

# **Positive outcomes for students studying on a modular basis: summary of Call for Evidence**

**A report by Pye Tait Consulting for the  
Office for Students**

Final report

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## Executive summary

### Background

The government is introducing the Lifelong Learning Entitlement (LLE) from the 2026/27 academic year. The LLE will give individuals up to the age of 60 access to a tuition fee loan equal to four years of post-18 study. This can be used over the course of their lifetime. The entitlement aims to help people:

- respond flexibly as skills in the workplace and employment patterns change, and
- study, train, retrain and upskill throughout their lives.

The LLE will be available for full courses at Levels 4 to 6, such as degrees, technical qualifications and designated distance learning and online courses. For the first time it will also give access to loans for modules of high-value technical courses at Levels 4 and 5, and modules from full Level 6 qualifications that align with priority skills needs and the government's industrial strategy. Eligible learners will be able to access a tuition fee loan, with a maximum entitlement of £38,140, equal to four years of study based on fee rates in the academic year 2025/26.

The Office for Students (OfS) issued a Call for Evidence (CfE) in July 2023 to gather views on the potential changes and impacts that the LLE will have on higher education delivery, and specifically on how the OfS could measure student outcomes resulting from modular study.

The CfE was open from 27 July to 2 November 2023. In total, 37 unique, valid responses were received. The CfE questions were as follows:

1. Do you agree with our list of potential changes to the delivery of higher education in England as a result of the implementation of the LLE? Are there other changes that could arise that you think we should consider when developing our approach? Please explain your answer.
2. Do you agree that these are appropriate policy aims for the OfS in relation to the implementation of the LLE? Are there other aims that we should consider? Please explain your answer.
3. Do you agree that a measure of 'completion' would be an appropriate part of delivering our general policy aims for the implementation of the LLE?
4. How should we approach measures of 'progression' for students undertaking one or more modules? For example, when should we seek to measure the outcomes of modular study for a student?
5. Are there other measures that we should consider as we think about how to deliver our policy aims? What measures do [higher education] providers currently use to understand outcomes for students studying modules?

## Key findings

### Potential impacts of the LLE on higher education delivery

#### Summary of potential ways in which higher education delivery could change (as stated in the Call for Evidence)

- Providers use the flexibility offered by the LLE to change currently full-time courses into more modular delivery.
- Providers use the flexibility offered by the LLE to reshape their current part-time courses.
- Providers offer their modules from full courses on a standalone basis funded by the LLE.
- Providers increasingly offer modules, including many that are not fundable under the LLE.

Respondents generally agreed with the considerations outlined in the CfE. Just under one third (12, 32 per cent) overall agreed with the potential changes to the delivery of English higher education as a result of the LLE's implementation suggested by the OfS, for three main reasons.

- The LLE will allow certain students, such as those currently in employment, to reskill and upskill on a modular basis rather than attain full qualifications.
- There will be greater flexibility for providers when exploring and developing modular provision.
- There will be a more flexible pathway for prospective students to gain qualifications.

Around half (19, 51 per cent) broadly agreed but provided certain caveats, for instance that, although the changes are likely, they will come at a gradual rather than instantaneous rate, in response to the anticipated uptake of the modular delivery of the LLE across England. There is also potential for unknown changes to occur, given that the LLE has yet to be implemented.

One respondent (3 per cent) disagreed with the OfS's suggested potential changes, arguing that potential change cannot be speculated upon without any evidence of impact.

Other changes that may affect higher education delivery were noted. These included:

- The LLE may be an administrative burden on providers when managing the changing student landscape that the LLE will instigate (17, 46 per cent).
- Concerns over a lack of demand for modular provision in comparison to a 'traditional' student pathway (13, 35 per cent).

Some (12, 32 per cent) requested more detail regarding the LLE's implementation before they can comment on potential changes.

## General policy aims for the OfS

### Summary of the OfS's policy aims for the implementation of the LLE (as stated in the Call for Evidence)

- Protecting students by ensuring positive outcomes from study on a modular basis.
- Protecting taxpayers' investment by ensuring a minimum level of quality, including outcomes, and minimising the potential for the misuse of public funding by providers and students.
- Protecting the reputation of higher education in England during a period of change and growth in new approaches to delivery.
- Providing clarity and transparency about our regulatory approach such that registered providers can comply, innovate and grow.
- Ensuring the OfS can take regulatory action where appropriate for individual providers that do not meet its minimum expectations.

Respondents largely agreed with the policy aims outlined in the CfE. Ten (27 per cent) agreed that the policy aims set out by the OfS in relation to the LLE's implementation are appropriate, and particularly welcome the following aspects:

- protecting the taxpayer by assuring quality within higher education,
- the policy of protecting the reputation of higher education, and
- giving transparency and clarity about the OfS's regulatory approach such that registered providers can comply, innovate and grow.

Around two in five (16, 43 per cent) broadly agreed and offered suggestions to amend certain policies. For example, while ensuring positive student outcomes was seen as important, what constitutes a 'positive' outcome may vary for those studying on a modular basis under the LLE, rather than through a traditional learning pathway.

Other aims that could be incorporated were put forward for consideration, including:

- developing a quality assurance framework for modules that will be offered under the LLE bracket, thus ensuring new provision meets a minimum standard (14, 38 per cent), and
- proportionate regulation that considers the relative burden on providers (12, 32 per cent).

Respondents also suggested that, in the OfS's policy aims, appropriate guidance is offered to students to ensure their complete understanding of the LLE. They advocated for regulation to reflect the staggered approach to the LLE's implementation (ten, 27 per cent), which would allow flexibility and enhance effectiveness of regulation, and take into consideration students' and providers' experiences.

## Views on a measure of 'completion'

### Currently, thresholds are set for:

- Continuation: the proportion of students continuing on a higher education course.
- Completion: the proportion of students completing a higher education qualification.
- Progression: the proportion of students advancing to managerial or professional employment, further study or other positive outcomes.

Around half (17, 46 per cent) agreed that a measure of 'completion' is an appropriate part of delivering policy aims as part of the LLE, with most confirming this is an appropriate measure of student outcomes.

