

Article

A Critique of the Ambitions and Challenges of the Lifelong Learning Entitlement (LLE) from a Lifelong Learning Perspective

Mary Mahoney ^{1,*} and Annabel Kiernan ²¹ Kellogg College, University of Oxford, Oxford OX1 2JD, UK² Staffordshire University, Stoke-on-Trent ST4 2DE, UK; annabel.kiernan@staffs.ac.uk

* Correspondence: mary@mahoneyconsulting.co.uk

Abstract: In 2025, the English government will commence the roll out of a transformative new funding system for post-18 learners entitled the ‘Lifelong Learning Entitlement’ (LLE). This will be a single funding system for both higher and further education, which the government argues, will enable learners to pay for courses to develop new skills and gain new qualifications at a time that is right for them through full-time degree programmes, flexibly through part-time study, or by undertaking individual modules as and when they are needed. The focus is on training, retraining and upskilling at levels four to six (i.e., the first three years of a degree programme) and on high-value technical courses at levels four and five. Essentially, the LLE is a lifelong entitlement to access a loan fund to support higher level/higher education studies up to age 60. Some targeted maintenance grant funding will be provided to some students who require it to age 60 and beyond. The authors will provide a critical review of the LLE from a lifelong learning perspective. They will explore the complex multifaceted discourse embedded in LLE intentions, as presented in policy statements, some of which appear to be at odds with the claims made about the role of LLE, and identify the ways that it will need to be shaped to achieve the benefits sought by government. Using the critical themes underpinning this special edition of the journal, they will consider the role that education provided through the LLE ‘transformative agenda’ can play in enabling access by adult learners of all types and for multiple reasons. They will consider the interplay between these and neo-liberal values relating to the role of higher education in employment, training and skills-focused priorities. They will also reflect on the role that the HE sector will inevitably need to play in shaping course design and delivery to ensure that the LLE can deliver both the government’s goals and those of lifelong learners, particularly those from disadvantaged communities and backgrounds.

Keywords: lifelong learning; higher education; adult education; inclusive education; policy impacts



Citation: Mahoney, M.; Kiernan, A. A Critique of the Ambitions and Challenges of the Lifelong Learning Entitlement (LLE) from a Lifelong Learning Perspective. *Educ. Sci.* **2024**, *14*, 713. <https://doi.org/10.3390/educsci14070713>

Academic Editors: Nalita James and Anil Awesti

Received: 3 May 2024

Revised: 21 June 2024

Accepted: 26 June 2024

Published: 30 June 2024



Copyright: © 2024 by the authors. Licensee MDPI, Basel, Switzerland. This article is an open access article distributed under the terms and conditions of the Creative Commons Attribution (CC BY) license (<https://creativecommons.org/licenses/by/4.0/>).

1. Background to the LLE and Its Intentions

In 2020, the English government announced the introduction of the ‘Lifelong Loan Entitlement’ to commence in 2025. This was accompanied by a detailed consultation process focused on its scope and the core elements it should contain. A key change arising from this consultation was the renaming of this new policy initiative to the ‘Lifelong Learning Entitlement’ (LLE) [1]. It is from this lifelong learning perspective that this paper will explore the LLE as a major new policy initiative.

The intention of the LLE is to roll out a transformative new funding system for post-18 learners in England, creating a single funding system for both higher and further education (HE/FE). The English government argues that this will enable learners “to pay for courses to develop new skills and gain new qualifications at a time that is right for them through full-time degree programmes, flexibly though part time study or by undertaking individual modules as an when they are needed”

As such, the LLE represents a lifelong entitlement to access loan funds to support higher level/HE studies across an adult’s life. Whilst tagged as ‘lifelong’, access to the

tuition element of the funding is only available to age 60 with some targeted maintenance grant funding provided to some students from age 60. This was a second concession achieved through the consultation based on arguments on the needs and responsibilities of adult learners.

From an international reader's perspective, the introduction of the LLE by the English government also signifies a major shift in the way lifelong learning and adult education will be understood globally. Whilst other countries grapple with a range of approaches to addressing the skills and productivity challenges caused by the global pandemic and the increasing digitisation of work, the LLE is unashamedly seeking to use a funding mechanism to address them rapidly. The impact of the UK's departure from the European Union through Brexit exacerbated these challenges, resulting in major workforce and skills shortages at a time when the country needed them most. The LLE is a rapid response to ensure that adults become a core constituent in higher and further education, breaking down the view that these forms of education are principally focused on school leavers because the economy and businesses need them. Other governments will be keen to understand if the LLE approach is a successful option.

In addition, the LLE serves as an ideal vehicle for addressing the intentions of this Special Edition of *Education Sciences* focused on lifelong learning and 'reimagining HE as a system where the fundamental ambition should be to allow all people to cultivate their interests and acquire understanding, experience, and skills in disciplines and areas that excite and intrigue them' and 'consider[ing] how this vision can be embedded within the current neoliberal model of HE' [2] As the LLE represents a wholesale shift in the English HE and FE policy landscape, it provides a unique and highly practical opportunity for examining, analysing and critiquing how the current system "where formal learning dominates and is mostly reserved for young people" [2] can be disrupted by the LLE to enable it to make HE more inclusive. The paper also focuses on the factors that need to be embedded in the LLE to enable this to happen.

As the LLE has not been implemented yet, the paper serves as a prospective impact assessment of the likely implications of the introduction of the LLE for providers and learners of all types and communities. The authors have analysed the complex multifaceted discourse embedded in the LLE intentions presented in policy statements to show that some appear to be at odds with the claims made about the role that the LLE will play. We present a critical review of the factors that will need to be considered and shaped to achieve the benefits sought by government when viewed through a lifelong learning and adult education perspective.

We consider the role that education provided through the LLE's 'transformative agenda' can play in enabling access by adult learners of all types and for multiple reasons, and we will consider the interplay between these and neo-liberal values relating to the role of HE in employment, training, and skills-focused priorities. We will reflect on how the interplay of key factors may side-track some of its intentions. We consider the role that the HE sector will inevitably need to play in shaping its provision through course design and delivery to ensure that the LLE can deliver both the government's goals and those of lifelong learners, particularly those from disadvantaged communities and backgrounds. and we illustrate this through a case study of Staffordshire University's (SU) approach—a university that focuses on making HE more inclusive. Rather than discussing this in the abstract, the paper weaves this example throughout to show the planning processes in place to prepare for the LLE implementation to achieve the best outcomes for its future lifelong learners and its region.

