

Office for
Students



Regulatory Advice 6

Good practice advice on the
preparation of access and
participation plans for 2019-20

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Introduction

1. This regulatory advice sets out good practice advice on the preparation of an access and participation plan for providers of higher education in England that wish to do both of the following:
 - register with the Office for Students (OfS) in the Approved (fee cap) category of the Register
 - charge fees above the basic amount for qualifying students on qualifying courses from 2019-20 onwards.
2. It is intended to give providers advice on how they might address some of the required elements set out in 'Regulatory Notice 1: Guidance on access and participation plans for 2019-20' (OfS 2018.03).
3. This advice is designed to support providers on particular topics, and highlights approaches they should consider when developing their access and participation plan and wider work. It should be used alongside providers' existing knowledge and research in effective practice in access and participation to meet the 2019-20 access and participation plan requirements.
4. The good practice advice is divided into sections:
 - assessment of current performance
 - ambitions and strategy
 - access, success and progression measures
 - investment
 - glossary
 - a template for how the Word document section of an access and participation plan might be structured (see Annex A).

This advice is not intended to be exhaustive in its coverage and does not provide information on each requirement identified in our guidance on access and participation plans. Equally, each area identified in this document as good practice does not necessarily have a corresponding section in the main guidance document.

5. Alongside your access and participation plan, you must also submit a resource plan using a Microsoft Excel template. You can find instructions on how to complete your resource plan in Annex B of 'Regulatory Notice 1: Guidance on access and participation plans for 2019-20' (OfS 2018.03).

Assessment of your current performance

Step 1: Identify those underrepresented student groups, or sub-groups, where there are gaps in access, success and progression

6. Your assessment should establish how you are currently performing on access, success and progression, both in relation to your own student population and to the priorities the OfS has identified for access and participation in 'Regulatory Notice 1: Access and participation plan guidance for 2019-20' (OfS 2018.03). As a minimum, you should focus on gaps in access, success and progression in relation to:
 - students from areas of low higher education participation, low household income and/or low socioeconomic status backgrounds.
 - students of particular ethnicities
 - mature students
 - disabled students
 - care leavers.
7. We encourage you to use a range of national and local data sources to understand your performance across the student lifecycle. These may include:
 - Higher Education Statistics Agency (HESA) data, such as the UK performance indicators and student statistics for alternative providers
 - Individualised Learner Record (ILR) data
 - UCAS national and provider statistics
 - data required in relation to the transparency information condition (Condition F1)
 - Teaching Excellence and Student Outcomes Framework metrics data
 - data on graduate destinations
 - Department for Education (DFE) destination measures and free school meal statistics
 - Student Loans Company data on students receiving the maximum maintenance loan.
8. We encourage you to use your own data as well as the wealth of data available across the sector and beyond to help you shape and refine your strategy for improving access, success and progression.

Intersections of disadvantage

9. To identify which student groups and stages of the student lifecycle to prioritise for your own continuous improvement, and to address the priorities we have identified for access and participation, you should examine the intersections of characteristics to identify more accurately

gaps in access, success and progression for particular groups of students (e.g. where examination by a single characteristic may mask or underestimate the extent of a gap that needs addressing for a particular group). You should consider how your own data can support this analysis.

10. For example, in its 'End of Cycle Report 2017', UCAS¹ highlighted the importance of considering multiple equality characteristics through its multiple equality measure. This identifies the most underrepresented groups as characterised by multiple forms of disadvantage. Research published in 2015 by the former Department for Business, Innovation and Skills² adopted a similar approach in identifying disadvantage. It concluded that white British men from socioeconomically disadvantaged backgrounds are the most underrepresented group of students in higher education.
11. In its report 'Working in partnership: enabling social mobility in higher education', the Social Mobility Advisory Group³ advised that a basket of indicators, shared across the sector, should be used to measure disadvantage using both population-based and individual indicators.

Further sources of support for providers

- 'Topic briefing: White British students from low socioeconomic status groups' (April 2017) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-white-british-students/)
- UCAS 'Undergraduate End of Cycle Report 2017' (December 2017) (www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/ucas-undergraduate-end-cycle-reports)
- Briefing from Association of Colleges and Action on Access on widening participation measures and indicators (February 2015) (<http://actiononaccess.org/resources/briefings>)

Step 2: Assess in absolute terms

12. To conduct a robust assessment of your performance, you will need to understand your performance trends. You should consider data across several years and comment on past trends and your future trajectory. We want to understand where your progress is accelerating or slowing. Your access and participation plan should include an up-to-date assessment of your performance in access, success and progression for the groups, or sub-groups, identified in your initial analysis of data.

¹ www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/ucas-undergraduate-end-cycle-reports

² <https://www.gov.uk/government/publications/higher-education-participation-socio-economic-ethnic-and-gender-differences>

³ <http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/working-in-partnership-enabling-social-mobility-in-higher-education.aspx>

13. As outlined in 'Regulatory Notice 1: Access and participation plan guidance for 2019-20' (OfS 2018.03), we will expect your assessment to cover those groups of potential or current students where national data indicates there are significant sector-wide, or sub-sector, gaps in equality of opportunity in different parts of the student lifecycle. As a minimum, you should therefore focus your assessment on groups of students who share the following particular characteristics where data show gaps in access, success and/or progression:

- students from areas of low higher education participation, low household income and/or low socioeconomic status backgrounds
- students of particular ethnicities
- mature students
- disabled students
- care leavers.

We expect all providers to assess their performance for each of these groups for each stage of the student lifecycle.

14. In addition, you may also wish to look at other groups where data indicates particular gaps, or where there is specific evidence that barriers exist that may prevent equality of opportunity in relation to access, success and/or progression. A list of these is included on page 9 of the guidance.

Step 3: Describe your performance relative to your context

15. Once you have analysed your absolute performance you should demonstrate that you understand how this relates to your own context. You should consider how your past trends and future trajectories compare with those of the wider sector, for example through sector-wide data or benchmarks.

Ambitions and strategy

Target groups

16. In setting out which underrepresented groups you will be specifically targeting in your access and participation work, you will want to consider:
- sub groups as distinct from the aggregate group
 - groups that face intersections of disadvantage.
17. Where you have identified specific barriers to equality of opportunity in your assessment of performance, across the student lifecycle and for specific groups, you should ensure the activity and support measures you will deliver are tailored to the specific needs of these students.

Low higher education participation, household income and socioeconomic status

18. An individual or household's social and economic position can be represented through indicators such as income, education, occupation and how this compares to others. Students from more advantaged backgrounds often benefit from more effective information and guidance from schools, parents and broader networks. Students from more disadvantaged backgrounds, who may not have the same support at home and through their networks, are less likely to have access to effective information and guidance.
19. We encourage you to consider a variety of measures and indicators to develop an understanding of underrepresentation in your own context. These measures may relate to:
- participation in higher education measures: Participation of Local Areas (POLAR)
 - household measures: household income, free school meal eligibility
 - area based measures: Index of Multiple Deprivation (IMD), Income Deprivation Affecting Children Index (IDACI), A Classification of Residential Neighbourhoods (ACORN)
 - family based measures: parent education (for example, families with no prior experience of higher education) or occupation.
20. UCAS data from the 2017 cycle⁴ shows that 18-year-olds from low participation neighbourhoods (POLAR 3 quintile 1) have an entry rate to higher education of 20.4 per cent, which is higher than ever before. In spite of this progress, the participation gaps in higher education remain large with those from the most underrepresented backgrounds (POLAR 3 quintile 1) still 2.3 times less likely to enter higher education than their most advantaged peers (POLAR 3 quintile 5). They are 5.5 times less likely to enter a higher tariff provider⁵.

⁴ www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/2017-end-cycle-report

⁵ www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/2017-end-cycle-report

21. A 2017 report from the DFE⁶ shows an estimated 24 per cent of pupils who were in receipt of free school meals (FSM) at the age of 15 entered higher education by age 19. Again, this is higher than ever before. However, the gap in the entry rates between FSM and non-FSM pupils was 18 percentage points and has not narrowed over time.
22. With regard to student success, HESA data⁷ shows the non-continuation rate of young entrants from low participation neighbourhoods (POLAR3 quintile 1) is at the highest level since 2009-10, with a rate of 8.8 per cent for UK domiciled full-time first degree entrants in 2014-15. This is the second year in a row that the non-continuation rate has increased for this group.
23. There are also significant unexplained differences between POLAR quintile 1 and 5 students in employment and further study outcomes, three years after graduation⁸.
24. UCAS's multiple equality measure demonstrates the importance of considering multiple dimensions of disadvantage when looking at higher education participation. The measures listed within the multiple equality measure vary in terms of coverage and definitions. Therefore, we encourage you to adopt those most relevant to your own context to inform your understanding of inequality among your students and to develop activities and support measures across the student lifecycle.
25. We encourage you to examine multiple characteristics of disadvantage to get a better understanding of inequalities and associated differential outcomes for students from low participation areas, low income or low socioeconomic status backgrounds at your institution. This will help you to more effectively target your access, success and progression activities.
26. Our definition of 'low-income background' is based on residual household income and varies from year to year, in line with the government's tiers for maintenance loans.

