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Skills mismatch or skills mishmash? Problem representation in England's
Lifelong Loan Entitlement policy

Abstract

The valorisation of skills in English higher education policy making is a longstanding refrain, informing both rhetoric and investment from government and shaping university behaviour. Critiques of the 'skills agenda' are equally established, on grounds of its contested evidence base, manner of implementation and even its very definition. This paper draws on Bacchi's 'What is the Problem Represented to Be?' (WPR) approach (Bacchi, 2012a; Bacchi and Goodwin, 2016) to examine how the UK Department for Education's nascent Lifelong Loan Entitlement (LLE) policy represents, and therefore in Bacchi's sense *produces*, problems in the English higher education system. Through its WPR analysis of a significant contemporary shift in the English funding system, this paper demonstrates how the LLE policy replicates but also extends certain key features of the skills agenda and the dominant presuppositions of current English higher education policy making.

Key words: skills agenda, Lifelong Loan Entitlement, WPR, critical policy analysis

Introduction

The importance of skills is a common theme in contemporary discourse and policy-making around education and employment in England. We see the concept of ‘skill’ put front and centre in education media, policy discussion, ministerial speeches and university strategy alike. Concurrently, the *purpose* of higher education is increasingly being framed through the lens of the skills that graduates must emerge with (Holmes, 2013). Regular surveys and studies – conducted by companies, government and training providers – suggest that employers are not satisfied with the skills of incoming graduate hires (Moore and Morton, 2017; Tomlinson, 2021), findings which are then often used to urge universities to make their curricula more focused on employment-readiness, serving as a bridge between student and industry; Moore and Morton label this the ‘skills gap’ model of higher education (2017, 593).

Indeed, the idea that there is a pervasive mismatch between the skills the economy requires and the skills that students are acquiring is central to what is more widely referred to as the *skills agenda* (Tran, 2019, 160). Tomlinson describes the logic of the skills agenda as follows, noting that universities have done much to follow and promote the valorisation of teaching skills with employment in mind:

‘If universities are able to decode the kinds of skills required by employers and build these formally into provision, this will go some way into further enhancing graduates’ attractiveness to employers. This has been avidly embraced by the university sector which has generated a vast skills lexicon and

seen an upsurge in initiatives to boost graduates' skills development'

(Tomlinson, 2021, 136-137).

The skills agenda leads governments to encourage universities to 'develop more outward looking, state-regarding purpose that ties, explicitly, to the nation's wider economic and social goals' (Saunders and Angharad, 2011, 466) – founded on the assumption that this is not currently being done successfully.

However, this idea that universities should be doing more to address skills gaps has been the subject of critiques from a variety of angles. First, the prevalence of survey data diagnosing widespread employer dissatisfaction with graduate skills has been criticized as lacking in rigour – Tomlinson refers to such research as composed of 'descriptive indicators of what employers would like more of' (2021, 148), and Holmes contends that it focuses too much on the *perceptions* of respondents (2013, 546). Keep also emphasizes that blunt pronouncements about what employers need can be misleading, as employers have 'varied and competing needs' (2012, 359) and identifying the 'voice' of employers in a meaningful way is problematic.

The question of *what* skills are needed by graduates is also a contentious one, and the lack of conceptual clarity has been much remarked (Barrie, 2005; Green et al, 2009). Commentators have taken issue with the idea that there are transferable skills which exist independently of disciplinary knowledge (Wingate, 2007) or which can be transferred between disciplines unproblematically (Wheeler et al, 2022) or between different geographical contexts (Saunders and Angharad, 2011). Suleman (2018) observes a proliferation of different lists of 'employability skills' in university education, becoming ever more fine-grained but with little consensus as to exactly what skills are required by graduates. There is also the ontological

question of what is really meant by a ‘skill’, which we shall return to over the course of this paper along with further exegesis of critiques of the skills agenda.

Given the ‘extraordinary policy enthusiasm for skills’ in contemporary education policy (Wheelahan et al, 2022, 475) allied with the widely referenced shortages of skills – or skills gap, or mismatch, or crisis – which are said to leave the UK economy uncompetitive and poorly future-proofed, and given also the repeated questioning of the logic underlying the skills agenda, it is valuable to consider a concrete example of current higher education policy-making with regard to how ‘skills’ are framed therein. Carol Bacchi’s ‘What is the Problem Represented to Be?’ approach will provide a framework for analysis, representing as it does a powerful tool for policy areas where certain narratives of ‘crisis’ have gained widespread acceptance (Ideland et al, 2020).

