



Event summary: Professional, Statutory and Regulatory Bodies' meeting

14 March 2024

In March, QAA brought together a group of officers from professional, statutory and regulatory bodies (PSRBs) to discuss two topics:

- Implementation of the Lifelong Learning Entitlement (LLE)
- Impact of Generative Artificial Intelligence (Gen AI) on accredited programmes.

The event featured the following speakers:

- Dr Ailsa Crum, Director of Membership, Quality Enhancement and Standards, QAA
- Helena Vine, Policy and Public Affairs Officer, QAA
- Dr Nick Watmough, Quality Enhancement and Standards Specialist, QAA.

This note summarises the workshop discussions.

QAA also convenes a PSRB Forum which offers an opportunity for officers working in PSRBs to meet with those responsible for delivering qualifications that include professional recognition. It is a space where topics of mutual interest, opportunity and challenge can be considered, facilitated by QAA.

The PSRB Forum will next meet on 30 May 2024 - for more information on how to attend, please [visit our events page](#). This Forum will explore topics including student time poverty, an update on the consultation responses for the revamped UK Quality Code and an analysis of the recent QAA survey on how higher education providers work effectively with PSRBs.

Lifelong Learning Entitlement (LLE)

Helena Vine from QAA's Public Affairs team opened the discussion on LLE's potential impact on PSRB-accredited courses. She provided a recap on what LLE is and the current status of the policy. LLE is a major new policy for England, intended to be transformative for the post-18 student financing system. Eligible learners will be able to access loan funding of up to £37,000. Unlike the current system, which relates student loans to awards, the LLE approach is linked more closely to credit. To be eligible for LLE funding, each module or parcel of learning must be a minimum of 30 credits (equivalent to 300 hours of full-time study).

Modules must also form part of a wider 'parent' programme leading to a whole qualification over time. More detail on the policy is expected to be released this year, although this may be disrupted by the anticipated General Election. Two pieces of secondary legislation are expected this year, on fee limits and the wider system.

LLE will first be offered for higher technical qualifications at levels 4 and 5 next year (trailblazer groups), then level 6 in 2027. There will also be a separate registration for providers who are not registered with the Office for Students (OfS).

There are a number of implications across HE, with different opinions so far around the potential impact on accredited courses. QAA asked the meeting for the PSRB perspective on this emerging area.

Comments from delegates

- Some PSRBs indicated they would have preferred a 10 to 20 credit minimum rather than the proposed 30-credit minimum module size.
- There are currently two initiatives taking place which could impact the future shape of LLE, and some PSRBs expressed interest in how they could find out more about taking part. One is the [Higher Education Short Course trial \(HESC\)](#) conducted by the Office for Students (OfS) and the Department for Education (DfE), which is trialling shorter provision within the current regulatory framework. Another is the Institute for Apprenticeships and Technical Education (IfATE) route panels, which are [currently recruiting](#).
- The policy was likely to attract more student interest at postgraduate level or post-experience rather than for undergraduate provision. Medicine and finance are areas where CPD modules at level 4 are offered for professionals needing to develop post-qualification. However, if students use their LLE entitlement on their undergraduate award, they may not have further loan left to cover CPD activity post-qualification.
- The capacity required to design and deliver awards capable of being studied in a modular and episodic manner is substantial, changing from whole-qualification administration to part-qualification.
- Student demand is difficult to assess - there has been limited demand demonstrated from the pilots run to date. Some PSRBs had discussed LLE implementation with providers, noting that they are looking for new markets, so there is some indication of demand and opportunity. Interestingly, many European jurisdictions are considering modular delivery but without addressing credit and funding.
- There were mixed views on whether PSRBs could envisage a time when accreditation could take place at modular level. Several PSRBs highlighted that their recognition systems looked at whole qualifications not parts.
- For those individuals who choose to take modules over a period of time and at different providers, PSRBs found it difficult to see how they could recognise such an approach. On the other hand, for some programmes, such as accounting, each module is individually accredited so moving programmes would be more manageable.
- PSRBs had not discussed with providers the LLE's potential impacts on accredited programmes, mainly due to the difficulties already outlined. One PSRB was interested in seeing how many other bodies were looking to enable the design of accredited individual modules. Capstone Level 6 modules with sophisticated recognition of prior learning (RPL) systems have been developed under existing funding models, so it is possible. Two schools of thought are emerging in programme design - increasing modularisation, and more holistic programme level design approaches.