2. What Is Currently Known about the LLE Provision

The LLE has been developed to address concerns about the problems of the post-18 system that were outlined in the Augur Report, *Review of Post-18 Education and Funding* in 2019 [3]. This recommended major changes to the FE/HE sector, including increasing opportunities for everyone, reforming and refunding the FE college network, focusing on

low-value HE provision, addressing higher education funding, increasing flexibility and lifetime learning, supporting disadvantaged students, ensuring those who benefit from higher education contribute fairly, and improving the apprenticeship offer. Despite the Lifelong Learning Bill receiving Royal Assent on 20 September 2023, the hard work of refining the detail is only just beginning. The policy ambition has largely been welcomed by the HE sector, not least because both pragmatically and in the widest sense of mission, lifelong learning, transforming individual and collective opportunities, and having tangible economic and mobility impact through HE, sit at the heart of what universities do.

The LLE's central focus is on learners being able to 'train, and retrain' and on upskilling by studying at UK levels 4 to 6 (i.e., the first three years of an English undergraduate programme) and, in particular, on high-value technical courses at levels 4 and 5. The latter are generally, but not exclusively, offered by FE colleges separately or in a partnership arrangement with an HE institution and industry to ensure that progression opportunities exist and the provision suits the sectors' needs. Additionally, learners will have access to a new portal developed by the Student Loans Company (SLC), where they can track their entitlement, balance, and debt.

The initial description of the LLE when launched described an approach to study where learners could move between FE and HE and other HE institutions (HEIs)/higher education providers (HEPs) to suit their needs. The more-recent literature has not emphasised this focus, presumably because the practical realities of managing such a system were identified in the consultation by institutions and professional bodies who were concerned about the 'ownership' of learners within the context of degree classification for full degree programme completion, the administrative burden of mapping of learning across HEIs as a pre-requisite to the portability of credit (even if such a framework already existed), ensuring consistency in quality across multiple learning providers and mechanisms for payment to different institutions for learner completions.

Recent announcements have clarified that the minimum size for a fundable programme of study is 30 credit points, and this must form part of a 'parent' programme. This announcement has provided some clarity on the nature of the baseline module/short course unit to be studied, but this was largely expected by the sector because the Office for Students (OfS) 'short course' pilot programme [4], which involved 22 pilot institutions including SU, required this.

Since the announcement, several consultations and evidence submissions have been called by the DfE, which recently announced the creation of the DfE LLE Readiness Action Group (Source from DfE; LLE Provider Readiness Team's email to HEPs: *LLE Readiness Action Group—Further Information and Launch Date*; 22 March 2024.), which will be convened in April 2024 to focus on the following workstreams and key considerations for implementation:

- Credit transfer: how could you improve learner mobility and increase recognition of prior learning among education providers in your local area, to boost credit transfer rates and deliver the flexibility the LLE seeks to achieve?
- Employer engagement: do you regularly work with employers to market and create provision tailored to the local skills market?
- Admissions and operations: how prepared are you to recruit, administer, and support the non-traditional learners that the LLE may attract?
- Marketing and demand-raising: who is your main target learner for modules, and what do you think is the best way to reach them?

Similarly, the LLE Planning and Awareness Programme has been announced and is run by the SLC, DfE and OfS. It will inform and guide institutions on all aspects of LLE implementation, share key messages, outline policy and business requirements, and explore the implementation timescales (Source from DfE; LLE Provider Readiness Team's email to HEPs: *LLE Readiness Action Group—Further Information and Launch Date*; 22 March 2024.).

At the time of writing of this paper, the Department for Education (DfE) has just announced that the introduction of the LLE for HE will be delayed to enable time for institutions to develop systems that will cope with the LLE, including single module

enrolments and all other associated developments required. (Secretary of State's letter to HEPs—Re: Lifelong Learning Entitlement (LLE) Spring 2024 update).

3. The Paper's Focus

At this point of high levels of uncertainty and lack of clarity, there is a need for a critical review of the LLE from a lifelong learning perspective because it represents a radical transformation of the funding for the entire HE/FE system, moving the focus away from a model of HE for young people progressing from schools to the next level of study into one that encourages lifelong and life-wide engagement with education to ensure that knowledge and skills can be developed across an individual's working life. This means that there is a seismic shift towards adults as mainstream consumers of HE, a focus on those who prioritise career progression and expect to pay large amounts of money to achieve it, and on ensuring that their knowledge and skills remain and are current across their working life. The LLE has the potential to promise a highly relevant and engaged HE sector that provides training, re-training, and upskilling opportunities linked to skills and productivity needs and that delivers tangible individual benefits.

From a lifelong learning perspective, the hidden implications of this need to be understood before the LLE can roll out to match its promises. This means understanding what is important for providers as they plan appropriate provision, provide ongoing appropriate support and education for adult learners, are relevant to the needs of all learners irrespective of their differing reasons for studying and the outcomes they require, and ensure their systems and processes can enable successful delivery of all these outcomes through a highly flexible funding approach.

It is very difficult to analyse the LLE in its current state of development to identify tensions and the extent to which it will be able to deliver a transformational agenda because it is seeking to do more than one thing. This means that there are cases to be made about multiple aspects. However, it is essential that we analyse it now to draw attention to these and to understand the challenges facing institutions to understand the implications of their planning decisions.

The following section provides a critique of the discourses in the LLE documentation, and this is followed by a detailed analysis of the way these impact institutional decision-making. These discussions focus on both the LLE's articulated intentions and on those that are tacit, taken for granted, or seem to be excluded but need to be considered from a lifelong learning perspective e.g., support for adult learners, inclusivity and links to other agendas such as access and participation.