Around a quarter (nine, 24 per cent) felt that it would be difficult to assess the appropriateness of completion, as they were unsure how the LLE would operate in practice. Respondents commonly referred to students changing modules or transferring between providers, questioning how this would impact the measurement of completion rates. Further clarity on what a measure of completion would entail was requested, and how this would operate under the new LLE system.

A few (four, 11 per cent) felt that measuring completion rates for individual modules is unnecessary, as the OfS already collects data on 'parent courses' under condition B3. They pointed out that this would create data duplication and administrative burden for providers.

## Approach to measures of 'progression' for students undertaking one or more modules

Several (ten, 27 per cent) pointed out that flexibility will be required if using a measure of 'progression', given the wide variety of different courses available and the variability in individual students' circumstances. Some (eight, 22 per cent) believed that 'attainment' or 'completion' may be better metrics to assess. Others (five, 14 per cent) highlighted that existing metrics could be utilised or indicate alternative metrics.

Just over two in five (15, 41 per cent) suggested a qualitative, student-based survey as a measure of progression, arguing that a more flexible approach will more clearly highlight how successful a module has been, given learners' different reasons for undertaking modular study.

Potential challenges to measuring progression were noted, with some feeling that progression-based metrics are not suitable for modular study for a variety of reasons. Some noted potential issues relating to the overall introduction of LLE modular learning, and complications of monitoring progression that may arise as a result, including:

- Difficulty tracking learners' progression if they may be undertaking modules across multiple providers, in different fields, which may ultimately lead to benefits being observed months after students have taken a module, or progression not being clearly attributable to one provider (14, 38 per cent).
- Excessive or unnecessary provider burden given the need to maintain a tracking system if traditional progression routes were to be monitored (eight, 22 per cent).

Differing progression routes were noted as another potentially challenging area, given that students will likely have different reasons or motivations to undertake modular study.

### **Other measures to consider in the delivery of the policy aims**

Just over four in five (29, 81 per cent) put forward other measures for consideration. One frequently mentioned suggestion (11, 31 per cent) was a student-led approach, in which learners would be directly asked about their experiences and opinions to gather feedback to perceive the overall success of the modular study, similar in some regards to the National Student Survey (NSS) but taking a more qualitative approach.

Some commented on various elements of measuring progression and monitoring activities. Points raised included:

- ensuring there is no duplication of existing monitoring,
- making sure there is no additional burden on providers, and
- a belief that modular progression monitoring is not needed for regulatory purposes.

A quarter (nine, 25 per cent) additionally noted that more transparency is required, particularly regarding the quality assurance processes and documentation for these modular courses, including transferability of credits.

As part of improving measures to deliver policy aims, respondents (seven, 19 per cent) would welcome greater awareness and collaboration between the higher education sector and employers, to ensure that there is a continued recognition of the qualifications and modules. They suggested that employers within the third sector will need a clearer understanding of the LLE scheme to enable them to consider all adequate applicants.

Measures currently used by higher education providers offering modular study that may be of note (but not necessarily scalable on a national level) include:

- direct monitoring of completion or pass rates of modular courses,
- individual internal monitoring systems, such as transcripts, credit accumulation and success of students, and
- student satisfaction via end of module evaluations and surveys.

## 1. Introduction

### 1.1 Background

#### 1.1.1 Lifelong Learning Entitlement

Following recommendations within the 2019 independent review of post-18 education and funding,<sup>1</sup> plans to introduce the Lifelong Learning Entitlement as part of the Lifetime Skills Guarantee were announced by the previous government in 2020.

In October 2024, the current government confirmed its commitment to introducing the LLE, announcing a delay to its implementation to 2026/27 academic year – with fee applications to open in September 2026 for courses starting from January 2027. On 9 July 2025, the government confirmed policy details to enable providers to begin preparations ahead of LLE launch.

The LLE will give individuals up to the age of 60 access to a loan that will cover the costs for the equivalent of four years of post-18 study. This can be used over the course of their lifetime.

The LLE is designed to transform the post-18 student finance system in England. It aims to establish a unified funding system to financially support individuals pursuing college or university courses, as well as those seeking to acquire, update, or enhance their skills throughout their careers. The LLE aims to offer flexibility, allowing people to choose between full-time degrees, technical qualifications and modules and short courses.

From the 2026/27 academic year, the LLE will be available for full courses at Levels 4 to 6, such as degrees, technical qualifications, and designated distance learning and online courses. It will also be available for modules of high-value technical courses at Levels 4 and 5 and modules from full Level 6 qualifications that align with priority skills needs and the government's industrial strategy.

Eligible learners can access a tuition fee loan, up to the full entitlement of £38,140, equal to four years of study based on 2025/26 fee rates. Additionally, a maintenance loan will be available to cover living costs for courses with in-person attendance. Financial help will also be available for learners with disabilities and support with childcare. Individuals may be entitled to an additional entitlement, for priority subjects or longer courses like medicine, when studied full-time.<sup>2</sup>

LLE funding for modules will be introduced in stages: from January 2027, funding will be available for modules of Higher Technical Qualifications at Levels 4 or 5, and modules from full Level 6 qualifications in subject groups that address priority skills needs and align with the government's industrial strategy. Wider expansion will follow at a later date.

For a module to be eligible for funding it must meet the following criteria.

1. Be part of an existing designated full course – its 'parent course' delivered by the provider.

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<sup>1</sup> Department for Education, 2019, Post-18 review of education and funding: independent panel report  
<https://www.gov.uk/government/publications/post-18-review-of-education-and-funding-independent-panel-report>

<sup>2</sup> Department for Education, 2025, Lifelong Learning Entitlement overview  
<https://www.gov.uk/government/publications/lifelong-learning-entitlement-lle-overview>



2. Be worth at least 30 credits or a bundle of modules from the same parent course equalling at least 30 credits.
3. Have a single qualification level that should be Level 4, 5 or 6 to determine if it is eligible for funding.
4. Be assessed and given a standardised transcript on completion
5. Not be delivered through franchise or subcontractual arrangements.

### 1.1.2 Call for evidence

In its response to its consultation on regulating student outcomes published in July 2022,<sup>3</sup> the OfS noted it would need to consider the impact of the LLE's introduction on measures of quality, particularly the shift to modular provision. The OfS set out plans to engage with the higher education sector on appropriate measures of student outcomes when the government's plans on the LLE were further detailed.

