Achieving credit transfer at scale: Do we want it, and how might we achieve it?

Contents

Credit transfer – one of higher education's most perennial stalemates

In 2003, the "The Future of Higher Education" White Paper commended credit transfer as an important model of flexible delivery and called for "further work on a credit transfer scheme" within a new Higher Education Strategy. Over two decades later, the impetus created by the Lifelong Learning Entitlement (LLE) has raised the topic of credit transfer again but, in doing so, also demonstrated how little progress has been made in the intervening years.

Credit transfer is not necessary for successful LLE implementation. But the policy's goal of enabling access to higher education throughout a person's working life will not be realised if more is not done to facilitate it. In addition to the LLE, the broader sector environment has raised increasing fears that the closure of programmes or even entire institutions will necessitate unprecedented levels of transfer.

In September 2024, the Quality Assurance Agency for Higher Education (QAA) published a report analysing UK provider's credit transfer and recognition of prior learning (RPL) policies. The report provided valuable learnings about the current state of play. We're now following the what with a greater focus on the why? Why was it so difficult for us to locate the policies, and why were they so confusing when we did? Why have providers chosen to put those restrictions in place? What are the obstacles preventing those policies from being better? And what might ease the improvement process?

When discussing credit transfer, institutional autonomy must remain front of mind. The sector's autonomy and the diversity it engenders means that there is no one-size fits all approach. But institutional autonomy does not mean the sector should not be held to account in areas where its performance is poor, and the benefits of improvement are to be felt broadly. This report seeks to address how we might make that happen.

What do we mean by credit transfer?

For the purposes of this report, credit transfer is defined as the process by which a provider recognises the credit a student has accrued at another institution, exempting them from modules or even whole years of learning that they have already undertaken elsewhere.
This research has concentrated on how credit transfer can work under the LLE, and therefore emphasises learning that has acquired credit or certification rather than experiential learning, although many of the insights remain applicable. The LLE's policy parameters mean the focus is largely on domestic, undergraduate students, although stakeholders were encouraged to share their experiences and expertise across all forms of delivery.
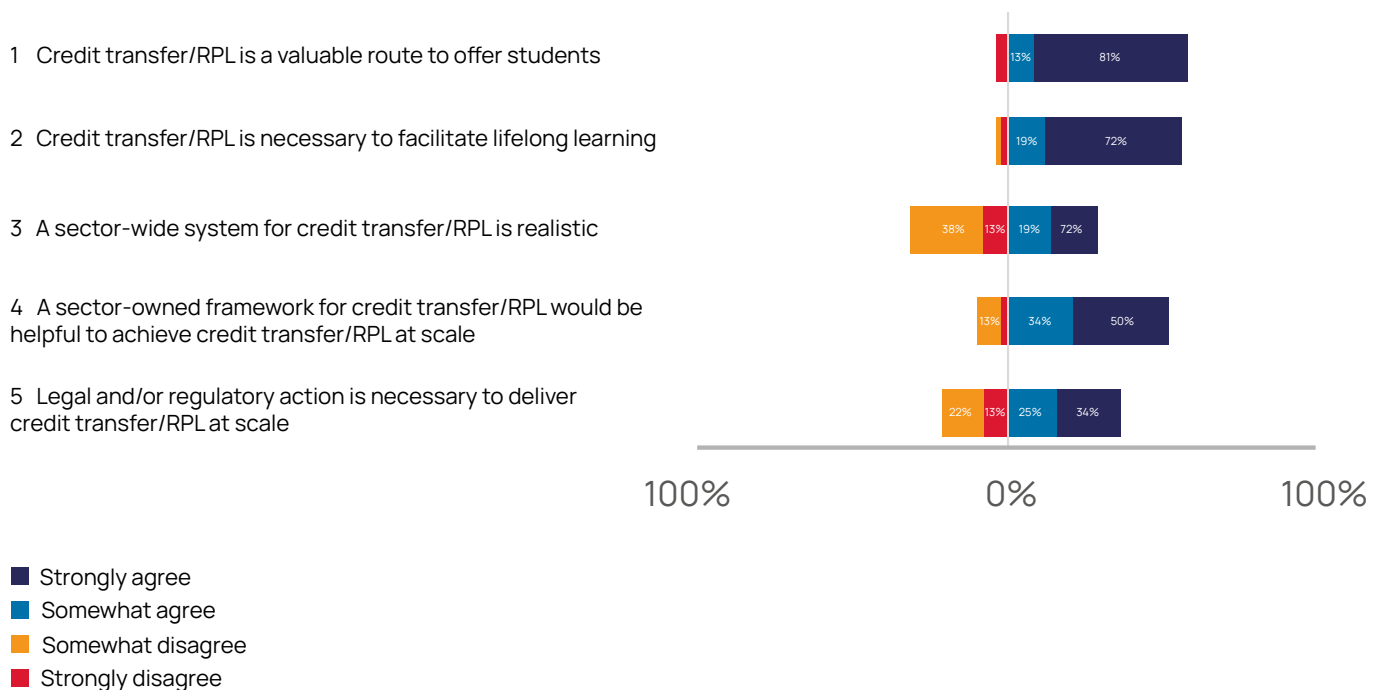
Methodology

The purpose of this research was to gain insight into the obstacles impeding credit transfer at scale and explore potential solutions to those obstacles. Consequently, and importantly, much of the research is therefore based on extensive stakeholder engagement to provide depth and understanding which builds on the existing desk-based research QAA published in 2024.

- **An open access survey** was completed by 32 respondents. Of those 32, six were from the college sector, seven were from a research-intensive provider, 10 were from a post-92 institution, five were from an independent or specialist institution and five were from "other" interested organisations. The survey questions are available here.

- **Four focus groups** facilitated stakeholder discussions on the barriers to more effective credit transfer and any potential solutions. These covered 14 stakeholders and nine institutions.

- **A PSRB focus group** was held with a select group of representatives from four PSRBs to discuss in-depth the implications of credit transfer for accredited provision.

- **Stakeholder conversations** provided insight into individual institution's approaches and personal views on credit transfer. These covered 19 stakeholders and 10 institutions or relevant organisations.

- **Further desk research** explored the literature around credit transfer, in particular learnings from other countries. Preliminary learnings from US comparisons were published by HEPI.

- **In-depth analysis of 25 RPL policies** was conducted using a representative sample of providers registered with the Office for Students.

We are grateful to those across the sector who took the time to engage with this research. A full list of involved institutions and organisations can be found at the end of the report.