To set the context for current participation by adult learners in the English HE system, a House of Commons report released in 2021 provided trends in 'mature' learner entry to HE [5]. It states that there is no official definition of a 'mature student', but the term is generally used to refer to older students, particularly students over 21 at the start of an undergraduate (UG) degree course. These learners are more likely to study part-time at all levels (i.e., 28% of UG students studying part-time compared to 3% of young UGs), make up the majority of the post-graduate student population, and undertake flexible continuing professional development (CPD) provision. The total number of mature UG learners fell from more than 400,000 in 2010/11 to fewer than 240,000 in 2017/18, a drop of 40%, with numbers increasing to 254,000 in 2019/20. This represented 37% of all UG students. Since the pandemic mature student numbers have reduced from 12.5% of the total UG enrolments to 9%, and this is attributed to the cost of living crisis in the UK. In the context of the national skills agenda, one of the clear and stated government priorities is to increase the number of adult learners who are either in work or not in work undertaking all forms of HE studies.

4. Critique of the Discourses in the LLE

One of the biggest challenges for HEIs in understanding the LLE and planning for its implementation is the complex multifaceted discourse embedded in its intentions as

presented in policy statements, some of which appear to be at odds with the claims made about the role of LLE, and the ways that it will need to be shaped to achieve the benefits sought by government.

Analysis of the documentation released to date (Some of these documents are no longer available on the various government websites.), including formal statements, publicity materials and presentations given by various representatives of government, including those whose remit is to deliver on the LLE, shows that it contains at least eight different intentions:

- Imperative linked to skills shortages: The LLE is variously described as a tool or mechanism to test the market to determine if there is a demand for level 4/5 skills. In a presentation given by a senior policy officer to the national HE lifelong learning conference, the key focus of the presentation was that the LLE is principally focused on addressing structural gaps in provision at levels 4 and 5. Whilst this point is not necessarily emphasised in the documents released about the LLE, it was clear that the issue of higher technical skills development at the technician level is one of the government's main reasons for the LLE, i.e., the goal of addressing one aspect of the skills shortage and a reason for the initial focus from 2025 of funding for HTQs. They cite that too many people leave full-time education with low skills, and that too few have higher technical skills (level 4–5 qualifications), with only 4% of people with an achievement age of 25 having these. It also connects back to the Augur report and the creation of new Institutes of Technology based on a network of FE Colleges and an HEP and a focus on the adult learner market completing level 4/5 in FE and level 6 top up in HE [3];
- Imperative linked to learners: A second key message presented in all government documentation is that the LLE represents a new funding regime to enable lifelong access to funding across a person's lifespan to enable them to train, retrain, and upskill. It is ironic that the funding for tuition fees stops at age 60 when the retirement age is now 67 (soon to be 68) years of age, despite the pandemic showing that retraining people from age 50 in certain at-risk jobs was crucial in some sectors due to the lack of digital literacy and skills in areas of the workforce. Lobbying by lifelong learning experts as part of the Government's initial consultation achieved a change in the proposed approach to enable some eligibility for maintenance support from age 60, but no eligibility to the entitlement has been achieved [6]. Presumably, this age is linked to the time taken to pay back the loan. This is curious, given that one of the biggest 'return to work' post-pandemic priorities is the over-50s age group and the lack of an LLE offer at level 7;
- Imperatives linked to the need for a market-driven approach: A third key message is that the LLE is a mechanism to allow increased flexibility for providers in the HE 'market' to open to new and/or different types of learners. Does the LLE include flexibility to allow new or specialist providers to enter the market, competing with HEPs for student numbers? This is unclear in the documentation;
- Imperative linked to controlling funding for provision: A fourth and more tacit element embedded in the documents is that the LLE is a way of controlling which courses are funded based on the skills needs in key localities and regions. This will move the LLE closer to the types of funding decisions in place currently for FE provision and is based on the Adult Education funding model, which is prioritised by the skills needs at regional levels and controlled by Combined Authorities—a regime aligned to LSIPs and Regional Skills Plans (As an example, see DfE Research Briefing *Technical Education in the UK: T Levels* [7], which notes the removal of 5500 public funding qualifications at level 3 and below, the requirement on post 16 providers to facilitate stronger employer and education provider involvement in local skills systems, and the requirement for cooperation with designated 'Employer Representative Bodies' to develop local skills improvement plans (LSIPs), which will help colleges to shape their provision to ensure it is responding to local labour market skills needs.);

- Imperative linked to FE and HE funding system: In this fifth interpretation of the scope of the LLE, it potentially represents a means of creating a new and simpler funding regime to amalgamate Adult Learner Loans (ALL) and HE funding. This will achieve a seamless FE–HE tertiary sector under the control of the DfE. The result is an offer that potentially enables seamless movement for learners and creates a truly integrated system, but a movement that is controlled by bodies such as ESFA, OFS etc.;
- Imperatives linked to sector or labour market needs: In the sixth, readers are left asking whether the LLE is aimed at strengthening sector/employer responsive provision in key areas of shortage, largely driven by statements such as ‘The origins of the LLE are routed (sic) in the need to provide flexible, lifelong learning opportunities so that employers have people with the right skills at the right time, both in the short and long term. Proactive provider and employer engagement will be an important tool to ensure local skills provision meets that skills need’. and ‘We need providers to work even more closely with businesses to ensure the flexible provision they offer will give people the training needed to emerging local and national skills gaps. It is key that employers have confidence in high-quality courses and qualifications that provide the knowledge and skills that they need.’ [1] (Theme 2 p.27);
- Imperative linked to future skills needs: The seventh identifies the LLE as a mechanism to enable innovation to address future skills needs in the context of the current challenges facing the country and employers. Whilst this point is expressed within DfE documentation, it is unclear how this is intended or expected to be developed as much of the narrative focuses on responsiveness, local skills needs, provision of high-quality courses, etc. As such, it is very much an expected outcome of the funding model being introduced but implied rather than an explicit component;
- Imperatives linked to all these or a combination of several: Given the range and scope of these intentions, it is also possible for any combination of those identified (and other possible ones) to be amalgamated to create a set of linked imperatives, as well as a scope for a differential roll out of provision in different parts of the country for a range of differing imperatives linked to demand in the region or locality. This could result in a complex landscape from the perspective of student choice and a limited range of provision in education ‘cold’ spots. From a lifelong learning perspective and adult learner choice, this may exacerbate access and inclusion rather than expand it.