Our research question is then as follows: what is the problem represented to be in current English higher education skills policy, and what are the consequences of this problem representation? The language of ‘problem representation’ and the potential consequences of how policy frames problems follow from Bacchi’s approach, and will be defined more rigorously in the next section. We note also that education policy in the UK is devolved to the constituent nations, and our enquiry here will focus primarily on the English system.

Critical policy analysis and Bacchi’s WPR approach

Policy sciences as a discipline has always been problem-oriented (De Leon and Vogenbeck, 2006), and what might be called the ‘rational’ approach to policy analysis is founded on the assumption that policy-making follows from the recognition of a policy problem (Jann and Wegrich, 2006, 45). This understanding of policy as a process of problem-solving led to the

development, oft-refined, of the idea of a ‘policy cycle’, wherein an agenda is set according to the problem or problems which need addressing, and then a policy is formulated, implemented and evaluated – this cycle is variously characterized as a linear or cyclical process.

For our purposes, we would note here that the ‘skills agenda’ in English education policy is not by itself a single instance of policy which can be said to follow a cycle but rather, as we will see in more detail when tracing its genealogy in a later section of this paper, a recurrent theme and set of assumptions in policy-making over several decades. However, we will later consider a concrete instance of policy which, it will be argued, forms the latest instance of this broader agenda.

This is one reason why investigating the skills agenda through the lens of a policy cycle or cycles is problematic, and there is also the question of *nature* of the problem which the skills agenda is responding to, and whether it can be neatly identified. We have already referenced critiques of the evidence for a ‘gap’ in skill levels across the working population, and to this we can add the impression, among certain commentators at least, that the idea of ‘skills’ has become detached from clear definition and taken on a life of its own. Keep and Mayhew (2014) characterize solving employment problems with education reform as a ‘silver bullet’ – an object of faith among policy-makers, a policy panacea – and Wheelahan et al describe the role of skills in creating economic growth as a ‘doxa’ or ‘taken-for-granted and unquestioned truth’ (Wheelahan et al, 2022, 475). The exact nature of the problem which the skills agenda is ‘solving’ remains a question worthy of analysis, and as such we will draw on a more ‘critical’ strand of policy analysis in attempting to answer our research question.

Ball’s distinction between ‘policy as text’ and ‘policy as discourse’ is useful here. In the former, policy documents are understood as ‘textual interventions into practice’ (Ball, 1993,

12) wherein policy actors ‘are making meaning, being influential, contesting, constructing responses, dealing with contradictions, attempting representations of policy’ (ibid, 14).

Through this lens, we analyse policy as it is negotiated in practice, with all the contestation this entails. Policy as discourse, however, considers how policy leads to the exercise of power through the *production* of truth and knowledge (ibid, 14), drawing on the ideas of Michel Foucault. Analysis through this lens considers how policy *creates* certain social structures (Appleby and Bathmaker, 2006, 196).

The work of Carol Bacchi (Bacchi, 2012a; Bacchi and Goodwin, 2016) builds on Ball’s framework, emphasising the ‘constitutive, or productive, nature of policies’ (2016, 8) in contrast to what Bacchi labels as the ‘rationalist’ approach to policy studies, discussed above, which assumes a given set of problems and then considers how to achieve certain objectives (ibid, p.58). For Bacchi, policies *create* problems, in the sense that ‘what we propose to do about something indicates what we think needs to change and hence what we think the “problem” is’ (ibid, 16) – and further to this, policy framings of problems have real-world effects. Bacchi is interested in ‘how policy “problems” are framed or represented, and the social and political implications of this’ (Southgate and Bennett, 2014, 25). This is the meaning of *problem representation* that appears in our research question.

The ‘What is the Problem Represented to Be?’ approach (hereafter WPR) which Bacchi espouses is a six-step unpicking of how problems are represented in policy-making, starting from a policy proposal and then ‘working backwards’ to understand how a problem is being ‘produced’ (Bacchi, 2012b, 4). It is concerned with the ‘deep conceptual premises’ on which policies are built (Tawell and McCluskey, 2022, 137) and mindful of the fact that ‘dominant discourses can naturalize certain ideological assumptions as common sense’ (Lomer, 2017, 86).

The six steps in a WPR analysis are based on six questions about the representation of a particular problem in policy:

- ‘1. What’s the problem [...] represented to be in a specific policy or policies?
2. What deep-seated presuppositions or assumptions underlie this representation of the “problem” (*problem representation*)?
3. How has this representation of the “problem” come about?
4. What is left unproblematic in this problem representation? Where are the silences? Can the “problem” be conceptualized differently?
5. What effects (discursive, subjectification, lived) are produced by this representation of the “problem”?
6. How and where has this representation of the “problem” been produced, disseminated and defended? How has it been and/or how can it be disrupted and replaced?’ (Bacchi and Goodwin, 2016, 20).