Details of the LLE implementation were published in March 2023, as part of the government's consultation response to the Department for Education's consultation on the LLE.<sup>4</sup> This confirmed that to access LLE funding for its students, a provider must be registered with the OfS.

In July 2023 the OfS put out a Call for Evidence (CfE) to gather views on the potential changes and impacts that the LLE will have on higher education delivery, and on how the OfS could measure student outcomes resulting from modular study.<sup>5</sup>

Through the CfE, the OfS sought views on three areas of the LLE's implementation:

1. Potential impacts of the LLE on higher education delivery.
2. General policy aims for the OfS.
3. Measuring student outcomes for modular provision.

Further detail on each of these three areas is provided below.

#### Potential impacts of the LLE on higher education delivery

The CfE outlined a number of broad ways that higher education could change following the LLE's implementation. In general, the impacts identified demonstrate flexibility of the LLE, including modular provision and potential for students studying across multiple departments, subject areas and providers.

The potential impacts identified are outlined in section 2.1.

#### General policy aims for the OfS

In addition to anticipating ways in which the higher education delivery will change, as described in the CfE, the OfS is considering how its approach to regulation of higher education in England will need to adapt to the changes brought by the LLE. Its aim is to

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<sup>3</sup> OfS, 2022, Consultation on a new approach to regulating student outcomes: Analysis of responses to consultation and decisions <https://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/>

<sup>4</sup> Department for Education, 2023, Lifelong Loan Entitlement: Government consultation response <https://www.gov.uk/government/consultations/lifelong-loan-entitlement>

<sup>5</sup> OfS, 2023, Positive outcomes for students studying on a modular basis: Call for Evidence <https://www.officeforstudents.org.uk/publications/positive-outcomes-for-students-studying-on-a-modular-basis/>

ensure continued protection for students and taxpayers in the evolving educational landscape. In doing so, the focus will be on regulating student outcomes, considering risks associated with new loan products. Balancing regulation with the promotion of innovation and equal opportunities under the LLE is emphasised, highlighting the importance of managing administrative and regulatory burdens.

The OfS's policy aims can be found in section 2.2.

### **Measuring student outcomes for modular provision**

Finally, as outlined in the CfE, the OfS is considering the best way to measure the outcomes of students on modular courses. For context, for a module to be eligible for the LLE it must be part of a 'parent course'. The OfS's current approach to regulating student outcomes already includes collecting data on these 'parent courses'. Additionally, it publishes information that shows whether a provider is delivering positive outcomes above its minimum numerical thresholds for its students. The thresholds are set for three student outcome measures: continuation, completion, and progression.

The CfE states that the OfS is of the opinion that 'completion' is likely to be the most appropriate measure of whether a student 'completes' the module on which they registered. However, its current definitions of completion are based on course lengths longer than modules. Therefore, the OfS thinks it will need to develop a different approach to understanding 'completion' for students studying on a modular basis.

Further detail can be found in section 2.3.

### **Analysis of responses**

In October 2023, Pye Tait Consulting, an independent research agency, was commissioned to undertake an analysis of the CfE responses. This report presents the findings from the analysis of all responses received to the CfE. (Note: the background information and policy details in this report have since been updated to reflect the delays to the launch of the LLE following the change of government in 2024 and the more recent updates on 9 July 2025 from government about LLE policy.)

## **1.2 Aim and objectives**

The overarching aim of this research was to analyse all responses received to the CfE and to report the outcomes to the OfS. Specific objectives were to:

- conduct an objective and comprehensive qualitative analysis of all responses to the CfE,
- identify and categorise themes, focus areas, or questions, and
- report on the findings.

## 1.3 Methodology

### 1.3.1 CfE approach

The CfE questionnaire comprised three core sections on different aspects of the LLE implementation, with a particular focus on modular provision:

- potential impacts of the LLE on higher education delivery,
- general policy aims for the OfS, and
- measuring student outcomes for modular provision.

The CfE questions can be found in the Executive Summary and the structure of this report mirrors that of the CfE.

The CfE was open for responses from 27 July to 2 November 2023. The main route through which to submit responses was the OfS's online 'smart survey' portal. In total, 39 responses were received, of which 37 were received through the online portal, while two offline responses were received by email.

The OfS shared all responses with Pye Tait Consulting, having first removed any personal data from responses where consent had not been granted in line with OfS's privacy policy and data sharing agreement. Pye Tait Consulting then undertook onward analysis of all responses.

### 1.3.2 Approach to the analysis

Before undertaking a detailed analysis, responses were first reviewed and cleaned. This process involved checking for campaign responses, errors, blank, or duplicate responses. A total of 39 responses were received, of which 37 were online and two offline. Two blank responses were found and removed, leaving 37 unique, valid responses for onward analysis. The two offline responses broadly aligned with the CfE questions and so these were manually added to the main dataset of online responses for onward analysis.

Responses were analysed at an overall level, and subsequently subgroup analysis was undertaken to explore any notable differences by:

- organisation type, and
- respondent type.

#### Approach to grouping of respondents

Respondents were asked to select which category best described them from a list of predefined options:

- awarding body
- higher education sector body
- support staff at a student membership organisation
- teaching staff, professional services staff or leader at a higher education provider.

Respondents were also asked whether they were submitting a collective response on behalf of their organisation, or an individual response.

These two sets of categories were then used for cross-tabulation analysis.

Qualitative analysis of responses received to the open-ended questions was undertaken by Pye Tait Consulting in three successive stages:

1. High-level review of all responses to identify broad themes and sentiment.
2. Identify key themes arising to each question. Based on this, a coding framework was developed by Pye Tait Consulting, with checks for inter- and intra-coding consistency, and finalised in collaboration with the OfS.
3. A comprehensive review to code each response according to the coding framework, to identify frequency of themes overall and by respondent subgroup.

On completion of each of the above stages, outcomes were discussed with the OfS before moving forward to the next phase.