Further sources of support for providers

- Ministry of Housing, Communities and Local Government report on English indices of deprivation (September 2015) (www.gov.uk/government/statistics/english-indices-of-deprivation-2015)
- UCAS 'Undergraduate End of Cycle Report 2017' (December 2017) (www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/ucas-undergraduate-end-cycle-reports)
- UCAS's multiple equality measure (www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/equality-and-entry-rates-data)

⁶ www.gov.uk/government/uploads/system/uploads/attachment_data/file/635103/SFR39-2017-MainText.pdf [PDF]

⁷ www.hesa.ac.uk/data-and-analysis/performance-indicators/non-continuation-summary

⁸ Ibid

explorers) brings together information on several equality dimensions for which large differences in the probability of progression into higher education exist.

Ethnicity

27. There are significant gaps between different ethnic groups in access, success and progression in higher education. The extent of these gaps varies depending on ethnic group and stage of the student lifecycle.

Black and minority ethnic groups

28. Data from DFE's Destination Measure statistics⁹ show a large range in the proportions of Key Stage 5 leavers from different minority ethnic backgrounds entering higher education. Some groups are more underrepresented than others, so it is important to consider specific ethnic sub-groups rather than the homogenous definition of black and minority ethnic students.
29. The Destination Measure statistics also highlight differences between ethnic groups in terms of access to higher tariff providers, with black students having the lowest entry rate.
30. In terms of student success, analysis by the Higher Education Funding Council for England (HEFCE)¹⁰ shows non-continuation rates are higher for all black and minority ethnic groups (apart from students of Chinese and Indian heritage) compared with their white peers. Furthermore, students from a black Caribbean background have the highest non-continuation rates of all ethnic groups.
31. Degree outcomes also vary by ethnicity. HEFCE analysis¹¹ shows that regardless of entry qualifications, the proportion of students from black and minority ethnic groups achieving a first or upper second class degree is lower than their white peers. Research published in 2015 by the former Department for Business, Innovation and Skills (BIS)¹² shows that differences in degree outcomes between ethnic groups persist even when controlling for other factors that may affect attainment.
32. For progression, employment outcomes for all other ethnic groups are worse than for white students, even three years after graduation.

White British students from low socioeconomic status backgrounds

33. When other factors such as socioeconomic status are considered alongside ethnicity it can be seen that white British students from the lowest socioeconomic status backgrounds are less likely than any other group to access higher education (BIS, 2015).

⁹ www.gov.uk/government/collections/statistics-destinations

¹⁰ www.hefce.ac.uk/analysis/ncr/timeseries/

¹¹ www.hefce.ac.uk/analysis/HEinEngland/students/social/

¹² www.gov.uk/government/uploads/system/uploads/attachment_data/file/474273/BIS-15-85-socioeconomic-ethnic-and-gender-differences.pdf [PDF]

34. Disadvantage tends to persist during and beyond the higher education experience. Therefore providers may particularly wish to explore success and progression for this group among their own students.

Good practice in considering ethnicity in your access and participation plan

35. Throughout your access and participation plan, where possible, you should disaggregate by different ethnic groups of students.
36. You should consider how students' ethnicities intersect with other variables that may impact on their equality of opportunity, for example examining how gender or socioeconomic background intersects with ethnicity (e.g. white British students from low socioeconomic status groups). Without considering multiple demographic factors together you may be less effective at targeting interventions at those groups where there are the greatest inequalities.
37. In developing your activities and support measures, we encourage you to engage with students of different ethnic backgrounds to understand their experiences, in order to best address issues within the context of your institution.
38. When addressing any disparities in experiences of students from different ethnicities, we encourage you to assess your institutional practices and any possible systematic biases, and support students through interventions. This could consist of staff and institution-facing interventions, such as curriculum reviews, pedagogy, staff training and support services, to ensure your practices are inclusive.

Further sources of support for providers

- 'Topic briefing: Black and minority ethnic students' (January 2018) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/offa-topic-briefing-bme-students/) and 'Topic briefing: White British students from low socioeconomic status groups' (April 2017) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-white-british-students/)
- OFFA commissioned research 'Targeting students from disadvantaged ethnic backgrounds' (November 2017) (www.offa.org.uk/egp/ethnicity/)
- Equality Challenge Unit 'Equality in higher education: statistical report 2017' (November 2017) (www.ecu.ac.uk/publications/equality-in-higher-education-statistical-report-2017/)
- BIS 'Higher education participation: socioeconomic, ethnic and gender differences' (November 2015) (www.gov.uk/government/publications/higher-education-participation-socioeconomic-ethnic-and-gender-differences)
- HEFCE 'Differences in degree outcomes: The effect of subject and student characteristics' (September 2015) (www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/2015/201521/HEFCE2015_21.pdf [pdf])

Mature learners

39. Mature students are typically defined as those aged 21 or over when they enter higher education¹³.
40. In recent years, there has been a significant decline in the number of mature entrants to undergraduate studies, with 145,000 fewer entrants in 2015-16 than there were in 2006-07¹⁴.
41. There continue to be significant differences between young and mature students at the success stage of the student lifecycle. Full time, UK-domiciled mature entrants in 2014-15 were almost twice as likely to leave after one year compared with their young peers at a rate of 11.3 per cent and 6.3 per cent respectively¹⁵.
42. Mature learners are more likely than their younger counterparts to have characteristics associated with underrepresentation in higher education. Mature learners are more likely than younger learners to:
 - have non-traditional qualifications
 - come from lower socioeconomic backgrounds
 - have family or caring responsibilities
 - be disabled
 - be from black and minority ethnic groups.
43. Studying on a part time basis is not necessarily an indicator of disadvantage, but evidence shows that part time higher education provision plays a significant role in improving access for students who face inequalities. For example, 92 per cent of undergraduate part time students in 2016-17 were mature students (aged 21 and over) compared with 23 per cent of full time students¹⁶.
44. UCAS data indicates there is significant differentiation between the ages of entrants, with just over half of mature entrants aged between 21 and 24, 38 per cent between 25 and 39 and 10 per cent over 40 when they commence their courses¹⁷.
45. We encourage you to consider the different barriers mature learners may face in accessing, succeeding in and progressing from higher education. As with other characteristics of underrepresentation, we encourage you not to treat mature students as a homogenous group. We encourage you to develop alternative and flexible modes of study to better support this

¹³ <https://www.hesa.ac.uk/data-and-analysis/performance-indicators/definitions>

¹⁴ www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/2017/201720/HEFCE2017_20.pdf [pdf]

¹⁵ Ibid

¹⁶ <https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he>

¹⁷ www.ucas.com/file/35436/download?token=2Q6wiw-L

group. This could include apprenticeship routes, evening classes, intensive weekend modules, online and distance learning or delivering provision in the community. Summer schools, partnering with further education colleges and credit accruing work placements are other ways to consider delivering higher education to mature or part time learners.

46. Mature students are often in employment and many have caring responsibilities. It is important to recognise that reduced intensity programmes studied over a longer period, but within the same structures as standard full time programmes, may not offer sufficient flexibility to be considered accessible to potential part time students.
47. Non-continuation rates are higher for mature entrants than for young entrants. Mature learners may not feel a sense of belonging in the learning community as they may be less able to take part in extra-curricular activities. So there may be a particular need to support them to continue with their studies.

Further sources of support for providers

- 'Topic briefing: mature learners' (June 2015) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/offa-topic-briefing-mature-learners/)
- OFFA-commissioned research on understanding the impact of outreach for mature learners with low or no prior qualifications (September 2016) (www.offa.org.uk/egp/improving-evaluation-outreach/outreach-mature-learners/)
- Carruthers Thomas, K, 'Thinking "spatially" about mature part-time learners in higher education' (July 2015) (www.researchgate.net/publication/303523035_Thinking_'spatially'_about_mature_part-time_learners_in_HE)
- Student Finance England information on tuition fee loans for part time undergraduate study (www.practitioners.slc.co.uk/products/part-time-undergraduate-education/part-time-tuition-fee-loan/)

Disability

48. The proportion of all students who disclose themselves as disabled is rising, with a 56 per cent increase of full time, first degree entrants with a known disability over a five year period until 2015-16¹⁸. Nonetheless, disabled people remain underrepresented in higher education and there are significant variations in the degree outcomes of disabled students compared with others¹⁹.
49. Additionally, the proportion of full time first degree undergraduate students disclosing a mental health condition has increased significantly in recent years, up to 3 per cent in 2016-17 from 0.4 per cent in 2007-08. Mental health conditions account for an increasing proportion of all

¹⁸ www.hefce.ac.uk/analysis/HEinEngland/students/disability/

¹⁹ www.hefce.ac.uk/pubs/Year/2015/201521/

disability disclosed by first year students: 22 per cent in 2016-17 compared with 5 per cent in 2007-08²⁰.

50. For first degree entrants in 2014-15, those with a declared disability but not in receipt of Disabled Students' Allowances (DSA) have a higher non-continuation rate (almost four percentage points) compared with those in receipt of DSA²¹. This gap has not improved in the past 10 years, as shown in recent HEFCE research²² which also identified that disabled students not in receipt of DSA are less likely than their peers to achieve a first or upper second class degree.
51. In terms of progression, Association of Graduate Careers Advisory Services data²³ indicates that disabled graduates are more likely to be unemployed than non-disabled graduates and graduates of all disability types are less likely to have obtained a permanent role than non-disabled graduates.
52. In order to increase opportunities for disabled students, we encourage providers to consider the social model of disability, as outlined by the Disabled Student Sector Leadership Group²⁴. The group's guidance outlines why change is needed and how this could benefit higher education providers themselves, and provides support in implementing reasonable adjustments and reducing risk by providing inclusive teaching and learning, an approach that recognises and values diversity within the student body.
53. HEFCE's 2017 review of models of support for disabled students in higher education²⁵ provides information on an inclusive social model of support in higher education, which includes:
 - assistive technology
 - learning resources, including staff training and induction
 - inclusive learning in module and programme development and evaluation
 - alternative assessment methods for disabled students
 - counselling services and administrative processes to identify potential wellbeing issues
 - accessibility plans for social/recreational space, teaching and learning facilities and accommodation.