As an example in the field of education research, Tawell and McCluskey (2022) use WPR to consider school exclusion policies in England and Scotland, and identify that a key assumption behind the policy in England is that individual children are responsible for their own behaviour, that pedagogical considerations are ignored in policy formulation, and that the effects of English policy are both symbolic – children being seen as more dangerous – and concrete, in terms of a higher number of school exclusions than in Scotland. The paper also serves as a critical appraisal of WPR as a method, concluding that it is an effective way to ‘render visible some key aspects of policy which had previously been submerged or obscured’ (ibid, 147).

As well as in education research more broadly (other recent examples include Mausethagen, 2013; Ideland et al, 2020; Røise, 2020; Liu and Hardy, 2021), WPR is increasingly being used in research specifically around higher education policies and systems, in a diverse range of areas and locations: widening participation (Southgate and Bennett, 2014; Blackmore, Hutchison and Keary, 2017; Jones, 2021), the meaning of “education” in the European Higher Education Area (Custers and Magalhães, 2023), entrepreneurship education in Sweden (Hägg and Schölin, 2018), academic workload planning in Australia (Crisp, 2022), gender inequality in Ethiopian universities (Molla, 2013), UK international student recruitment (Lomer, 2017), student views of employability (Reid and Kelestyn, 2022), professional development for sessional staff (Hattam and Weiler, 2022), skills gaps in the Canadian post-compulsory sector (Viccko et al, 2019), Chinese world-class university policies (Liu and Hardy, 2021) and Chinese higher education internationalisation (Zhou et al, 2022). As the above survey of references shows, use of WPR in higher education studies has become increasingly common in the last three years. In the subsequent section, we will outline and justify the object of study for our line of investigation.

The Lifelong Loan Entitlement

The Lifelong Loan Entitlement (LLE) is a policy initiative proposed by the current UK government in 2020, which would give individuals in England a loan entitlement for four years of post-compulsory education, for both modular and full-time study, to be used over one’s lifetime (Department for Education, 2022a). It is intended to unite the student finance available for both further and higher education, which are currently two entirely distinct systems, and to be used therefore for any higher technical or degree level study (levels 4 to 6 in the English system, corresponding to the three years of a bachelor’s degree, but not

postgraduate level), in line with its intention to provide ‘greater access to shorter higher education courses for adults who do not have a degree’ (Freedman, 2022, 15). Students (including those who already have a three-year degree) would be able to get a tuition fee loan on a per module basis, and in this way potentially study many modules at many different institutions in a non-time limited way. This is a radical departure from the current system in which students can only receive an undergraduate student loan for three or four consecutive years’ full-time study (or pro-rata for part-time but still successive and at a fixed frequency). It could also mean that students are funded for a mixture of higher and further education courses, something prohibited under the current system.

The LLE was originally introduced as a central part of the Skills and Post-16 Education Bill, which passed into law in 2022, but the elements of the Bill (now Act) concerning the implementation of the LLE were held back to be legislated for separately (Education Journal, 2022). Nonetheless, the target date of introducing the LLE by 2025 has been maintained (Department for Education, 2022a), and elements of the groundwork needed for the legislation are currently undergoing pilots (Office for Students, 2021).

As of January 2023 much of the detail of the policy has not yet been announced (Freedman, 2022; Kernohan, 2022), including how the loans will be managed, what provision for credit transfer between institutions will be legislated for, and to what extent maintenance support for students will be on offer (as opposed to loans simply covering tuition fees). A consultation into the implementation of the proposal closed in May 2022, and the Department for Education has not yet responded to the submissions it received (Department for Education, 2022a). In terms of the ‘policy cycle’ model, the LLE is very much still within the policy formulation stage, in which we see a ‘more or less informal process of negotiated policy formation, with ministerial departments (and the units within the departments),

organized interest groups and, depending on the political system, elected members of parliaments and their associates as major players' (Jann and Wegrich, 2006, 49).

The LLE as mentioned above forms an explicit part of the government's policy on skills, and is referred to as 'responding to skills gaps' in official publications (Office for Students, 2021). While the LLE is still a nascent policy proposal, it is of course not possible to evaluate its successes (or lack thereof) in terms of addressing the problems it seeks to respond to, as rationalist policy analysis would aim to do. But as a subject for critical policy analysis, with the aim of answering our research question about how current English higher education skills policy represents (and therefore in Bacchi's sense *produces*) problems, it is highly suitable for two reasons: first, that it is a new policy which has not yet been critically considered in the academic literature, which gives added importance to analysing how it does or does not fit in with the broader skills agenda; second, due to its widely heralded importance as a transformative policy.