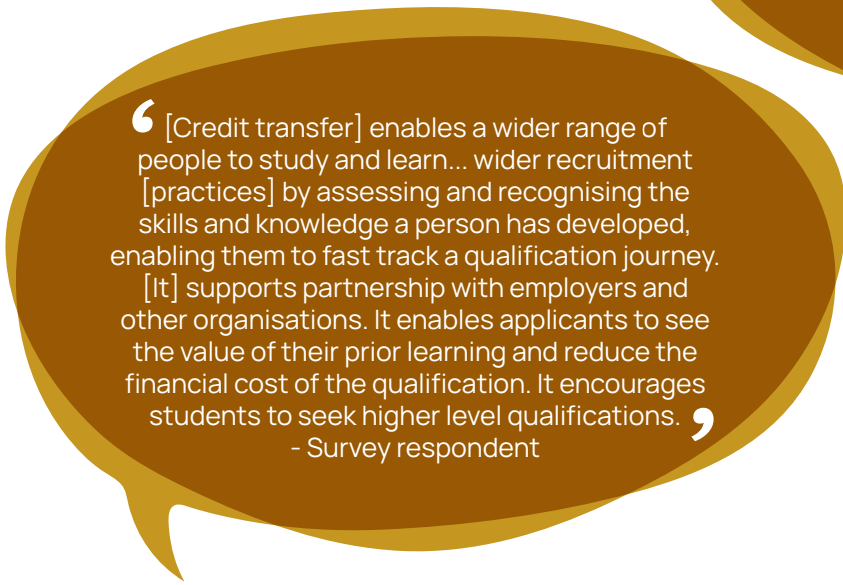# What does the sector think about credit transfer and RPL?

How strongly to do you agree/disagree with the following statements?

1   Credit transfer/RPL is a valuable route to offer students

2   Credit transfer/RPL is necessary to facilitate lifelong learning

3   A sector-wide system for credit transfer/RPL is realistic

4   A sector-owned framework for credit transfer/RPL would be helpful to achieve credit transfer/RPL at scale

5   Legal and/or regulatory action is necessary to deliver credit transfer/RPL at scale

Statement	Strongly disagree	Somewhat disagree	Somewhat agree	Strongly agree
1			13%	81%
2			19%	72%
3		38% (disagree) 13%	19%	72%
4		13%	34%	50%
5		22% 13%	25%	34%

100%   0%   100%

- ■ Strongly agree
- ■ Somewhat agree
- ■ Somewhat disagree
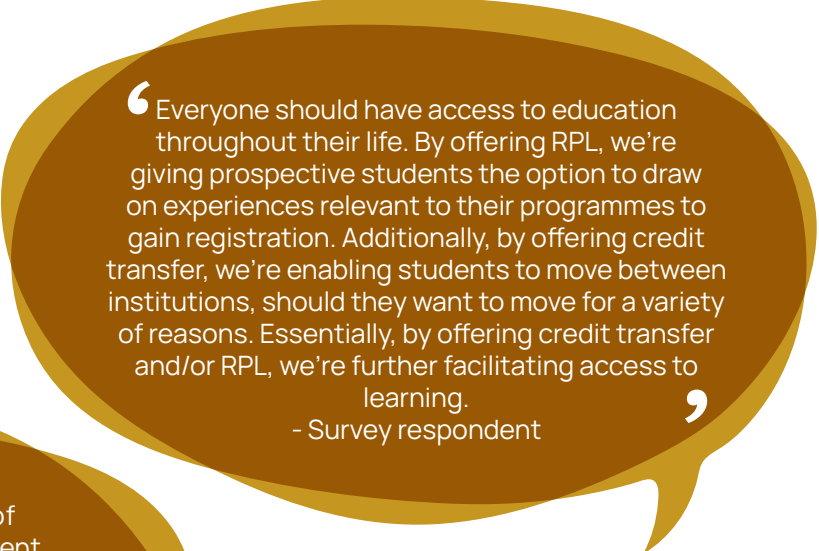- ■ Strongly disagree

Survey respondents overwhelmingly agreed with Statement 1 (credit transfer and/or RPL is a valuable route to offer students) and Statement 2 (credit transfer and/or RPL is necessary to facilitate lifelong learning), both key considerations in the context of the LLE. Although the respondent numbers were small, it was interesting to note that those who disagreed with either statement were from the college sector. From broader engagements with the college sector, this is expected to reflect the fact that colleges are more likely to have outbound, rather than incoming, credit transfer students. The multitude of flexible learning routes that colleges offer may also have weakened their view that credit transfer is a necessary mechanism for lifelong learning.

This statements' largely positive viewpoint was corroborated in the answers respondents provided when asked about the benefits of credit transfer. The most cited was flexibility and agility for students and the impact on widening participation, particularly for mature learners. Respondents also highlighted the practical benefits for students gaining qualifications and learning in a shorter time and for lower cost through removing the need to duplicate learning unnecessarily.

Respondents also cited benefits of accepting credit transfer students to institutions, particularly to improve completion rates, which is used in regulatory activity in England. Broader benefits around skills development, particularly locally, were also cited, which aligns with the LLE's core messages.

> *"Everyone should have access to education throughout their life. By offering RPL, we're giving prospective students the option to draw on experiences relevant to their programmes to gain registration. Additionally, by offering credit transfer, we're enabling students to move between institutions, should they want to move for a variety of reasons. Essentially, by offering credit transfer and/or RPL, we're further facilitating access to learning.*
> *- Survey respondent*

> *"[Credit transfer] enables a wider range of people to study and learn... wider recruitment [practices] by assessing and recognising the skills and knowledge a person has developed, enabling them to fast track a qualification journey. [It] supports partnership with employers and other organisations. It enables applicants to see the value of their prior learning and reduce the financial cost of the qualification. It encourages students to seek higher level qualifications.*
> *- Survey respondent*

Recipients welcomed the idea of a sector-owned framework (Statement 4), where the main principles of a strong credit transfer policy would be established, allowing providers to tailor it to their specific contexts. 84% agreed it would be helpful to achieve credit transfer at scale. 63% of survey respondents proactively mentioned a sector-wide framework of some form in their response to an open-ended question about potential solutions. Similarly, the more reticent responses came from the college sector, suggesting this is something more appealing to larger HE institutions, potentially because they would benefit from greater support as the main recipients of credit transfer students.

Where the respondents were less optimistic was in response to Statements 3 and 5. Statement 3 (a sector-wide *system* of credit transfer is realistic) received the most disagreement among respondents. This is perhaps unsurprising, as a system where students can move more seamlessly between institutions would require the most significant shift from current practice. The split by provider type here is interesting – respondents who disagreed covered all provider types, whereas both "strongly agree" responses were from sector organisations. This suggests there may be a misalignment between the sector-level policy view and the view of those tasked with implementing such a system.

Respondents were somewhat split on the need for regulatory or legal action to deliver credit transfer at scale, although a reluctance for further regulation in a saturated sector may have somewhat skewed the results. There is an interesting pattern between the statements, with those who believe a sector-wide system to be realistic more likely to agree that legal or regulatory action is necessary. On the surface, this appears counter-intuitive. If such a system is believed to be unrealistic, you would expect enforcement action to be required, as it implies a lack of will. But further insight from the stakeholder discussions provided a potential explanation. The biggest advocates for credit transfer were cognisant of the entrenched barriers and therefore sceptical about full sector engagement without action from an authoritative body. For those less convinced about credit transfer, legal or regulatory action encountered many of the same cultural barriers, such as institutional autonomy over admissions and the role of academic judgement in any decision-making.

