

# UCAS response to the Department for Education's consultation on the Lifelong Loan Entitlement (LLE)

## Contents

<b>Executive Summary</b> .....	2
Diagram of LLE Roadmap .....	4
<b>Introduction and Context</b> .....	5
<b>Section 1: Principles Needed To Underpin Successful Rollout Of LLE</b> .....	6
<b>Section 2: Utilising UCAS To Implement The LLE</b> .....	12
<b>Section 3: What Challenges Need To Be Resolved To Enable The Successful Delivery Of The LLE?</b> .....	16
<b>Annexe: Relevant questions from the consultation addressed throughout the submission</b>	

## EXECUTIVE SUMMARY

With inclusivity as one of its core values, UCAS believes that education and training should be accessible for all students from all backgrounds and ages and welcomes both the introduction of the Lifelong Loan Entitlement, and the stimulus for the development of a more modular and credit-based education system. UCAS recognises the potential these have to address some of the existing barriers to entry to progression and looks forward to working with government and the broader sector to make this a success.

By considering the question “what is currently stopping the uptake of lifelong learning?” UCAS has developed the following key principles which it believes are necessary for the Lifelong Loan Entitlement to be successful:

- **Clear:** The needs of adult learners must be supported by a strong, personalised careers information, advice and guidance architecture underpinning the LLE which in turn enables an independent and clear view of each learner’s potential options and outcomes.
- **Convenient:** The process for exploring, connecting, and continuously engaging with lifelong learning opportunities should be seamless for learners, and no more burdensome than any other route.
- **Constructive:** Learners must be able to build on study, underpinned by effective credit management including agreed definition, recognition, and portability.
- **Consistent:** A genuinely joined up approach to all aspects of the LLE roll out and delivery is required to underpin an efficient system that doesn’t leave learners behind because of their background or location.
- **Financially Accessible:** Lifelong learning should be accessible to all - tuition fees are not the only financial implication of study.

UCAS recognises it is a key enabler of the LLE, along with several other partners including the Student Loans Company and JISC. Working together to build on and scale up the Office for Students’ Short Courses Pilot paves the way for pragmatic delivery of the LLE without the need for the architecture of a new system. For its part, UCAS is committed to supporting successful delivery by:

- Building on its position **as the go-to place for progression and a leading provider of careers education, information, advice and guidance**, offering a tailored service based on learners’ motivations and aspirations to connect adult learners to lifelong learning opportunities.
- **Reaching the widest young and mature audience to build confidence in and understanding of the new systems** through its position as a trusted, independent charity which already acts as the UK’s shared admissions service for higher education and training.
- **Working with the sector to establish a verified qualification and credit account**, integrated into the application, and building on its track record of qualification verification
- **Collaborating with partners to integrate the discovery journey through UCAS with the LLE Account** – such as explorations with the Student Loans Company about how data can better flow between our systems to simplify

