

Yorkshire Universities' Response to the Department for Education Consultation on the Lifelong Loan Entitlement

May 2022

About Yorkshire Universities

Yorkshire Universities (YU) represents eleven universities and one specialist higher education institution (HEI). The members of YU are: Leeds Arts University; Leeds Conservatoire; Leeds Beckett University; Leeds Trinity University; Sheffield Hallam University; University of Bradford; University of Huddersfield; University of Hull; University of Leeds; University of Sheffield; University of York; and York St John University. The Vice-Chancellors and Principals of these institutions form YU's Board of Directors.¹

YU provides a collective regional voice for our diverse group of member HEIs. Our mission is centred around employing a place-based approach driven by regional collaboration. In line with our current strategy,² we are responding to the consultation through the lens of the place agenda, particularly highlighting the importance of the proposed changes to Yorkshire's labour markets, economy and society. Our response also covers the potential effects on collaboration, both between HEIs and with other stakeholders, building on our experience and knowledge of facilitating partnerships. This approach is designed to complement and add value to the responses of individual YU members, and so specifically does not aim to replicate their understanding of the varying practical implications for HEIs, but instead focuses on areas that are core to our work: place and collaboration.

Lifelong Loan Entitlement (LLE)

The development of the LLE is still in its early stages and many details still need to be established to ensure that it can deliver on its transformative potential. We would encourage piloting in advance to get a sense for demand and test certain subjects, geographies, maintenance structures.³ There is also a need for more in-depth modelling to better understand costs and benefits, and learner and provider behaviours to support decision making and preparations.

Working towards a more flexible and interconnected tertiary system across Higher Education (HE) and Further Education (FE) is an essential part of reforming the system to better support a broad range of flexible pathways for lifelong learning. In Yorkshire, there are already many collaborations between HE and FE, such as the West Yorkshire Skills Partnership⁴ and the Yorkshire and the Humber Institute of Technology (IoT) that involves the University of Hull and York St John University, as well as the development of the DN Colleges Group IoT with the University of Sheffield and Sheffield Hallam University. YU is also working with the Independent Commission on the College of the Future and the Civic University Network on taking forward the learning and recommendations from their Going

¹ YU. (2022). [Members and governance](#).

² YU. (2019). [YU Strategy 2019-22](#). Yorkshire Universities: Leeds.

³ Jarvis, A. (2022). [New rules: Unpacking the post-Augar political & funding settlement for universities](#). [Online meeting]. 8 March 2022.

⁴ West Yorkshire Consortium of Colleges. (2022c). [About the West Yorkshire Skills Partnership \(formerly Leeds City Region Skills Network\)](#).

Further and Higher Report, to feed into strengthening collaboration between colleges and universities across the region.⁵

Comprehensive support for existing and emerging partnerships and collaboration will be essential to ensuring that the LLE provides transformational opportunities. There are important local, sub-regional and regional elements to these partnerships that will support the development of the LLE to help address skills challenges of the different areas and meet the demands of employers. Yorkshire is well placed to explore how the LLE can address local skills needs due to the strong links between YU and Yorkshire and Humber Councils (YHC), which represents twenty-two Local Authorities (LAs) and two Mayoral Combined Authorities (MCAs) in Yorkshire.⁶ This partnership between HE, LAs, MCAs, Local Enterprise Partnerships (LEPs), and employers, has also been strengthened through the YU Task and Finish Group on Graduate Employment and Employability. A broad range of stakeholders from these groups have been engaged in developing a report on collaboration to support the employment and employability of graduates in Yorkshire, which outlines an agreed set of priority areas and suggested actions to build on existing work. This illustrates the strong networks and appetite to collaborate around education and skills across the region, which could be harnessed further to contribute towards the development of the LLE. There are a broad range of existing mechanisms and structures that the LLE can build on, including Local Skills Improvement Plans (LSIPs), such as the South Yorkshire Skills Accelerator,⁷ and Skills Accelerator Development Funds, as awarded to the TEC Partnership.⁸

Encouraging and supporting diverse partnership models is essential to ensuring that the LLE is a connected and joined up system that meets the needs of employers and learners. It is important to recognise that partnerships need resources to set up, maintain and develop, and it is important that funding and regulation promote collaboration. If funding or regulation is restrictive of collaborative provision or projects then this will be detrimental to the development of the LLE. Regulation should be proportionate and build on existing systems so that it protects students without taking resources away from delivery of provision or disincentivising partnerships.