²⁰ <https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he/characteristics>

²¹ www.hefce.ac.uk/analysis/HEinEngland/students/disability/

²² Ibid

²³ www.agcas.org.uk

²⁴ www.gov.uk/government/uploads/system/uploads/attachment_data/file/587221/Inclusive_Teaching_and_Learning_in_Higher_Education_as_a_route_to-excellence.pdf [PDF]

²⁵ www.hefce.ac.uk/pubs/rereports/year/2017/modelsofsupport/

54. Providers may also wish to consider how a whole provider approach can benefit their students with disabilities – see page 24 for further guidance on adopting a whole provider approach.

Further sources of support for providers

- OFFA 'Topic briefing: disability' (July 2015) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-disability/)
- Equality Challenge Unit 'Equality in higher education: statistical report 2017' (November 2017) (www.ecu.ac.uk/publications/equality-in-higher-education-statistical-report-2)
- HEFCE 'Models of support for students with disabilities' (October 2017) (www.hefce.ac.uk/pubs/rereports/year/2017/modelsofsupport/)
- Universities UK framework on mental health (September 2017) (www.universitiesuk.ac.uk/stepchange)
- Disabled Students' Sector Leadership Group 'Inclusive Teaching and Learning in Higher Education as a route to Excellence' (January 2017) (www.hefce.ac.uk/sas/disabled/inclusive)
- HESA disability categories for 2016-17 (www.hesa.ac.uk/collection/c16051/a/disable)

Care leavers

55. Students who have been in care continue to be significantly underrepresented in higher education. Data from the DFE²⁶ shows that only about 6.1 per cent of all care leavers between the ages of 19-21 were in higher education in 2017.

56. People who have spent time in local authority care face cumulative and significant barriers to entering and succeeding in higher education including:

- lower attainment
- lack of positive role models
- low expectation from carers and advisers
- low aspirations
- concern about being able to afford higher education
- lack of information and advice prior to and at the point of application to higher education
- difficulty accessing the necessary financial support
- problems with accommodation

²⁶ www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2016-to-2017

- low levels of personal and emotional support from professionals
- lack of personal support networks
- low levels of confidence to self-identify and proactively ask for support.

A definition of care leavers

57. In England, the official care leaving age is 18, although young people can leave care from the age of 16, at which point they are designated care leavers. Local authorities have responsibility for care leavers until the age of 21, or 25 if they are in full time education or have a disability. Young care leavers should receive the support of a personal adviser until they are 25.
58. The legal definition of care leavers may not capture all adults who have care experience and who may need support as they enter higher education later in life. Therefore, providers can include all those who have experienced care at any stage of their lives, including those who have been adopted, when developing activities to support this group.

Evaluation

59. We encourage providers to improve the collection, accuracy and evaluation of care leaver data for both pre-entry students and those on-course. This will require engagement with care leavers and local authorities, and will support further sector-wide understanding of the issues facing this group.

Bursaries for care leavers

60. Under the Children and Young Persons Act 2008, care leavers starting a recognised higher education course may be entitled to a minimum one-off bursary of £2,000 from their local authority. This is in addition to anything else care leavers receive under the state support system.

Further sources of support for providers

- 'Topic briefing: care leavers' (December 2017) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-care-leavers/)
- National Network for the Education of Care Leavers 'Moving On Up' (November 2017) (www.nnecl.org/resources/moving-on-up-report?topic=guides-and-toolkits)
- Organisations that provide support to care leavers include the National Network for the Education of Care Leavers (<http://nnecl.org/>), Become (www.becomecharity.org.uk/) and Propel (<http://propel.org.uk/UK/>).

Carers

61. The Carers Trust toolkit for providers²⁷ defines young adult carers as 'young people aged 14-25 who care, unpaid, for a friend or family member who could not cope without their support'. There

²⁷ <https://professionals.carers.org/unitoolkit>

is no national data on the number of carers in higher education because not all disclose their caring responsibilities and their carer status can change.

62. The Carers Trust toolkit highlights the barriers to accessing and succeeding in higher education faced by young adult carers. It notes that young adult carers are often a hidden population and therefore can be harder to reach and encourage into higher education. They may feel less able to access higher education due to their caring responsibilities at home and require more support when they do engage.
63. Sempik and Becker (2014)²⁸ found most young adult carers in their sample struggled to balance studying and caring responsibilities and that support from providers was not always accessible. They recommended providers develop policies, procedures and training to identify and support young carers throughout their studies.
64. An NUS survey²⁹ found that carers felt their responsibilities negatively affected their academic performance and many considered leaving their course. The report noted that caring responsibilities can affect overall wellbeing as well as physical and mental health. It highlighted the impact financial concerns may have on carers and encouraged providers to ensure that support and information on hardship funding was accessible.
65. We encourage you to consider the services you provide to support young carers and how these might align with or be strengthened through your access and participation plan.

Further sources of support for providers

- Carers Trust guidance on supporting students with caring responsibilities (February 2015) (<https://professionals.carers.org/unitoolkit>)
- NUS report 'Learning with care: Experiences of student carers in the UK' (January 2015) (www.nusconnect.org.uk/resources/learning-with-care)

People estranged from their families

66. In higher education, the term 'estranged' applies to students who are aged 18 to 24 and have no communicative relationship with either of their living biological parents. In addition, these students often lack the support of their wider family.
67. Research by the Unite Foundation and StandAlone³⁰ highlighted that estranged students are more likely to be from groups that experience disadvantage in education compared with the student population as a whole.

²⁸ Sempik, J and Becker, S, 2014, 'Young Adult Carers at College and University' (Carers Trust) (https://carers.org/sites/files/carerstrust/young_adult_carers_at_college_and_university.pdf [PDF])

²⁹ www.nus.org.uk/en/news/nus-publishes-first-ever-national-research-into-the-experiences-of-student-carers/

³⁰ <http://standalone.org.uk/reports/>

68. Estranged students often have similar needs to care leavers. About one in five have been in care, but they do not fit the statutory definition of a care leaver³¹. Local authorities have no statutory responsibility to look after the welfare of estranged students, or provide accommodation in the holiday periods, as they do for care leavers. Estranged students are therefore at risk of financial difficulty, summer homelessness and social isolation.
69. We encourage providers to evaluate the number of those affected among their own students and to explore the issues and outcomes for those students to develop effective support. We also encourage providers to sign the StandAlone Pledge. This is a written commitment from a senior member staff to develop support for estranged students in four areas:
- finance
 - accommodation
 - access and transition
 - mental health and wellbeing.

Further sources of support for providers

- 'Topic briefing: estranged students' (February 2018) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-estranged-students/)
- The charity StandAlone (<http://standalone.org.uk/>) supports students estranged from their families and has reports (<http://standalone.org.uk/reports/>) available with recommendations for higher education providers.

People from Gypsy, Roma and Traveller communities

70. LKMco's³² 2017 report identifies some of the key challenges for Gypsy, Roma and Traveller young people in accessing higher education. These include cultural misunderstanding or limited knowledge of Gypsy, Roma and Traveller communities and needs, lower attainment at school for pupils from these communities and lack of exposure to information about and experience of higher education.
71. Accurate figures of Gypsy, Roma and Traveller participation in higher education are difficult to establish and little research exists on the extent of these barriers to access and participation. For example, the DFE publishes statistics broken down by ethnicity, but student numbers for the Gypsy or Roma groups are too small to conduct detailed analyses and often data is suppressed. We encourage you to consider a tailored approach for these groups through enhanced advice and guidance, as well as access and participation activities appropriate for your student population.

³¹ <http://standalone.org.uk/wp-content/uploads/2013/08/StandAloneUNITEfoundation.pdf> [pdf]

³² www.lkmco.org/gypsyromatravelleruniversity/

Further sources of support for providers

- LKMco report 'The underrepresentation of Gypsy, Roma and Traveller pupils in higher education' (July 2017) (www.lkmco.org/gypsyromatravelleruniversity/)

Refugees

72. The Refugee Support Network³³ highlights some of the barriers refugees face in accessing higher education. These include lack of certainty over immigration status, tuition fee concerns and language and cultural barriers.
73. We encourage you to ensure you are able to provide this group of students with up to date and comprehensive information and guidance with regard to their tuition fee status and eligibility for financial support. You could also consider how your activities may be targeted or tailored to improve access and participation for students with refugee status.