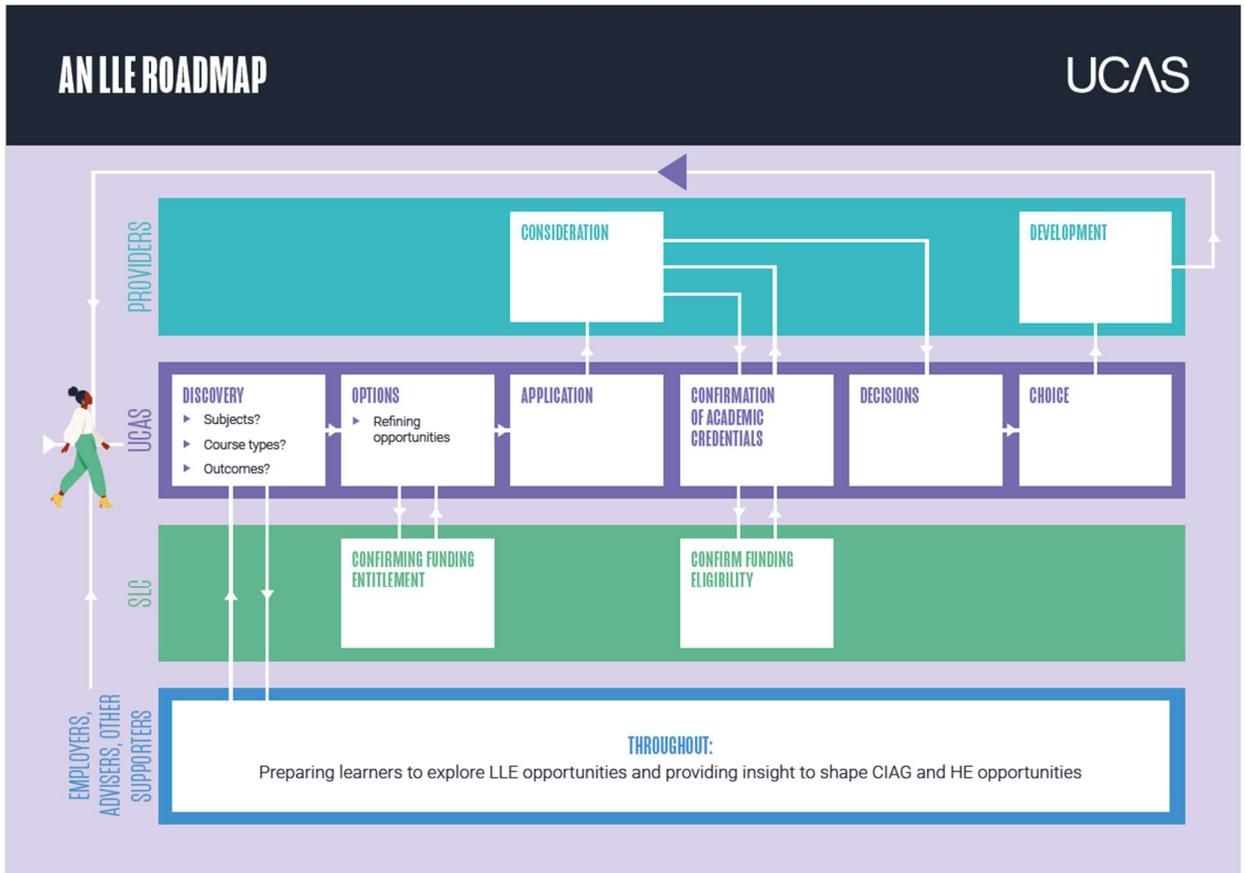
the learner experience and early consideration with JISC as to how the Unique Learner Number (ULN) may carry through a student's experience.

Additionally, the following areas will need to be addressed:

- **Establish a cross-system ULN:** the education sector and government will need work together to explore the adoption of a consistent unique learner identifier required to track and recognise learners throughout their continuous engagement across lifelong education.
- **Agree what a credit or module is:** There needs to be sector wide agreement, underpinned by government, on what a credit is, cross institutional recognition, clarity on length of validity, and a standard process for digital management and verification.
- **Clarity in scope and for who:** Tertiary education is becoming increasingly diverse – with apprenticeships and higher technical qualifications - and clarity is needed on the scope of provision included. Equally, people from over 200 countries and territories across the world come to the UK to study and train. Clear logic on who will be eligible to benefit from LLE and how it dovetails with other lifelong learning funding mechanisms, such as study programme funding for 16–19-year-olds, the adult education budget for adult training, as well as government backed loans for advanced and higher education, each providing alternative funding routes for skills training. Finally, mechanisms will need to exist to support those not eligible for financial support to access this provision.
- **Devolved Nations and Regions:** with education and training increasingly devolved and place based, making sure that where possible LLE reforms read across to the devolved nations especially will be important to ensure artificial or inadvertent barriers are not created on cross border flows. Combined authorities and regional bodies also continue to seek to expand their skills activities, including through Local Skills Improvement Plans; the LLE must enable these plans.
- **Ensuring Access Pathways:** Given the LLE creates a more modular and focused approach to education and training, how to get access will need to be clear, especially if Level 1-3 qualifications are absent, out of date, or need a refresh. Similar access courses, such as an equivalent of the *Access To HE Diploma* could help improve access, especially for the more mature learners who may not have been education or training for a significant amount of time.
- **Outreach:** While the route for young people from education into university, college or an apprenticeship is well established, encouraging mature learners to start on the discovery and research phase of lifelong learning will be important. With 25% of those that use *ucas.com* being a mature learner, UCAS' expertise alongside others in the sector can help shape an effective campaign to encourage uptake of LLE. Such a campaign will need to address the challenge of coverage, drawing on local "grass roots" organisations and initiatives wherever possible to ensure traditionally hard to reach groups are encouraged and enabled to benefit from the LLE.