What is effective – and less effective – in current practice?

Respondents thought both institutional-level and sector-level initiatives to support credit transfer were effective. At a sector-level, multiple respondents cited the embedded use of credit in designing courses across the UK HE sector (and the role of the Credit Framework for England in facilitating this). Some also cited the Office for Students' requirement for a student transfer policy which required institutions to think about credit transfer more broadly.

Respondents were also positive about the effectiveness of institution's own approaches. This was corroborated by the focus groups and stakeholder conversations, where even the most reluctant advocates of credit transfer were engaged in the practice of facilitating this on an individual, discretionary basis for students who enquired.

> In general, most programme teams are positive about mapping credit attained elsewhere to consider whether it can replace required elements of study.
> - Survey respondent

Respondents did, however, have much more to say about what is less effective in current practice. The barriers to implementation are explored in the next section, but responses to this question were rife with concerns about transparency, cultural resistance and resourcing.
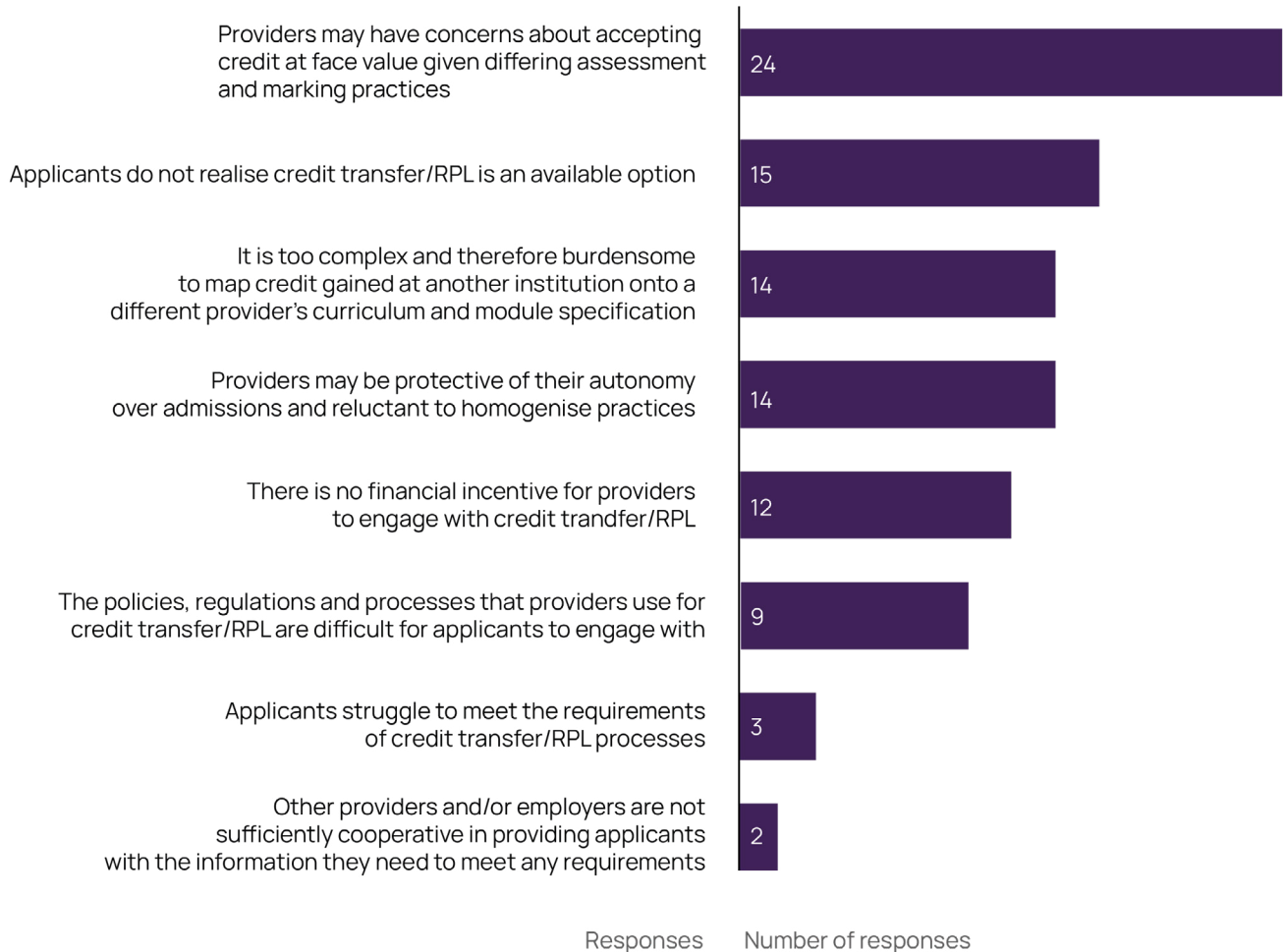
> Institutional partnerships appear to work quite well, as do clear, easily-available processes. Having dedicated staff (who have received training) is effective in reviewing the applications. That said, the lack of policies, partnerships and training are barriers to the success of students applying via this route.
> - Survey respondent

Where are the issues?

Biggest challenges to achieving credit transfer at scale

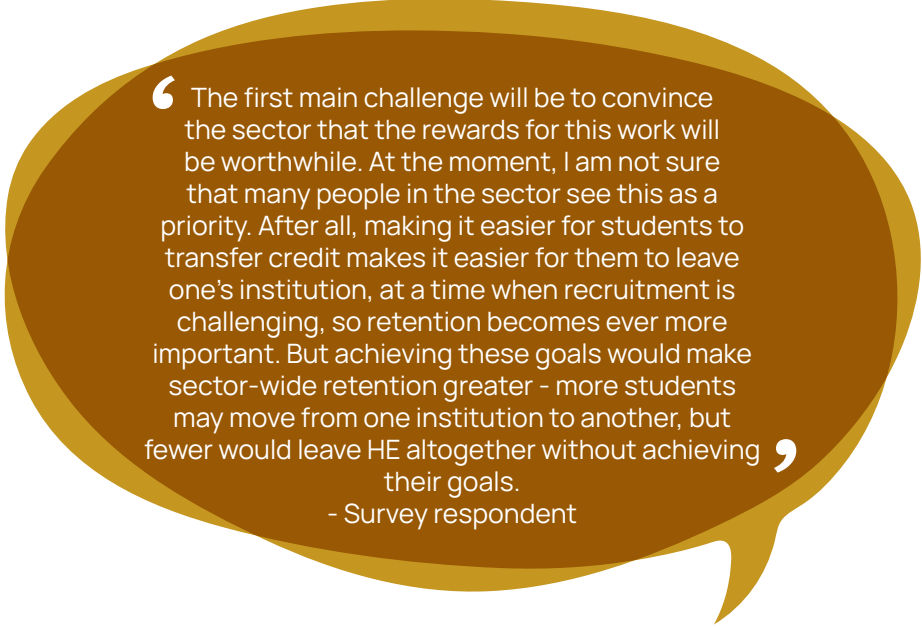| Responses	Number of responses
Providers may have concerns about accepting credit at face value given differing assessment and marking practices	24
Applicants do not realise credit transfer/RPL is an available option	15
It is too complex and therefore burdensome to map credit gained at another institution onto a different provider's curriculum and module specification	14
Providers may be protective of their autonomy over admissions and reluctant to homogenise practices	14
There is no financial incentive for providers to engage with credit trandfer/RPL	12
The policies, regulations and processes that providers use for credit transfer/RPL are difficult for applicants to engage with	9
Applicants struggle to meet the requirements of credit transfer/RPL processes	3
Other providers and/or employers are not sufficiently cooperative in providing applicants with the information they need to meet any requirements	2

Survey respondents and engaged stakeholders largely agreed that credit transfer was a valuable route and necessary to facilitate lifelong learning. But there was also clear scepticism among some about the feasibility of delivering this at scale. What, then, are the obstacles sitting between these two beliefs?