Further sources of support for providers

- Government information (www.gov.uk/student-finance/who-qualifies) on eligibility for student finance for students with refugee status
- Organisations that provide support to refugees in higher education include the Refugee Support Network (www.refugeesupportnetwork.org/pages/25-higher-education) and Article 26 (<http://article26.hkf.org.uk/>)

Children from military families

74. Research from University of Winchester³⁴ suggests that children from military families have particular experiences and characteristics that may be contributory factors affecting access to higher education. This may include mobility and discontinuity in schooling, fewer opportunities for extra-curricular and inclusive activities in school and particular pastoral needs addressing situations such as caring for family members and coping with the emotional stress of deployments.
75. Mobility between schools can impact on student outcomes due to lack of communication between schools, inadequate transition arrangements and differences in curriculum provision. In addition, mobility may make it more difficult for students to engage with sustained extra-curricular activities, which limits the opportunity to demonstrate additionality in higher education applications.
76. Challenges to wellbeing may also influence educational outcomes. The deployment and return of serving family members may cause disruption to learning as well as emotional and behaviour

³³ www.refugeesupportnetwork.org/pages/25-higher-education

³⁴ www.winchester.ac.uk/media/content-assets/documents/UoW-research-paper_Further-and-Higher-Progression-for-Service-Children.pdf [pdf]

difficulties. Parental deployment is also associated with an increased incidence of students taking on caring responsibilities, and research from the Children's Society³⁵ notes that young carers in military service families are less likely to be identified as young carers and are therefore less likely to receive support than young carers in civilian families.

77. These issues may persist into the higher education experience, so providers may wish to consider the support they have in place to support students in this group. It may also be useful to reflect on how you could work with the wider community to track and inform this population.

Further sources of support for providers

- The University of Winchester's toolkit to assist institutions in improving access for military service children (www.winchester.ac.uk/collaboration/widening-participation/military-service-children/)
- The Service Children Progression Alliance (www.scipalliance.org) provides further information and resources.

Nursing, midwifery and allied healthcare students

78. On 1 August 2017, tuition fee loans for undergraduate nursing, midwifery and allied healthcare courses came into effect. These courses are now within the scope of access and participation plans.
79. Data shows that nursing, midwifery and allied healthcare students are generally older, from lower socioeconomic status backgrounds, and more likely to be women and to have children than undergraduates generally. In addition, students studying for degrees in subjects allied to medicine are more likely to study part time³⁶.
80. Given their characteristics, we encourage you to consider enhanced guidance and financial support targeted at these groups of students, and measures to enhance existing schemes or to develop new, specific types of targeted outreach and provision for nursing, midwifery and allied healthcare training.
81. Providers should also consider that mandatory placements on these courses can amount to up to 50 per cent of the course. Together with considerable travelling time, childcare costs may deter single parents or those without a family support network, so there may be particular challenges for these students to succeed.

Further sources of support for providers

³⁵ www.childrensociety.org.uk/youngcarer/our-work/armed-forces

³⁶ 217,235 students were taking allied medical degrees in 2015-16. Of these, 40.4 per cent (87,763) were studying part time (Source: HESA) (www.hesa.ac.uk/data-and-analysis/publications/students-2015-16/introduction)

- Health Education England 'Widening Participation: It Matters!' (October 2014) (www.hee.nhs.uk/talentforcare/wideningparticipation)
- HEFCE 'Strategic interventions in health education disciplines' programme (www.hefce.ac.uk/It/healthcare/sihed)

Equality and diversity

Aligning your access and participation and equality strategies

82. Although our identification of underrepresented groups does not explicitly include all the protected characteristics covered by the Equality Act 2010, many protected characteristics interlink with groups that are underrepresented in and during higher education, such as disability, ethnicity, age (mature students) and gender. For example, black and minority ethnic people and disabled people are statistically overrepresented within lower socioeconomic groups and low participation neighbourhoods.
83. Given that activities targeted at those from lower socioeconomic groups and low participation neighbourhoods are central to access and participation plans, this may provide an opportunity for you to meet both your equality objectives and access and participation plan targets. This could include financial support packages for disabled students, retention activity targeted at mature students, or activities to address the gaps in success and progression between different ethnic groups.
84. We consider it good practice for access and participation plans and equality and diversity work to be closely linked, especially if you have separate teams working in these areas. For more information on adopting a whole provider approach, see page 24.
85. If you need further help developing priorities and activities, you may wish to contact an external organisation such as the Equality Challenge Unit³⁷, which advises subscribing providers on equality issues.
86. From 1 August 2018, Advance HE, a new sector agency comprising the Equality Challenge Unit, Higher Education Academy and Leadership Foundation for Higher Education, will support higher education providers in their ongoing development of learning and teaching, equality and diversity and leadership and governance.

Impact on those with protected characteristics

87. There is no set way to conduct an equality impact assessment. As these assessments are an established and credible tool for demonstrating due regard to the Public Sector Equality Duty³⁸, most providers will have an established process and documentation.

³⁷ www.ecu.ac.uk

³⁸ www.ecu.ac.uk/guidance-resources/governance-and-policies/equality-impact-assessment/

Further sources of support for providers

- Government guidance on the Equality Act 2010 (www.gov.uk/guidance/equality-act-2010-guidance)
- Equality and Human Rights Commission's list of protected characteristics (www.equalityhumanrights.com/en/equality-act/equality-act-faqs)
- Equality Challenge Unit 'Equality in higher education: statistical report 2017' (November 2017) (www.ecu.ac.uk/publications/equality-in-higher-education-statistical-report-2017/)

Evaluation

88. In your access and participation plan, you will need to demonstrate that you have a suitably robust evaluation strategy in place to measure the impact of your activities and support measures. We have set out below one way of doing this, but you may use other suitably robust methods.

Step 1: Take a strategic approach to your evaluation planning

89. When setting your strategy for access, success and progression, it is important to be clear what your activities and support measures are trying to achieve and how you will know if they are successful.

90. Building effective evaluation into your access and participation strategy is best achieved if the objectives of your strategy are clearly and comprehensively defined. These should then be matched to specific indicators against which outcomes can be measured.

91. You may wish to consider:

- What is the long term impact you want to achieve?
- What are your more immediate goals?
- What activities are involved and what are the direct results?
- What are you trying to change?
- Who will be affected and how?
- What resources will you need?
- What indicators can you use to measure progress?

92. One useful method is to use a theory based approach to evaluation. You may develop a theory of change³⁹ or logic model⁴⁰ to help you plan your evaluation.

Step 2. Plan and select evaluation research methodology

93. It is important to ensure that you are able to collect quantitative and qualitative evidence to evaluate the impact of your activities and success measures. You should plan in advance what data you want to collect and the most appropriate evaluation methods.

94. You should consider what processes and arrangements will be set up to ensure the relevant data can be collected (which might include collection before, during and after the intervention). If no objectives have been set, or no outcome indicators identified, you should think about why you are conducting this activity.

95. You may wish to consider:

- potential barriers to your preferred approach
- what approach makes most sense given practical constraints
- how big the evaluation should be
- the number of participants needed
- what happens if you are running a small programme
- whether you are undertaking an impact evaluation or a process evaluation.

Step 3. Select measures and indicators

96. The objectives and the indicators should be made clear when programmes and activities are at the design stage to ensure methods and processes are put in place to collect data.

97. When conducting your activities, you should ensure in advance that your chosen methods and processes for data collection have been built in.

98. You may wish to consider:

- what kinds of data are needed for the chosen approach
- whether you are undertaking impact and outcome evaluation or a process evaluation
- what method you will use to collect data, when to collect it and how.

Step 4. Analyse findings and make inferences

99. When analysing findings and forming conclusions you should refer back to the aims and objectives of your activities. What were you trying to understand? What were the research

³⁹ www.nesta.org.uk/resources/theory-change?gclid=EAlaIqobChMImbiX142F2QIV6JPtCh2LHgjvEAAYASAAEgKhh_D_BwE

⁴⁰ www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/Independentresearch/2015/Student,opportunity,outcomes,in-depth,study/HEFCE2015_sodepth.pdf [PDF]

questions you set out to answer? Evaluation methods should be implemented as planned and you may want to refer to the Standards of Evaluation Practice produced by OFFA⁴¹ to understand the appropriate type. Additional analysis might follow according to the nature of the evidence and results.

Step 5. Report, review and reflect

100. The evaluation process is ongoing, based on learning and enhancement and continuous improvement. You should always consider disseminating your results, even if they show no impact or a negative impact, because this is often where the greatest learning takes place.

Financial support evaluation

101. We expect all providers to take a robust approach to evaluating financial support, although this will vary according to each provider's context. Providers with significant investment in financial support should be led by a range of evidence that examines student outcome behaviour changes (such as improved access, continuation and attainment rates) and student experiences of how financial support impacts on outcomes.

102. We recommend the OFFA toolkit⁴² for providers to use in evaluating their own financial support provision. The tools facilitate different approaches to financial support evaluation to help you understand the impact of your investment. The evaluation tools are:

- statistical tool: a framework for statistical analysis
- survey tool: a set of survey questions
- interview tool: a semi-structured interview framework.

103. We expect that most providers will need to use all the evaluation tools to ensure their financial support is informed by robust evidence. The statistical analysis will only tell you **whether** there is an effect on outcomes. This data should be interpreted alongside findings from the survey and interview tools, which will explore **how** and **why** financial support affects academic, personal and social outcomes.

104. We recommend that these evaluation tools are incorporated into your annual evaluation activity to feed into your strategic planning cycle for activity in this area. Timely evaluation will be particularly important to guide your strategic planning where the nature of your financial support or the environment changes significantly. Evidence from your evaluation should inform how you design your financial support to drive improved outcomes for underrepresented groups.

105. It is likely you will need to draw on a variety of staff and expertise within your organisation to complete the evaluation effectively, interpret your findings and make strategic decisions informed by your new evidence.