### **1.3.3 Interpretations and limitations**

An open CfE of this nature does not seek to be a representative sample of the whole population. The implication of self-selection bias is that an assessment of views can be made only for the respondents who choose to participate and will not represent the entire target population, but rather a small subset. The findings should be interpreted with this caveat in mind.

It should be noted that some responses were received from representative bodies reflecting the views of their community. Organisational responses, including those from representative bodies, have not been weighted in the analysis – in effect, this means each response has an equal weight, although trends by organisation type are drawn out in the report. The reader is advised to bear these points in mind when interpreting the report.

Each subsection outlines the number of respondents providing views in response to that question. The numbers and percentages quoted relate to each CfE question being discussed, not to the overall total number of CfE respondents.

Some respondents provided comments that covered more than one of the themes identified as most commonly arising within each question and analysis. Further, some respondents provided comments which 'agreed' with one aspect of one question and 'disagreed' with a different aspect of the same question. Responses for each theme and code were counted, meaning some responses were counted more than once per question as more than one theme or code was covered. The result is that numbers in the report may not add up to 100 per cent.

Reasons for agreeing or disagreeing are generally presented in order from most to least frequent themes, with the descriptors 'many', 'several', and 'some' being used in cascading order to represent relative weight of feeling for each subsection.

The final coding book containing all coded responses for each question, developed by Pye Tait Consulting, has been provided to the OfS.

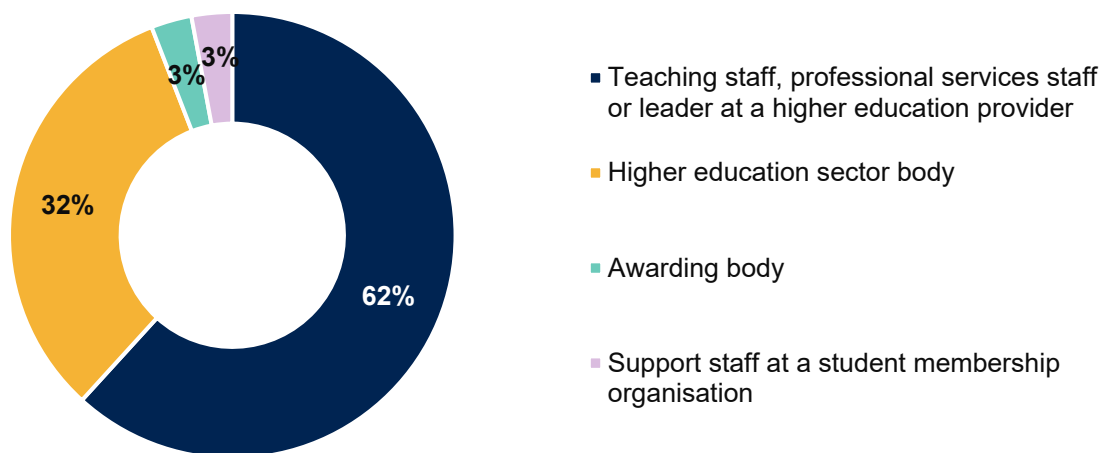
Note that some anonymised quotations from respondents are included in the report. These extracts are included to provide examples that reflect the most common points raised.

## 1.4 Respondent profile overview

Of the 37 valid responses received, a large majority (33, 89 per cent) were submitted by organisations, with two (6 per cent) from individuals. The other two respondents did not consent to provide this information.

Respondents were presented with a predefined list of options and asked which best described them. Of the 34 who answered, the majority (21, 64 per cent) were teaching staff, 11 (30 per cent) were higher education sector bodies, with one awarding body (3 per cent), and one support staff at a student membership organisation (3 per cent).

**Figure 1: Breakdown of respondent type**



Base: 34 respondents. Source: OfS Call for Evidence, 2023

## 2. Key findings

As described in section 1.1, in the CfE the OfS envisages a number of changes in higher education delivery following the implementation of the LLE. These changes can be split into: potential impacts of the LLE on higher education delivery; general policy aims for the OfS; and measuring student outcomes for modular provision. The three areas are respectively discussed in sections 2.1, 2.2 and 2.3.

### 2.1 Potential impacts of the LLE on higher education delivery

As outlined in the CfE,<sup>6</sup> the OfS envisages that, following the implementation of the LLE, higher education delivery could change in a number of ways outlined in the box below.

**Summary of potential ways in which higher education delivery could change (as stated in the Call for Evidence)**

- Providers use the flexibility offered by the LLE to change currently full-time courses into more modular delivery.
- Providers use the flexibility offered by the LLE to reshape their current part-time courses.
- Providers offer their modules from full courses on a standalone basis funded by the LLE.
- Providers increasingly offer modules that include many that are not fundable under the LLE.

Respondents were asked whether they agreed with the potential changes to the delivery of higher education as a result of the implementation of the LLE that the OfS had identified, and whether any other changes could arise that the OfS should consider when developing its approach.

They generally agreed with the considerations outlined in the CfE. Of the 37 responses, just under one third (12, 32 per cent) agreed with the potential changes, while just over half (19, 51 per cent) broadly agreed overall but provided certain caveats or disagreed with some aspects. One respondent (3 per cent) disagreed with the OfS's identified potential changes, on the basis of there being no available evidence. Remaining respondents (four, 11 per cent) did not express any level of agreement, while some gave reasons both for and against the changes outlined by the regulator. The majority (31, 84 per cent) gave suggestions, concerns or both regarding potential changes to higher education delivery.

<sup>6</sup> OfS, 2023, Positive outcomes for students studying on a modular basis: Call for Evidence  
<https://www.officeforstudents.org.uk/publications/positive-outcomes-for-students-studying-on-a-modular-basis/>

## 2.1.1 Views on potential impacts

### Reasons for agreeing

The main reason for agreement (ten, 27 per cent) was a belief that the LLE's modular delivery will allow certain students, such as those currently in employment, to reskill and upskill on a modular basis rather than attain full qualifications.

'The flexibility offered by the LLE would no doubt lead to innovative new course developments more geared towards upskilling those already in employment.' – Higher education sector body, individual response

Around a quarter (nine, 24 per cent) highlighted the flexibility the LLE afforded to providers when exploring and developing modular provision. Six (16 per cent) agreed that the LLE will also provide a more flexible pathway for prospective students to gain qualifications. A further six (16 per cent) said they were keen to engage with the LLE agenda, while a handful (five, 14 per cent) agreed particularly with the notion of students increasingly studying in different departments or subject areas within the same provider as a result of the LLE implementation.

