

## Lifelong Loan Entitlement Consultation

The Greater London Authority (GLA) welcomes the opportunity to submit its views on the Lifelong Loan Entitlement consultation. More accessible and flexible approaches to lifelong learning and higher level progression are welcome, and something that the Mayor of London has supported strongly in his Skills Roadmap for London.

This paper sets out the GLA's response – on behalf of the Mayor – to the relevant questions set out in the consultation document.

The key points made in the GLA's response to the consultation are summarised below:

- The Mayor is best placed to understand overall local skills needs and facilitate collaboration to ensure these needs are met. The Mayor has a proven track record of working and regularly consulting with a vast range of stakeholders including business, communities, boroughs and skills providers to benefit Londoners and London's economy.
- To effectively support upskilling and reskilling to meet the needs of London's economy and population, the Mayor and London's Skills Advisory Panel should have a role in identifying particular modules/ courses where exemptions should be made to Equivalent or Lower Qualification rules, which restrict access to funding for a qualification, in any subject, which is at the same level as one someone has studied for before.
- The GLA is engaging with London's main business groups to support a single Local Skills Improvement Plan (LSIP) for London and ensure it complements existing Mayoral skills strategy and programmes. We do not see a direct role for London's LSIP in determining eligibility for LLE-funded provision. However, it should be referenced in developing local information and guidance for Londoners in their use of any future LLE. For example, providers can reference where London's LSIP supports or is aligned with LLE-eligible courses they offer.
- Access to high quality Information, Advice and Guidance will be essential for adult learners to make effective use of their Lifelong Learning Entitlement (LLE). Any advice offered in relation to the LLE needs to form part of a wider all-age careers offer. Funding and responsibility for co-ordination of this work needs to be devolved away from the centre to regions - such as the Greater London Authority and other Mayoral Combined Authorities - to ensure that what is offered is locally responsive and integrated with other services.
- Consideration should also be given to how pastoral support for learners will work under the LLE system, with individuals potentially moving between institutions.
- Access to adequate maintenance support will be crucial to the success of the LLE, particularly as adults may need to be encouraged to take a career break, or reduce their paid hours, to retrain or upskill. Maintenance support should be provided as grants, rather than loans, and include a London weighting, to recognise the increased cost of living. It is still unclear how an effective credit transfer process will be developed, in a way that is agile and not overly

burdensome for providers, while guaranteeing quality. The GLA welcomes further consultation on this.

- Overall, more clarity is needed on how the proposals will be implemented and reflect London's skills and employment priorities. We would welcome further consultation as well as in-depth discussions with Government on the detail of the proposals, so the full impact of the suggested changes can be better understood.

## **Consultation Questions**

### **LLE ambition**

#### **1. 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?**

Access to more flexible approaches to lifelong learning and higher-level progression are welcome. However, it is unclear whether loans in themselves will provide enough of an incentive for adult learners to participate in further higher-level study. A range of other factors, including the support of an employer, access to sufficient maintenance support to cover childcare and financial responsibilities may impact on an individual's decision to make use of their LLE. Structural inequality also means that these financial barriers are not felt equally by all groups, and certain groups are likely to be disproportionately impacted by barriers such as those on low incomes, in insecure work and with caring responsibilities (see response to Q7 for more detail on this). It is important to remove as many of these barriers as possible if we want to better support learners to train, retrain and upskill throughout their lifetime.

To effectively support upskilling and reskilling to meet the needs of London's economy, the Mayor and London's Skills Advisory Panel should have a role in identifying particular modules or courses where exemptions should be made to Equivalent or Lower Qualification rules, which restrict access to a funding for a qualification, in any subject, which is at the same level as one someone has studied for before.

High quality Information, Advice and Guidance will also be essential to support learners to understand how to use their LLE to support their progression and achieve positive outcomes (including social outcomes).

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

As in response to Q1, financial barriers will be a key challenge for learners drawing on their LLE. As well as the loan itself, access to adequate maintenance support is essential to the success of the LLE, particularly as adults may need to be encouraged to take a career break, or reduce their paid hours, to retrain or upskill.

Maintenance support should be provided as grants, rather than loans, and include a London weighting, to recognise the increased cost of living in a city like London and to avoid disincentivising studying in the capital. A loans-based system may not encourage adult learners to participate in further study, particularly where they have significant financial responsibilities or are needing to take a career break to study.

For those in work, being supported and encouraged by an employer to draw on your LLE and being given time off to study will also be an important factor. Employers need to be appropriately informed about the LLE and the potential benefits to their workforce and encouraged to put policies in place to support employees to make use of it.