⁴¹ <https://www.offa.org.uk/universities-and-colleges/guidance/financial-support/financial-support-evaluation-toolkit/>

⁴² www.offa.org.uk/egp/impact-of-financial-support/

106. You may use alternative methods instead of the toolkit if you can provide evidence that these methods are robust. However, the toolkit tools were developed by experts through a process of multiple pilots and cognitive testing to develop robustness.

Further sources of support for providers

- OFFA commissioned research 'Understanding the impact of institutional financial support' (December 2016) (www.offa.org.uk/egp/impact-of-financial-support/)
- OFFA commissioned research 'Evaluation of outreach for young people who are first in their family to go to higher education' (www.offa.org.uk/egp/improving-evaluation-outreach/impact-outreach-young-first-family/)
- OFFA commissioned research 'Evaluation of outreach activity for mature learners with low or no prior qualifications' (July 2017) (www.offa.org.uk/egp/improving-evaluation-outreach/outreach-mature-learners/)
- OFFA commissioned research 'Evaluation of outreach interventions for under-16-year-olds' (www.offa.org.uk/egp/improving-evaluation-outreach/pre-16-outreach/)
- Better Evaluation (www.betterevaluation.org/) includes a range of resources on evaluation.

Whole provider approach

107. In demonstrating a strategic approach to improving access, success and progression, we encourage you to adopt an approach to access and participation that is embedded at all levels of your organisation, extends across all areas of your work and engages senior management. This is important for creating an inclusive culture to enable and sustain effective practice.

108. In your access and participation plan, we encourage you to include details of how you will develop and enhance a structure and culture of access and participation across your organisation.

109. There is not a single model for a whole provider approach to access and participation, but some core features may be viewed as crucial:

- a. A whole lifecycle approach to access and participation is adopted that starts with primary school outreach, through to progression into employment and further study.
- b. Staff from departments, services and units from across the organisation are involved in access and participation. Engaging colleagues from across the organisation, including those who are not specialists, and crucially students, is integral to a whole provider approach.
- c. There is a clear and explicit organisational commitment to access and participation, defining target groups and expected outcomes.

Further sources of support for providers

- OFFA commissioned research ‘Understanding a whole institution approach to widening participation’ (October 2017) (www.offa.org.uk/egp/whole-institution-approach/)
- Universities UK’s whole university approach framework (www.universitiesuk.ac.uk/policy-and-analysis/stepchange/Pages/whole-university-approach.aspx) designed to address the rise of negative mental health and wellbeing issues facing students and staff (September 2017)

Student consultation and involvement

110. Collaboration between providers and their students on access and participation has the potential to be mutually beneficial. Providers can improve their understanding through the experiences of underrepresented students, and can improve their strategy and activities based on this understanding. Engaging students in implementing activities across the student lifecycle can also add resources and impact to providers’ work. Students can make positive changes to their higher education experiences and being involved in processes can contribute to sense of belonging and their employability.

111. Good practice in student engagement may include:

- a. Collaborating with your student union or association to ensure there are transparent mechanisms for student representation.
- b. Providing student representatives with appropriate training and support for their roles, so they are able to make informed and meaningful contributions.
- c. Providing a variety of opportunities and channels for student input and feedback, as well as clear processes for recognising and disseminating where student contributions have had a positive impact. Where student feedback has not been or cannot be secured, you are encouraged to consider how the rationale and decision-making process for your work can be most effectively communicated.
- d. Including student representatives on decision-making panels and actively collaborating with them in the preparation of papers and meeting content.

112. In describing student consultation and involvement in your access and participation plan, you should be clear about the opportunities you have provided for sufficient engagement from students’ unions, their representative bodies and students directly.

Further information for student unions and representatives

113. We encourage student unions and representatives to comment on their consultation and involvement in their provider’s access and participation work. This can take the form of an annex to the plan or as a separate submission. Your provider will be able to assist and advise on how to submit information through the registration process.

114. We are interested in understanding student consultation and involvement from the student body’s own experiences. We will use your submission as supporting evidence during the

assessment to understand whether your provider's plan has met the student consultation and involvement criteria set out in this guidance document.

115. To aid the assessment process, we will want to understand:

- a. How students (including student unions or other representative bodies) have been consulted and engaged during the development of the access and participation plan.
- b. How students (including student unions or other representative bodies) have been consulted and engaged during the implementation and evaluation of the access and participation plan.
- c. How students from groups both supported and not supported by the access and participation plan have had opportunities to express their views within the above processes.
- d. How students from underrepresented groups are specifically supported to meaningfully contribute to and participate in wider student engagement.

116. We encourage students and their representative bodies to provide any further information they think necessary to support our understanding and assessment of the access and participation plan. Please note that we are wanting to understand broader strategies and policies to ensure that sufficient student engagement and consultation has taken place; we are unable to be involved in or influence specific policy discussions between providers and student unions or representative bodies.

117. If you have any questions about a submission regarding student consultation and involvement in the access and participation plans, contact registration@officeforstudents.org.uk.

Complementarity with other activity

118. In demonstrating a strategic approach, we encourage you to highlight complementarity with any activities and support measures not funded through your access and participation plan. We are particularly interested in understanding the relationship between the activity funded through your access and participation plan and:

- the National Collaborative Outreach Programme (NCOP)
- the government's 12 opportunity areas.

National Collaborative Outreach Programme

119. The NCOP is targeted specifically at students in years 9 to 13 in areas where higher education participation is low overall and lower than would be expected given GCSE attainment rates. It is important that you continue to support and grow activities and programmes through your access and participation plan that complement the NCOP according to your broader targeting criteria for underrepresented groups, age groups and areas that do not fall within NCOP criteria.

120. You should include information in your access and participation plan on:

- how the work delivered through NCOP will complement the work being delivered through your access and participation plan

- how you will ensure underrepresented groups in need of support are not missed, such as geographical areas and age ranges not targeted through NCOP activities.

121. The NCOP was developed as a four year programme commencing in January 2017 with a review at the midpoint. Funding for the second half of the programme is subject to the outcomes of this review, which will be conducted during 2018. We recognise that NCOP consortia partners will be developing their access and participation plans ahead of receiving confirmation of the approach to NCOP for the 2019-20 academic year. For the purposes of your access and participation plan, you should continue to use current NCOP goals, aims and targets to inform the design of your access and participation strategy.

Opportunity Areas

122. The government has committed an additional £72 million over three financial years to provide tailored interventions in 12 Opportunity Areas⁴³ across the country that experience significant challenges in social mobility. Where appropriate, in your access and participation plan, we want you to:

- consider what more you can do to target these areas
- ensure that the work being done through your access and participation plan (locally, regionally or nationally) complements other work taking place
- use these opportunities to further broaden your range of collaborative partners – for example, with employers and third-sector organisations.

123. Funding you receive from NCOP consortia, opportunity areas or other public funding must not be counted in your access and participation plan.

Collaborative working

124. Many providers included investment in collaborative activity in their access agreements and we expect providers to take this forward into their access and participation plans. Such activity could include working collaboratively with other providers to explain the value of higher education to potential students from underrepresented groups, or work around curricular choices, which can be crucial in ensuring both young people and adult learners are well informed when choosing qualifications and subjects for GCSE or equivalent and beyond.

125. Collaboration can also be beneficial for success and progression, for example, through working with third sector organisations to understand and support retention for specific student groups that may have particular needs. Additionally, collaboration with employers can support the progression of underrepresented students to graduate employment or further study.

126. Collaboration is important across the whole student lifecycle and we encourage higher education providers to learn from the work of others, adopt and adapt tried and tested activity, and to innovate. This is likely to be one of the ways a provider could demonstrate continuous improvement in developing their activities.

⁴³ <https://www.gov.uk/government/publications/social-mobility-and-opportunity-areas>

Further sources of support for providers

- HEFCE outreach resource pool (www.hefce.ac.uk/sas/aboutrp/)

Access, success and progression measures

127. You should aim to target resources to activities and support measures where you are able to evidence impact on access, success and progression. We encourage you to share effective practice wherever you find it, using your local and national networks, and we also welcome efforts to try new approaches where effective evaluation and monitoring are built in from the start.

128. We expect to see a strategic, data- and evidence-led approach to your planned activities and support measures. These should be based on your assessment of your own performance, strategic priorities and progress towards targets and be informed by evidence of the impact of previous and current activities. This should enable you to demonstrate how you plan to tackle performance gaps. For example:

- If you have low proportions of students from underrepresented groups, you will wish to focus on access measures with the aim of improving your own performance and access to higher education across the sector.
- If your student body is more representative of the wider population, you will wish to focus on improving success and progression into graduate employment or further study, while continuing with collaborative access work.
- If there are gaps between the continuation, attainment and employability of different groups of students, such as those with protected characteristics as defined by equality law, you will wish to focus on this.

Targeted

129. In your access and participation plan, you should be clear about how your activities are targeted to specific groups of potential and current students who face inequalities. This may include work with schools and colleges that have low higher education progression rates, or with communities that have low rates of participation in post-compulsory education, or with employers and local agencies. As part of this, you will wish to draw on your broader equality and diversity work (see page 20 for further information on equality and diversity).

130. In some cases, particularly in your work to improve success and progression, it may be appropriate to develop inclusive activities that are available to all students. You should be clear how this work will improve outcomes for your target groups and provide evidence of impact when developing new, or improving existing, inclusive activities (see page 42 for information on investment that is countable in your access and participation plan).