Around half (19, 51 per cent) broadly agreed with the changes outlined in the CfE, but some (seven, 19 per cent) were keen to highlight that, although the changes are likely, they will come at a gradual rather than immediate rate, in response to the uptake of the LLE's modular delivery across England. Others (six, 16 per cent) believed that the proposed changes are reasonable but that further details are difficult to determine until the LLE is seen in practice – for example, one respondent commented that learner demand and motivation will not be fully understood until after LLE implementation.

### Reasons for disagreeing

One (3 per cent) respondent overall disagreed with the changes discussed in the CfE, arguing that potential change cannot be speculated upon without any evidence of impact.

Beyond this, there were some specific areas of contention raised by other respondents. Just over one quarter (ten, 27 per cent) disagreed with the idea that students will increasingly study at more than one provider at the same time. One respondent believed that students already have to opportunity to transfer between providers, but that this is rare, while another felt that studying across multiple providers would simply complicate a student's educational pathway.

'The bureaucracy of doing this at one provider is already a burden on students. This will no doubt complicate the already lengthy student registration process as well as confuse student support. Institutional regulations would differ leading to confusion and poor satisfaction from students, as well as parity of experience.' – Higher education sector body, individual response

A few (five, 14 per cent) also disagreed with the notion that providers would increasingly offer modules that are not fundable under the LLE, with one arguing that there is less incentive for the provision of non-fundable modules given current resource constraints.

### Other considerations and suggestions

Nearly half (17, 46 per cent) believed the LLE will prove to be an administrative burden on providers when managing the changing student landscape it will instigate. Some of these



(11, 30 per cent) voiced that, where students study at more than one provider, managing their academic record and learning support requirements could be challenging in terms of resources required.

‘One possibility, that relates to the changes but is outside of the delivery itself, is the strain on support services at institutions. Because students should still be entitled to the same support systems, but may only be studying for short periods of time with said provider.’ – Support staff at a student membership organisation, collective response

Around a third (13, 35 per cent) expressed concerns over a lack of demand for modular provision in comparison to a traditional student pathway.

A similar proportion (12, 32 per cent) believed that more detail regarding the LLE’s implementation needs to be shared with providers before they can comment on potential changes.

Another point raised by several respondents (11, 30 per cent) was the difficulty in gauging positive student outcomes. Students may use the funding for a less traditional higher education pathway such as reskilling or upskilling on standalone modules, with less focus on end-point assessments and yearly progression. In turn, respondents felt the measurement of student outcomes may become more onerous and will need to be clearly outlined during the implementation of the LLE.

Finally, five (14 per cent) believed more engagement with employers on the benefits of LLE will be necessary to outline the benefits of an alternative academic pathway.

## 2.2 General policy aims for the OfS

The CfE stated that, with the implementation of the LLE, the OfS is considering how its approach to the regulation of higher education in England should adapt. The focus is on ensuring that the regulatory approach continues to safeguard students and taxpayers in the altered landscape caused by the potential changes the LLE will bring. The emphasis is on regulating student outcomes and addressing risks associated with new loan products. The CfE described how the OfS’s intention is to draw on lessons from both international practices and past experiences in England, especially considering the potential for negative consequences on students and increased risk to the financial contribution made by taxpayers. Additionally, there is a commitment to balancing regulatory measures with fostering innovation and maintaining equality of opportunity within the evolving framework of the described changes.



**Summary of the OfS's policy aims for the implementation of the LLE (as stated in the Call for Evidence)**

- Protecting students by ensuring positive outcomes from study on a modular basis.
- Protecting taxpayers' investment by ensuring a minimum level of quality, including outcomes, and minimising the potential for the misuse of public funding by providers and students.
- Protecting the reputation of higher education in England during a period of change and growth in new approaches to delivery.
- Providing clarity and transparency about the OfS's regulatory approach such that registered providers can comply, innovate and grow.
- Ensuring the OfS can take regulatory action where appropriate for individual providers that do not meet its minimum expectations.

Respondents were asked whether they believed the policy aims set out in the CfE were appropriate in relation to the LLE's implementation, and whether there were any other aims they should consider. They largely agreed with the listed policy aims. Of the 37 who answered this question, ten (27 per cent) agreed with the policy aims set out by the OfS in relation to the LLE's implementation. Around two in five (16, 43 per cent) broadly agreed but offered suggestions to amend certain policies. No respondents overall disagreed with the set of aims, and around one in ten (four, 11 per cent) did not indicate a level of agreement. Most (30, 81 per cent) gave suggestions regarding further policy measures they believe should be incorporated by the OfS.

### **2.2.1 Views on policy aims**

#### **Reasons for agreeing**

One policy aim that was particularly welcomed (11, 30 per cent) was the idea of protecting the taxpayer by assuring quality within higher education and ensuring public funds are not being misused. To a lesser extent, the aim of protecting the reputation of higher education was acknowledged as essential by just under one in five (seven, 19 per cent), with one acknowledging that the government must help providers continue to operate coherently across the UK. Six (16 per cent) also believed that giving 'transparency and clarity about the regulatory approach such that registered providers can comply, innovate and grow' is a vital policy aim set out by the OfS.

While the notion of ensuring positive student outcomes was highlighted as important, several (11, 30 per cent) were keen to stress that what constitutes a 'positive' outcome may be vastly different for those studying on a modular basis under the LLE, rather than through a traditional learning pathway.

'The area which is particularly challenging relates to measuring positive outcomes from modular study. If the positive outcomes mirror those for graduates, i.e. graduate employment, those completing modules rather than programmes are not qualified to the same level, and will not be treated in the same way by employers, so what would be measured?' – Teaching staff, professional services staff or leader at a higher education provider, collective response

Others (six, 16 per cent) believed students should be included in the policy aim of ‘providing clarity and transparency about our regulatory approach such that registered providers can comply, innovate and grow’, to give them the same support and guidance offered to providers around how the LLE will be implemented.