The implication of this range of possible intentions is that each has different impacts on its development going forward, the funding approach to be used, the core responsibilities of education providers to achieve these, and the overall success of it from a lifelong learning perspective as an enabling mechanism. If a tightening of controls and restrictions are placed on HEIs to deliver the LLE, on what can be offered in different locations, and who can provide it, then the LLE is likely to fail to deliver on the key elements—the elements that will allow greater accessibility for new groups of learners in sectors of need, in locations where participation is already limited, and for communities who need a highly skilled population who not only have the skills needed by the local/region’s economy. Through this process, the transformative power of education for individuals, their families, communities, and regions will result in major improvements not only for the economy but for individuals. Alongside this also sits a potentially different set of imperatives, drivers, and impacts for students who want to pursue full-time study. Any one of these imperatives will differ with respect to quality, course design, costing, the role of prior learning, etc. For example, if the LLE’s intention is to increase lifelong learning opportunities, it will need to exist differently than an intention focused on employers’ needs for a skilled workforce. This raises challenges for a provider in terms of different learners in different patterns with different support needs at a time when the sector is ‘right sizing’. The following section will focus on unpicking this complexity in a specific context.

5. The LLE from a Lifelong Learning Perspective

Using the context of Staffordshire University (SU) and its location in Stoke-on-Trent (Box 1), this section will consider the complexity that institutions face in preparing both strategically and operationally for the roll out of the LLE in the context of multiple and often conflicting intentions or absence of clear direction of travel. These are set against the backdrop of their striving to achieve the lifelong learning ambitions of the LLE's 'transformative agenda'; that is, demonstrating the role that HEIs can play in delivering high-class education to enable access for adults to all types of learning for multiple reasons against the practical realities of their communities.

Box 1. Staffordshire University's context.

This year we will put forward a new plan that aligns both sector and regional challenges to provide a key structure to support meaningful 'levelling up'. Our local area, Stoke-on-Trent, has high levels of deprivation compared to the rest of England, with over 30% of neighbourhoods belonging to the most deprived compared to 10% of neighbourhoods nationally. The communities we serve face poverty and hardship that are currently exacerbated by the cost-of-living crisis [8]. Our communities have lower-than-average rates of highly qualified individuals who often churn through 'low pay low skills' work [9] (pp. 121–141). Not enough young people in our local area participate in HE. The university needs a meaningful offer to raise the current 17% participation rate in Stoke-on-Trent to the national average or higher. We know that the lack of participation is related to a variety of factors, including the broader economic and labour-market context of our local region. These factors can often undermine our attempts to keep graduates in the local area. The LLE provides an opportunity to design provision, which enables individuals to access flexible and affordable learning throughout their lives. This provision must 'pay off' for those who access the learning and be aligned with local and regional skills needs.

5.1. Issue 1: The Challenges of Conflation of Lifelong Learning and Skills

There is a clear conflation of lifelong learning and the skills agenda of the government, and this trend has been increasing rapidly in recent years. Given the speed of technological change, the loss of the EU workforce as a result of Brexit and national skills shortages caused by the loss of UK adults from the workforce at the end of the pandemic, skills are clearly at the forefront of Government thinking and policy ideation as a 'swift shuttle' around the statements on low value, 'mickey mouse degrees' and the burnishing of apprenticeships, illustrate. There are clearly national skills shortages in key areas, including construction, skilled trades (e.g., carpentry, bricklaying), engineering, green economy, digital, health, and social care, and these need to be addressed urgently. There is an argument that these shortages are, in part, the result of too many young people going to university instead of choosing to gain skills in these trades and professions.

Universities are not set in contradiction to skills development as part of their core mission, as recent reports such as *Skills, skills, skills—The Role of Modern Universities Delivering the Workforce for the Future* [10] and *Future Proofing England's Workforce—How Modern Universities Can Meet the Skills Challenge* [11] show. Professor Graham Baldwin, Chair of MillionPlus, addressed a Fringe Event at the Conservative Party Conference in 2023 and urged the government to recognise and utilise modern universities as a key piece in the skills puzzle, arguing that they are ready to "seize the opportunity" to address skills gaps. Modern universities were established to upskill in applied professional areas and this has continued in recent times through the professionalisation of key sectors, including nursing and policing, with the call for higher qualifications coming from these sectors.

However, very specific industry upskilling is arguably not best served by 'chunking up' a three-year degree programme into its constituent parts and delivering it as 30 cp short courses. This approach fails to take into account the necessary sequencing of content and skills developments that are embedded in the accredited programme developed by industry learning experts. This is even more the case when considering in-work reskilling that would be best served by a shorter course provision funded either by the industry or by the individual. In fact, endpoint qualifications short of degrees that support SMEs to grow

and/or inject necessary future-forward business thinking, such as the transition to net zero and the green economy, and can and should be part of a university offer to help drive high-level skills in a regional economy. Similarly, the LLE covers levels 4–6, but arguably, this should extend to level 7 for this type of up/reskilling to have real meaning and impact on skills shortages and productivity (see also the HEPI report, 2023 [12]).

Similarly, for LLE to work, to be attractive to adults, and a real option in education and skills ‘cold spots’ across the country, there is a need for further investment in developing skills at levels 1–3 to enable fluid progression and address all levels of skills gaps across key sectors. In this sense, the LLE could have the most significant impact if it was partnered with more significant funding across the full education pipeline. The *IFS Green Budget Report* [13] demonstrated the impacts that reductions in funding at these levels have had on course recruitment in level 1–3 programmes and the knock-on effect, including a significant decline in UK participation in adult education and training with the number of publicly funded qualifications started by adults declining by 70% since the early 2000s (dropping from nearly 5.5 million qualifications to 1.5 million by 2020), and the number of workplace training days received each year has fallen by 19% per employee in England since 2011. The decline in training participation has occurred alongside a fall in both public and private investment in training, with a 27% per trainee drop in the average employer spending on training and public funding for adult skills falling by 31% in real terms.

In the context of imperatives linked to skills, these reflections highlight the difficulty of truly grasping the LLE’s intent. If it is to do more than simply change the way that student finance is delivered and bring in learners who might not have previously had a clear route into FE and HE, then it needs to be part of a whole-system reform. If it is about upskilling and reskilling, then it needs to be linked to, for example, reform of the apprenticeship levy to a skills levy or employer reinvestment in skills and training.

