

Lifelong loan entitlement consultation

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation. Our Blueprint for a Fairer Education System sets out our plan for an education system which is fairer for all.

B. Key points

3. We are broadly in agreement with the proposals, but we are concerned about the system of exemptions surrounding eligibility requirements to access lifelong learning loans. The loan is proposed for those over 25, who are part-time learners, learners with a level 4 or 5 award, a foundation year, or an access to HE qualification leading to a level 6 qualification. However, the proposed new system is over-complicated.
4. There appears to be no opportunity to accredit qualifications gained in employment, even though accreditation of workplace learning would demonstrate that the individual is sufficiently skilled to enter the next level of study.
5. We agree there should still be a minimum standard, but learners should not be disqualified from accessing funding if they have not met a minimum standard in areas irrelevant to their next level of qualification.
6. Minimum eligibility requirements should be designed to fit into a system of vocational and technical or vocational-specific lifelong learning pathways. This might also assist the government in addressing the current divide between academic and technical qualifications.
7. The opportunity to step on and off learning at various stages in one's life should be a greater consideration within the education and skills system, as this may reduce attrition in higher education in the longer term.

C. Answers to questions

Q1. How can we best ensure that, compared to the current student finance system, the LLE will better support learners to train, retrain or upskill throughout their lifetime?

8. It is important, firstly, to make learners aware of the loan entitlement and what it will mean for them in terms of the credit agreement and financial burden. Secondly, it is important that access to the lifelong learning loan is as simple as possible and accessible to as many people who wish to make use of it as possible.

Q2. What barriers might learners face in accessing/drawing on their LLE and how could these barriers be overcome?

9. Barriers to access for potential learners may be linked to concern about overstressing themselves financially, about the burden of debt in the longer term, about whether they can study at a pace which suits them, including taking time out when necessary and whether or not they meet the minimum standard for a loan.

Q3. What information and guidance should be displayed in a lifelong learning account to support learners to understand their options for using their LLE.

10. Details of funding available, repayment terms and pathways open to the learner for the whole of the loan period.

Q4. How can we best ensure that the LLE will enable learners to access technical as well as academic courses at levels 4 to 6?

11. Link work-related learning to technical pathways and provide detail to demonstrate options to level 4 to 6.

Q5A. How can we best ensure that the LLE will encourage FE and HE providers across the country to offer provision that closes the current skills gap and supports future upskilling?

12. By introducing a national credit framework which accredits all relevant learning whether funded by loans or not. Learners will then be able to total the value of their own learning to from levels 4 to 6.

Q5B. How can we facilitate collaboration between FE and HE providers and employers, to ensure that provision keeps up with industry developments?

13. About half of FE providers already offer higher education and most have links with other HE providers and with employers. Increased collaboration will ensue that when competition is minimised, the system of funding does not force providers to compete against each other.

Q5C. How can we help FE and HE providers to provide modules and courses that offer real value to employers and improve employment prospects for learners?

14. Many FE and HE providers already offer modular provision which offers real value to employers and improves employment prospects for learners. By offering a national credit accumulation framework for learning, existing courses can be tailored to further meet the needs of employers and learners seeking employment.

Q5D. How can providers support and facilitate learners gaining qualifications through modular study?

15. Providers already have extensive experience in supporting and facilitating learners to gain qualifications through modular study. Learners studying on a part-time basis have been taking modules for many years. The issue currently is that there is no one size of modules and no national credit accumulation system.

Q6. Do you think the move to the LLE will have any particular impacts on people with protected characteristics? If so, which groups and in what ways? Your answer could include information about both the potential challenges and the positive equality outcomes of this policy.

16. Yes. Those groups of people who do not have formal qualifications in English and maths will be impacted.

Q7. What barriers might learners with protected characteristics face in accessing/drawing on their LLE and how could these be overcome? Your answer here could include previous consideration of an alternative student finance product for students whose faith has resulted in concerns about traditional loans.

17. The example given is helpful. Other barriers include failing to achieve qualifications at school, not meeting the minimum criteria for a loan and not being able to pay back a loan at various stages in their working lifetime.

Q8. Should all level 4 to 6 courses which are currently designated for HESF funding be treated as automatically in scope for the LLE? If not, why not, and what additional criteria for inclusion should be considered?

18. Yes. This would be a fair approach for those learners currently on a pathway of learning for a higher-level qualification.

Q9. Specifically, do you think that the following courses, which currently attract HESF, should be incorporated into the LLE, under the same repayment terms as other provision (i.e. fee loans count towards an individual's four-year fee entitlement)?

19. Yes to Foundation year and Integrated Masters. A foundation year integrated into a degree course **do** need access to loans. PGCEs **may not** always need access to loans. Integrated Masters (3 years undergraduate plus 1-year Masters) **do** need access to loans.