### Other considerations

Several suggestions were offered in response to the policy aims set out in the CfE. A recurring theme (14, 38 per cent) was the idea of developing a quality assurance framework for modules that will be offered under the LLE bracket, thus ensuring new provision meets a minimum standard. Proportionate regulation that considers the relative burden on different providers was also a common suggestion (12, 32 per cent).

‘The OfS has acknowledged the need to be mindful of the impact of administrative and regulatory burden. This could feature as an explicit aim of “ensuring potential increases to administrative and regulatory burden remain proportionate, by measuring, monitoring and reviewing regulatory requirements”. Related to this the OfS must publish a burden impact assessment, to support a transparent and proportionate response.’ –  
Higher education sector body, collective response

Another commonly mentioned theme (11, 30 per cent) pertained to the information, support and guidance that must be offered to students, ensuring they have full understanding of the LLE and the modules they will be choosing.

Respondents also advocated for regulation to reflect the staggered approach to the LLE’s implementation (ten, 27 per cent), which would allow flexibility and enhance effectiveness of regulation. This would, respondents believe, ensure that regulation is shaped by the actual experiences of students and providers.

Other notable considerations given included the following.

- Making sure regulation does not stifle provider innovation when developing modular provision under the LLE (nine, 24 per cent).
- Recognising the cost implications associated with the introduction of the LLE when introducing regulation (seven, 19 per cent).
- Some form of regulation to acknowledge recognition of prior accreditation should be introduced by the OfS (two, 5 per cent).

## 2.3 Measuring student outcomes for modular provision

Via the CfE, the OfS sought views on how it should measure the outcomes of students on modular courses. For a module to be eligible for the LLE it must be part of a ‘parent course’. As described in the CfE, the OfS’s current approach to regulating student outcomes already includes collecting data on these ‘parent courses’. Additionally, it publishes information that shows whether a provider is delivering positive outcomes above the minimum numerical thresholds for its students.

**Currently, thresholds are set for:**

- Continuation: the proportion of students continuing on a higher education course.
- Completion: the proportion of students completing a higher education qualification.
- Progression: the proportion of students advancing to managerial or professional employment, further study or other positive outcomes.

In the context of the LLE, as described in the CfE, the OfS is of opinion that ‘completion’ is the most appropriate measure of whether a student completes the module on which they registered. However, the OfS has recognised the need to adapt its understanding of completion for modular study.

### **2.3.1 Views on a measure of ‘completion’**

Respondents were asked whether they agree that a measure of ‘completion’ would be an appropriate part of delivering the OfS’s general policy aims for the implementation of the LLE. Of the 37 responses received, around half (17, 46 per cent) agreed, and around a fifth (eight, 22 per cent) disagreed. Over two fifths (16, 43 per cent) indicated a mixed opinion, often broadly agreeing but pointing out concerns or considerations. Just under one third (12, 32 per cent) also gave suggestions for the OfS to consider.

#### **Reasons for agreeing**

Around a third (11, 30 per cent) referred to completion being an appropriate measure of student outcomes. A few (three, 8 per cent) emphasised the importance of setting appropriate thresholds or benchmarks, to ensure that completion rates will be appropriately assessed for individual modules. They highlighted the need to consider various factors – such as the flexibility of modular study and students’ motivations – when setting thresholds. One respondent elaborated on this, advising that an initial approach of benchmarks over absolute thresholds would be more appropriate, as there is currently insufficient data to set thresholds with confidence.

#### **Reasons for disagreeing**

A few (four, 11 per cent) felt that measuring completion rates for individual modules is unnecessary, as the OfS already collects data on ‘parent courses’ under condition B3. Elaborating on this, they pointed out that additional monitoring of completion rates would create data duplication. Indeed, some (seven, 19 per cent) stated that this data collection would place unnecessary administrative burdens on higher education providers. A couple (two, 5 per cent) answered that it is too soon to know whether completion is an appropriate measure, stating that the OfS needs to wait until the LLE is rolled out before deciding on measures of student outcomes.

‘It seems sensible that if a provider meets the minimum baseline thresholds at a course level, the OfS would be reassured that a module that is part of that course is delivering positive student outcomes.’ –  
Teaching staff, professional services staff or leader at a higher education provider, collective response

### Other considerations and suggestions

Over a third (13, 35 per cent) highlighted that qualification aims and study motivations are likely to vary between students, with many potentially taking modules to pick up new skills, rather than to 'complete' a qualification; this being the case, a measure of module completion is unlikely to be appropriate.

'There may be students who want to access the knowledge and skills within a module, and for whom passing the assessment is not the main aim or benefit.' – Teaching staff, professional services staff or leader at a higher education provider, collective response

A similar proportion (12, 32 per cent) also voiced concern regarding students' individual situations – such as their caring responsibilities and financial circumstances – and emphasised that these must be considered when designing new measures of student outcomes.

Around a quarter (nine, 24 per cent) felt that it would be difficult to assess the appropriateness of completion, as they were unsure how the LLE would operate in practice. Respondents commonly referred to students changing modules or transferring between providers, questioning how this would impact the measurement of completion rates. Some (seven, 19 per cent) also requested further clarity on how a measure of 'completion' would operate under the new LLE system.

'It is difficult to comment on whether developing a different understanding of 'completion' is appropriate when much of the operational detail of the LLE remains unknown. A simple scenario where a student registers for one module and either does or doesn't complete it is quite different to a learner who enrolls for two or more modules at Provider A and, while still studying these, embarks on a further module at Provider B. If the learner in the latter scenario completes one of the Provider A modules and the one delivered by Provider B, how would that outcome be viewed?' – Teaching staff, professional services staff or leader at a higher education provider, collective response

A few (four, 11 per cent) felt that completion rates for individual modules are likely to be low, because of the increased flexibility and decreased financial commitment offered by the LLE. They suggested that, compared to those taking out loans for an entire course, students taking out smaller loans for individual modules could feel less committed and thus be less likely to complete their studies. A similar proportion (four, 11 per cent) also highlighted that variation in module provision between providers may make it difficult to compare completion rates.