The LLE’s dislocation from these scenarios weakens its articulation as a significant change to the offer of real lifelong learning. For lifelong learning to be the radical step change that the LLE ambition implies, first, it needs to be situated in a ‘tertiary model’ to facilitate the full spectrum of further and higher learning and the skills development the UK economy needs, as well as removing the distinction between technical and academic education. Second, a different funding model that balances the individual, the taxpayer, and importantly, the business contribution to investment in the economic future to support the skills and productivity narrative would be helpful. In recent months, the Labour Party has started to set out its stall on a reform of the apprenticeship levy to a skills and growth levy to create that flexibility in the technical skills part of the system. This may work well with an LLE higher learning offer and, when set in regional contexts, offers the possibility of more collaborative working between education providers, businesses, and local government for the social and economic opportunities needed to realise the impact. This would mean a return to a form of tripartism that may still rely on the financial and devolution settlement in a future electoral landscape and that the burden of debt for addressing the national skills shortages is considerably removed from individuals.

5.2. Issue 2: Legislating for Flexibility—Planning in a Vacuum

Although not a new concept, legislating as outlined in the LLE for the required flexibility of broad access to higher learning and lifetime opportunities (until you are 60!) for the accrual of new knowledge and skills, is an important step. In its most crude form, the LLE is a reform of the student finance system. However, many HEIs are embracing lifelong learning as part of a renewed HE architecture and are looking at the ways to respond best to and put in place the types and modes of learning that will support the LLE’s success. SU has developed micro-credentials as part of the final iteration of the DfE’s short course pilot. These are smaller units of learning, bundled as 3×10 credits and were built with local businesses to meet skills’ needs and with partner FE colleges to support the transition to HE. Like other HEIs, with its partners, SU is exploring the option of extending its Higher

Technical Qualifications footprint to tailor the portfolio to newly emergent learning and skills demands.

The biggest challenge is that many questions remain unanswered about the LLE, as the detail has yet to be provided as part of its implementation. From an institutional planning perspective, these details absolutely matter. For example, questions on how new modular LLE provision will be regulated in practice are still unanswered despite the OfS consultation closing in November 2023. This ‘Call for Evidence on Student Outcomes for the LLE’ [14] was framed using existing measures for full-time programmes (success, progression, and retention), none of which reflect the other intentions of the LLE for flexible enrolment across a model of lifelong learning. How will universities shoulder the burden if the LLE measures mean a move to module-level regulation? How will learners easily navigate the potential complexity of modular stacking that was intended to be transferable between universities? How will credit transfers be best facilitated? How will personal learner accounts be owned and managed and explicitly supported by appropriate information, advice and guidance, especially in the context of payments potentially only for individual module enrolments?

Notwithstanding the additional uncertainty of a potential new government in 2025 due to elections to be held in 2024, the critical point is that all student loan finance will be available as 30 credit module chunks from 2027, with the additional condition that all 30 credit modules must ‘stack’ to a parent qualification, i.e., an endpoint qualification at levels 4–6. Learners will be able to indicate their intention to purchase their qualification in 30 credit chunks or, at the point of application, indicate that they intend to purchase a linear 360 credits in the usual way for a full-time degree. It may be that modular learning remains, at least at the outset, a limited part of the HE market, especially given that there is, as yet, no evidence of demand for modular learning. The OfS short course trial only served to demonstrate that the market is not yet aware, let alone ready, for this type of provision [4] (*OfS Short Course Trial Evaluation Report*, January 2024).

Furthermore, the quality oversight of modular provision is yet to be settled by the DfE (including the application of B3-style metrics), the regional or national mechanisms for the smooth transfer of credits between HE providers are not yet tangible, and the ways in which the policy aims for employer engagement to support the success of the policy are not fully determined. It is expected that these conversations will take on more pace from Spring 2024 based on outcomes of the *DfE LLE Readiness Working Groups*. It is anticipated that HEIs will need to have 30 credit modular offers (in line with LLE requirements) available from 2025 for HTQs and from 2027 for all other provisions.

The delay to January 2026, signalled in the letter from the Minister for Skills, Apprenticeships, and Higher Education (18 April 2024) [15] indicates a very late realisation that the roll through of the necessary changes to try to support the LLE represents a significant piece of work for the SLC and universities—from the finance and enrolment systems to potentially changing credit structures and the build that requires, the potential for adding multiple entry points to the academic year to deliver flexibility, and timetabling complexity and flexibility even before considering the module level KPI reporting to the regulator, the IAG needed to navigate the system and the student support systems, which may add layers to what is needed if LLE is successful in drawing in learners who may be accessing or returning to higher learning after a break from formal education.

5.3. Issue 3: Alignment with Access and Participation and Other Lifelong Learning Imperatives

For local communities such as Stoke-on-Trent, to access meaningful opportunities presented by the LLE, universities must have an Access and Participation Plan (APP), which seriously considers how to support them to succeed and be part of an economic transformation of their community. The requirements of the APP set out in the OfS’ new *Equality of Opportunity Risk Register* (EORR) means that HEIs must reconsider their roles with schools and colleges. At SU, this is a necessary precondition of LLE ‘paying off’ for areas like Stoke-on-Trent. Having engaged with the SU Academies Trust (MAT) and the University APP Board, it is clear that life opportunities can be limited from as

early as early years and primary education. For future generations to access an LLE that delivers meaningful educational outcomes and economic transformation for individuals, communities and the region, SU's work lies squarely at the intersection of APP and LLE, and these two frameworks must work in combination to deliver life opportunities.

Micro-credentials (MCs), an emerging new form of lifelong learning, have an important role to play in improving access to HE, as well as delivering on the vision of the LLE [16]. MCs are flexible, bite-sized, and therefore, bite-priced chunks of learning designed to be responsive to growth priorities in a local area/region. MCs can reduce access barriers by providing the flexibility needed by learners and employers. MCs are more agile 'bites of learning' and can be stackable to meet the requirements of lifelong learning as envisaged by the introduction of the LLE. They can support small and medium enterprises (SMEs) to upskill their workforce to grow or mature their businesses. This type of learning can often be more accessible to employers, where they cannot release workers for the time required for a degree apprenticeship or part-time course attendance. MCs should be stackable and, upon completion of a series of MCs, result in a higher-level qualification. As a result, a review and reform of the apprenticeship levy is key to ensuring SMEs can access the right training over the right timeframe for their workforce. A broader skills levy or skills tax credit are ways to support this and have been articulated in detail elsewhere.