There is a widespread consensus that the LLE when implemented will represent a significant change in the English higher education policy landscape, by way of uncoupling the ability to access student loans from the commitment to study an entire degree, and through the policy's bringing together of the currently highly separated academic and vocational tertiary education systems. Both in the specialist media and in higher education policy commentary the importance of the LLE has been repeatedly stressed – it is presented as 'a radical reform of the country's narrow and inflexible higher education system' (Rees, 2022), one that 'could trigger exciting, radical and positive change' (Bell, 2022). Sector representative organisations and arms-length bodies have also recognized its significance, with Universities UK, the main advocacy body for UK higher education institutions, calling the LLE 'a welcome and exciting programme of reform' (Universities UK, 2022) and the Student Loans Company, the UK

body responsible for disbursing student fees and maintenance payments, framing the LLE as having the potential to ‘enable radical change in culture amongst students, providers and employers’ (Davenport, 2022).

In terms of the LLE policy documents available for analysis, we will consider the two most substantial and recent texts available: the 58-page consultation document published by the Department of Education in February 2022 (Department for Education, 2022b) which set out the ‘design principles’ of the LLE (Education Journal, 2022), and its accompanying 25-page impact assessment (Department for Education, 2022c) which puts forward a rationale for the policy and suggests its intended effects on different groups, primarily limited in the first instance to the policy’s impact on businesses (ibid, 4). These two texts will be analysed thematically for the ‘problem representations’ they engender, in accordance with the WPR approach to policy texts described in more detail below.

Methodology

WPR has been described as both method and methodology (Tawell and McCluskey, 2022, p.139), in that it provides a theoretical framework as well as a concrete process of approaching and investigating texts. Though WPR as an approach has been applied to texts including interview transcripts (Hattam and Weiler, 2022; Reid and Kelestyn, 2022) or existing academic literature on a topic (Crisp, 2022), its primary use is on policy documents. This is generally to interpret and inform the results of a process of thematic analysis (Southgate and Bennett, 2014; Lomer, 2017; Jones, 2021), or what Ideland et al refer to as ‘reading’ the problem representation(s) identified in the policy using WPR (Ideland et al, 2020). That is to say, the approach to WPR taken here and elsewhere is to begin with an

inductive thematic construction of how the texts ‘represent’ problems, and then once this has been achieved to apply Bacchi’s six questions to the problem themes.

In our identification of the problem representations in the LLE policy documents selected, we follow the six phases of thematic analysis in Braun and Clarke (2006), namely familiarising oneself with the data, generating initial codes, searching for themes, reviewing themes, defining and naming themes, and reporting. Extracts are coded where relevant to our research question (Lomer, 2017, 92) – in particular, where they function as ‘problem representation’ in Bacchi’s sense, either via direct reference to problems or in proposing policy solutions which therefore implicitly contain problem representations. In moving from searching for themes to reviewing and defining themes, the two stage process of open coding followed by axial coding is employed, whereby the text is first ‘read reflectively to identify relevant categories’ which are then ‘refined, developed and related or interconnected’ (Gibbs, 2007, 49). NVivo is used to facilitate the coding, but automatic coding is not employed.

As detailed above, the WPR approach consists of six steps, each in the form of a question – the first describing the problem representations which were arrived at through thematic analysis, and the subsequent steps ‘probing’ the uncovered problem representations to better understand the assumptions and effects of the policy (Tawell and McCluskey, 2022). It has become common practice to integrate WPR into analysis rather than treating each question in turn (e.g. Zhou et al 2022; Custers and Magalhães, 2023), or to omit certain steps as less relevant to one’s research question (Røise, 2020; Reid and Kelestyn, 2022; Tawell and McCluskey, 2022). We will concentrate primarily on the first five WPR steps, which identify and analyse the problem representation and its effects, with the sixth (analysis of where the problem is produced, as well as how it can be disrupted) treated in passing as less central to our research question.

Analysis

What is the problem represented to be in the LLE?