Strategic barriers

In the current environment, there is little strategic incentive for providers to engage with credit transfer

In the current operating environment, all providers must make difficult choices. QAA has previously argued about the importance of financial sustainability in delivering quality enhancement and innovation. While credit transfer in some form has been happening across the sector for decades, stakeholders made clear that delivering it at scale would be considered a major innovation and investment in an area that is not a high priority.

Credit transfer not only suffers from this reprioritisation, but also from the perception (and to some extent the reality) that it provides little to no financial benefit to providers. Because of the intense resource required to deliver the credit transfer process which, if completed successfully, concludes in a student paying lower tuition fees, any financial imperative is largely nullified. The lack of financial incentive was rated as one of the highest priority barriers to implementation. It was, understandably, also particularly prominent for the senior leaders who engaged in the research.

> ‘ The first main challenge will be to convince the sector that the rewards for this work will be worthwhile. At the moment, I am not sure that many people in the sector see this as a priority. After all, making it easier for students to transfer credit makes it easier for them to leave one's institution, at a time when recruitment is challenging, so retention becomes ever more important. But achieving these goals would make sector-wide retention greater - more students may move from one institution to another, but fewer would leave HE altogether without achieving their goals. ’
> - Survey respondent

The strategic imperative is, however, elevated in the case of potential market exit. Should a programme, suite of programmes or entire provider close unexpectedly or require support to teach-out, credit transfer will become a necessary mechanism to facilitate continued learning for students. Despite the financial environment deprioritising initiatives such as credit transfer for individual providers, it also necessitates the sector take proactive action on protective measures.

> ‘ Credit transfer allows greater freedom of choice and flexibility to students and, more importantly in my mind, offers greater insurance against course closures and, at worst, provider closures ’
> - Survey respondent

Mission possible

Providers who were particularly engaged in credit transfer often cited their institutional missions as the underpinning reason. From this perspective, even where there was little financial or regulatory imperative, it still felt strategic. As found in the examples below, the focus was often on inclusion or accessibility.

> **The Open University's mission is to be open to people, places, methods and ideas. We promote educational opportunity and social justice by providing high-quality university education to all who wish to realise their ambitions and fulfil their potential.**
>
> **Through academic research, pedagogic innovation and collaborative partnership we seek to be a world leader in the design, content and delivery of supported open learning.**
>
> - [The Open University's mission](#)

> **Central to the UCEM vision, both now and in the future, is its core purpose; to provide truly accessible, relevant, and cost-effective education, which enhances careers, increases professionalism, and contributes to a sustainable built environment.**
>
> - [The University College of Estate Management vision](#)

> **As an institution built on world-class research, we want to share knowledge to challenge and transform our students, giving learners of all ages and backgrounds the chance to contribute to positive change, improving their lives and those of others.**
>
> - [The University of Manchester's vision statement](#)

Lack of demand – fact or fiction?

Scepticism of student demand was raised repeatedly by stakeholders from all provider types, as has been in the case in the wider LLE policy debate. There is widespread belief – underpinned by a weak evidence base – that there is no market for the kind of provision the LLE wishes to encourage. It is an argument QAA itself made about the limited scope of the LLE and its exclusion of the microcredentials and standalone short courses that currently dominate the lifelong learning market. The short courses trial run by the Office for Students did nothing to assuage these fears, with many providers who engaged having to close their offerings or failing to attract more than single-digit numbers of students.[1]

While research undertaken for this report did not refute the concerns around lack of demand, it did raise questions about their validity. It remains unclear whether the credit transfer processes in place cater to small numbers because of low demand, or rather that low demand is a consequence of restrictive processes.

Three examples suggest the latter may carry more weight than has previously been acknowledged.

1.   Of the more than 10,000 respondents to the HEPI/AdvanceHE Student Academic Experience Survey 2024:

•   8% would have selected a different university if choosing again;

•   7% would select a different course;

•   6% would select a different university and course.

•   25% considered withdrawing from or leaving university.

2.   The Open University receives over 6,000 credit transfer applications *every year.*
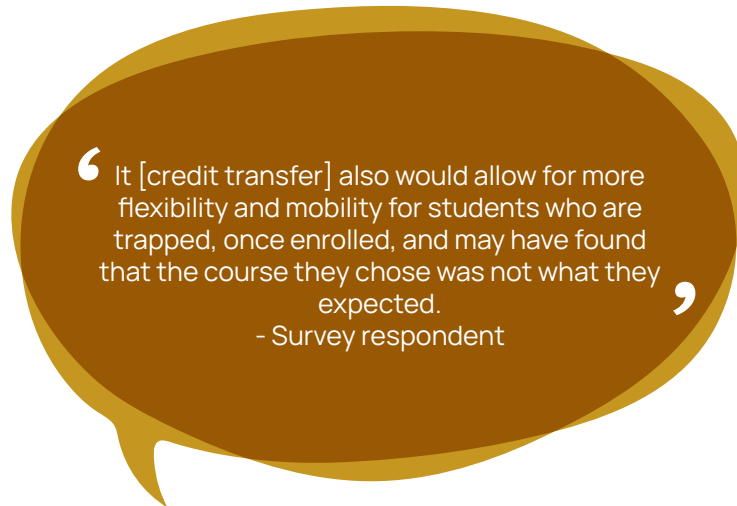
3.   Multiple specialist providers engaged in the research cited that credit transfer accounts for over 10% of their annual intake.

Aspects of The Open University's provision attract more non-traditional students than other providers, namely the distance learning model. However, their credit transfer systems are also much more advanced. The Open University website includes a full sub-section on credit transfer, how it works, and what information applicants must provide to successfully complete the process. Every qualification has its own five-page factsheet to walk applicants through the process. 6000 students would represent at least 22.5% of any other provider's intake. The market for credit transfer is significantly smaller than the mainstream student market, but these numbers demonstrate that demand exists but is not being met by most of the sector.

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1 Interestingly, two providers waived fees and opened courses up to partner employers' staff free of charge. This increased uptake because employers were more willing to advertise the opportunities and provide staff members with the time to engage, something they were less willing to do when participation was loan-contingent.