131. Where you have activities or support measures that are specifically targeted at people wishing to study on a part time basis, or relating to initial teacher training, you may wish to describe these separately.

Access

132. We encourage sustained, coordinated activities that work with potential applicants including young and mature learners, their parents and carers, other advisers and communities and

employers, over several years from primary school age upwards. Collaboration is an effective way of delivering this type of work (see page 27 for information on collaborative work).

133. Where you are delivering access work with younger age groups outside your access and participation plan, you should still describe this activity in your access and participation plan, while being clear that the spend on it is outside your access and participation plan.

Outreach

134. Outreach helps raise awareness, aspirations and attainment among people from underrepresented groups. This can include:

- a. **Outreach work with schools and young people:** Mentoring programmes with schools and young people; summer schools, campus visits, taster days and masterclasses; compact programmes and progression agreements with schools and colleges; curriculum design and enhancement work; work with looked-after children and care leavers.
- b. **Outreach work with communities and adults:** Taster days and visits for adults; community projects; progression agreements aimed at adults progressing from further education; work with employers aimed at progressing adults into higher education.
- c. **Outreach work with disabled students:** Mentoring programmes with disabled students; summer schools, campus visits, taster days and masterclasses; compact programmes and progression agreements aimed at disabled students progressing from further education.

Strategic relationships with schools

135. All providers benefit from raising the aspirations and attainment of potential students, so all providers should contribute to this work. Providers should, therefore, develop strong links with schools, colleges and communities where rates of progression to higher education are low or where there are significant proportions of students from underrepresented groups. These links should be appropriate to the context of the provider. For example, we would expect providers with substantial proportions of young entrants to carry out the most significant work in this area.

136. You should build strong, sustained relationships with schools and colleges to address challenges concerning prior educational attainment and subject or qualification choice. In your access and participation plan, you should tell us about the work with schools and colleges you intend to carry out in 2019-20, and where appropriate how this will build on existing activities and work, including any committed in previous access agreements. As with all activities and support measures, you should seek to provide evidence of impact. Our expectations for providers to demonstrate continuous improvement are set out in 'Regulatory Notice 1: Guidance on access and participation plans for 2019-20' (OfS 2018.03). This includes an expectation that providers will improve their practice, through better evaluation and sustained engagement with schools from early years and with employers.

137. If you have not previously had an access agreement for 2018-19, you should first look at how you can create and maintain strategic relationships, or refocus your existing work and relationships with schools and colleges to enhance their teaching and learning outcomes, with the aim of improving access to higher education.

Attainment-raising activities in schools and colleges

138. There is a clear link between academic attainment in schools and colleges, and access to higher education. As TeachFirst highlights in its report 'Beyond access: Getting to university and succeeding there' (2017)⁴⁴: 'No matter how much support is provided to students from disadvantaged backgrounds, they will not get into university unless they reach the required academic standards.'
139. The Institute for Fiscal Studies research 'Family background and university success' (2016)⁴⁵ highlights that attainment at Key Stage 4 is a key predictor of participation in higher education. This means attainment interventions may be most effective if they are targeted at students under 16 years old.
140. When disadvantaged students achieve the same levels of attainment as their advantaged peers at age 16, they are almost equally likely to go to higher education⁴⁶. However, only one third of disadvantaged students get the GCSE grades⁴⁷ associated with higher education entry, compared with two thirds of their advantaged peers. Those from disadvantaged groups are often not able to access as many opportunities to develop the specialist skills⁴⁸ required in the admissions processes of some institutions, such as in art, music or agriculture.
141. As part of your sustained activities, you should set out how you will work with schools and colleges to support the attainment of those from underrepresented groups. Providers with the highest academic or specialist skills entrance requirements should give particular consideration to how they can raise applicants' ability to meet them.

Outcomes

142. The long term goal of all work to raise attainment should be to improve access and participation in higher education.
143. To achieve this, your interventions should have as their medium term goals one or more of the following outcomes:
- improve students' progress between KS2, KS3, KS4 and/or KS5
 - improve students' progress within an academic year

⁴⁴ www.teachfirst.org.uk/reports/beyond-access

⁴⁵ www.ifs.org.uk/publications/8799

⁴⁶ www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-raising-attainment/#attainmentks4

⁴⁷ www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-raising-attainment/#linkwithdisadvantage

⁴⁸ www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-raising-attainment/#specialistskills

- close the attainment gap between disadvantaged groups (e.g. those in receipt of free school meals) and the general school population
- increase performance of students in academic measures such as Attainment 8, Progress 8, attainment in English and maths, English Baccalaureate (EBacc) entry and achievement, and destinations of pupils after Key Stage 4
- improve Ofsted inspection outcomes
- improve access and outcomes in specialist areas such as music, performing arts and agriculture.

144. To achieve the above outcomes and for the purposes of planning and annual evaluation you should consider the short term goals of your work. Attainment in academic or specialist skills can be influenced by a variety of factors, which may form the basis of your short-term aims. These factors include:

- improved subject knowledge
- student confidence
- learning environment
- teaching quality.

145. You should describe which short term goals you will address and demonstrate the link between these and your medium to long term goals of improved attainment among disadvantaged students, for example by referencing a report or academic research. Information on developing short and medium term goals, and a summary of relevant evidence, is provided in the topic briefing on raising attainment⁴⁹.

Activities

146. Interventions to raise attainment may be aimed at improving school characteristics, student characteristics, or teaching quality. Activity where raising attainment is the primary objective may include:

- school sponsorship, establishing a maths school, or other formal relationships with schools
- sustained, collaborative, and strategic outreach with specifically targeted schools
- supporting multi academy trust-level governance, or governance at school level as part of a wider partnership
- partnerships with third sector organisations that offer outreach provision

⁴⁹ www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-raising-attainment/#whatsbeingdone

- other approaches such as academic research, employer engagement, or foundation provision which is specifically targeted towards underrepresented students and over and above normal business.

147. Raising attainment activities should be collaborative between schools, colleges, higher education providers and third sector providers, with each party providing unique resources and expertise to enhance existing provision. We encourage you to provide details of these collaborations in your access and participation plan.

Further sources of support for providers

- 'Topic briefing: Raising attainment in schools and colleges for widening participation' (December 2017) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/topic-briefing-raising-attainment/)
- The Education Endowment Foundation (<https://educationendowmentfoundation.org.uk/>) summarises academic research about student attainment and draws attention to high potential education interventions
- DFE information about sponsoring an academy (www.gov.uk/guidance/sponsor-an-academy) and setting up a free school (www.gov.uk/set-up-free-school).

Supporting access through apprenticeship routes

148. In targeting your access work towards underrepresented students, you may wish to consider flexible and work-based routes such as higher and degree level apprenticeships.

149. As apprenticeships allow learners to be employed during their course and tuition fees are paid by the employer or through government funding, they may be more attractive to students with existing responsibilities. For example, the flexibility to study and work simultaneously may benefit mature students who are more likely to have family or other commitments. Another example may be carers who would benefit from the alleviation of financial pressures associated with being a student and carer.

150. Degree apprenticeship students can also develop the skills, knowledge and behaviours required by employers for specific occupations that are in demand. Due to their links with employers, apprenticeships can be a powerful route to employment

Success

151. Your work on success will be concerned with supporting students to continue their studies and reducing gaps in attainment between different groups of students that cannot be attributed to prior attainment or otherwise explained. The activities and support measures you provide should be targeted to improve outcomes for groups of students for which you have identified disparities in your **ambitions** and **strategy** and based on your **assessment of performance**.

152. Where your assessment of your performance shows you are successful at recruiting students from underrepresented groups, but your success rates for these students are low, we expect you

to invest appropriately in measures to address this, based on the evidence in the assessment of your performance.

153. With the wellbeing and attainment of your students depending on academic and social factors and experiences, it is important to have a holistic approach to supporting your students' success. We encourage you, therefore, to consider the practices across your organisation so that success for students from underrepresented groups is supported across your academic departments, student services and other departments, as appropriate. For more information on the adoption of a whole provider approach, see page 24.

Inclusive practice in success activities

154. As with the other stages of the student lifecycle, different groups of students face different barriers to their success in higher education, and we can identify differential outcomes, both in terms of non-continuation and attainment, for students with different characteristics. It is important, therefore, that you develop your understanding of the specific obstacles faced by different groups of students at your organisation.

155. Once you understand these barriers, you may develop a specific and targeted intervention to improve outcomes in this area. However, based on your evidence, you may decide that an inclusive practice intervention is more appropriate to reduce gaps in the non-continuation and attainment of different student groups. This goes beyond activities and events available to your whole student body and means you ensure that different groups of students have the opportunity to benefit equally. Inclusive practice is about changing structures and cultural practices so all students have a sense of belonging.

156. Through your evaluation of your inclusive activities and support measures, you will want to see a more significant positive impact for the underrepresented groups you are targeting, compared with other groups benefiting from this intervention. This will demonstrate that you are making progress in reducing disparities in outcomes between student groups.

Reducing attainment gaps

157. Evidence⁵⁰ shows that attainment gaps persist for groups of students with certain characteristics⁵¹, even when taking into account prior attainment. A critical review commissioned by HEFCE in 2015 reported on 'Causes of differences in student outcomes'⁵² and found four explanatory factors:

- **Curricula and learning, including teaching and assessment practices:** Different student groups have different levels of satisfaction with what they learn and with the user friendliness of learning, teaching and assessment practices.