## Diagram of LLE roadmap



# UCAS response to the Department for Education's consultation on the Lifelong Loan Entitlement (LLE)

## INTRODUCTION AND CONTEXT

As an independent charity, UCAS is the leading authority on student progression. Our significant role as the gateway to post-secondary opportunities allows us unparalleled insight into the shape of the HE and training landscape – we make three million data points freely available each year. UCAS' retrospective and forecasting analysis can both play a valuable role in informing the sector's understanding of student demand and behaviours. In addition, we are a student-centric organisation with unparalleled reach – [ucas.com](https://ucas.com) receives 30 million unique visits per year – and CIAG expertise, which includes tools such as the Careers Quiz, where outcomes and skills data support decision-making, mean that we have the capability to support the Government and sector in addressing skills gaps.

This insight and analytical capability underpins our response to this consultation. Over the last decade, UCAS has supported over one million mature students gain a place in higher education, and each cycle around a quarter of applicants are aged over 25. We also understand that the needs of these students are unique. For example, mature students:

- Are more likely to be engaging with higher education for economic or career driven reasons, with Nursing, Business and Teaching common routes for these students.
- They are more likely to make late applications, closer to the start date of the course. Nearly 1/3 of mature students apply after the January deadline.
- They are more alert to financial considerations around progressing to HE and have additional financial commitments such as a mortgage. For example, a financial consideration for a mature student may be both the cost of study, but also potential lost income.
- Their engagement with HE is directly linked to the economy. During periods of economic downturn, we see increased engagement in HE by mature students. This has been evident in the pandemic, with 20,000 additional mature applicants in 2021 compared to 2019.

In 2026, UCAS is forecasting a million undergraduate applicants, and increased demand for the full range of post-secondary routes. It is vital that at this point we are offering a range of high-quality opportunities to these students, and the LLE will play a key part in this.

To test ideas and gain insights from a wide group of experts in the sector, UCAS undertook extensive sector wide engagement, including a roundtable session with higher education leaders and sector experts in April 2022. This engagement has informed the position UCAS has taken throughout this consultation response. Broadly, there was consensus that wherever possible existing and trusted

mechanisms should be used to enable the delivery and roll out the LLE, bringing with them efficiency and reliability. This extended to the use of a single application service with UCAS being best placed to offer this. It was also agreed that careers education, information, advice and guidance would be critical to making the LLE a success – and UCAS – working with partners as it currently does – is uniquely positioned to use its wide audience to highlight the pathways through the reformed higher education and training landscape, as well as integrating qualification verification into the single application service.

This response takes these findings and presents a series of principles which should underpin the roll out of the LLE to ensure its success in meeting its aims of broadening access to Higher Education and ensuring that workforce in England has the skills needed to meet the changing needs of the economy. UCAS' role in meeting these principles is outlined, along with broader challenges for the sector to address.

## **SECTION 1: PRINCIPLES NEEDED TO UNDERPIN SUCCESSFUL ROLLOUT OF LLE**

The availability of guaranteed funding for modular and bite sized provision is a significant step forward in enabling a wider group of learners to engage with higher education, including those who may have previously believed that HE was not viable for them. However, there are a wide range of factors underpinning learners' appetite and readiness for higher education; understanding and addressing these will be critical for the successful introduction and uptake of the LLE. UCAS has captured these factors as a set of principles which should guide the development of the LLE roll out.

### **Consistent**

UCAS has successfully delivered the centralised undergraduate admissions service for over 50 years, and each year supports over a million students explore their options – with a quarter of applicants over the age of 25. More recently, we have developed a centralised apprenticeship offer, with our Career Finder tool used over a million times each year. UCAS.com receives 30 million unique visits a year, where students receive personalised careers information advice and guidance about the full range of post-secondary options side by side.

At present, part-time, and modular study is delivered in a decentralised and inconsistent fashion, with students engaging with provision at their local university or college, or via distance providers such as the Open University or Arden University. In addition, the underpinning careers information, advice and guidance for these opportunities is also largely delivered locally, often at the local provider. The availability of provision and support will vary based on the location of a student. UCAS undertook extensive engagement across the sector to understand the current landscape and barriers for participation in modular learning. A constant theme across the feedback received was the need for an independent, trusted, centralised and consistent service to support accessibility and awareness of these opportunities, with UCAS best placed to deliver this as part of its commitment to promoting all

post-secondary opportunities to students, with recognition that UCAS is a key enabler of the success of the Lifelong Loan Entitlement.

Furthermore, through this engagement it was recognised that the Lifelong Loan Entitlement is designed to support English higher education provision. Any centralised service developed to support entry into modular study should accommodate similar provision across the UK, and potential policy changes in the devolved administrations. As noted in UCAS' *'Reimagining UK Admissions'* report, a core principle of the admissions service is to support progression UK wide.