The findings from HEPI and AdvanceHE's survey raise similar questions about whether the barrier is demand or obstacles within the system. Taking the survey sample as broadly representative, approximately 20% of students would choose a different university and/or course if given the chance again. Under the LLE, doing so would become significantly easier as students have better recourse to exit, utilise the credit they have accrued and maintain a much greater proportion of their student loan allowance.

> ' It [credit transfer] also would allow for more flexibility and mobility for students who are trapped, once enrolled, and may have found that the course they chose was not what they expected. '
> - Survey respondent

The sector is a long way from credit transfer students becoming the norm. But arguments about a missing market do not fully stand up to scrutiny either. Enabling students to dip in and out of a provider creates a level of uncertainty that is particularly unwelcome in the current environment. But it also creates a larger, more diverse student market to draw from. To embed lifelong learning and broaden student choice, the argument of lack of demand needs to be interrogated further.

Cultural barriers

Providers have a brand, and credit transfer does not always fit neatly within it

The cultural barriers to credit transfer are some of the most amorphous and the most intractable. Survey respondents ranked the barrier of accepting credit at face value as the biggest challenge, and stakeholder discussions corroborated this. Despite widespread adherence to the Framework of Higher Education Qualifications, the Credit Framework for England and the use of external examiners, providers are still reluctant to accept credit accrued at another institution at face value without deep interrogation of the learning gained.

The sector rightly takes a robust approach to academic standards and the quality assurance processes that underpin credit transfer. There is a danger though, that the focus on the importance of academic standards shields from view some value judgements about individual students that are less about whether they have achieved the right learning outcomes, and more about whether they would 'fit in' at the receiving institution.

Distinct perceptions of the value of credit transfer students were apparent between two types of institution. In recruiting institutions, who must seek out applicants, credit transfer was much more readily welcomed and transferring students were considered a clear segment of the student market. The cultural concerns in these providers were focused more on the increased frequency of "poaching" activity between providers, already somewhat commonplace, should credit transfer become easier. Credit transfer was therefore viewed less as a collaborative initiative and more as a lever to gain a competitive advantage. Conversely, in selecting institutions, where applications outnumber places, the focus was much more on maintaining credit transfer as an exception reserved for a handful of students. There was less active resistance, and more a lack of understanding of its value and how it would benefit the institution when delivered at scale, particularly when traditional application numbers are sufficient.

A distinction was also apparent between institutions who prefer programme-level course design and those who utilise more modular course design. Some programmes are designed with programme-level outcomes that all modules build towards, with sub-outcomes not necessarily incorporated at the academic year or level. Some providers operate somewhere in between these models, where the programme is the primary lens for overall objectives, but operationally the modules have greater prominence. Programme-level course design understandably poses issues for credit transfer. QAA has argued that a risk under the LLE is the assumption that modules can be delivered on a standalone basis when they are designed to form part of a coherent whole. Advocates of credit transfer suggest less that these modules should be considered standalone, and rather that a more flexible approach could be taken to what constitutes programme coherence and the avenues through which students can accrue the necessary building-blocks. The varying approaches to course design between and within institutions do, however, reiterate the fallacy of a one-size fits all approach.

Coherence is also a concern in how credit transfer interacts with the student experience. A barrier that was raised sporadically by stakeholders but is prevalent in the broader literature is the importance of preserving the distinct culture of the student experience within UK HE. One of the sector's strengths is its focus on cohorts of students and the community which underpins their experience. Many providers deliver a campus experience, and all think intentionally about how their physical and digital spaces cultivate a sense of belonging and connection. Some of this is inevitably lost if students move between institutions, and limiting numbers of transfer students can be a strategic decision when made to protect the student experience and ensure adequate wraparound support is available. While flexibility provides many benefits, it is crucial for providers to address the aspects of higher education that are potentially lost through deviation from the traditional model, a further practical burden explored in more detail in the next section.

Another strength of the UK HE sector which could hinder the acceptance of credit transfer is the investment and autonomy of its staff in curriculum design. The high profile and world-leading nature of UK HE means that courses are often designed and taught by world-leading researchers, many of whom base these courses on their own research. The established community of academics also means that personal knowledge of specific research areas and teaching styles can, even subconsciously, feed into decisions about transferability. Informal knowledge and distinct teaching styles produce benefits as well as barriers, but they can add a level of discretion that can undermine consistency. It is even more important to consider this in the context of students who transfer because the approach of their previous institution was not the best fit.

Cultural barriers can be the hardest, and take the longest, to change. Despite a much more embedded credit system in the USA, where movement between community colleges and four-year degree institutions is much more commonplace, the literature demonstrates that many of the cultural barriers present in the UK continue to exist there. It is a useful example of how cultural evolution is more than a waiting game – it requires proactive action and strategic impetus to happen. Time will tell whether the LLE can deliver that.
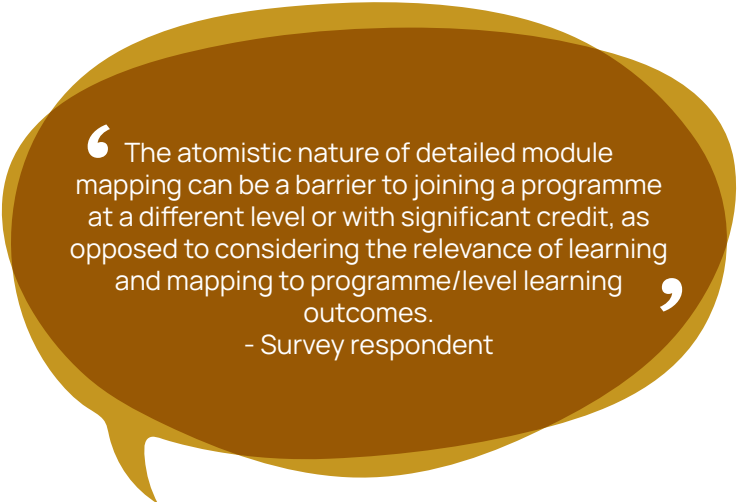
Practical barriers

The credit transfer process is burdensome and complex

In contrast to more amorphous cultural barriers, tangible practical barriers prevent even the strongest advocates of credit transfer from scaling up the process. Complex and burdensome processes were cited as the third biggest barrier to credit transfer at scale by survey respondents.

In almost all cases, the credit transfer process involves an extensive mapping exercise. Applicants must present the module information and learning objectives from their prior learning for an institution to map onto their own programmes and determine what exemptions can be applied. A successful process requires alignment across the admissions team, relevant faculty, data and planning team and quality team. Measures are in place to ensure consistency, but the discretionary nature of academic judgement results in a system that is often opaque with varying results.

In addition to institutional systems, sector-wide infrastructure does not facilitate easy credit transfer. Student records systems vary significantly across providers and even those who use the same systems do not necessarily do so in the same or similar ways. This means that any mapping exercise must be done manually. HESA returns include entry profile fields that record if a student has enrolled with existing credit, but they do not include the level of detail necessary for admissions tutors to confidently map the learning. Under the LLE, the Department for Education has proposed a standardised student transcript, and this may ease the process somewhat. However, similarly to the HESA record, it is unlikely to include the level of detail necessary and, if it does, it would duplicate existing systems within institutions, further increasing burden.