- Where partial qualifications had been awarded historically, individual applications and considerations would be necessary to determine the currency of credit, as some subjects have time limits set by PSRBs (for example, five years for accountancy). Some providers have no time limits on RPL.
- RPL is used increasingly to encourage learners onto programmes, but provider RPL policies vary, some of which PSRBs can accept and some they cannot as they are too permissive. Another issue for providers that have these policies is that there can be little evidence for the decision making behind acceptance of RPL. In one PSRB's view, in order to enable higher technical qualification (HTQ) mobility and use of LLE, some standards around RPL would be needed, to allow one institution to accept the evidence gathered by another. The evidence needed to ensure that the LLE's 30 credits requirements had been met were another unresolved issue.

QAA engages with the DfE LLE implementation team on a regular basis and the key points raised during the discussion with PSRB would be useful to inform that dialogue. This doesn't prevent any individual PSRBs sharing feedback directly themselves.

Generative AI and its implications for regulated professions - open forum discussion

Nick Watmough from QAA opened the discussion and explained that at the last PSRB Forum there was a strong sense that providers were seeking a steer from professional bodies on how they should assess and construct programmes in light of developments in Generative Artificial Intelligence (Gen AI). The discussion was intended to be a safe space to share developing thinking and help QAA understand the limits on advice and guidance that PSRBs can give to providers, and how we can help to manage expectations and conversations.

Three questions were posed for discussion:

1 Do you plan to offer guidance to providers on forms of assessment they can or cannot use on accredited programmes?

At least three PSRBs' views were that providers employ experts in assessing and therefore assessment is a matter for them. However, one of those PSRBs had produced guidance in response to providers continuing to use assessment approaches they had adopted during the COVID lockdown, which the PSRB felt posed risks to academic integrity.

Other PSRBs had Teaching and Learning forums where they intended to explore the issues around Gen AI and encouraged providers to allow flexible assessment where appropriate.

PSRBs were generally confident that their accreditation and monitoring systems would be able to pick up any issues arising from Gen AI with providers taking responsibility for the integrity of awards.

2 As staff and students navigate a landscape changed by Gen AI, has your organisation changed its view on the threshold for students who breach academic integrity guidelines to no longer be considered of good professional standing/fit to practice?

This was again largely seen as a matter for accredited providers. PSRBs generally expected providers to have policies around Gen AI and reserved the right to apply their own sanctions if students are found guilty of misuse. For PSRBs who have their own qualifications delivered by providers under license, guidance is provided stating what they consider to be

acceptable and any sanctions that might be applied, including withdrawal of approval if they deem their code of ethics and practice to have been breached.

3 As a professional body, have you had any conversations with providers about how they should prepare students to use Gen AI in their future workplace?

Current students will ultimately be going into a workplace environment where use of Gen AI will be the norm, and where they will be expected to use it effectively to make their work more efficient - ability to use AI is therefore an employability skill. PSRBs considered it essential for providers to include an assumption of Gen AI use into their thinking, creating assessments where the use or not of Gen AI is irrelevant, rather than considered to be cheating.

This was also on the agenda for another PSRB and their providers, to consider the competences professionals need to work in a world with Gen AI, and when using and developing these technologies. It was recognised that learning outcomes for accredited degrees may need to be changed.

For people who trained even relatively recently, updating CPD in Gen AI as well as areas such as remote/virtual communications is vital for professionals to stay familiar with these emergent technologies.

QAA is providing substantial guidance and support for our members around the use of [Generative AI](#) and [academic integrity](#) on our website.

Keep up to date with our work

Our Membership Calendar is regularly updated with all the different activities that you can access as a QAA Member and our weekly Member Update mailing is another great way to stay updated. If you do not currently receive the Member Update newsletter, do [sign up](#).

All staff and students from QAA Member institutions can also find a wide range of valuable resources on our [Membership Resources site](#). Access the site for the first time by completing this short online [registration form](#).

Next Network meeting

The Forum will next meet on [30 May 2024](#). This forum will explore topics including student time poverty, an update on the consultation responses for the revamped UK Quality Code and an analysis of the recent QAA survey on how higher education providers work effectively with PSRBs.

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