### Clear

A large group to benefit of the LLE will be adults looking to upskill and reskill. The latest data for those enrolled on Level 4 and 5 courses shows that the vast majority (77%) are over the age of 21.<sup>1</sup> Looking at what we already know about the motivations of mature students in higher education<sup>2</sup> can therefore help us to understand the specific demands needed for personalised careers education, information, advice and guidance for adults. UCAS research from 2018 summed it up as follows: local, focussed and female. The data below from the 2021 cycle shows this characterisation has remained consistent.

- **Mature students are typically drawn to a smaller range of courses, that tend to be vocational in nature** – Economic factors play a significant role in adults returning to the classroom. Firstly, as stated earlier in this submission, the health of the economy directly affects the number of adult applicants, with mature students more likely to apply during a period of economic downturn. Secondly, the courses they apply to tend to be more career-focused, with those 21 and over well-represented in subjects allied to medicine including nursing (32,270 accepted students in 2021), social studies (11,215) and education (7,365).
- **The difference in the number of men and women accepted increases as age increases, with the share of men decreasing with age** – looking at 21-25 year olds, 56.6% of accepts were female; for those aged 36 and over the proportion of female accepts increases to 70.7%
- **Mature students study closer to home** – Those 21 and over placed at university or college in the UK are more likely to study closer to home – the average distance between home and their placed university or college is 29 minutes, compared to over an hour for those under 21. Unsurprisingly then, they are more likely to live at home while studying with over half (56%) of mature students living at home compared to 27% of those under 21. This figure rises to 62% for those 30 and over.
- **Mature students are more likely to be accepted on to courses at lower tariff providers** – While 31% of under-21s are accepted to lower tariff providers, 62% of those 21 and over are. This rises to 69% for those 30-34 and 75% for those 35 and over. Meanwhile, 12% of mature students are accepted to

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<sup>1</sup> [Mapping the Higher Technical Landscape](#) (Gatsby: 2018)

<sup>2</sup> [Admissions patterns for mature applicants](#) (UCAS: 2018)

higher tariff providers compared to 37% of those under 21. For those 30-34 the figure is 8% and for those 35-plus it is 5%.

- **Flexibility is key, with mature students opting to study part-time** – Data for the 2019-20 academic year from HESA shows 40% of students 21 and over study part-time, and this rises to 53% for those 30 and over. This contrasts with the under-21 cohort, where only 4% study part-time. In fact, mature students make up 86% of all part-time students.
- **Mature students tend to already have their qualifications and therefore apply later in the cycle** – Students 21 and over largely apply to university or college already holding their required qualifications, and with less influence on their application process from a school or college. Therefore, mature applicants are more likely to apply later in the application cycle, with these applicants making up 54% of applicants applying after the equal consideration deadline in January, 52% of Direct to Clearing acceptances and 62% of Records of Prior Acceptance (RPAs).

What this tells us for the LLE is that the needs and motivations of adult learners are different to those of school and college leavers. While this is not a surprise, this is something which needs to be considered throughout the design and implementation of the LLE: a new cohort of learners require clarity over the routes and options available to them; how they access them and what outcomes they can expect.

### **Financially Accessible**

The idea of cost within the LLE system is multifaceted. UCAS research shows that mature students are more motivated to return to education by economic decisions, largely choosing courses in higher education which will help them to pursue a particular career path. In addition, mature students usually have additional financial considerations, including loss of income. This group of reskillers will be well-served by the new LLE accounts and will need to be signposted towards their new entitlement. Making decisions based on opportunity costs is well understood, where adult learners make a decision to invest their time, and money, in pursuing new education and skills for the purposes of changing or furthering their career. **For them the return-on-investment, of both time and money, needs to be clear.**

For other groups of students, this opportunity-cost decision might not be as clear, or even a consideration. Particularly for 18-year-olds who currently largely choose to embark upon a three-year undergraduate course and for adults who have spent many years away from the classroom or any formal training. These groups will need to make their own cost-benefit decisions and may need additional incentivisation and persuasion.

Previous UCAS research, [Through the lens of students: how perceptions of higher education influence applicants' choices](#), has suggested that it is up front and immediate costs that are of greater concern to students, as opposed to overall tuition fee costs. More recent research explored within UCAS' response to the HE policy statement and reform consultation response, analysed students' views as to these 'pre-HE' costs. A survey of c.2,000 applicants found that 61% of individuals were worried that they would struggle to afford the costs incurred prior to university

or college. Whilst some of these costs will likely be less relevant to lifelong learners e.g., travel costs, other such as laptops, books etc. will still be relevant and may create a barrier to entry.