The first WPR step is to clarify ‘the implicit problem representation within a specific policy or policy proposal’ (Bacchi, 2012a, 22) – in our context, this means identifying the problem or problems which the LLE consultation documents purport to address. As outlined above, a process of thematic analysis was used, and the most prevalent theme that arose was that of *flexibility*. The LLE is positioned as a ‘more flexible, efficient and streamlined funding system across higher education levels’ (Department for Education, 2022b, 4), one that will ‘make it easier for adults and young people to study more flexibly – allowing them to space out their studies, transfer credits between providers, and take up more part-time or modular study’ (ibid, 23). We repeatedly hear that the student funding system is to become more flexible, and this in turn will make learning more flexible – allowing more part time study, study at different ages, and study at different institutions. The clear ‘problem representation’ contained within the policy documents is that *current higher (and further) education in England is not flexible enough*, in terms of course choice, in terms of study modes, and also in terms of its interplay with the labour market: ‘we also need a flexible and responsive skills system that can pivot to changing employers’ needs’ (ibid, 13). Thematic analysis shows that this is the principal problem for which the LLE is presented as a solution.

Two other problem representations are less prominent, though still important, within the texts: first, the problem that the current loan and bursary systems available across the breadth of further and higher education in England are confusing to students, which ‘both restricts and distorts choice’ (Department for Education, 2022c, 12); second, that a supposed binary

divide between technical and academic qualifications is encouraging students to take university degrees ‘which may not be best aligned to their needs or that of the economy’ (ibid, 11). While both of these problem representations could be further explored using the subsequent WPR steps, the problem of lacking a flexible ‘skills system’ is by far the most central to the two consultation documents, and it is this particular problem representation which we will now apply the subsequent WPR steps to.

What presuppositions or assumptions underlie this problem representation?

The second step of WPR involves reflection on the *underlying premises* of the claim that something is a problem to be addressed by policy (Bacchi, 2012a, 22), with the caveat that, as Bacchi and Goodwin note, ‘we are seeking the meanings within the policy, program or technical instrument, not in the heads of the social actors’ (2016, 21). A straightforward example of this can be found in the repeated proposal within the texts to the effect that ‘learners need to access courses in a more flexible way, to fit study around work, family and personal commitments in response to employers’ needs’ (Department for Education, 2022b, 9). In the context of the LLE providing more tuition and maintenance loan funding for part-time students and for individual modules, the assumption here is that many students (especially those without additional financial support from their families) will need to work at the same time as studying in order to afford further or higher education – that is, that student maintenance loans (or grants) will not cover the full living expenses of many entering higher education. Equally, the regular mentions of family commitments presuppose that childcare – either at the educational institution, or from other public or private source – will not be available or affordable enough to allow those with caring responsibilities to access university study on a full-time basis, for example.

However, the lack of flexible study options is not the only way in which flexibility is represented as a problem in the LLE policy documents. It is not only how students learn that needs to become more flexible, but also the graduate workers that come out of the education system – there is a growing need for a ‘flexible and adaptable workforce’ (Department for Education, 2022b, 20), which can respond to changing skills needs and employment patterns in the future economy. The assumptions underlying this aspect of the problem are manifold: for example, that the current higher education system is not achieving this, leaving widespread ‘skills gaps’ – a contested point, as discussed in the introduction to this paper – or that future labour markets will be increasingly insecure and characterized by short-term, unpredictable employment. Another assumption, of particular importance for our research question, is that a worker who does not have the skills needed to find or continue employment is responsible for ‘reskilling’ (a commonly used phrase in the consultation) through paying for additional education financed by student loan debt.

While the idea of flexibility appears regularly in the consultation documents as a free-standing concept – that is, where the LLE is conceptualized as promoting flexibility *in a general sense* – the process of thematic analysis showed that there are different aspects to flexibility which fall under this wider parent category, such as flexibility of study mode and flexibility of workers in the labour market. It also demonstrates that there is a further assumption being made in representing the current higher education system as problematically inflexible – namely, that *studying in a flexible way prepares students to work in a flexible way*: ‘there is a lack of flexible learning offers available for adults [which] hinders career and wage progression and reduces individuals’ ability to respond to changes in the labour market’ (Department for Education, 2022b, 17). The LLE policy as currently presented collapses different aspects of flexibility into a broader whole and present them as causally connected – WPR allows us to unpick this process through considering the

genealogy of the problem representation and the alternatives (or ‘silences’) to this representation, which we will turn to now.

How has this representation of the problem come about?

The third WPR step involves ‘consideration of the contingent practices and processes through which this understanding of the “problem” has emerged’ (Bacchi, 2012a, 22), with emphasis on the fact that they are ‘contingent’, rather than necessary. Here we will focus primarily on the genealogy of the problem as it relates to our research question and English higher education’s ‘skills agenda’; however, there would be a great deal of scope for further exploration of, for example, how part-time undergraduate study has declined in England (Halfon, 2022), and the contribution to this of reforms to student finance in England, beginning in 2010 and culminating with the abolition of maintenance grants in 2015 (Hillman, 2013; House of Commons Library, 2017). Equally, the question of how policy has framed and impacted on the experiences of students with caring responsibilities could be further explored using the subsequent WPR steps, but for our purposes this is not directly aligned with the research question of this paper.