The LLE aims to help address employer needs by filling skills gaps and supporting talent pipelines. To achieve this aim, it will be important for the development of provision to build on local understanding and up-to-date intelligence and information about local labour markets. In Yorkshire, there is already a commitment to improving the collation, sharing, analysis and interpretation of data to support more effective action in the region as a priority area of the YU Graduate Employment and Employability Report. This use of local information should also be supported by national intelligence, particularly through the Future Skills Unit and Levelling Up Data Unit, which should both ensure that the information they gather can be effectively utilised by partners at local and regional levels.

In order to support employers, it is important that top-down ideas of employer-relevance or 'high-value learning' for the needs of the employers and the economy are not used as a

⁵ Civic University Network, Sheffield Hallam University & the Independent Commission on the College of the Future. (2022). [Going further and higher How collaboration between colleges and universities can transform lives and places.](#)

⁶ YHC & YU. (2021). [Yorkshire and Humber Councils Memorandum of Understanding with Yorkshire Universities.](#)

⁷ South Yorkshire Skills Accelerator. (2022). [The South Yorkshire Skills Accelerator is putting business engagement at the heart of the regional skills agenda.](#)

⁸ Grimsby Institute. (2021). [TEC Partnership leads winning bid for share of £65m government flagship investment programme.](#)

basis to impose restrictions. Central support, guidance, and regulation should be kept flexible to enable adaptation to local needs. It is extremely difficult to define or measure employer-relevance or 'high-value' learning or skills and these areas will see lots of variation across geographies and time; attempts to restrict provision based on currently thinking around these ideas is unlikely to be flexible enough to adapt to such differences, particularly in relation to the unpredictability of future skills needs. It is important to encourage and build on the diversity of the HE and FE systems across all subjects, which benefits the development of skills and talent at local, regional, and national levels. Yorkshire benefits from having a broad and diverse range of HE and FE provision across all subjects. There needs to be wide LLE eligibility for all subjects recognising the importance of transferable skills, adaptability and creativity between a broad range of sectors and job roles across the economy. There should be minimal restrictions to ensure that the LLE truly supports expanding opportunities and that learners have flexibility and choice. Learners should be supported to make the best decisions through the availability of advice and guidance rather than restricting options.

Instead of adopting a narrow approach to subject and course eligibility, it would be better to support the development and strengthening of relationships between providers and employers to build on the existing importance given to employability within the education system and to allow dynamic responses to changing needs. This approach should recognise that different areas will have different skills needs and will be building on a variety of existing partnerships, any centrally imposed restrictions that cannot fully account for these differences would not be in line with the government's levelling up agenda.

In line with expanding options across all subjects, it would be unhelpful to divide and categorise courses into either technical or academic courses as most provision involves a mix of both elements, and this overlap is highly beneficial to well-rounded development. Furthermore, the LLE needs to support pathways across courses with a range of more academic or more technical focuses to meet changing employer needs and to support the changing needs of learners across their lifetime.

Universities across Yorkshire are already working to ensure that their courses and the broader HE experiences of their students have employability embedded throughout and that this adapts to the changing needs of employers. Through the YU Graduate Task and Finish Group, stakeholders across the region have committed to work collaboratively to understand the changing needs of businesses and help students and graduates understand the challenges employers might be facing, such as technology adoption, net zero, ageing workforce, supply chain management, succession planning.

Local piloting would help providers understand the how modular provision can be developed in a way that connects employer needs with choice and flexibility for learners. Local pilots would create a better understanding of local demand from learners and employers, which will be essential for providers to develop the qualifications needed. It will be important for providers to develop their understanding of the skills needs, career and educational stages and geographic mobility of different types of learners who are interested in modular learning. It will also be important to strengthen understanding of the LLE amongst employers so that they support their employees in retraining and upskilling. Furthermore, it is vital that employers have information and support to ensure they can connect into the talent of other learners in all parts of the education system, as the Skills for Growth programme is currently

working on in Leeds City Region.⁹ Piloting could also test how different levels of qualifications and completed modules will be understood and valued by employers. Providers will need to understand employer engagement in order to shape their provision to employer needs. The importance of this interconnected understanding of demand through local pilots also highlights the need to build on existing partnerships and share information throughout.

Yorkshire provides a valuable testing ground for LLE pilots due to its strong HE and FE sectors, ongoing collaboration networks, and the potential to contribute significantly to the governments levelling up strategy. The LLE could help provide alternative pathways to support the continued learning and development of young people in Yorkshire who currently – for different reasons – get lower grades at GCSE and A level grades than those in London and the South East,^{10 11} as well as providing opportunities to those who could benefit from continuing their education later in life.