It is clear that for students to opt into higher education at any stage, tuition and maintenance costs must be manageable, with funds easily accessible and understood as value for money when considered against the benefits of higher education. If learners are not convinced that this is the case, the appetite for them to draw down the LLE diminishes.

### Constructive

A truly effective lifelong learning system will see students able to engage in study across multiple higher education providers, using previously achieved credit to gain access to differing institutions. An effective system of credit transfer is therefore crucial to the operation of the LLE system, underpinned by the ability to verify and link student profiles and achievement.

A formalised, standardised and recognised system of credit transfer is needed in order for a more flexible and modularised system to be effective. How and when credit is recognised will need to be agreed between institutions, working alongside the Quality Assurance Agency for Higher Education (QAA).

**Table 1: Challenges to overcome to establish a successful credit transfer system**

<b>Recognition</b>	One of the challenges around credit transfer centres on the recognition and transferability of credit due to variance in course provision. Trust needs to be built in the credit system – through agencies like QAA – to persuade institutions which may be reluctant to recognise learning and credits awarded elsewhere. The UK Credit Forum suggests that institutions group qualifications into families (e.g. the undergraduate family of qualifications from Certificate of Higher Education through to Honours Degree) and have as a guiding principle that credit awarded in one qualification can only contribute to a higher qualification in the same family (and not to the same level or lower level qualification, or a qualification from another family such as the postgraduate group of qualifications). <sup>3</sup>
<b>Shelf-life</b>	Another key consideration for institutions when implementing credit transfer relates to the potential time limitation on awarded credits, particularly in situations of delayed interinstitutional credit transfer.
<b>Records</b>	A system is needed to record what credit students accumulate throughout their education career.
<b>Existing systems</b>	There are already two credit transfer systems in the UK whereby qualifications are awarded on the basis of accumulated credit points: the national credit transfer system for accredited

<sup>3</sup> [Credit Transfer in Higher Education](#) (DfE/Government Social Science: March 2017)

	qualifications in England, Wales and Northern Ireland, and the credit transfer system in Scotland. Additionally, some higher education providers use the European Credit Transfer and Accumulation System (ECTS).
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Despite the challenges of establishing an effective credit transfer system, existing models point to the benefits of addressing these challenges

<b>Scotland</b>	The Scottish credit-based lifelong learning system offers flexible pathways and is underpinned by the Scottish Credit and Qualifications Framework. Internationally it is regarded as an example of good practice in credit arrangements. In June 2021, The Scottish Funding Council (SFC) recommended setting up a Micro-Credential Framework and Delivery Plan which would certify “bite-sized learning” and explore how modules can be combined to form larger qualifications over time.
<b>Australia</b>	Australia has an established credit transfer system. It is estimated there are more than 450,000 students annually applying for credit across and within Australian institutions. This is equivalent to one in every three students interacting with credit management services annually. The Universities Admissions Centre (UAC) has developed Advance – a credit management system, to help universities and students solve the riddle of the management of academic credit. Its own research states it can take institutions up to 60 days to process an application for credit, and the estimated annual cost to the sector is AUD\$36.5 million (£19.3m).

What is clear from the above examples is that a centralised system of credit transfer is advantageous. The Australian example shows the benefits of an integrating credit management with application and admissions systems.

### Convenience

For the LLE to be a success, ensuring the journey of potential lifelong learners is accessible for all needs to be at the heart of the design of the system. Whereas higher education outreach tends to focus on school and college leavers, within the LLE system there will be multiple entry points for students throughout their lifetime, and people will be able to reengage in the education and training system at various times in their life. Therefore, it is important there is a clearly defined route for finding out information about entitlements and the pathways through education and training, as well as easy access to information on accumulated credit and a single, common application portal.

During a roundtable session with higher education leaders run by UCAS in April 2022, it became clear that the LLE account needs to be closely integrated with careers education, information, advice and guidance and application services. The more

cumbersome the experience for potential students, the greater the risk of disengagement. Given the number of stages a learner must progress through to successfully benefit from the LLE – from pre-discovery (inspiring learners to take the first step of viewing Higher Education as a route worthy of their consideration); to exploring their options, understanding which courses they are eligible for and can receive funding for; successfully applying and evidencing suitability; drawing down the loan itself and then using gained credits in future applications – it is vital that the stakeholders of these stages maximise the use of data and digital capabilities to create a seamless journey for the learner. The ideal scenario sees learners directly accessing as few systems as possible with minimal form filling – behind the scenes mechanisms need to ensure data automatically and robustly transfers between application, funding and awarding systems.