⁵⁰ HEFCE (2013) 'Higher education and beyond': (www.hefce.ac.uk/pubs/year/2013/201315/) and HEFCE (2014) 'Differences in degree outcomes': (www.hefce.ac.uk/pubs/year/2014/201403/)

⁵¹ HEFCE (2017) 'Higher Education in England 2017' (www.hefce.ac.uk/pubs/year/2017/201720/)

⁵² King's College London, ARC Network and the University of Manchester (2015) 'Causes of differences in student outcomes' (www.hefce.ac.uk/pubs/rereports/year/2015/diffout/)

- **Relationships between staff and students and among students:** A sense of 'belonging' is a key factor that influences student outcomes.
- **Social, cultural and economic capital:** How students experience higher education, how they network and how they draw on external support. Students' financial situations also affect their student experience and engagement with learning.
- **Psychosocial and identity factors:** How far students feel supported and encouraged in their daily interactions within their organisations and with staff members. Such interactions can both help and limit students' learning and attainment.

Interventions

158. Providers working to address differential non-continuation and attainment rates often make specific interventions to address one or more of the explanatory factors above. For example:

- refreshing curricula to be more inclusive and representative of diverse backgrounds
- co-creating curricula and assessment practices in partnership with students that represent the diversity of the student body
- creating more inclusive teaching and learning environments for all students using technology and innovative pedagogy
- embedding cultural change with staff and students through training and inclusive curricula frameworks
- enhancing personal tutoring support
- using data and employing learner analytics to target at-risk students with relevant interventions and support
- supporting student ambassadors from certain student groups
- providing support for mental health and wellbeing.

Further sources of support for providers

- Social Market Foundation 'On course for success? Student retention at university' (2017) (www.smf.co.uk/publications/course-success-student-retention-university/)
- HEFCE 'Differences in degree outcomes' (2015) (www.hefce.ac.uk/analysis/degree/)
- HEFCE 'Causes of differences in student outcomes' (2015) (www.hefce.ac.uk/pubs/rereports/year/2015/diffout/)
- Paul Hamlyn Foundation, Higher Education Academy and Action on Access 'What works? Student retention and success programme' (2017) (www.heacademy.ac.uk/knowledge-hub/supporting-student-success-strategies-institutional-change)

Progression

159. We expect that providers with poor records of graduate employment or disparities in employment outcomes for different groups of students will focus on improving progression to employment as the full benefits of higher education are not realised only by enrolling on and completing a course, but through successful progression.
160. You may wish to target some activities specifically at improving outcomes on courses that lead to professional careers, particularly for courses that are less representative than your wider student population. For example, you might consider working with employers or professional, statutory and regulatory bodies (PSRBs) to provide mentoring, work placements and other activities to improve progression to these careers.
161. As with your work to support student success, we expect your activities and support measures to focus on improving outcomes for the student groups whose progression to graduate employment is relatively low within your organisation, or where there are disparities for different groups, and should be based on the evidence in your assessment of performance. For example, if your cohort tends to progress locally, you may decide to increase employer engagement and boost local vacancies to enable greater absorption into your local labour market.

Employability

162. We expect providers with an access and participation plan to demonstrate continuous improvement in developing their activities. You may wish to work with employers through intra-, co-, and extra-curricular activities, or any combination of these, to suit your student cohorts. This may include increasing student engagement with enterprise and social enterprise, curriculum refreshments to include greater employer input, and increasing early engagement with careers and work experience.
163. Activity focusing on increasing the employment outcomes of students could include:
- work-based learning
 - placements, including micro-placements
 - embedded employability modules
 - professional mentoring
 - recruitment matching services
 - improved information, advice and guidance about career pathways
 - student engagement with enterprise and social enterprise.
164. Providers may also wish to consider how they can engage with employers and PSRBs in their course and curriculum design to enhance graduates' employability.

Work placements

165. Work experience can improve graduates' employability and ease the transition into employment and the workplace⁵³. Outward mobility such as study or work placements abroad can also play an important role in progression from higher education. A Universities UK International report⁵⁴ found that 'graduates who were mobile during their degree were less likely to be unemployed (3.7 per cent compared with 4.9 per cent)'. We recognise that opportunities to undertake a full year placement may not be available or suitable for all students, but providers may wish to think about how work placements and opportunities abroad could be developed and offered to be more inclusive of students from underrepresented groups.

Working with careers services to support transition into work

166. If you have a professional careers advisory service in your organisation, it can be an important source of expertise in supporting your work at the progression stage of the student lifecycle. Consideration should be given to how this resource is maximised to support students in their transition to employment. We encourage providers to support students' early engagement with careers education information advice and guidance so they are able to benefit from opportunities gained through, for example, work placement schemes. Employer engagement is also a feature of careers services and may help target employers or increase employers' involvement in the availability of placements, mentoring and employment matching services.

167. It is important for providers to ensure that these services are available to all students and consider where different groups may require additional support to access services and opportunities. We also encourage collaboration between careers services and academic departments as part of a whole provider approach.

Progression to postgraduate study

168. Interventions that aim to increase the take up of postgraduate study for certain groups of students may include:

- increased promotion of postgraduate options to undergraduate students and alumni
- improved information, advice and guidance about postgraduate study, linking to career pathways
- embedded postgraduate transition support within curricula and learning.

Further sources of support for providers

- The Careers Group (www.thecareersgroup.co.uk/about/)
- The Association of Graduate Careers Advisory Services (AGCAS) (www.agcas.org.uk/pages/about-us)

⁵³ www.gov.uk/government/publications/business-university-collaboration-the-wilson-review

⁵⁴ www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/gone-international-mobility-works.aspx

Financial support

169. As with the access, success and progression measures you implement, you should take an evidence-led approach in developing financial support measures. Where you do not have evidence to support your investment in financial support, you should consider whether this investment could be more effectively invested in other activities to support access, success and progression.

Designing your financial support packages

Consulting students

170. Where you offer financial support, it is important to ensure it provides the greatest benefit to your students. To determine whether your financial support schemes are fit for purpose, we strongly encourage you to consult with your students (see page 25 for further details on consulting with students).

Considering students who receive social security benefits

171. If students are on social security benefits such as housing benefit, the Department for Work and Pensions (DWP)⁵⁵ will count a provider's bursary as income when calculating those benefits. This may result in the student's benefits being cut. To reduce the risk of that happening, the following conditions must be met:

- a. The student in question receives the income assessed Special Support Grant. This is designed specifically for full time students eligible for DWP benefits.
- b. The bursary is for course related costs such as books and other materials, course related travel etc. Students must have a written statement to this effect to qualify for the disregard. The disregard will not apply to any part of a bursary intended for living costs.

172. We strongly encourage you, therefore, to make every effort to describe your bursary in terms that enable the DWP to disregard it as income – so enabling students on benefits to receive the full value of your support as intended.

Changing financial support/fee discounts during the application cycle

173. Ultimately, it is up to providers to decide whether they wish to discount their fees or increase their financial support late in the application cycle as a way of filling undersubscribed courses (for example during clearing). However, we expect you to consider the potential impact carefully.

174. In particular, you should bear in mind that discounting late in the application cycle is unfair to applicants who chose not to apply to your institution because of the fee and support package you advertised earlier. There is also a risk that late fee discounts may encourage applicants in future cycles to apply late in the hope of paying reduced fees. This would reduce their chances of being admitted to their preferred course, or even at all. We are concerned that such risks are more likely to be taken by applicants from underrepresented groups.

175. In the interest of fairness, if you decide to offer a late fee discount or increase the financial support for a course, we expect you to offer the same improved financial package to all eligible

⁵⁵ www.gov.uk/government/organisations/department-for-work-pensions

applicants, including those who have already accepted an offer from you, not just those who apply late.

Financial support for students with special circumstances

Students who owe debt to the provider

176. If a student is indebted to you, e.g. through unpaid accommodation costs or library fees, we consider it reasonable for you to offset their bursary against this debt, if you wish to do so.

177. It is for individual providers to devise their own rules regarding the administration of financial support. However:

- you should make your offsetting policy clear in the rules of your financial support scheme
- where you offer a bursary for a specific purpose, such as covering the cost of tuition fees, it is not good practice to offset this against a debt incurred in a different area.

Students who defer entry

178. If you change your support package from one year to another, there will be a different support package in place when deferred students start their studies than was available when they applied. It is for you to decide which package to give them: the one offered in their year of entry or in their year of application.

179. You should base your decision on reasonableness, timing and the clarity of information you have given to deferred students, particularly if your financial support has decreased.

180. You will need to make sure that:

- you provide clear and accessible information on what financial support package deferred students can expect, preferably directly to the students concerned
- this information makes it clear to students that your financial support package is linked either to their year of entry or their year of application (whichever you decide)
- if, when you offer a deferred student a place, you have not finalised the financial support package that will apply to their year of entry, you give full details as soon as the package has been finalised.

181. Please be aware that if a deferred student decides to challenge you on the level of financial support you are offering and you cannot resolve the matter to their satisfaction, they may take the matter to the Office of the Independent Adjudicator for Higher Education⁵⁶.

182. We think it is reasonable to change the financial support you offer to deferred students provided that:

- you alerted deferred students to any negative changes within a timetable that would have reasonably allowed them to apply elsewhere and/or

⁵⁶ www.oiahe.org.uk/

- caveats in your original offer stated your financial support might change or was not finalised.