Several Canadian provinces are leading the way in establishing MCs as a solution to growth and productivity challenges like those faced in England. Better Jobs Ontario's 'Get skills training and financial support when you qualify for Better Jobs Ontario' [17] and Ontario's Student Assistance Programme have embedded HE-delivered MCs in their plans to deliver regional economic growth (News Ontario [18]). In 2020 they committed over CAD 59 million to establish 600 MC programmes over three years and to offer subsidised or free training for workers who lost their jobs because of the pandemic.

SU will invest in the development of MCs to deliver a fit-for-purpose LLE for its local area and work to align these areas based on the following principles:

- LLE or flexible/modular could be key to increasing HE access and mitigating the risk of equality of opportunity;
- LLE or flexible/modular should be embedded into our education ecosystem;
- LLE or flexible/modular must be responsive to labour-market information and employer voice;
- LLE or flexible/modular could be key to enhancing the collective educational gain of our communities.

5.4. Issue 4: Alignment with Civic Mission, Local Transformation, and Lifelong Learning Participation

Universities play a vital role in driving fundamental local economic transformation through education within the larger education ecosystem of its local area working purposefully together to deliver these outcomes. This intentional dynamic can deliver economic growth in partnership with other regional organisations, such as Local Skills Improvement Plans (LSIPs) and devolved government. The enabling strand of this work is the alignment of APPs with an LLE offer that is reflective of the local socio-economic context, local labour markets, and growth priorities. Universities can work collaboratively to develop and sustain local educational ecosystems that are a necessary precursor to local economic transformation that deliver fit-for-purpose higher-level skills and education relevant to the local context. They can also use leverage in the delivery of LSIPs as a key mechanism for local economic opportunity, informed by a 'learning and earning' skills match. An important bridge between local opportunity and the LLE is micro-learning, particularly if situated in a broader learning/skills levy context.

SU's work with employers shows that (a) there is little if any awareness of LLE, (b) that apprenticeship provision does not suit SMEs, and (c) they see the value in having education quality assurance with the training so that the credits/training retains value and currency for longer and that individuals can stack their learning into a qualification if wanted so

that it is not one-off training. They are also concerned about workforce churn as a result of the additional learning. Additionally, it could become a flagship provider in key subjects, attracting students from other regions, whilst at the same time, providing a skills model that emphasises access locally based on regional skills needs. From a lifelong learning perspective, this is a vital aspect.

In terms of exploring these possibilities in its region, SU's opportunity for modular learning (including below 30 credits) to support social policy is appealing. As noted earlier, education and economic opportunity 'cold spots' in the regions could make very positive use of a modular and flexible learning offer at L1–L3 for NEET and for other adults who are at a distance from education and/or the labour market. Taking Stoke-on-Trent as the example, trends show that it is 4% behind the national average when children start school, and they cannot make up the gap for a number of reasons. The average adult reading age is 8, and adults cannot access the additional 15 hours of child care if they are not working. This child care actually provides early-years learning not babysitting. For a truly integrated system that would address these adult concerns at starting levels, a joined-up system where small bites of learning or training could be situated as part of the Department and Work and Pension's (DWP) Return to Work Package rather than the current systems based on precarious work, limited opportunities and benefits sanctions.

In communities such as this, education, when viewed from a lifelong learning perspective, is the main driver for levelling up, economic transformation, and growth strategies, if social and individual change is to be achieved (see worked example in Box 2). The introduction of the new APP framework and the LLE reinforces the role that HE must and can play as strong civic institutions, with convening powers, who sit at the intersection of access, participation and lifelong learning. The role that they will play once the LLE is embedded will be important to understand.

Box 2. So, can you do it on a cold rainy night in Stoke-on-Trent?

From a Stoke and Staffordshire regional perspective, the introduction of LLE has positive and negative dimensions. On the one hand, given the socio-economic challenges in the city (and parts of the region), the eligibility of LLE at level 4 (rather than levels 2 or 3) means that LLE in and of itself is unlikely to increase access to HE. However, there is a market for those 'potential' learners and for those adult learners in work through our micro-credential offer, which facilitates stacking three connected smaller 10-credit units into one 30-credit module. This also allows for flexibility in delivery and a more targeted approach to local skills needs and local educational development to support people to get closer to education or the labour market. A project on this, commissioned by the Staffordshire Chamber of Commerce, will report at the end of April on the possibility of a regional pilot of adult skills accounts, based around SU's micro-credential approach.

More positively, for learners who can access level 4 and above higher learning, a step on/step off approach may favour learner cohorts that have a multiplicity of challenges in achieving through linear HE pathways. These barriers may mean that, as a university, its externally regulated metrics are negatively impacted. Its pilot of a Student Basic Needs Survey [19] has shown that financial pressures, caring responsibilities, and precarity in all its forms can lead to academic disengagement and mental health pressures that impact learner success. The ability to learn in chunks and, therefore, more flexibly, may suit key constituencies of its current student intake.

Retaining a minimum modular requirement of 30 credits to access SLC funding and an attachment to a parent qualification makes sense in terms of maintaining degree course value and currency, but will it meet the flexibility and lifelong learning approach implied by the LLE policy ambition and the needs of residents in Stoke-on-Trent? Only time will tell.

In summary, when mapping the eight imperatives embedded in the complex multi-faceted discourse in the LLE policy documents against the four main issues identified in the previous discussion, the challenges for lifelong learning and the HE sector become very clear. Table 1 maps seven of the eight imperatives against these four issues. The eighth, a combination of the previous seven, has been excluded as the possible permutations are unknown.

Table 1. Alignment between the 8 LLE imperatives and the 4 key issues.