Accessing the LLE must by design be simple, straightforward, and convenient. Common language, systems with appropriate data flows, and minimised administrative processes for learners must combine to ensure a seamless experience.

## SECTION 2: UTILISING UCAS TO IMPLEMENT THE LLE

Diagram 1 outlines a model in which the sectors works together to bring the LLE to life while upholding the principles outlined in Section 1. UCAS sees itself as a core partner in effective delivery of LLE, with the trust, expertise and capabilities needed to drive successful delivery:

- **Build on its position as the go-to place for progression and a leading provider of careers education, information, advice and guidance, offering a tailored service based on learners motivations and aspirations to connect adult learners to lifelong learning opportunities.**

This is something UCAS is already prepared for with its continuing rollout of clear personalised careers education, information, advice and guidance through the UCAS Hub. Ucas.com has specific resources available for mature students and will build upon these as we prepare for the introduction of the LLE. By placing LLE in the context of all available routes – as UCAS does in the current landscape – UCAS can support students in finding the route that is right for them.

Given its established position in the higher education and training landscape, what UCAS does to support the LLE rollout will have a marked impact on the success of the system. UCAS has a strategic objective to ensure UCAS is a leading discovery brand, in line with its charitable mission, positioning itself as ‘route neutral’ to ensure parity across all pathways including academic and technical routes. UCAS is continuing to improve its offer. It has also updated its corporate strategy running to 2025 to specifically support the effective delivery and promotion of lifelong learning.

- Partnerships will remain at the heart of its approach to careers education, information, advice and guidance as UCAS continues to build on its established relationships with the Careers and Enterprise Company (CEC), the National Careers Service (NCS), National Apprenticeship Service (NAS), Gatsby Foundation, Careers and Development Institute (CDI) and other key organisations UK-wide. At a recent Executive-level workshop between UCAS and CEC, both parties expressed the clear strategic imperative to work closely and in collaboration to achieve its common mission of supporting young people and their influencers to make the right and best next step about their future.
- UCAS is committed to working with school pupils from a younger age, engaging with those aged 13 and over to inform and influence their decision-making, right from the start, mindful that early engagement is key to opening doors, as well as introducing concepts around flexible learning that are fundamental to the LLE reforms.
- UCAS’ central courses database is being enhanced to enable capture of a greater range of provision, including short courses and modules, allowing UCAS to support applications for lifelong learning opportunities, and powering the promotion of such opportunities to potential students via its Search and Explore tools.

- It is committed to deepening the personalisation technology within the UCAS Hub to support students with individual needs, and in recognition of their local context. This will be particularly relevant within the UCAS Hub which will serve adult learners with an experience which is unique to their needs.

Understanding these unique drivers is also fundamental to delivering a successful underpinning careers information, advice and guidance support structure – the UCAS Hub currently delivers content to students in a personalised fashion based on who the student is and their preferences, and could tailor the experience for students exploring lifelong learning opportunities.

- **UCAS can help to reach the widest audience** – In particular, the following audience groups can be supported to better understand the LLE reforms through established channels and relationships which UCAS manages: Students, employers, parents, teachers and advisors at schools and colleges and higher education professionals at universities and colleges.

UCAS is uniquely positioned within the education and training system to be able to promote and support the LLE reforms – It is understood that the LLE will help fund modules of courses at Levels 4 to 6 regardless of whether they are provided in colleges or universities, as well as full years of study. It will make it easier for adults and young people to study more flexibly – allowing them to space out their studies, transfer credits between providers, and partake in more part-time study. The changes to the student finance system will also make it easier for adults from all socio-economic groups to upskill and retrain. UCAS sits at the heart of all of this and can build on its current position of strength.

UCAS is a trusted, free-to-access, personalised and independent source of information and advice for millions of school pupils and mature students. For any new policy, building confidence is crucial. Using well-known brands like UCAS and the Student Loans Company can help build trust quickly. Recent UCAS research involving more than 6,000 students and 400 advisers in schools and colleges - plus four focus groups – helps illustrate the value of the UCAS brand:

- UCAS is the number one platform for students and advisers: 92% of students use the UCAS Hub to inform their decision-making and 94% of advisers are aware of and are using the UCAS Hub.
- UCAS Hub is trusted by advisers, who also appreciate the fact that UCAS Hub is free to use, providing a more accessible service than some competitors.
- The UCAS Hub offers a personalised information and advice experience for students, guiding students through all of their post-secondary, side by side, based on who they are and where they are in the process.

