

## Submission of Evidence

### Response to the Lifelong Learning (Higher Education Fee Limits) Bill

We welcome the Lifelong Learning (Higher Education Fee Limits) Bill as a positive step to enable providers to deliver flexible and modular Higher Education (HE) provision to support lifelong learning and the upskilling and reskilling of the labour market. The bill sets out a credit-based method of setting tuition fee levels as well as changes needed to develop stackable credits for modular delivery. The technical changes for a credit-based method using course years rather than academic years will help support the Government's aims when it launches the Lifelong Loan Entitlement (LLE) in 2025.

The aim of the LLE is to address the recommendations set out in the Augar report to enhance productivity and improve social mobility; reverse the decline in level 4 and level 5 technical qualifications where demand remains in the labour market. While we agree that the Bill itself will bring us closer to these aims, we have some concerns about the response to the bill and how this will be implemented. We believe that LLE must address the following to ensure its success:

**Diversity and choice within provision.** The 30-credit minimum does not provide the flexibility for the diversity and choice of provision to develop place-based responses to local skills needs. We know that businesses want to work with Higher Education Providers to deliver flexible learning. One seeming success of the Higher Education Short Course trial was the ability for universities and business to get around the table, outside of the existing apprenticeship arrangements, and identify short- and medium-term business needs, which will have a longer-term pay off, and co-create an academic offer. Unfortunately to date, uptake and learner appetite for 12-14 week 'short' courses remains weak. Employers and learners tell us that 12-14 weeks is not 'short'.

The Augar report suggests that modular and flexible approaches would mitigate against the incentives that create 'uniform provision' in the HE sector. However, the current drive to expand Higher Technical Qualifications (HTQ) under the LLE will only seek to expand uniform provision at Level 4 and Level 5. We believe that smaller credits (e.g. 10s) would allow HE and employers to work together to deliver local skills solutions. Microcredentials (MC) offered as 10 credit provision may offer a way forward. This type of provision has been funded by the Canadian Government as a solution to labour market mismatch and local economic shocks (e.g. mass layoffs in the manufacturing sector). It is also important that the LLE address its position on MCs (5-10 credits). If the Government does not act to regulate quality of MCs the proliferation of MCs in the private sector will confuse the landscape for learners further just as the LLE takes effect.

There is a need to clarify whether the development of flexible and modular Level 7 provision is in scope of the LLE.

**Flexibility of funding mechanisms.** We believe that the LLE is one of several mechanisms to fund flexible and modular provision for the benefit of individuals and the labour market, particularly if LLE funding is to be constrained to the 30-credit minimum. The Chancellor's Spring Budget and

expansion of devolution deals may be one area to strengthen engagement with local Government, Employers and HE providers to deliver different types of flexible and modular learning. A fit for purpose Local Skills Improvement Plan (LSIP) with strategic funding allocation with all partners working collaboratively can help achieve this. Apprenticeship levy reform may also support employers to deploy agile responses to their own skills needs.

**Access to Level 4 modules in places of social deprivation.** In Stoke-on-Trent, only 29% of the population have Level 4 qualifications or higher with 50% of the population holding Level 3 qualifications or higher. Recent changes to the Level 3-5 landscape such as the introduction of T-Levels and Skills Bootcamps (some provided at level 2) suggest that further alignment – or clarification of the relationship - to the aims of the LLE is needed. HE providers are key to raising attainment and supporting employers to address their skills needs. It is tied to both our regulatory commitment to raise pre-16 attainment and our civic and employer engagement missions. An alignment of skills and education policy is critical for areas like Stoke-on-Trent where coherence of offer can help improve access to Level 4 qualification. The Spring Budget listed these activities together to support its ‘returnship’ and ‘train and progress’ activities. This is the time to ensure there is coherence of post-18 education and skills policies so that HE providers have the best opportunities to support economic growth in their local areas.

**Portability and Mobility.** If modules can be bundled or unbundled to achieve a qualification then there is a need for a credit transfer system to ensure that other HE providers recognise the credits gained elsewhere as part of any qualification or award.

**Careers Information, Advice and Guidance.** Learners will need to make informed decisions about further and higher education provision. The development of modular provision adds further complexity to the post-18 education landscape. Investment in qualified careers advisers in schools and HE will be key to ensuring learners access the right modules and courses to meet their career goals.

*This submission was prepared by Dr. Annabel Kiernan Pro-Vice Chancellor Academic and Vanessa Dodd Head of Education Research and Evaluation on behalf of Staffordshire University.*

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