LLE Imperatives in the Policy Documents	Alignment with the Key Issues
<p>1. Skills shortage: focused on levels 4/5 demand for technical skills with flexible entry/exit from an integrated further/higher education system</p>	
<p>2. Flexible LLL funding: focused on funding to increase flexibility to train, retrain, and upskill adults to age 60.</p>	
<p>3. Market-driven funding: focused on a commercial, responsive HE system with increased flexibility of provision, new specialist providers, different types of learners.</p>	<p>1. Conflating lifelong learning and skills which impacts how HEPs deliver provision: focused only on skills and a single utilitarian view of the role of HE.</p>
<p>6. Strengthened employer-responsive provision: focused on employers having people with the right skills at the right time in key areas of shortage and flexible LLL opportunities.</p>	
<p>7. Future skills needs: focused on enabling innovation to address future skills needs of country and employers.</p>	
<p>3. Market-driven funding: focused on a commercial, responsive HE system with increased flexibility of provision, new specialist providers, different types of learners.</p>	
<p>4. System of controlling what HEPs provide: focused on planned response to workforce skills in areas of high demand determined by needs in key localities.</p>	<p>2: Legislating for flexibility—planning in a vacuum: focused on reforms to funding to introduce flexible new provision versus subtle new controls of HE provision to ensure alignment with national priorities.</p>
<p>5. FE–HE funding system: focused on integrated tertiary sector funding controlled by DfE, allowing learners to move seamlessly between both for skills development.</p>	
<p>None</p>	<p>3: Alignment with access and participation and other lifelong learning imperatives: focused on creating flexible/modular provision to increase access to HE, reducing barriers for individuals and collective gain for communities.</p>
<p>None</p>	<p>4: Alignment with civic mission, local transformation, and lifelong learning participation: focused on role of education and learning as transformative as the main driver for levelling up, economic transformation, and growth strategies to achieve social and individual change.</p>

Table 1 shows the stark reality that the LLE is heavily focused on skills, productivity, and the potential increased control of HE provision to address these national challenges and the lack of alignment or consideration of broader lifelong learning considerations linked to the needs of adult learners and support for their development and the broader civic mission of HE. Ironically, the LLE is based on an entitlement to loan funding with the onus borne by learners.

6. Conclusions

In conclusion, the picture portrayed is unsurprisingly complex and exacerbated by the lack of detailed information at this stage on core elements of the LLE to enable both HEIs to plan for its roll out and an adequate assessment of its implications for lifelong learning provision and learners. This lack of detail is worrying, given the short time frame for its implementation, despite the recent extension for roll out in HE.

From this paper’s perspective, there are three key questions to be answered in determining whether the LLE offers the reimagined HE system that the journal’s special edition is seeking to achieve, i.e., ‘where the fundamental ambition should be to allow all people to cultivate their interests and acquire understanding, experience, and skills in disciplines and areas that excite and intrigue them’ [2].

The first is 'whether the LLE will enable us to embrace learning in its broadest sense in terms of the social, cultural and economic development of individuals, communities and the region'. Given the heavy imperative for skills that sits as a core imperative of the LLE, the ability to deliver on this goal appears (at this time) to be left to institutions to determine. The example of SU's planned approach illustrates the measures needed to ensure that the LLE works for its region and learners. The devil will be in the detail. Imperatives that potentially focus on the DfE restricting or controlling the types of provision/subjects funded in different parts of the country, would potentially hamper these endeavours or enhance them if aligned with LSIPs, local skills, and economic profiles. This is conditional on whether decisions are influenced by regional or central government priorities. The overarching imperative of linking education funding to increasing vocationally focused provision is already evident in lower levels of funding of provision, e.g., Adult and Community Learning budgets requirements for increased provision of vocational ESOL funding. Is the same likely to emerge through the LLE requirements?

A consistent system that creates stackable modules will benefit adult and lifelong learners by providing them with excellent flexibility to step on and off learning to suit their needs and circumstances and have it formally recognised through innovative new mechanisms such as MCs. Coupled with international trends in the development of MCs that seek to integrate knowledge, skills, and competencies, and even accredited CPD provision, there are potentially new and exciting ways of accessing education across the lifespan. The caution here is that what is developed in England should ideally be compatible with developments internationally, so that English adult learners are not disadvantaged when/if they seek to engage with other MC programmes aimed at facilitating increased mobility, breadth of study, or topical global issues such as environmental sustainability and green economy. This is vitally important in a post-Brexit context, particularly for younger 'GenZ', etc., learners.

As discussed previously, the LLE potentially represents a seismic shift in the role of HE with its increased role in skills provision at the HE level. When considered against the current mainstream provision, tensions for HEIs may occur. Similarly, in the current context of rapid technological expansion and environmental challenges, what is the transferability, currency, or legitimate life span of modular/short courses or MC offers? This is a vital consideration given the individual debt burden arising from the LLE and who 'owns' the learner and their final qualifications. Similarly, what is the focus of the skills provision? Will it be driven by the current imperatives for skills shortages or by the skills needs of the future?

The second is '*whether the introduction of the LLE will address equity/equality perspectives from an inclusive standpoint*'. The biggest concern with the LLE is that, ultimately, it is a loan and not an entitlement. This does not differ from the current funding arrangement but answers to questions in the previous section become even more important when viewed from an equity perspective. As the LLE is seeking to align funding with a lifelong opportunity to upskill and retrain, this potentially changes the meaning attributed to learning and creates a new dynamic between HEIs and learners. Based on short time frames and possibly short bursts of engagement with learning and the way the LLE is framed, there is a potential for learners to expect to achieve personal benefit through improved employment options and promotion. This linking of ongoing investment in higher learning with personal return on investment (ROI) in that learning (that may or may not be achieved) inadvertently moves the onus for ROI to the education provider as an outcome of the LLE).

The third question that the journal seeks to address is '*will LLE positively influence the way that learners learn, and teachers teach*'. This aspect has not been addressed in this paper, except through acknowledgement of the potential changes to the way learning packages will be offered, because it is too early to address this question. Without critical information on the actual intentions of the LLE and the expectations of FE and HE to deliver it, it is impossible to determine the impact on the learning experience. An important final

consideration that needs to be emphasised is that adult learners are not a homogenous group, and neither are their reasons for engaging in learning. The paper has sought to show how HEIs will need to work to enable access and participation in disadvantaged communities. The same will need to be argued for the needs of other types of adult learners in this funding context that does not clearly explain how support will be paid for or embedded in its funding model. Similarly, social, ethical, environmental, and technological problems require complex and well-planned new approaches and cross-disciplinary engagement rather than simple technical fixes that will be delivered through modular/short course approaches, thus potentially limiting the types of learning and thinking that adults are exposed to.

Finally, to address the key question ‘will the LLE focus on neoliberalist agendas that do not aim to increase the well-being of everybody but have the potential to increase social inequality which in turn, drives a more competitive society and economy thus compounding/increasing social inequality’, it is too early to tell, but this paper has provided a detailed overview of the challenges that the LLE presents (several months before it is scheduled to be introduced!) and HEI’s considerations and challenges on how they will deliver it.