Each year there are 30 million unique visits to [ucas.com](https://ucas.com), with students exploring content on the full range of post-secondary options UK-wide, including technical education, apprenticeships, and flexible and lifelong learning. School leavers make up the most significant cohort of individuals applying through UCAS; however, in 2021 it supported 100,000 students aged over 25 take that next step in their

educational journey. UCAS is part of the government’s Lifelong Learning Entitlement (LLE) steering group and are prioritising expanding our reach and impact in this area.

UCAS also has a strong and continually growing relationship with hundreds of employers and has successfully adapted its expertise in course search development to offer the ‘Careers Finder’ apprenticeships tool – this received a record 2.13 million searches in 2021, up 32% from 2020. Our most recent innovation allows employers to create profiles on UCAS and showcase their offer to students. These currently include Jaguar Land Rover, Vodafone, Rolls Royce, Sky and Keir Group – some of the top apprentice employers in the country.

**Table 3: UCAS can use its channels to engage a variety of audiences in the LLE**

<b>Students</b>	Each year UCAS supports over 700,000 students to apply to higher education in the UK.
<b>Employers</b>	UCAS has a working relationship with over 100 employers.
<b>Parents and carers</b>	UCAS regularly engages with parents and has held webinars over digital channels to help parents and carers as they assist their children in applying to university or college.
<b>Teachers and advisors at schools and colleges</b>	UCAS has relationships with over 4,500 teachers and careers advisers across the UK.
<b>Higher education professionals at universities and colleges</b>	UCAS works with over 380 universities and colleges across the UK who choose to use our application system.

- **Work with the sector to establish a UCAS-held verified qualification and credit account, integrated into the application and building on its track record of qualification verification**

UCAS already works with higher education providers across the UK on the shared admissions service, creating a single, common experience for students whether they are applying to the largest or smallest provider, the most selective provider, or the most open-access provider. Part of this service includes the awarding body linkage (ABL) service, in which validated examination results are matched against

In order to make LLE work, there needs to be a similar, verified record of achievement and logging, and UCAS is well placed to work with the awarding bodies to deliver this. Each year, UCAS verifies around 2.2 million results, from 580 qualifications and 38 awarding organisations for students via its ABL process. Extending this to credits and courses funded by the LLE would offer an efficient

experience for both learners and higher education providers; would provide all stakeholders the assurance of robustly validated credentials; and would support progression through the “stacking” of modules and credits.

- **Collaborate with partners to integrate the discovery journey through UCAS with the LLE Account** – such as explorations with the Student Loans Company about how data can better flow between their systems to simplify the learner experience.

For the LLE to be a success, it will require partnership working across the higher education and training sector, as well as with employers, schools and colleges and wider society, with a shared goal of simplifying the experience for learners and reducing any potential burdens they may face.

UCAS works extensively with partners and has the independence to bring stakeholders together. UCAS would deepen these partnerships and relationships and continue to signpost to the National Careers Service, Careers and Enterprise Company and the Gatsby Foundation.

UCAS has already held multiple workshop meetings with representatives from the Student Loans Company to understand more about how their systems could integrate with UCAS’ own systems to provide a more seamless experience for would-be lifelong learners as part of their discovery and application journey. These sessions are on-going but it has already been established that it is achievable for both organisations to establish data flows between their back-end technical systems to work together in order to simplify the learner experience.

The seamless learner journey can be realised through such partnership working – a journey in which learners and their supporters can understand and explore their options through the single doorway of the UCAS Hub. This would allow for sharing of a student’s personal information once, trusting that it is appropriately shared with education providers and the SLC using a mechanism such as the ULN to remove the need for further manual entry on their part as they apply for courses of study and access funding. Individuals would also have confidence that when courses and modules have been completed those same data flows would allow UCAS to store academic credentials in a qualifications account ready for inclusion in future applications, or to present to employers. This partnership working enables learners to free themselves from investing in the administrative business of accessing HE, and instead invest fully in the exploration of what will most suit them and in completing their courses of study.