If not, please explain why?

20. Individuals taking PGCE courses may not always need access to loans as they may attract training bursaries or special payments on taking up a post. However, access to funding should be available for those that cannot access bursaries or special payments.

Q10. What arrangements should be made under the LLE for courses which are over four years and are currently eligible for student finance – including medicine, dentistry and architecture?

21. Longer courses, such as those mentioned in the question, should be supported in full over five years to take account of those who are required to defer or delay some of their course. This would mean that anyone starting a longer (four years or more course) could have the opportunity to complete their study should they wish to do so, even if they have to defer for a time during that period.

Q11. We are proposing that all HTQs should be in scope of the LLE. Should approval as an HTQ be the sole route for qualifications that are ALL-funded to become eligible for the LLE? If not, why not, and what alternative route(s) would be appropriate? Please include detail on the process and eligibility criteria that would be used in any alternative route.

22. See answer to question 10 above. All qualifications for which loan repayments are a pre-requisite should be included.

Q12. In particular, how could employer-relevance be tested as a basis for LLE eligibility?

23. The content of the learning in work, as well as the assessment of learning in work, could be matched against similar qualifications which are accredited.

Q13. We are aware that some courses (e.g. medical degree courses, some ALL-funded courses) are not currently structured around individual credit-bearing modules. Should such courses be excluded from any form of modular funding, and if so on what grounds and criteria?

24. If the courses are funded in full, then there should be no need for module funding.

Q14. We are seeking views on whether to set a minimum amount per funding application equivalent to 30 credits. This is not a minimum module size, as smaller modules could be “bundled” together to meet the minimum application amount. What are your views on this proposal?

25. We would suggest that the minimum module size should be 10 assessed credits, which would still account for a sizeable chunk of learning.

Q15. Which (if any) courses should be funded per-academic year (i.e. using the same basis as the current-HESF-system), and which courses should be funded according to the number of credits in the course?

26. Courses which are already funded should continue to be funded. Others should be funded according to the cost and value of those courses. For example, a module which is part of a professional qualification will be worth more than a qualification which is not.

Q16. Do you/does your provider currently use a credit framework or follow credit rules, and if so which framework or rules do you/they use? (e.g. OfS credit table, Ofqual credit conditions).

27. Many providers use a system which is like a credit accumulation framework. However, as there is no national system, it is difficult to compare credit ratings.

Q17. In brief, what internal processes do you/they have to ensure compliance with the framework or rules?

28. Our members tell us that they use knowledge of the HE landscapes, awarding organisation details and the value placed on qualifications by employers to ensure compliance.

Q18. What impact could modular study have on study mobility across the UK?

29. It would certainly be of value within the UK where Scotland and soon Wales will be ahead of England in this regard. Further afield, a national credit-based system would help learners transfer to other countries should they wish to.

Q19. How can the LLE promote and encourage flexible study across England, Scotland, Wales, and Northern Ireland?

30. See answer to question 18. In addition, since the system in Scotland is more flexible than the one in England, we should follow the system already in place.

Q20. What should be the most important considerations when determining how the lifetime entitlement will work?

31. For individuals it will be overall cost and the implications for their day-to-day disposable income. For providers it will be accuracy in crediting all learning towards a higher qualification.

Q21. What, if any, age-related restrictions should be in place for the LLE that would impact on an individual's ability to access their loan entitlement?

32. If the individual can pay back the loan over 40 years, they would need to be able to financially pay for their loan by the age at which they cease to be economically active.

Q22. We propose that we only fund individuals taking modules that are derived from a full course. Do you think that there should be restrictions in place so that borrowers should not be able to use their whole entitlement on a succession of individual modules which are not on track to a full qualification? We would welcome views on what these restrictions could be.

33. No. If the loan fund is to be inclusive, it needs to be as flexible as possible.

Q23. In a system where modularised study is widespread, how can we ensure that learners and employers understand what programmes of study deliver the skills that employers need?

34. Learners and employers will both be aware that programmes of study should meet employers' needs. This message could be reinforced through media campaigns.

Q24. When considering restrictions by level and subject, how could the government ensure that the LLE is used for high-value learning that meets the needs of employers and the economy?

35. We believe that the LLE should have as few restrictions as possible.

Q25. Are there other restrictions we should consider on the use individuals can make of their entitlement?

36. No. If the lifelong learning entitlement is to be truly lifelong, then it needs as few restrictions as possible.

Q26. Do you think a future system should include a facility for provider-based bursaries, which providers allocate directly to students?

37. Yes. This would help many students and be in line with the maintenance grants currently available.

Q27. Should maintenance support, like fees, be proportional, so that e.g. modules which amount to one-quarter of a full-time year of study carry an entitlement to one-quarter of the maintenance support that the latter does?

