remains principally a funding mechanism. It does not, by itself, create learner demand, provide careers guidance, guarantee credit transfer or connect provision at Levels 1 to 3 with higher technical and professional learning.

There is also an unresolved tension between learner and employer demand. The LLE finances choices made by individuals, while apprenticeships and the Growth and Skills Levy organise training more directly around employer and occupational needs. These approaches could be complementary, allowing learners to move from employer-funded training into portable, credit-bearing higher learning. At present, however, they operate through separate rules, standards and funding systems. Without clearer progression agreements and recognition of prior learning, England risks creating parallel modular offers rather than an integrated pathway.

Funding is the sharpest point of divergence across the UK. England's loan-based model may give institutions a stronger incentive to develop modular provision, but it places more responsibility on individuals and may deter adults unwilling to take on further debt. Scotland removes tuition fees for eligible first-time undergraduates but depends on constrained public funding and does not offer an equivalent modular lifetime entitlement. Wales combines tuition fee loans with stronger maintenance support, while Northern Ireland offers lower fees but restricts the number of publicly supported places. No system has yet resolved the underlying trade-off between affordability, flexibility and capacity.



→ Conclusion

The LLE's value to the existing workforce may also be more limited than its name implies. Previous publicly supported higher education is deducted from an individual's entitlement, leaving many graduates with approximately one year of support rather than four. This applies to study funded elsewhere in the UK as well as in England. The LLE may therefore offer its greatest benefits to future generations able to plan their education around the entitlement from the outset, while providing a more restricted opportunity for many adults already in the workforce.

Differences in funding are unlikely to produce large-scale movement by adult learners, who are generally constrained by work, family and geography. The more immediate cross-border implications concern institutions, credit and employers. Providers may receive learners carrying modular credit from another system, while employers operating across the UK must navigate different funding and qualification arrangements for a single workforce. Higher education is devolved, but employers and labour markets do not stop at national borders.

The sector is not yet well prepared for these implications. Only four of the 47 respondents to QAA's survey believed that their organisation was ready for the LLE, while 32 did not feel supported by the relevant bodies to prepare. This suggests that the policy challenge is not confined to the formal design of the entitlement. Successful implementation will depend on whether institutions understand the reforms, learners can navigate them and employers recognise the value of modular achievement.

Greater coordination does not require the four nations to adopt a common policy or funding model. It requires more systematic comparison of participation, demand and outcomes; compatible approaches to recording and recognising credit; and regular exchange between governments, funders, quality bodies and providers. Each nation has experience from which the others can learn: Scotland's articulation and tertiary quality arrangements; Wales's integrated institutional architecture and maintenance support; Northern Ireland's flexible Skill Up provision and cross-border perspective; and England's experiment with credit-based finance.

The test of all four systems is ultimately the same. Lifelong learning must offer more than a collection of programmes or a theoretical entitlement to finance. It must provide adults with clear, affordable and supported routes into learning, enable them to carry their achievements between institutions and stages of life, and connect education more effectively with changing careers and employer needs. Devolution has produced four different answers to this challenge. The next step is to ensure that the nations learn from one another as those answers are tested in practice.



About the LEI

The Lifelong Education Institute (LEI) promotes learning and skills training for people at all ages and stages of their lives and careers.

Our unique convening role connects the education-and-skills landscape - linking universities, colleges, independent training providers, local authorities and employers - by providing research, policy and advocacy services to make lifelong learning work for people, employers and places.

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