> " The atomistic nature of detailed module mapping can be a barrier to joining a programme at a different level or with significant credit, as opposed to considering the relevance of learning and mapping to programme/level learning outcomes. "
> - Survey respondent

The investment of time and resource continues once a credit transfer student is enrolled. By enrolling later, they are likely to have missed the various induction activities that support students academically but also socially and culturally. Providers must be intentional in ensuring this support is available for credit transfer students, particularly as many are from non-traditional backgrounds and may require additional help. The consequences of not getting this right exacerbate the cultural aspects of the student experience that present a barrier to credit transfer.

This complexity also impacts the applicant's experience. The various terms used by providers that all refer to the same process prove confusing for those outside of the sector and act as an unnecessary barrier to engagement.

At present, very few providers include information on this process as part of the entry requirement information or choose to include this information on their relevant UCAS pages. Some that do include this information in a more accessible place often do so only to point students towards contact information for their admissions team, adding a further step. The providers who actively promote credit transfer are in the minority. Despite most issuing warm words in various admissions policies or academic regulations, these are not documents that an applicant can reasonably be expected to engage with.

> "The promotion of the availability of credit transfer and RPL is not well promoted by institutions to learners. Many learners are unaware of how to access credit transfer or RPL. In many cases the process to get recognition can be long [and] complex. In Scotland, there is a well established articulation route from college to university via HND to degree which means learners go from college to third year of degree. We also have a set of guidelines for RPL in the tertiary sector in Scotland.
> - Survey respondent"

Where does accredited provision fit into credit transfer?

Professional, Statutory and Regulatory Bodies (PSRBs) are organisations which oversee and regulate specific professions. Importantly in this context, they accredit educational programmes which meet their standards.

PSRBs take a range of approaches to accreditation and this means there is no universal approach to credit transfer. Some PSRBs do not allow students to enrol in later years and some mandate only minimal admissions criteria. Some PSRBs set statutory limits on the length of study a student undertakes to get their qualification. Others do not set statutory limits but have expectations about the length of time it should take for a student to qualify. One issue identified in our research was the implications credit transfer posed to the length of study. This would become a bigger consideration as the LLE develops.

Importantly, there is a perception among providers that PSRBs are a barrier to implementing credit transfer with greater frequency. Although some thought the threshold competencies (the skills, knowledge and behaviours graduates must demonstrate) may make transfer easier between accredited institutions, others thought it would present further boundaries. All PSRBs engaged were open to exploring their approach further as the LLE developed and the frequency of credit transfer potentially increased.

The PSRBs engaged in the research were much more focused on a student's outcomes and their capabilities upon finishing a course than the process through which they enrol. Requirements were not established for entry criteria. Instead, oversight focused on reviewing admissions policies and procedures to ensure they were robust and provided for different cohorts, without dictating how they should be implemented. The focus of accreditation is at course-level, rather than module-level.

It is the degree we accredit, rather than the subcomponents.
- PSRB

One provider shared that the demand for credit transfer often came from applicants looking to "top-up" their learning to achieve accreditation or recognition from a PSRB. They therefore only wanted to take the modules that met the criteria the PSRB had outlined was missing from their prior learning, rather than enrol on a full qualification. While small in number, these students tended to be particularly motivated and consequently achieved strong outcomes.

What are the potential solutions?

There are a multitude of ways in which the sector could improve its credit transfer practice. But there are also a multitude of views about what is feasible or desirable. The various solutions available – and the levers necessary to make them happen – broadly fall into three categories below. With each category, the action required of providers increases, but so does the potential for wide-ranging impact:

1. Making the process smoother for applicants

2. Improving the policies themselves

3. Delivery at scale

Making the process smoother for applicants

The second biggest barrier identified by survey respondents was that applicants did not realise credit transfer is an available option. Within stakeholder discussions, there was almost universal agreement that the credit transfer process is not well advertised and is complex for students to understand. This was apparent in the map QAA published in 2024 and was corroborated by all aspects of this research.

This was also the area for which there was greatest enthusiasm to act. All providers who were engaged, even those already engaged in significant credit transfer activity, recognised that they could make the process easier for applicants. Because this focuses on the processes underpinning any policy rather than the policy itself, it enables providers to retain full autonomy of their credit transfer practice and therefore circumvents many of the cultural barriers inherent to increasing scale. It is unlikely to accelerate numbers of students enrolling via credit transfer beyond a provider's practical capabilities and supporting better informed and prepared applicants would inevitably decrease the burden on providers. It does not directly address the inherent strategic barriers, but as the least resource intensive option, requires the least investment. It may, however, enable a better understanding of the true demand in the student market which is currently difficult to decipher when the process is restrictive.

Options to improve the process for applicants include, but are not limited to:

1. **Embedding greater transparency and promotion of credit transfer** by including clearly signposted, accessible information in places applicants visit. In many cases, relevant information sits within policies or academic regulations where applicants cannot reasonably be expected to look. Including this information – or, at a minimum, signposting to it – on course pages would make this much more accessible. In addition to a provider's own website, this information could also be incorporated into the information shared with UCAS, which would additionally have the benefit of sharing with applicants **how** to apply for admission with credit transfer within the UCAS process.

2. **Standardising the language used to describe credit transfer processes for a student audience.** Because much of the information on the credit transfer process is written and held within academic policies and regulations, it is not written with a student audience in mind. It is consequently complex, and limits comprehension for one of its key stakeholders. In addition, greater consistency across the sector would enable easier comparison and allow applicants to make more informed decisions. [QAA Scotland's RPL Framework](#) includes a glossary developed with the sector that can be used by providers. Additionally, a template factsheet co-created with students, similar to that devised by The Open University, would support consistency and comprehension.

The Open University case study

Recognition of Prior Learning (RPL) at The Open University (OU) supports our mission to "be open to people, places, methods and ideas" and our core values of 'inclusivity and responsiveness'. With over 6000 students applying for credit transfer per year, we value RPL as a mechanism to promote lifelong learning and the role it can play in widening access to and through higher education. RPL is used as an umbrella term which encompasses the Recognition of Prior Certificated Learning through Credit Transfer, and the Recognition of Prior Experiential Learning, providing opportunity for learners to:

- enter a programme of study at a stage appropriate to their prior learning

- top up from another qualification to a degree

- return to learning after a period away

- transfer from another institution - allowing students who have faced challenges in their studies to complete a qualification or change to a different subject to what they previously studied.

The OU designs its qualifications to build in the ability for students to transfer credit.

The Open University case study

Qualification teams decide how much prior learning can be recognised against the credit requirements of the qualification and the currency of the prior learning, within the parameters of the RPL policy, and whether module or general credit exemption can be awarded. RPL is therefore considered at the design stage of a qualification.