Turning to the history of how the problem of ‘flexibility’ has developed in post-compulsory education – and higher education particularly – it should first be remarked that the connection between flexible study and future flexibility in employment is not a new one. More than two decades ago, commentators were endorsing the need for higher education to become more flexible: ‘flexibility in the contemporary workplace is forcing a mirroring flexibility in the provision of education’ (Edwards and Usher, 1998, 91). Cloonan observes a ‘double impact’ of flexibility on universities, noting that higher education is being instructed to ‘serve the

flexible economy and in order to do so it must in itself become more flexible' (2004, 181).

More recently, various authors have made the connection between calls for greater flexibility in higher education and a graduate labour market which is more precarious, less well-regulated and more subject to rapid changes (Flannery and McGarr, 2014; Ortega, 2017; Kornelakis and Petrakaki, 2020; Wheelahan and Moodie, 2021).

The history of the assumption that problems with post-compulsory education are creating skill gaps – a central tenet of the skills agenda, as discussed in the introduction – can also be traced through various cycles of policy under successive British governments. It would be no exaggeration to say that past decades have seen initiative after initiative aimed at increasing the nation's skills (we will put in parenthesis for now exactly what is meant by this). The Leitch review, commissioned by the UK government in 2004 with a mandate to 'examine the UK's optimal skills mix' (Leitch, 2006, 6), concluded that by 2020 skill demand in the British economy would have grown at every level (Wolf, 2007), and that the government should target 'raising its global position to within the top eight countries in the world, at every skill level' (Helyer, 2011, 99). Further back, the 2001 *Skills for Life* basic skills strategy for England put a 'price tag' on skills shortages of £10bn cost to the economy per year (Appleby and Bathmaker, 2006, 709). As Keep and Mayhew analyse, the central presumption in the skills agenda has been that problems with and in the labour market can be fixed with the 'silver bullet' of education reform, despite companies increasingly structuring their production processes so as to minimize skills needs across their workforce (2014, 770), with a corresponding diminishing investment by employers in training (House of Commons Public Accounts Committee, 2022, 13). Tomlinson (2021) argues that a focus on 'skills enhancement' within university education is a corollary of this.

Both the skills agenda and the idea that higher education needs to become more flexible (and produce more graduates better suited for flexibility in the labour market) are, then, problem representations with a long-standing history rooted in policy development – or, in Bacchi’s sense, *contingent* on particular policy agendas and wider social discourses. Wheelahan et al suggest that the emphasis in education policy-making on the rapid, demand-led acquisition of discrete skills is a more recent phenomenon, one in which ‘economic productivity is increased not by education in general, but by the development of specific skills’ (Wheelahan, Moodie and Doughney, 2022, 479). WPR analysis of the LLE proposals finds evidence that this particular policy is an instance of this phenomenon, whereby greater flexibility is needed in higher education in order to allow for the quick ‘upskilling’ that the economy is said to increasingly need.

Can the problem be conceptualized differently?

The fourth step of WPR analysis is to consider different potential conceptualisations of the problem, building on what has been identified as contingent in its framing. Bacchi characterizes these alternative ways of understanding as ‘gaps’ or ‘silences’ in a problem representation (Bacchi, 2012a, 22), as policy is ‘a site for the interaction of language and power to shape, codify and limit potential imaginaries and, crucially, social representations’ (Lomer, 2017, 10).

The LLE consultation documents call for ‘a real shift in how, what, and when people study’ (Department for Education, 2022b, 18), but the process of thematic analysis showed that the question of *what* people study is given much less attention than the questions of when and how learning is conducted. While part-time study, study at different points in one’s life, study

at a range of different institutions, and studying at different levels are all consistently put forward in the LLE as part of its ‘solution’, the matter of what subjects and what subject knowledge is necessary are generally excluded from its problem representation. There are occasional references to certain sectors said to be experiencing shortages – engineering, hospitality, ‘net zero’ – but no sustained set of principles for ensuring that students study in these areas (or are given the skills required to progress to work in these areas); this can be contrasted with, for example, the large amount of attention paid to how ‘credit transfer’ can successfully allow students to receive accreditation for modules and short programmes of study at a range of institutions.