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

Access to high quality Information, Advice and Guidance will be essential for adult learners to make effective use of their Lifelong Learning Entitlement. This will be particularly important as the LLE encourages learners to take up new modules throughout their working life. Consideration should also be given to how pastoral support for learners will work under the LLE system, with individuals potentially moving between institutions.

Information and guidance needs to go beyond an individual's online account. Learners need access to ongoing support to discuss their options for using the LLE and different pathways they could pursue, for example understanding the combinations of modules that would be appealing to employers in a certain sector.

Information should include what the short, medium and long-term employment options are likely to be, along with other indicators to give applicants a clear sense of what the return on investment would be such as projected earnings, progression opportunities, previous achievement rates and sustainability of employment within given sectors, including likelihood of growth.

Any advice offered in relation to the LLE needs to form part of a wider all-age careers offer. Funding and responsibility for co-ordination of this work needs to be devolved away from the centre to regions - such as the Greater London Authority and other Mayoral Combined Authorities - to ensure that what is offered is locally responsive and integrated with other services. The Mayor has made the case for this to government, including in letters to ministers, in London Government's [Call to Action](#) and more recently in the manifesto for his successful re-election to a second term of office in May 2021.

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

As outlined in response to question 3, high quality Information, Advice and Guidance should also promote and support learners to understand the range of technical and academic pathways available to them.

This should include the range of technical provision at levels 4-6 across London's FE sector, including through London's three Institutes of Technology and National Colleges.

Employers must also be supported to understand the range of technical and academic pathways, in order to support their employees to make use of their LLE to upskill and retrain.

**5a. 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?**

See response to 5b.

**5b. How can we facilitate collaboration between FE and HE providers and employers, to ensure that provision keeps up with industry developments?**

The Mayor has a proven track record of bringing together a range of stakeholders including business, communities, boroughs, FE and HE providers to ensure London's adult skills system meets the needs of Londoners and London's businesses. This includes: convening the Skills for Londoners Board (London's Skills Advisory Panel) and Jobs and Skills Business Partnership; carrying out extensive stakeholder engagement as well as annual consultation on the Mayor's proposals for adult education in London; and programmes such as the Mayor's Academies Programme, which is funding partnerships of employers and skills providers to come together to ensure high-quality, industry-relevant training provision.

As the directly elected representative of Londoners, the Mayor frequently seeks feedback from Londoners through our online engagement platform Talk London, community conversations and People's Question Time, to ensure that he is responding to their needs and is being held to account.

In addition to the Skills for Londoners Board and Jobs and Skills Business Partnership, the Mayor has a number of business boards, including London's Local Enterprise Partnership (LEAP) and the Business Advisory Board, which help to inform London's skills and employment priorities. He also regularly engages London's employer representative bodies to understand and respond to business skills needs.

In London, the Mayor, working closely with London's Skills Advisory Panel, is therefore best placed to determine local priorities and ensure investment in skills provision meets the needs of Londoners and London's economy, delivering greatest value for money.

Local Skills Improvement Plans (LSIPs) will provide additional employer-led opportunities to focus on local skills priorities. The GLA is engaging with London's main business groups to support a single LSIP for London and ensure it complements existing Mayoral skills strategy and programmes. We do not see a

direct role for London's LSIP in determining eligibility for LLE-funded provision. However, it should be referenced in developing local information and guidance for Londoners in their use of any future LLE. For example, providers can reference where London's LSIP supports or is aligned with LLE-eligible courses they offer.

London's three Institutes of Technology (IoTs) have demonstrated some success in bringing together FE and HE providers and employers on industry relevant provision at levels 4 and 5, and have made some early progress in supporting progression pathways to and from this provision. DfE should learn from the successes and challenges faced by IoTs.

**5c. 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?**

There is a risk that only large organisations will have the resources and capacity to develop the types of modular courses expected to be delivered through the LLE and manage the associated regulatory framework. No FE providers are involved in the OfS Challenge Competition which is piloting the development of modular study for the LLE, and two successful projects are based in London at present. Engaging the FE sector in delivery of the LLE is essential.

The Mayor's Academies Programme (MAP) covers key sector skills areas in London, including digital, green, hospitality and health and social care. The programme's Quality Mark will support employers and learners to identify high value training. Providers granted the Quality Mark will need to have demonstrated how skills training provision is industry-relevant, helping to tackle skills shortages and the strength of employer links, including specific engagement with SMEs, where relevant.

As well as offering value to employers, modules and courses should offer value to the learner and their individual needs. Learner perspectives and voices should be heard and incorporated when assessing value.

**6. 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.**

Provided the LLE is accompanied by appropriate Information, Advice and Guidance and adequate maintenance support, the LLE has the potential to have a positive impact and open up access to higher level study for learners with protected characteristics. By opening up more opportunities for modular, flexible higher-level study, participation may be increased by older learners, those with accessibility needs and those with caring and childcare responsibilities.