### SECTION 3: WHAT CHALLENGES NEED TO BE RESOLVED TO ENABLE THE SUCCESSFUL DELIVERY OF THE LIFELONG LOAN ENTITLEMENT?

It is UCAS' view that resolving the following areas, and achieving sector-wide buy in, would allow for the successful delivery of the Lifelong Loan Entitlement:

- **Consideration of full adoption, and maximised value, of the ULN across the entire tertiary education system:** Given the additional fluidity in provision, with students likely to engage in lifelong learning sporadically throughout their lifetime across multiple providers, it is UCAS' view that a single identifier would be a significant enabler to link the achievements and profile of all students across all agencies. This would stay with them throughout their educational journey, and form part of any connection service UCAS offers in this space. This would require significantly greater uptake and commitment to the existing ULN, with expansion to include adult education.
- **The range of provision supported by the Lifelong Loan Entitlement, and who can access this:** Higher education is becoming increasingly diverse – with Degree Apprenticeships and Higher Technical Qualifications- and clarity would be welcomed on the scope of provision included, and the relationship with other forms of delivery such as potential flexi-apprenticeships. Equally, English HE attracts students from over 200 countries and territories across the world. Who will be eligible to benefit from the Lifelong Loan Entitlement, and what mechanisms exist to support those not eligible for financial support access this provision? Furthermore, clear logic on who will be eligible to benefit for LLE and how it dovetails with other lifelong learning funding mechanisms, such as study programme funding for 16–19-year-olds, the adult education budget for adult training, as well as government backed loans for advanced and higher education, each providing alternative funding routes for skills training is required.
- **Devolved Nations and Regions:** UCAS supports student progression UK wide. With education and training increasingly devolved and place based, making sure that where possible LLE reforms read across to the devolved nations especially will be important to ensure artificial or inadvertent barriers are created on cross border flows. Combined authorities and regional bodies also continue to seek to expand their skills activities, including through Local Skills Improvement Plans, which must align with the roll out of LLE.
- **A new approach to credit management:** As noted above, effective credit management is fundamental to the successful delivery of the Lifelong Loan entitlement. It is UCAS' view there needs to be an agreed definition of credit across the entire tertiary education sector, underpinned by government, along with an agreed recognition to support the continuous movement of students. Furthermore, given the movement of students, there is a need for a

central verification of a students achievements, similar to the Awarding Body Linkage process UCAS delivers to verify Level 3 attainment.

- **Ensuring access through pathways and routes into Lifelong Learning:** The Lifelong Loan Entitlement brings with it welcomed flexibility in Level 4 and above provision. However, adult learners are more likely to have a broader range of Level 3 and below provision, and potentially work experience in lieu of a professional or accredited qualification. Therefore, it is important that Level 3 provision itself does not become a barrier for entry to lifelong learning provision, and that appropriate pathways are available to students (such as a similarly modularised Access to HE Diploma). Furthermore, Accreditation and Recognition of Prior learning arrangements will need to form a core part of the assessment of mature students wishing to enter lifelong learning, with the potential for a consistent, sector wide approach. Resolution of this will support the Lifelong Loan Entitlement in realising its potential benefits in widening participation.
- **Outreach:** The Lifelong Loan Entitlement offers opportunities to re-engage adult learners later in life. However, this initial reconnection and curiosity in provision (the Discovery phase) is unlikely to be spontaneous – stakeholders need to establish effective catalysts. As part of the reboot of Access and Participation Plans, adult learners, with LLE provision, should become a core component of higher education outreach, with employers a recognised audience within this. Partnering with local community groups, third sector bodies and other “grass roots” organisations will also be critical. While the route for young people from education into university, college or an apprenticeship is well established, encouraging mature learners to start on the discovery and research phase of lifelong learning will be important. UCAS’ expertise alongside others in the sector can help shape an effective campaign to encourage uptake of LLE.

## ANNEXE

### Relevant questions from the consultation addressed throughout the submission

**Table 6: Relevant questions from the consultation addressed throughout the submission**

Q2. What barriers might learners face in accessing/drawing on their LLE and how could these barriers be overcome?
Q3. What information and guidance should be displayed in a lifelong learning account to support learners to understand their options for using their LLE?
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?
Q19. How can the LLE promote and encourage flexible study across England, Scotland, Wales, and Northern Ireland?
Q23: In a system where modularised study is widespread, how we can we ensure that learners and employers understand what programmes of study deliver the skills that employers need?
Q30: To what extent do you think maintenance support would be a consideration for learner access to, and progression through, LLE funded courses?
Q32. How can we support flexibility whilst maintaining high-quality provision through the introduction of the LLE?
Q38. What are the barriers to encouraging greater credit recognition and transfer between providers?
Q48. How can the process be more transparent?