Author Contributions: Conceptualisation, M.M. and A.K.; Formal analysis M.M. and A.K.; Resources M.M. and A.K.; Writing—original draft preparation M.M. and A.K.; Writing—review and editing M.M. and A.K. All authors have read and agreed to the published version of the manuscript.

Funding: This research received no external funding.

Institutional Review Board Statement: Not applicable.

Informed Consent Statement: Not applicable.

Data Availability Statement: No new data were created or analyzed in this study. Data sharing is not applicable to this article.

Conflicts of Interest: The authors declare no conflict of interest.

References

1. DfE. Lifelong Loan Entitlement Government Consultation, Launch Date 24 February 2022 Respond by 6 May 2022. 2022. Available online: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1056948/CP_618_Lifelong_Loan_Entitlement_Consultation_print_version.pdf (accessed on 7 May 2022).
2. James, N.; Awesti, A. Message from Guest Editors and Guidelines for the Special Issue, ‘Re-Imagining Lifelong Learning in Higher Education’ and Education Sciences Journal. 2023. Available online: https://www.mdpi.com/journal/education/special_issues/TVF0EQ1176 (accessed on 5 October 2023).
3. Secretary of State for Education. Independent Panel Report to the Review of Post-18 Education and Funding, Presented to Parliament by the Secretary of State for Education. May 2019. Available online: https://assets.publishing.service.gov.uk/media/5ceeb35740f0b62373577770/Review_of_post_18_education_and_funding.pdf (accessed on 1 May 2024).
4. Office for Students. Higher Education Short Course Trial, Evaluation Report. 10 January 2024. Available online: <https://www.officeforstudents.org.uk/publications/evaluation-of-the-higher-education-short-course-trial/> (accessed on 1 May 2024).
5. Hubble, S.; Bolton, P. *Mature Higher Education Students in England Report Number 8809*; House of Commons Library: London, UK, 2021.
6. DfE. March 2023 Lifelong Loan Entitlement Government Consultation Response. Available online: https://assets.publishing.service.gov.uk/media/64060e398fa8f527f310d54b/Lifelong_Loan_Entitlement_Consultation_Response.pdf (accessed on 30 March 2023).
7. Lewis, J.; Bolton, P. *Technical Education in the UK: T Levels*; DfE Research Briefing; House of Commons Library: London, UK, 2023. Available online: <https://researchbriefings.files.parliament.uk/documents/CBP-7951/CBP-7951.pdf> (accessed on 27 April 2024).
8. Etherington, D.; Jones, M.; Telford, L. Covid crisis, austerity and the ‘left behind’ city: Exploring poverty and destitution in Stoke-on-Trent. *Local Econ.* **2022**, *37*, 629–707. [CrossRef]
9. Gratton, N.; Jones, M. More-Than-Civic: Higher Education and Civil Society in Post-Industrial Localities. In *Reframing the Civic University, an Agenda for Impact*; Dobson, J., Ferrari, E., Eds.; Springer: Cham, Switzerland, 2023; pp. 121–141.
10. MillionPlus. Skills Skills Skills—The Role of Modern Universities Delivering the Workforce for the Future Report. 4 December 2023. Available online: <https://www.millionplus.ac.uk/policy/reports/skills-skills-skills-the-role-of-modern-universities-delivering-the-workforce-for-the-future> (accessed on 27 April 2024).

11. MillionPlus. Future Proofing England's Workforce: How Modern Universities Can Meet the Skills Challenge. 4 December 2023. Available online: <https://www.millionplus.ac.uk/policy/reports/future-proofing-englands-workforce-how-modern-universities-can-meet-the-skills-challenge> (accessed on 5 December 2023).
12. HEPI. Does the Lifelong Loan Entitlement Meet Its Own Objectives? Policy Briefing 45. May 2023. Available online: <https://www.hepi.ac.uk/wp-content/uploads/2023/05/Does-the-Lifelong-Loan-Entitlement-meet-its-own-Objectives.pdf> (accessed on 1 June 2023).
13. Emmerson, C.; Johnson, P.; Zaranko, B. Investment in Skills and Training. In *IFS Green Budget 2023*; Chapter 9; Institute for Fiscal Studies: London, UK, 2023. Available online: https://ifs.org.uk/sites/default/files/2023-10/IFS-Green-Budget-2023_1_0.pdf (accessed on 26 October 2023).
14. Office for Students. Call for Evidence on Positive Outcomes for Students Studying on a Modular Basis. 27 July 2023. Available online: <https://www.officeforstudents.org.uk/publications/positive-outcomes-for-students-studying-on-a-modular-basis/> (accessed on 1 May 2024).
15. The Minister for Skills, Apprenticeships and Higher Education. *Letter to HE Providers: Lifelong Learning Entitlement (LLE) Spring 2024 Update*; Department for Education: London, UK, 2024.
16. Kiernan, A.; Hanson, J.; Dodd, V. Collaborating with business and local government to develop a successful microcredential approach. In *How to Enable Engagement between Universities and Business: A Guide for Building Relationships*; Elgar: Toronto, ON, Canada, 2024.
17. Better Jobs Ontario. Get Skills Training and Financial Support When You Qualify for Better Jobs Ontario. Available online: <https://www.ontario.ca/page/better-jobs-ontario> (accessed on 1 May 2024).
18. News Ontario. Student Assistance Programme, Ontario Expands Financial Assistance to Include Micro-Credentials. Available online: <https://news.ontario.ca/en/release/60792/ontario-expands-financial-assistance-to-include-micro-credentials> (accessed on 1 May 2024).
19. Bunting, K.; Mullor, J.R.; Dodd, V.; Andrews, S.; Kiernan, A. Developing a UK Measure of Student Basic Needs: A Pilot Study, Staffordshire University and Purpose Coalition. 2023. Available online: <https://www.purpose-coalition.org/impact-reports/sbns-pw367> (accessed on 1 May 2024).

Disclaimer/Publisher's Note: The statements, opinions and data contained in all publications are solely those of the individual author(s) and contributor(s) and not of MDPI and/or the editor(s). MDPI and/or the editor(s) disclaim responsibility for any injury to people or property resulting from any ideas, methods, instructions or products referred to in the content.