38. In general, yes. However, there may be exceptions and the main consideration should be that maintenance support regulation is as flexible as possible to meet learner needs.

Q28. Are there courses or circumstances for which maintenance should not be offered (e.g. where students are studying below the level of intensity)?

39. No. the entitlement should be for all.

Q29. Currently means-tested elements of the maintenance system relate to family income. Should this be reconceptualised for a system with more adult participation, and if so, how?

40. Yes. The current system tends to assume that family income means parental income, which is inappropriate for a system which offers adults loans for lifelong learning.

Q.30. To what extent do you think maintenance support would be a consideration for learner access to, and progression through, LLE funded courses?

41. It will be a major consideration for anyone on a low income.

Q31. Do you think a maintenance offer should differ by course type, mode of study (e.g. part-time), or learner circumstances such as age, income, or caring responsibilities?

42. A maintenance offer should meet the needs of the individual. This might increase or decrease over time depending on circumstances.

Q32. How can we support flexibility whilst maintaining high quality provision through the introduction of the LLE?

43. Flexibility and quality are not mutually exclusive. What is important is to have a system which is universally available and consistent, whilst at the same time being totally transparent.

Q33. How should the approach to quality change to support the introduction of the LLE?

44. It should not need to change. The difference with the introduction of the LLE is not in the approach to quality, but in the availability of loans to a wider range of people and over a wider range of courses.

Q34. What, if any, regulatory changes might be needed to support a modular system?

45. There would need to be a change to the way results at module level are recorded and stored.

Q35. Are there opportunities to simplify the regulatory regimes that will operate under the LLE?

46. Yes. There are opportunities to simplify and to unify the various regulatory regimes.

Q36. How should government look to facilitate new and innovative provision while supporting high quality provision?

47. New and innovative provision could be developed and shared in the way it is currently done through the college collaborative fund projects, i.e. sharing good practice within the sector.

Q37. We welcome views on how quality assessment and regulation could best work for level 4 and 5 technical education within the wider LLE context

48. Assessment and regulation for level 4 and level 5 technical provision could be modularised in the same way as full degree courses. Many level 4 and 5 programmes have this kind of structure already, as well as the same exam board processes which scrutinise quality.

Q38. What are the barriers to encouraging greater credit recognition and transfer between providers?

49. The main barrier is that there is no national system of credit accumulation and transfer.

Q39. How can the introduction of the LLE support credit recognition and transfer between providers? (Including those across the Devolved Administrations).

50. By funding, via the loans programmes, modular level study.

Q40A. How far does successful credit transfer depend on mutually recognised credit frameworks?

51. Completely.

Q40B. Is a single credit framework a precondition for easy credit transfer?

52. Yes, a national system.

Q41. If relevant, please provide details of any bespoke arrangements you have with other providers that support credit recognition and transfer.

53. N/A, although we are aware of providers where this happens.

Q42. Which features of credit accumulation, such as size (that is a minimum number), or subject, should apply to a credit recognition and transfer policy?

54. It helps if the module size and weight is the same.

Q43. Should there be a time-limit on how long modules stay current? Should this vary by subject? Please explain your answer.

55. No. This is about lifelong learning, so the value of modules already taken should remain current in terms of their transferability in the system. However, a recommendation might be that their shelf life, in terms of content detail, is limited to 5-10 years.

Q44. How can prior workplace or experiential learning be more consistently recognised for credit?

56. Many providers already place value on prior or experiential learning and award credits to that learning. This approach, however, needs to be consistent.

Q45. How might government work with professional standards bodies to facilitate recognition of prior workplace or experiential learning?

57. The government should work closely with professional standards bodies to facilitate recognition of prior learning.

Q46. Are there courses/subjects which would particularly benefit from accreditation of prior workplace learning?

58. Yes. Those courses which lead into higher level professional training, such as in medicine, dentistry, engineering and construction.

Q47. What data should be collected to facilitate credit recognition and transfer?

59. No more than for any other existing credit accumulation agreements.

Q48. How can the process be more transparent?

60. Learners should be able to see what they have in terms of their loan commitment and what they have left to pay. The loan repayment has been extended and this may mean a significant additional overall cost which adults need to factor into their everyday expenses.

Q49. Would you like us to keep your comments confidential?

61. No

D. Conclusion

62. Our response, as mentioned above, relies heavily on feedback from our members and others in the sector.

63. To ensure that the loan entitlement is lifelong, there should be no limits on individual course credits. Instead, there should be a limit on the total value, equivalent to a five-year degree course, to cover the needs of those taking courses such as medicine, dentistry and architecture, who may need to defer for a period during their course. This would enable the learner to understand what they can have and not have, and how much funding is available to them. The system must be transparent, with accreditation for technical, academic and any other integrated qualifications as in Scotland.

64. The system must also work for all learners.

65. We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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