See response to Q7 for information on barriers faced by learners with protected characteristics.

## **7.What barriers might learners with protected characteristics face in accessing/drawing on their LLE and how could these be overcome?**

Alongside the Skills Roadmap for London published by the Mayor in January 2022, the GLA conducted an Equality Impact Assessment, which identified key barriers and inequalities experienced by people with protected characteristics, particularly in relation to accessing skills provision and participating in the labour market.

Community conversations and peer-led research commissioned by the GLA, which targeted people experiencing severe inequality and disadvantage, found that many of the barriers identified were common across people with different protected characteristics. Some of these common barriers included:

- **Cost** – both direct costs of provision and, critically, indirect costs such as travel and childcare were barriers even when provision is nominally free. This is particularly acute for low-income groups or those with mobility impairments.
- **Childcare** – childcare is a significant barrier, with a lack of childcare such as creches available at training locations, and inability to afford or find alternative/flexible childcare. This barrier is more likely to affect women, and access to and take-up of free childcare varies by equality group such as ethnicity.
- **Past experience of trauma** – the lingering impact of trauma, for example at school, can lead to distrust of education institutions and a reluctance to engage with them.
- **Lack of information/ awareness** – people don't know where to find information about skills provision and aren't aware of wrap-around support/entitlements available to support them. Those experiencing severe inequality and disadvantage are primarily reliant on social connections for finding courses. So it is important that individuals receive impartial advice – in settings and via service providers that they interact with already - and fully understand the financial commitment they are making.
- **Need for flexible provision** – provision is more accessible to equality groups if it is local and flexible in terms of timing, length and structure. Community groups can also be an important referral route for adult learners, and an important way to share information on the LLE via trusted local voices to Londoners.

Learners with protected characteristics are also more likely to be in unstable or low quality employment, with less flexible working arrangements. Employer buy-in will be essential to support learners with protected characteristics get fair access to the LLE.

At present many Muslim students do not take interest bearing student finance loans. In 2013 the government pledged to introduce a new alternative student finance product for Muslim students, however, this product has not yet been made available. The new LLE system must address this issue as a matter of urgency.

## Scope of the LLE

**8. Should all level 4 to 6 courses which are currently designated for Higher Education Student Finance (HESF) funding be treated as automatically in scope for the LLE? If not, why not, and what additional criteria for inclusion should be considered?**

When considering which qualifications should be in scope for the LLE, consideration should be given to the following criteria:

- Industry relevance/endorsement from employers (as outlined in response to 5b, the Mayor is well placed to support with determining industry relevance in London)
- Whether there are alternative technical qualifications that are more industry relevant and offer better progression opportunities
- Progression into employment and higher level, higher paid job roles
- Enrolment and achievement data

**9. 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)?**

o A foundation year integrated into a degree course

o PGCEs

o Integrated Masters (3 years undergraduate plus 1 year Masters)

**Foundation year integrated into a degree course** – given that foundation years play an important role in widening access to HE, learners following this route should not be penalised and should be given access to a 5 year entitlement.

**PGCE** – should be funded for all learners regardless of whether they have used their 4 year loan as skills shortage for teachers.

**Integrated masters** – yes this should be incorporated into the LLE under the same repayment terms. However, it is a significant commitment for learners to enrol on a 4 year programme and circumstances may change during this period.

**10. 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?**

The GLA defers to providers to respond to this question in full. Full access to funding should remain in place for these courses, as exists under the current system.

**11. 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.**

There may be some qualifications outside of HTQs which offer substantial value for learners and employers. Employers and learners should be engaged to determine this and a process should be established for putting additional qualifications forward to be eligible for the LLE. More clarity is also needed on the future of the Advanced Learner Loan (ALL) for level 3 courses and level 4 courses which would not be funded through the LLE. The GLA should also retain the ability to fund existing ALL eligible qualification where this evidence of a local skills gap.

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

In London, the Skills for Londoners Board adopted the role of London's Skills Advisory Panel in 2020. The Board was initially established in 2018 to bring together key stakeholders from across London government, including the four sub-regional partnerships of boroughs, providers and business. The Skills for Londoners Board and the Mayor's Jobs and Skills Business Partnership should play a key role in determining employer relevance in London and determining which qualifications are industry relevant.

**13. 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?**

The GLA defers to providers to respond to this question.

**14. 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 .**

The GLA defers to providers to respond to this question.

**15. 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?**

The GLA defers to providers to respond to this question.

**16. 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**

The GLA defers to providers to respond to this question.

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

The GLA defers to providers to respond to this question.