Around one in five (eight, 22 per cent) felt it would be beneficial if the OfS provided more clarity on the definition of 'completion', and that it would perhaps be useful to create different terminology for measuring student outcomes under the LLE. A few (four, 11 per cent) also advised that taking a holistic approach could be more useful than looking only at completion rates, and that measures of student satisfaction or of skills learned by students would provide a better measure of student outcomes.

'We agree that a redefinition of "completion" (ideally changing the term to avoid confusion) is required for modular implementation. Suggestions such as "attainment" or "acquirement" / "acquisition" seem more relevant. Similarly, we would caution using any of the OfS agreed terminology (completion, progression, etc.) in this context to aid clarity.' – Teaching

staff, professional services staff or leader at a higher education provider,  
collective response

### **2.3.2 Approach to measures of 'progression' for students undertaking one or more modules**

Respondents were asked how the OfS should approach measures of 'progression' for students undertaking one or more modules. A total of 37 responses were received.

Around half (20, 54 per cent) commented on the metrics to be measured. Ten (27 per cent) noted that substantial flexibility will be required, given the circumstances of students undertaking the modules. They noted that there is a wide variety of courses and standards available which may vary for each individual scenario. Around a fifth (eight, 22 per cent) further believed that 'attainment' or 'completion' of modular courses may be better metrics to assess, given the potential uncertainties in the onward destinations of students. Therefore, a few (five, 14 per cent) believed progression measures should not rely upon continuation, either in a job role or in study, which they felt is not guaranteed.

A few (four, 11 per cent) noted that existing metrics could be used to measure progression or indicate alternative metrics. Suggestions included measuring the percentage of students securing graduate or full-time positions within 15 to 18 months, noting overall assessment grades and keeping in mind the current configurations of the B3 conditions. However, a further four (11 per cent) felt that there is too much uncertainty in timeframes to measure progression after completion, because of the multiple different avenues students may take once their modules are finished.

'It is not clear what elements of 'progression' as it is currently defined will be consistent with the flexible nature of study under the LLE. While it is clearly useful to understand these outcomes while the LLE develops, it is less clear whether it is realistic to define the success of modular study in terms of further study and employment at a defined period of time after completion.' – Teaching staff, professional services staff or leader at a higher education provider, collective response

Just over two fifths (15, 41 per cent) additionally suggested alternatives such as qualitative, student-based surveying as a measure of progression. They felt that a more flexible approach will more clearly highlight how successful a module has been, given the different reasons for undertaking study. In the words of one respondent, a 'student's perception of the value of the qualification should form the cornerstone of successful progression'.

Some (five, 14 per cent) suggested undertaking a full pilot scoping exercise of eligible LLE modules prior to the measurement of progression metrics. This would be to understand the depth, breadth and uptake of such courses. A few (three, 8 per cent) additionally suggested investment in improved learner-record systems to track progression more effectively from course to course, potentially across institutions.

'Because this is a new form of delivery and the evidence on demand and learner motivation is currently limited, we recommend collecting evidence on sector response, learner demand and progression routes before determining outcome measures. The regulator should work with learners, employers and providers to gather this evidence.' – Higher education sector body, collective response

The majority (26, 70 per cent) discussed potential challenges faced in approaching measurements for progression. Some (12, 32 per cent) – mostly teaching staff, professional services staff or leaders at a higher education provider – specifically noted that progression-based metrics are not suited to modular study for a variety of reasons. These reasons, and other related challenges noted by other respondents, are highlighted below.

Around three in five (21, 57 per cent) noted potential issues relating to the overall introduction of LLE module learning, and complications of monitoring progression that may arise as a result. In particular, several (14, 38 per cent) stated it might be too difficult to track learners' progression given they will be able to undertake modules across multiple providers, in several different fields, which may ultimately lead to delayed benefits, or benefits that cannot easily be attributed to the LLE scheme given the small size of the course. Eight (22 per cent) – primarily teaching staff, professional services staff or leaders at a higher education provider – commented that this would lead to excessive or unnecessary provider burden given the need to maintain a tracking system if traditional progression routes were to be monitored.

'Arguably, progression to another module could be deemed positive but so could progression into employment. The current Individualised Learner Record [...] will need to be updated to allow accurate tracking of student destinations which would imply huge burden on institutions (especially smaller institutions and Further Education Colleges).' – Higher education sector body, individual response

Further to this, a few (five, 14 per cent) pointed out that modular study may mean students could be less engaged, with a higher potential to drop out of study, or that students may not wish to progress onto further courses or education, meaning that progression as a result of the LLE would be burdensome to track.

Differing progression routes were noted by just over half (19, 51 per cent) as a potential challenge, with several (16, 43 per cent) commenting that there are many varying reasons or motivations for students to undertake modular study. They felt there cannot be one simplistic overall metric to measure for such progression, as there will be students who take up modules for differing reasons such as personal development, mandated continuing professional development or upskilling in work environments, or as part of other subjects of learning, and will not, therefore, follow traditional progression paths. Four (11 per cent) commented that employability should not be used as a metric given that many students may already be in employment while undertaking the course, and for some employment may not be possible given their final qualification level or credit accumulation.

'Measures of progression need to take into account the intended aims of the student studying a module. Some students may not intend to complete a whole degree qualification. Students may undertake a module to enhance their long-term career prospects. Measures of progression will need to include a range of progression indicators, including student case studies.' – Teaching staff, professional services staff or leader at a higher education provider, collective response

### **2.3.3 Other measures to consider in the delivery of the policy aims**

Respondents were asked if there were any other measures that should be considered as part of how the OfS delivers its policy aims, and what measures providers currently use to understand outcomes for students studying modules. A total of 36 responses were received.



Just over four in five (29, 81 per cent) offered considerations on the suggested outcome measures, provided alternative suggestions, or both. Around one third (11, 31 per cent) noted that an approach that focuses on measuring students' views and opinions would be beneficial to gather feedback, learner motivation, overall satisfaction and engagement levels, to help understand the overall success of the modular study. Some commented that this could be in the form of a student survey, akin to the approach taken for the NSS, but to gather qualitative free-form data, that would take into account the variability of progression routes. It should be noted that the NSS currently gathers feedback mainly via closed questions data, but respondents specifically suggested value in taking a more extended open-ended questioning approach (although this would likely come with additional burden). Eight (22 per cent) mentioned that motivation to undertake such study will vary (continuing professional development, upskilling, self-improvement etc.) and therefore a flexible monitoring method is required.

