# London Higher response to the OfS call for evidence on positive outcomes for students studying on a modular basis

**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.**

We broadly agree with the list of potential changes to delivery but would add that other (necessary or desirable) changes may emerge as delivery expands in this space and providers seek to be creative in developing a competitive advantage in this new market.

Clearly, ensuring positive outcomes for students whilst ensuring value for money from public funds is important regardless of the mode of study.

Although we recognise the value of the B3 condition as an indicator of value from public expenditure, measurement of outcomes should seek to recognise the wider social benefits, as well as the broader positive economic benefits that modular courses, can have on the economy. Limiting the availability of certain courses, based on a narrow perspective of value, will limit student choice and the potential impact of this policy change (through reduced take-up and restricting the areas of economy that could benefit from more skilled people.)

In terms of reputation of higher education in England, the financial implications of offering modular provision must be recognised, particularly at a time of broad financial challenges across the sector. The LLE provides a good opportunity to take a fresh look at the system as a whole, and a better funding system may incentivise providers to explore offering modular provision.

**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.**

The initial policy aims should be focused on facilitation of growth rather than start at the outset with a mindset solely around risk and protection. We understood that supporting growth was the original rationale behind the introduction of the policy and that point should, therefore, be recognised in the way the policy is regulated. Considerations such as awareness of this opportunity, or the ability to make informed choices, are fundamental to the success of the LLE. Choosing the right course is just as important as being on a good course.

Policy aims could be phased on an implementation curve, so that some of what the OfS propose now might be more suitable later (for example in 5 years' time). We should also remember that LLE by module requires courses to be in place which would already be part of the OfS regulatory framework. Students' Unions have suggested that an additional aim that should be considered is 'accuracy in advertised modules', ensuring that students are able to sign up for marketed modules and can make informed decisions and receive the teaching as advertised; particularly to ensure better alignment with OfS C conditions.

**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?**

We would like to see greater clarity and consistency around the different modes of flexible study, making sure any one measure does not undermine the overall policy aims.

The position outlined in the consultation document seems to suggest that continuation as a measure of student outcome for modular study, has already been discounted. If the DfE definition of an LLE-eligible module is that it is part of a course and thereby borrows qualification aim from that course, then perhaps it could mean continuation is conveyed if a type of award is made by a provider that constitutes intent to continue study towards the course-level qualification aim. Therefore, an LLE-eligible module 'qualification aim' is for a special type of award (e.g., UG Certificate of Credit Accumulation towards [insert qualification aim]), and continuation is implied if the student is awarded that and not an alternative award that implies an exit award (e.g., UG Certificate).

The assertion that for a module to be eligible for the LLE, it must be part of a 'parent course' brings the question of what happens in the event that parent course is closed or withdrawn? Clarity on this point would be helpful.

**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?**

Measures of progression for modular learning should reflect the diversity of the student body who choose to study these courses – for a student body that is likely to be of widely varying ages and with different goals for their study experience. Where progression is defined narrowly, with full time employment and/or further study fifteen months after graduation constituting a 'good outcome', this will not be a fair or accurate measure of how far courses have met the goals and expectations of their students.

There are some areas of study and employment where adherence to strict definitions of 'good progression outcomes' will be particularly damaging. In creative disciplines, learners who complete these courses are likely to be aiming to create a portfolio career in their chosen industry, which may start with developing a portfolio while not working full time. For learners taking modular courses with the intention of starting their own businesses, fifteen months is unlikely to be enough time to see the true long-term impact on enterprise over time.

The students who choose modular learning may have extra responsibilities and constraints on their time which led them to choose modular learning options and also make immediate progression into full time work hard. This may include parents with children to look after and learners with disabilities that impact their ability to study or work full time. We must ensure that if the modular courses are matched to students' needs, the measures we use to evaluate them are matched to the students as well.

Measures of progression for students undertaking one or more modules should respect the fact that modular learning as part of the Lifelong Learning agenda is intended to be accessible, flexible and ongoing over longer periods of time than a traditional full-time undergraduate degree. If the wrong measures are used to define progression, we risk undermining the overall policy aims of Lifelong Learning if we are too strict about exact timelines for learners to enter full-time employment. The length of time after which progression should be measured should be longer than the 15 months used in the Graduate Outcomes Survey. We suggest a longer period of 24 or 30 months.

**5. Are there other measures that we should consider as we think about how to deliver our policy aims? What measures do providers currently use to understand outcomes for students studying modules?**

For learners under the LLE who may take a break from studies and pick up other modules later, it has been suggested that a measure of 'projected or future validity of content' would generate confidence. This would enable learners to study flexibly and increase confidence in the robustness and academic rigour of the skills and content of these modules.