The OU also encourages the use of precedent awards, a preapproved award of credit transfer for specified external qualifications. This makes credit transfer easier by eliminating the need for individual assessments of the same prior learning and ensuring equity of assessment.

The OU's approach recognises credit rather than just qualifications and provides the opportunity to recognise accredited learning from within or outside recognised qualification frameworks. Learners can apply to have their prior certificated learning assessed against the requirements of up to three named qualifications, and will, in addition to this, receive an assessment against the BA/BSc (Honours) Open degree. This provides the learner with options before they choose their preferred qualification and accept their credit transfer award.

The OU's RPL policy is operationalised centrally through a dedicated credit transfer team within the OU's Student Recruitment department, coordinating the work of the individual qualification teams who assess applications and make decisions around awarding credit. The presence of the credit transfer team enables the institution to work at scale for the administration of and recognition of credit and to garner a wealth of expertise in this area.

The OU'S approach has several benefits.

For learners, it provides choice and flexibility and enables recognition for smaller chunks of learning as well as incomplete stages of a qualification, that may have been undertaken outside formal education settings. The presence of the credit transfer team also provides students with a direct point of contact for their application.
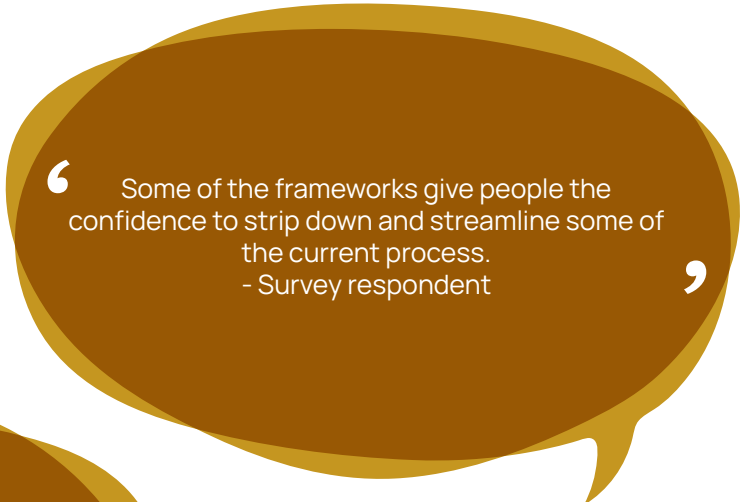
For the OU, our approach to RPL allows us to work at scale and be inclusive, viewing all recognised credit with equal merit. This is important in creating opportunities for progression from further education to higher education. We have formal progression agreements with 15 regional colleges in Scotland (known as "articulation agreements") and with all 6 further education colleges in Northern Ireland. The OU also has a growing number of formal agreements with further education colleges in England.

Improving credit transfer policies

Ensuring that applicants can access the information needed to make informed decisions is an important first step, but it inevitably raises the question: what do they find when they get there? While there is no one-size fits all approach, there are key foundational principles that can benefit the sector at large.

A recurrent theme in stakeholder discussions was the role that the external, sector-wide infrastructure and reference points had in easing the burden on providers, providing guidance and achieving some level of consistency. Suggestions included the UCAS admissions portal, Jisc's data services, UUK and GuildHE's Fair Admissions Code of Practice and the UK Quality Code, Credit Framework for England and Framework for Higher Education Qualifications.

> " Some of the frameworks give people the confidence to strip down and streamline some of the current process.
> - Survey respondent "

> " The carrot is the support offered to make it easy to develop a RPL process.
> - Survey respondent "

Options to improve credit transfer policies include, but are not limited to:

1. **Developing a sector-owned good practice framework** on the key principles of a good credit transfer policy, with QAA acting as custodian. This would draw on the Credit Framework, QAA Scotland's RPL Framework and the work of the Scottish Credit and Qualifications Framework. It would be co-developed with the sector to secure buy-in and ensure applicability and could be commissioned by the Department for Education to encourage take-up. Like other sector reference points, it would not be prescriptive but rather prompt institutions to consider how they can deliver best practice within their own context. QAA has recently funded a project led by Queen Mary, University of London which will develop a sector framework on lifelong learning.

2. **Actively engaging students** on the information they need to apply for credit transfer. A lot of the conversation about credit transfer and RPL is focused on influencing providers to change their behaviour, but it is student behaviour that will inevitably drive change in a marketised sector reliant on student numbers. Understanding what students want from this process and what will drive their behaviour is critical to putting students at the heart of the LLE.

3. **Exploring standard routes for sub-degree qualifications and sub-qualification learning.** The example of the University College of Estate Management (UCEM) demonstrates the effectiveness of standard routes that are automatically recognised for credit transfer. As smaller chunks of learning become more commonplace, it may become easier to identify and incorporate commonly utilised routes between institutions.

UCEM case study

The University College of Estate Management operate a standard exemptions approach for students with external cognate qualifications holding 120 or 200 Credits at undergraduate level. Each qualification is mapped to the specific undergraduate programme, and the list is reviewed and approved at the start of each academic year. We also adopt this approach for applicants transferring from our access module (20 credits) to the BSc programme. Other cognate study (full qualification and singular modules) is considered on a case-by-case basis by the programme leader and recognition of prior learning panel.

UCEM has chosen to take this approach as it provides the most consistent experience for the student. The qualifications we have chosen to standardised exemptions for are our most common so it means students will all receive the same assessment and RPL. With individual prior learning review this leads us open to discrepancies in RPL being offered between students in the same cohort on the same programme. Operationally, it's also a much more streamlined process for admissions officers to be able to confirm exemptions without the application having to go for further review.

Over the last 3 years, 430 applicants registered with exemptions. 353 were standard, so admissions could process straight away, and 77 were non-standard and needed to go through individual prior learning review.

For UCEM, this approach works as it means we have a documented framework that we can follow and refer back to that will cover a large proportion of our RPL population. We have found this consistent approach has worked in support of appeals and complaints as it is not a subjective decision that has been made but a group approach. It also allows for quicker turnaround times from application to offer which is a benefit to the applicant.

Delivering credit transfer at scale

The area where the greatest amount of reluctance exists, and the plethora of views grows even wider, is where such action moves beyond one institution. Engaging in a cross-institution, multi-institution or sector-wide initiative that creates a more coherent, system level approach to credit transfer would be the most transformative, but it would also require the biggest investment and, potentially, the biggest compromise from institutions and the sector's cultural and academic diversity.

The concept of establishing credit transfer pathways between institutions or across the sector encountered strategic, cultural *and* practical barriers. The level of investment required is not a priority for institutions and the current environment incentivises them to compete, rather than collaborate. Compromises would have to be made about autonomy and acknowledgement of credit from other institutions. While the practical barriers would be eased by a more coherent

system and the infrastructure necessary to facilitate it, it would be a large upfront investment at a time when bandwidth within the sector is limited.