In representing higher education’s lack of flexibility as a problem, one that leads to inflexible graduates and an unresponsive ‘skills system’, an alternative conceptualisation could be to promote through funding or regulation particular cognitive skills or graduate attributes which will give students the intellectual dexterity required to navigate a changing labour market, or to create mechanisms for greater interdisciplinarity or multi-disciplinarity in higher education. We might also expect to see policy formulation which aims at ensuring that learners are directed towards certain subject areas facing particularly urgent skills shortages; rather, the overarching presupposition of the LLE is that the market mechanisms of ‘making it easier for students to navigate the options available’ (Department for Education, 2022b, 27) and provision for students to more quickly access funding for further study will suffice to fill gaps in workforce expertise.

But our analysis suggests that these alternative conceptualisations would not mesh well with the wider assumption in English higher education’s skills agenda that success in the labour market is a matter of individual responsibility, rather than the responsibility of employers or the government, whose role should be limited to providing loan funding for citizens to access

new education as and when required. Keep (2012) concludes that industrial policy is needed to solve problems of supply and demand for skills, rather than education reform alone, but this is a notable silence within the LLE. We will consider the consequences of this problem representation in more depth in the next section.

What effects are produced by this problem representation?

The fifth step of WPR turns to the *effects* of how policy frames problems, which Bacchi categorizes into three types: discursive effects, subjectification, and lived effects, or more precisely ‘how identified problem representations limit what can be talked about as relevant [discursive effects], shape people’s understandings of themselves and the issues [subjectification], and impact materially on people’s lives [lived effects]’ (Bacchi, 2012a, 22). We have suggested that the main problem representation of the LLE for the purposes of our research question is that English higher education is *not flexible enough*, both in terms of how students can access courses, and in terms of the flexibility graduates of the system possess in responding to fast-changing skill needs in the economy.

In terms of ‘discursive effects’ – how limits are set on what can be said (and thought) – we can identify this policy’s contribution to a wider discourse, characterized by Marginson (2019) as a modern ‘social imaginary’, in which education leads to work which leads to earnings, a process which ignores, for example, the demonstrated connection between parental wealth and earnings. This reinforces the assumption that ‘what happens in workplaces and [...] one’s progression is a consequence of individual efforts rather than of the interplay between individuals and gendered, racialized and hierarchical social structures and power relations’ (Wheelahen et al, 2022, 486).

We can also see, in the LLE's framing of flexible education as being needed to foster the quick acquisition of skills, a discursive effect of promoting the idea that a skill is something that can be straightforwardly acquired and used. Wider critiques of the skills agenda have often focused their attention on this conceptualisation: Green et al conclude that skills develop in conjunction with one another, rather than separately (Green et al, 2009), and Saunders and Angharad argue that 'skill' is a 'rich word and [...] is far from stable over space and time' and that the term 'embraces a set of subtle practices and degrees of engagement' (2011, 473). Others have made the points that skills are 'dynamic', accumulating and deepening throughout one's professional life (Sgobbi and Suleman, 2013), and that research evidence demonstrates that skills are driven by context, 'related to specific demand-based workplace factors and situated in intricate work processes' (Tomlinson, 2021, 148-149). However, the more simplistic skills discourse within the LLE corresponds with what Wheelahan et al label the 'skills fetish' in contemporary education policy, whereby 'policies *reify* skills and treat them as divisible, additive, tangible or concrete entities' (Wheelahan et al, 2022, 486, emphasis added).

Seen through this lens, the LLE policy promotes a vision of skills as an investment, similar in nature to a consumer good, which brings benefits to the individual. The discursive effects here are to limit the value of higher education, and education more broadly, to private gain, and to discourage consideration of education as a public good. The LLE's impact assessment suggests that falling loan outlay if the LLE discourages individuals from taking longer programmes of study is a net benefit to the government (Department for Education, 2022c, 17), reflecting the narrow conception of the benefit that higher education brings – even wider economic benefits such as increased tax receipts or economic growth are not positioned within the frame of reference.

As outlined above, Bacchi's WPR approach also calls for consideration of the 'subjectification effects' that follow from the discourses produced or contributed to by policy, as well as the 'lived effects' which see people's lives being shaped by how policy represents reality. This follows from Bacchi's Foucauldian understanding of power, which is seen as exercised through production of 'truth' and 'knowledge' through discourse (Ball, 1993, 12), and means that policy shapes 'what it is possible for people to become, illustrating how power is a productive force' (Bacchi and Goodwin, 2016, 50), one that both creates 'subjects' and impacts their experiences.