Yorkshire is already at the forefront of these developments. For example, Sheffield Hallam University is involved in the Office for Students (OfS) short courses trial working with partners in the area on short courses for Developing Leadership Skills in the Early Years Sector and Developing Data Analytics skills in the Healthcare Sector.¹² These initiatives can be built on to work out levels of demand and how to grow the LLE in a manageable way.

Access to fee loans and maintenance will be central to the success of the LLE in opening up opportunities for all. A 2018 report by UUK found that one of the key reasons those who considered part-time HE in the UK did not pursue it as an option was financial concerns, with the most cited reasons being tuition fees (44%) and the cost of living (42%).¹³ This is especially important given that the Consumer Price Index (CPI) is forecast to average 10% at the end of this year,¹⁴ while maintenance loans are due to increase only 3.2% in September in England.¹⁵

There should be broad eligibility criteria for student finance so everyone can benefit in the most flexible way possible across their lifetime, without age restrictions, and to support all forms of upskilling and reskilling, including through low intensity, part-time, and virtual courses that are easier to fit around other commitments. How maintenance is provided will be essential to giving opportunities to those who have missed out and want to access HE as mature or part-time learner and may need more support with higher, and rising, costs of living e.g. childcare and housing.¹⁶ Consideration should be given to the circumstances of different learners, some of whom may require extra support to access the LLE, particularly those with caring responsibilities. Delivering on the delayed proposal to introduce Sharia compliant loans would also have a positive impact on expanding educational opportunities.¹⁷

It is also essential that there is sustainable funding for modular provision to support course delivery, including high-cost courses, additional administrative costs, and wrap-around

⁹ Leeds City Region Enterprise Partnership. (2022). [Skills for Growth](#).

¹⁰ Ofqual. (2021). [Infographics for GCSE results, 2021](#).

¹¹ Ofqual. (2021). [Infographics for A level results, 2021](#).

¹² OfS. (2021). [Higher education short course trial](#).

¹³ UUK. (2018). [Lost Learners](#).

¹⁴ BoE. (2022). [Monetary Policy Summary and Minutes of the MPC Meeting, 5 May](#). Bank of England: London.

¹⁵ Dickinson, J. (2022). [Low-income students will be hardest hit by the stealth that underpins the spring statement](#). WonkHE.

¹⁶ Day, N. (2022). [New rules: Unpacking the post-Augar political & funding settlement for universities](#). [Online meeting]. 8 March 2022.

¹⁷ Dickinson, J. (2022). [The living standards rollercoaster is much worse for students](#). WonkHE.

support including access to facilities, careers, and wellbeing. This wrap-around support will be important in helping all learners make the most of the LLE throughout their lifetime. It is important that there is support for learners at all stages, with a large variety of needs, to access modular provision. For example, accessibility needs may need to be responded to within quicker timeframes for modular courses.

Uncertainty remains around how the LLE will deal with a number of complexities, including ensuring it encourages collaboration and complementarity rather than competition between FE and HE. There are also a range of factors that could impact on student mobility depending on how they are tackled, including the approach to standardisation, transferability, information about options for students, understanding of modular learning among employers, differences in approaches across UK nations, availability of funding and pastoral support structures. All these interlinking considerations could impact on the extent to which students feel free to choose from the full range of options across the UK or are encouraged to build on courses at the same institution.

Information, support and guidance on modular study and the wide range of progression routes will be essential to empower learners to make decisions and use their entitlement effectively. This will require a coordinated approach to the information provided across schools, FE, HE and to potential adult learners not currently in the education system. And it will need investment in careers services to ensure that they have the resources needed to help learners navigate the emerging new LLE system. This will also demand stronger collaboration between careers services and other teams within HEIs (e.g., communication and outreach) and across providers, as well those working on central LLE communications. In Yorkshire, this could build on the work of the YU Task and Finish Group on Graduate Employment and Employability, which included careers professionals from across the YU member institutions.

The four Uni Connect programmes across Yorkshire, who come together with YU as a network, have a key role to play as they are bringing together a wide range of educational providers, schools, colleges, local authorities and employers around the aim of reducing gaps in HE participation. Since 2017, in the Yorkshire & Humber region, Uni Connect has supported over 179 schools delivering targeted support to just under 80,000 young people in Yorkshire. Clear information and guidance will need to be embedded into work on widening access and participation and into target interventions like Uni Connect to help avoid disparities in access and ensure that opportunities are available to all. We are, therefore, concerned at the implications of reduced programme budgets for Uni Connect and what this means for learners and the support they receive from skilled staff and experts in the region this field.

Contact

Dr Peter O'Brien
Executive Director
Yorkshire Universities
p.obrien@yorkshireuniversities.ac.uk