However, progress in this respect aligns with broader trends within the sector in England and particularly the rest of the UK. As the conversation shifts more towards tertiary education and removing the barrier between higher and further education, easier movement between predominantly FE institutions and HE institutions would hasten this approach. It would also encourage greater local and regional cooperation, prevent duplication of provision, and enable more flexible skills pathways to develop. While changes on this scale inevitably take time, it would benefit the sector to proactively engage, particularly at a time where greater government investment is contingent on the sector better delivering on broader government objectives.

Degree apprenticeships demonstrate how you can deliver credit transfer at scale

Degree apprenticeships exemplify how RPL can be embedded as a system-level requirement. Before starting an apprenticeship, an apprentice's prior learning and experience must be assessed. Crucially, this assessment is an "eligible cost" and can be included in the apprenticeship's funding.

The process is discretionary, but must include the following stages:

1. Checking the individual's personal learning record where applicable;

2. Conducting a "skills scan" against the apprenticeship standard's Knowledge, Skills and Behaviours;

3. Account for T-level or skills bootcamps progression profiles.

After the assessment, the remaining training must cover 12 months to qualify for apprenticeship funding.

Apprenticeship funding regulations clearly state that providers must not use funds to pay for training in Knowledge, Skills, and Behaviours already attained by the apprentice. If this occurs, the Department for Education will take action to recover the apprenticeship funding.

Apprentices made up 5% of undergraduate entrants in 2022-23 (7% when excluding providers without apprenticeship provision). Although the proportion varies across providers, this represents a significant number of students undergoing an existing, systemic RPL process (with apprentice numbers likely higher than students enrolling with prior credit).

> For degree apprenticeship programmes it is a regulated requirement that all prospective apprentices are initially assessed to determine their prior learning before they start their programme of learning. This has been in place since the introduction of degree apprenticeships and has not constituted any challenge to institutional autonomy, which is often used as an alibi for HE providers not fairly recognising prior learning.
> - Survey respondent

The role of articulation agreements and partnerships

Cross-institution credit transfer already occurs through articulation agreements and progression partnership agreements.

Articulation agreements allow students to earn credit through a specific program that is recognised by a partner institution. This enables students to gain advanced standing (enrol at a later stage) at the partner institution, with their existing credit automatically recognized.

Progression agreements allow students to earn an award (typically at a sub-degree level) or complete early stages of an award, then progress to a program at a partner institution to complete a higher-level award. These arrangements are often formal, with transfers occurring at designated points during the program.

Both mechanisms are widely used across the sector and demonstrate how providers can collaborate to create pathways through tertiary education, while maintaining institutional autonomy and distinct offerings at each provider.

Mechanisms to deliver credit transfer at scale include, but are not limited to:

1. **Exploring learnings from articulation agreements, existing regional consortiums and the opportunities for potential future ones.** Regional consortiums have been the most utilised mechanism for credit transfer at greater scale over the past two decades, although with mixed success. The Midlands Credit Compass has not led to widespread transfer between institutions in the county, and the Northern Universities Consortium (NUCCAT) has largely ceased to operate[2], although the newly announced initiative of Universities for North East England suggests regional conversations are very much alive within the sector. Some consortiums have operated at a subject or faculty level rather than institutional, and these have also had some success. The most prominent of these consortiums is SEEC, which now operates as a network within the University Alliance for Lifelong Learning. SEEC's work includes the credit level descriptors, which is a tangible example of how these consortium approaches can ease transfer and develop broader learnings for the sector. But there has been little evaluation of what works in this space and why, which would strengthen future practice.

2. **Develop a best practice threshold or charter that providers can sign-up to.** While sharing good practices helps providers develop their policies, it does not hold them accountable or highlight which providers have implemented the shared practices. A threshold or charter would maintain sector ownership of these practices while providing a clearer accountability mechanism. The QAA's existing Academic Integrity Charter sets a baseline for academic integrity and signing up represents an institutional pledge to uphold its principles and commitments. Over 200 institutions have signed up. A similar mechanism could be developed for credit transfer—or more broadly for lifelong learning initiatives—to encourage action.

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2 NUCCAT has no live website to link to.

3. **Explore potential regulatory action.** The crowded regulatory landscape in higher education means any new regulation must be carefully considered, and credit transfer is unlikely to meet the threshold for additional regulation. However, existing mechanisms, such as the Access and Participation Plan process, could incorporate light-touch oversight of this process. Outside England, credit transfer and recognition of prior learning are viewed as widening participation initiatives and critical to lifelong learning. But this practice is missing from the English sector's discussions of access and participation, and access and participation mechanisms are often missing from conversations on credit transfer. Incorporating this into Access and Participation Plans would create a formal accountability mechanism without significantly increasing regulatory burden.

SCQF case study

The SCQF Partnership (SCQFP) is the custodian of the Scottish Credit and Qualifications Framework and sets out the principles of RPL for Scotland in the SCQF Handbook which includes credit transfer. These are used to develop RPL and credit transfer policies and processes by institutions and other organisations in Scotland including any organisation which has the authority to allocate SCQF levels and credit to qualifications.

The SCQFP also acts as an ambassador for RPL and credit transfer in Scotland promoting its use across all sectors through developing workshops, capacity building activities, sharing good practice events as well as a range of resources for different user groups.

The recently created SCQF RPL Hub provides information, case studies and a guidance tool on RPL and credit transfer for learners, educators and employers.

There is currently no national strategy for RPL and credit transfer in Scotland or 'learner entitlement to RPL'. Each institution sets its own policies and admission requirements, resulting in many variations of policy and practice across different institutions and organisations. QAA Scotland has also developed a Framework for RPL for the tertiary sector in Scotland providing guidance for institutions which references the SCQF definition of RPL.

However, RPL, as a process, is well established in Scotland with many examples on its use for access to further and higher study and/or to employment and other career opportunities. Recent Scottish Government and Independent Reviews of the education and skills system in Scotland have highlighted the use of RPL and credit transfer to avoid repetition of learning already undertaken, citing potential benefits to the economy. In 2025 Scottish Government has commenced work with SCQFP's support to explore the benefits and challenges of a national RPL strategy.

One well-established route utilising credit transfer in Scotland is SQA Higher National Certificates and Diplomas (vocational qualifications normally studied at college) giving access to university degree programmes, normally to either the second or third year of the programme respectively. This route gives the potential for learners to move between institutions and programmes without repeating learning. In Scotland, this process is sometimes referred to as 'articulation'. The SCQF website has examples of this in action.

Next steps

The LLE cannot achieve its potential without greater use of credit transfer. However, the research indicates that significant external motivation—such as clear government ambitions and a fully operational LLE—is needed to encourage and incentivize the sector to invest in this change. Currently, the scope of the government's ambition for the LLE and lifelong learning, and their long-term plans to facilitate that, remains unclear, creating uncertainty about how to integrate them into the sector's future. Without this clarity, the existing cultural and strategic barriers are unlikely to shift enough to create meaningful change.

There are, however, straightforward steps the sector can take to improve in this area. Students interested in the credit transfer process are often left unsupported in the current system, but providers can take tangible actions to ease this burden. As competition for students increases, and with the LLE allowing students to transfer their tuition fees in 30-credit intervals, the sector may need to act sooner than anticipated.

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