Among the most tangible effects of framing skills as something purchased through education and required to continually access or retain employment is increased levels of student loan debt (under the current repayment system, which the LLE will not alter, this entails repayments of 9 per cent of one's income above a certain threshold for 40 years or until fully repaid – a substantial financial burden), as well as disadvantage faced by those unable to access the qualifications required for work on a repeated basis, whether through having exhausted the loan funding available to them, being unwilling to take on additional debt, or being from a cohort under the existing system not entitled to four years of student loan financing. This latter effect would be referred to as a 'dividing practice' by Bacchi and Goodwin, in which different groups in society are differentiated and some are made subordinate to others, often along class, gender or ethnic lines (2016, 51) – this is an example of both lived effect and subjectification. We might also suggest that this conception of individual responsibility for regular 're-skilling' contributes to the declining levels of employer investment in training referred to above. There too are likely consequences for students' experiences within education; as Holborow suggests, 'narrow skill-getting for an imagined job is a poor and alienating representation of the rounded lived experience of education' (2012, 102).

How and where is this problem representation produced? How can it be disrupted?

The final step of WPR involves analysis of the ‘contestation surrounding representation of the “problem”’ (Bacchi, 2012a, 22), both in terms of the wider discourses which contribute to the problem representation beyond the policy itself, as well as ways of ‘disrupting’ the dominant discourse, especially in light of the symbolic and real effects on certain groups identified in the fifth step. For the former, we might consider other ways in which quick reskilling through education is both valorized and framed as one’s individual responsibility, for example in job adverts, education provider marketing, the work of university careers services, or political speeches and debates. However, as previously referenced, WPR is intended to be an adaptable tool according to one’s line of inquiry, and for the purposes of our research question it is not necessary to carry out the sixth step in detail.

Conclusion

There is still much more that can be done in analysis of the LLE using Bacchi’s framework, from applying the process to other problem representations that were visible through thematic analysis, such as the vocational-academic divide or the positioning of students with caring responsibilities within the policy. But for our research question of what the problem representations are in current English higher education skills policy, and what their consequences are, we are now in a position to make some concluding observations.

Among other objectives, the ‘What is the Problem Represented to Be?’ approach seeks to examine ‘the processes involved in the formation of concepts and categories as “objects” and

[...] the effects that follow from the problem representations they enable' (Bacchi and Goodwin, 2016, 85). This has made it a highly suitable approach for unpacking the underlying assumptions within the Lifelong Loan Entitlement, which as we have seen is premised on the idea that individuals need rapid, flexible access to 'reskilling' for labour market success, paid for by student loans. As discussed above, the policy's conception of what 'skills' are and how they are used by individuals matches Bacchi and Goodwin's wider project of questioning concepts that appear 'natural and obvious' (ibid, 20) which have 'come to be spoken of as "objects", closed to critical scrutiny' (ibid, 84). WPR analysis of the two LLE consultation documents shows the extent to which, as Wheelahan et al have argued, skills in current English education policy are increasingly seen as concrete things to be acquired, or even purchased.

The contribution of our analysis is to place the LLE as the latest iteration of the skills agenda in English higher education, an agenda which is not fixed but rather in a process of repeated updating. For example, Tomlinson has highlighted how the skills agenda, as far as universities are concerned, is now dominated by a '*new* body of skills demands which [it is argued] are most appropriately met by higher education' (2021, 135, emphasis added), such as soft skills, critical thinking, collaboration, and others, suitable for the 'post-industrial age'. Wheelahan et al (2022) have similarly concluded that the skills agenda sees repeated 'rounds' of obsession on the part of policy-makers with certain types of skill, the latest iterations being '21st century skills' and 'fourth industrial revolution skills. Keep earlier made the broader point that the question of what employers are said to be looking for in terms of employees' skills and knowledge has been subject to frequent revision, as 'new issues have been discovered that allow some sections of the employer community and commentators linked to their perspectives to find fault afresh' (2012, 364). This changing nature of the skills agenda underscores the value of our analysis of the LLE.

The primary problem representation in the LLE was found to be that current higher education in England is not flexible enough – but, as shown by deeper analysis of how the problem was represented and what assumptions this is based on, flexibility is here conceived of only in terms of where and when students can access courses, and the question of *what* is studied is either framed solely in terms of simple acquisition of in-demand ‘skills’, divorced from context, or else left to student choice under the supposition that enough flexibility in the system will suffice to meet wider societal need.

Despite Keep and Mayhew’s argument almost a decade ago that ‘research (and common sense) suggests that there are some employability skills that are best acquired within the workplace environment’ (2014, 359), English education policy development still frames skills acquisition as primarily an individual’s own responsibility – and furthermore, as this paper has sought to demonstrate, there is an *intensifying* emphasis on flexibility of study as a means of preparing oneself for flexibility at work. The effects of this policy agenda include a greater supposition that individuals should pay for education throughout their lifetime via personal debt, and a wider discursive limitation on the public benefits of education.

Conflict of Interest Statement

The author states that there is no conflict of interest.

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