**18. What impact could modular study have on study mobility across the UK**

Modular study could have a positive impact on study mobility across the UK, if an effective credit transfer system is developed which would make learners less tied to an individual institution. As outlined in response to Q2 and Q30, it is essential that the cost of living in London is factored into maintenance support to ensure that learners aren't discouraged from studying in London.

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

The GLA defers to providers and other organisations to respond to this question.

**21. 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?**

No age-related restrictions should be in place for the LLE, this offer should be open to all adults.

**22. 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.**

It is important that learners are given the right advice to use their entitlement effectively, which will differ depending on an individual's circumstances. See response to Q3.

**23. 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?**

See response to Q3 and Q5b.

**24. 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?**

See response to Q5b.

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

As outlined in response to Q27-30 below, an adequate maintenance offer should be provided to support learners from all backgrounds to succeed. A discretionary provider-based bursary may be beneficial to support students facing unexpected financial hardship part way through their studies.

**27. 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?**

As outlined in the Higher Education consultation, students who choose to enrol in part-time or modular courses may do so for reasons relating to personal circumstances that make full-time study difficult for them. These might vary from the need to earn, to caring responsibilities. Maintenance support available through the LLE should reflect these additional challenges.

Clarity is also needed on how access to other financial support that is offered to full-time students would work on a modular basis, such as Council Tax relief.

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

Maintenance support should be proportionate to the level of intensity of study, recognising that learners in work and with other responsibilities may take longer to complete individual modules.

**29. 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?**

Yes, this system must be reconceptualised for adult learners. Adults living in the same household should have independent access to maintenance support, which should not be dependent on household income. For example, an individual should not be forced to rely on spousal income to support their studies. The existing approach also fails to take into account whether more than one family member is studying, to scale support accordingly.

Additional consideration should be given to whether adult learners have caring or other responsibilities, that may require additional financial support to enable them to participate.

The additional cost of living in London should also be considered, where income is used to means test any elements of the maintenance system.

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

Access to adequate maintenance support is essential to the success of the LLE, if adults are to be encouraged to take a career break to retrain or upskill

Maintenance support should include a London weighting, to recognise the increased cost of living in a city like London and to avoid disincentivising studying in the capital.

**31. 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?**

Yes, see response to Question 29.

### **Supporting quality provision and flexible learning**

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

The GLA defers to providers and other relevant organisations to respond to this question.

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

The GLA defers to providers and other relevant organisations to respond to this question.

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

The GLA defers to providers and other relevant organisations to respond to this question.

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

The GLA defers to providers and other relevant organisations to respond to this question.

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

The GLA defers to providers and other relevant organisations to respond to this question fully.

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

The GLA defers to providers and other relevant organisations to respond to this question.

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

For the LLE to be successful, better credit recognition and transfer is clearly required. A significant number of statutory bodies are involved in regulating and delivering provision at these levels, including DfE, ESFA, IfATE, Ofqual, Ofsted and

the OfS. Navigating this regulatory landscape is complex and it is unclear how recognition between technical (e.g. HTQs) and academic pathways will operate under this system.

The government should be cautious to avoid adding additional bureaucracy into the system or stifling innovation and flexibility, by being too prescriptive about course curricula and content as a way of creating consistent standards.

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

From the outset, level 4/5 qualifications need to be structured in a way that enables them to be delivered on a modular basis and portable across different providers. Qualifications should have an overall credit value and the loan could be apportioned based on the credit value of the unit compared to the overall credit value of the qualification. The GLA defers to providers and other relevant organisations to respond to this question more fully.

**40a) How far does successful credit transfer depend on mutually recognised credit frameworks?**

See response to Q38. The GLA defers to providers and other relevant organisations to respond to this question more fully.

**40b) Is a single credit framework a precondition for easy credit transfer?**

The GLA defers to providers and other relevant organisations to respond to this question more fully.

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

The GLA defers to providers to respond to this question.

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

The GLA defers to providers and other relevant organisations to respond to this question more fully.

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

Qualifications should have an expiry date when they are no longer current. However, the content of some modules within qualifications may not change, whereas others may require updating with latest industry expertise. For instance, within engineering the content of a module covering welding may not change over time, whereas units around digital electronics would require updating. When

qualifications are updated, modules could continue to stay current where there is no industry updating required.

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

This could be recognised through initial advice and guidance and assessed by teaching staff, where learners have prior learning enabling them to enter at a higher level. This could be further supported by learners completing a skills matrix demonstrating their prior knowledge which could be endorsed by their employer.

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

The GLA defers to providers and other relevant organisations to respond to this question more fully.

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

Business related qualifications such as leadership and management and marketing are likely to benefit from accreditation of prior workplace learning. Other areas include skilled trades and digital skills, where the learner has self-taught or has learnt through employer training i.e., coding, IT technician, web design, data analyst.