'We believe that including student motivation as a measure, would also be appropriate in this new context. It is likely that with this flexible approach to study, students' end goal may not be career-oriented, but simply for personal development or enjoyment, in which case, the existing measures including 'progression' cannot summarise this.' – Support staff at a student membership organisation, collective response

A quarter (nine, 25 per cent) additionally noted that more transparency is required, particularly regarding quality assurance processes and documentation for these modular courses, including transferability of credits. A couple (two, 6 per cent) also noted that there could be a direct comparison between LLE modules and non-LLE modules, purely for the benefit of provider clarity on how different groups may be performing.

'The measurement of quality should be expanded to enable providers to fully engage with the LLE offer, for modular learners to receive a high-quality experience, and for modular provision to be of most value to those learners.' – Higher education sector body, collective response

As part of improving measures to deliver policy aims, some (seven, 19 per cent) commented that there should be a greater awareness and collaboration developed between the higher education sector and employers, to ensure that there is a continued recognition of the qualifications and modules. For example, these respondents felt that many job opportunities require a specific degree level or equivalent for candidates to qualify, so it may be 'difficult for someone to progress who has passed various modules which are not recognised as a qualification'. They suggest that employers will need a clearer understanding of how the LLE scheme may impact such requirements in order not to overlook any suitable applicants. This could in particular be useful to track labour market progression and to ensure the consistency of credits that employers can recognise.

Some commented on various elements of measuring progression and monitoring activities. Points raised include:

- ensuring there is no duplication of existing monitoring activities (i.e., overwriting internal provider efforts, compatibility with condition B3 etc.) (four, 11 per cent),
- making sure there is no additional burden on providers to undertake learner tracking activities (four, 11 per cent), and
- a belief that modular progression monitoring is not needed for regulatory purposes (four, 11 per cent).

In terms of current measures currently in use, around half (17, 46 per cent) offered approaches that may be of note in this context. These include the following:

- direct monitoring of completion or pass rates of modular courses (13, 36 per cent),
- individual internal monitoring systems, such as transcripts, credit accumulation and success of students (eight, 22 per cent),
- student satisfaction via end of module evaluations and surveys (six, 17 per cent),
- academic progression into other courses or modules (four, 11 per cent), and
- career paths and future employment (one, 3 per cent).

‘Most institutions use examination board data to measure modular completion and success rates, i.e. modular reports and combine this with qualitative data (e.g. module evaluation surveys) to monitor quality and standards of each module as part of the overall qualification. This is used extensively within providers and could perhaps form part of the measures but should not be publicly publishable (much like the new Q28 of the NSS).’ – Higher education sector body, individual response

### Other comments

Finally, four (11 per cent) would be reassured to see the OfS keeping abreast of how the higher education landscape is changing, and being proactive to ensure that the sector is ready for its plans to monitor policy aims.

Two (6 per cent) took the opportunity to raise concern with the exact terminology used within the policy document – in particular they suggest ‘completion’ be changed to ‘attainment’.



### 3. Conclusions

This report has provided an overview of responses received to the OfS's CfE relating to measuring positive outcomes for students studying on a modular basis, following the implementation of the LLE.

Based on the analysis of the 37 unique responses received to the CfE, this section does not seek to cover the detail of all points raised in the CfE but draws together the themes and considerations most commonly raised by respondents, acknowledging instances where there is a range of views on certain topics.

#### **General agreement with the OfS's views on the impacts of the LLE**

The majority (31, 84 per cent) either fully agreed or broadly agreed with the potential impacts of the LLE suggested in the CfE, including increased flexibility for students in terms of choice of studying multiple subjects and at multiple providers. This, respondents believed, will enhance providers' flexibility when exploring modular provision. It was noted, however, that the impacts will only be realised once the LLE is rolled out, and that further changes – as yet unknown – may still occur.

#### **Broad support for the OfS's general policy aims in light of the LLE implementation**

The majority (26, 70 per cent) broadly agreed with the OfS's policy aims outlined in the CfE. These include protecting the taxpayer by assuring quality within higher education and ensuring public funds are not being misused; protecting the reputation of higher education; and giving transparency and clarity about the OfS's regulatory approach such that registered providers can comply, innovate and grow.

#### **Mixed views on measuring student outcomes for modular provision**

Around half (17, 46 per cent) agreed that 'completion' is an appropriate measure of student outcomes, noting the importance of setting appropriate thresholds or benchmarks, to ensure that completion rates will be accurately assessed for individual modules.

With regard to the OfS's approach to measures of 'progression' for students undertaking one or more modules, it was felt that substantial flexibility will be required, given the circumstances of students undertaking multiple modules. Some believed that 'attainment' or 'completion' of modular courses may be better metrics to assess, given the potential uncertainties in the next steps of students' education or professional pathways.

#### **Potential burden for providers**

Respondents voiced concern that the LLE could present a burden for providers, for example when it comes to collecting data for quality assurance purposes and for measuring student outcomes. Potential administrative, regulatory and financial burdens were anticipated, given the flexible nature of the LLE, which could instigate complications with students studying across multiple subject areas, departments and providers.

#### **Further details on the LLE's implementation welcome**

Respondents would like to receive more information on the various aspects of the LLE's implementation, including the recognition of prior learning, credit transfer and final degree

awarding powers, as well as more general areas such as how the OfS anticipates the LLE will work in practice. They also highlighted a need for clearer terminology, for example what entails 'completion' or 'positive outcomes'.

**Consider students' varied motivations for studying and their individual circumstances**

In relation to measuring student outcomes, respondents highlighted the need to take into consideration a variety of motives that students may have when taking up modular courses. For instance, some may want to upskill or reskill in order to progress in their career and may not aim to complete a qualification. Additionally, there are personal circumstances to acknowledge, such as caring responsibilities, parenting breaks or students needing to drop out of their course because they are unable to continue studying. Such considerations will need to be carefully borne in mind when developing associated regulation.

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