183. However, we do not think it would be reasonable to change your financial support offer if such caveats existed only in the small print, nor that providers should expect applicants to be excessively proactive in finding out about changes to their financial support entitlement.

184. We encourage you to test your position with your student union before deciding which financial support package your deferred students are eligible to receive.

EU students

185. It is for you to decide whether you award bursaries and scholarships to EU students. Your calculations in respect of financial support spend will include or exclude EU students according to your financial support rules.

Students from Wales, Northern Ireland and Scotland

186. It is up to you to decide whether these students are eligible for any financial support your institution offers. However, we strongly recommend that cross-border students receive a fair level of support, in line with England-domiciled students.

187. Where the state support provided for students studying in England from other UK domiciles is higher than support for England domiciled students, we feel it is reasonable for providers to take this into account and apply separate financial support criteria for such students for means-tested awards. Depending on the level of state support, this could result in students from other UK domiciles being entitled to less, or even no, financial support from their provider.

Paying students

188. The payment dates of bursaries and scholarships are for you to determine. We recognise that different providers may want to award bursaries at different times. Some choose to award bursaries at the start of the academic year to help students with set-up costs, others wait until they have received payment from the Student Loans Company to cover students' tuition fees, others pay at the end of the year and link to completion.

189. You may decide to delay payment of bursaries and scholarships into the second term or later, particularly if you have evidence that this gives students an injection of cash when it is most beneficial.

190. You should make your timetable for paying financial support clear in your access and participation plan and the literature you send to students.

191. If at any point you decide to change the payment dates of your financial support, you will need to manage the expectations of prospective students by flagging up changes to previously advertised payment dates, for example on websites and in any correspondence with applicants such as welcome packs.

Retrospective claims

192. Students may want to claim financial support retrospectively, sometimes after they have left a provider. It is for individual providers to devise their own rules regarding the administration of financial support, including payment dates and any cut-off dates by which students need to apply, or consent to share financial information, to be eligible for a bursary.

193. If you have under spent against your access and participation plan budgets or have a take-up issue, we encourage you to take a favourable view of any late financial support claimants up to the end of the academic year.
194. The best way to minimise retrospective claims is to make sure students know when and how to apply for financial support. This means making sure your rules are reasonable and your information is clear and well publicised to students as early as possible.
195. We also recommend that you are flexible where a student can demonstrate exceptional circumstances for not complying with your requirements.

Further sources of support for providers

- 'Topic briefing: financial support' (February 2018) (www.offa.org.uk/universities-and-colleges/guidance/topic-briefings/offa-topic-briefing-financial-support/)
- OFFA commissioned research 'Understanding the impact of institutional financial support' (December 2016) (www.offa.org.uk/egp/impact-of-financial-support/)

Investment

196. The following types of investment may be included in your access and participation plan:

- the direct costs of delivering access, success and progression activities and support measures, including:
 - relevant staffing (payroll costs of central widening participation units working wholly on access and participation activities including planning, delivering, monitoring and evaluating activities)
 - payroll costs of staff time specifically allocated to access and participation work from professional support services (e.g. admissions, student services, careers, finance)
 - remuneration costs of access and participation work undertaken by student ambassadors, student unions or alumni that are funded by the provider
 - access and participation staff learning and development
 - travel and other logistic costs of access and participation project delivery
 - outsourced research and evaluation projects, including work to identify and develop equality and diversity protected characteristics of access and participation activities
 - subscription and membership costs
- the indirect/support costs of access, success and progression activity, including:
 - payroll costs of academic staff time apportioned to widening participation work
- infrastructure costs apportioned to strategic projects
- the direct costs of delivering financial support.

Access investment

197. In the context of an access and participation plan, access investment specifically relates to work targeted to potential students, their families and communities before making choices about entry to higher education. It includes:

- outreach work with schools, young people, adults with no prior experience of higher education, communities and disabled people
- strategic relationships with schools (strategic partnerships between schools and higher education providers such as sponsoring of an academy, federation or trust, university technical college or free school).

198. For the purpose of allocating costs, access investment includes:

- prior year preparation costs, if not previously included

- your annual share of collaborative outreach activity with one or more partner institutions or other bodies
- your annual share of student and staff directed costs of administering progression agreements including monitoring and evaluation of the scheme
- deployment of prior year bursary underspend to identifiable access activities
- costs of gathering and analysing contextual admissions data
- infrastructure costs committed to strategic/sustained access projects
- promotional activities wholly or substantially directed to widening participation projects.

Costs associated with sponsoring an academy or setting up a new free school

199. We expect that most of the costs of setting up or sponsoring a school would be provided by the DFE rather than being incurred directly by higher education providers. For setting up new schools, this will include a project development grant to support the project before it opens and a post-opening grant to support the school in its early years as it builds to capacity. In addition, the Education and Skills Funding Agency will manage the process and provide capital funding for suitable accommodation for the school. For school sponsorship, funding depends on the phase of the school and level of challenge; see the DFE website⁵⁷ for more details. There is also the opportunity to apply for the DFE's Regional Academy Growth Fund⁵⁸ for additional funding to build capacity.

200. Additional costs incurred by higher education providers in setting up or sponsoring a school (such as the higher education provider's staff time) may be counted where this contributes to your work to raise attainment and support access for those from groups underrepresented in higher education. We recognise that it may be difficult to disaggregate higher education access investment within your work to set up or sponsor a school and appreciate that you may need to use estimates. If you do so, you should ensure your estimate is based on a clear rationale relating to the proportion of spend benefiting those from underrepresented groups. Ongoing costs such as for outreach activity, teachers' continuing professional development, or access to university or college facilities, may also be counted where they meet our broader guidance on access and participation plan countable investment. If you are unsure whether a cost is countable, contact us to discuss further.

Success and progression investment

201. We appreciate that much of the work you do to improve student success (continuation and attainment) and progression (to further study or graduate employment) may be embedded within your learning and teaching practices. To include success and progression investment in your access and participation plan you will need to disaggregate these investments.

⁵⁷ www.gov.uk/government/publications/sponsored-academies-funding-guidance-for-sponsors

⁵⁸ www.gov.uk/government/publications/regional-academy-growth-fund-award-recipients

202. You may count purposeful, proactive induction activities embedded within students' courses and on-course peer mentoring, as these may also be effective in building engagement and belonging, and reduce non-continuation.

203. Success investment may also be directed to:

- pre-entry (post-enrolment) interventions and activities for students: induction, bridging programmes and summer schools for currently registered students
- training and induction for staff in professional services and academic schools and faculties
- study skills programmes offered by libraries and study support teams.

204. Where new investment is not fully targeted at underrepresented groups, or is untargeted, you may apportion the cost (a percentage of the overall costs) based on reasonable assumption. Your assumption may be based on the reapplication of actual cost data measured in an earlier year. You should, therefore, provide us with the basis of the assumption, including the percentage you have applied. If you have no data on which to base a reasonable assumption on how to apportion investment, you should use as a proxy the proportion of qualifying student numbers expressed as a percentage of the total number of students in the targeted group. Where you are including investment of this type in your access and participation plan, you should evaluate the impact of these schemes in relation to underrepresented groups.

205. Progression investment may be directed towards:

- professional mentoring schemes
- internships
- other workplace schemes and formal placement programmes
- learn-while-you-earn initiatives
- advice and support on careers, employment and postgraduate study for targeted groups including students with disabilities
- surveys, analysis and research with graduates
- business incubation for current students
- engagement with employers to support graduate vacancies and absorption.

Financial support

206. We will only count investment on financial support directed at underrepresented groups; your financial support must be tightly targeted at these students. If you are unable to provide strong evidence of the impact on students from underrepresented groups of the financial support you provide, this investment should not be counted within your access and participation plan.

207. You are, of course, free to use your own resources to support other students as you see fit (for example, to recognise outstanding academic, sporting or musical achievement).

Predicting the cost of financial support

208. If you have data on the household income of your students and this is a measure you are using to target support, you can use this to predict your likely level of total investment in financial support.

209. If you do not have such data, the Student Loans Company⁵⁹ can provide you with data showing the proportions of your students that fall into different household income bands. This will allow you to estimate how much you will spend on financial support for lower income students.

Costs associated with monitoring and evaluation

210. We will count investment in monitoring and evaluation of your access, success and progression activities and financial support. You should include it within the cost of your activity and where possible divide it between the different areas of the student lifecycle.

Costs associated with using contextual information

211. If you use contextual information, you should include this in your access and participation plan, and you may wish to include any extra costs involved (for example, the cost of monitoring and evaluation) in your investment predictions.

Investment in part time students

212. Where you have data on your access, success and progression performance for part time students, you may wish to take this into account in understanding your overall investment in your access agreement. We will assume you will invest the same proportion of your fee income from part time students as you do from full time higher fee income, unless you have evidence to support a different level of investment.

213. You may include investment on access and participation measures for part time students in your access and participation plan regardless of whether you charge higher fees for part time courses.

Collaborative investment

214. You may count your investment on collaborative outreach and related activity as part of your overall access and participation plan spend. This includes investment on set-up costs such as building the networks required to ensure the effectiveness of collaborative activity, as well as setting up monitoring and evaluation systems.

215. Funding that you receive from NCOP consortia, Opportunity Areas or other public funding must not be counted in your access and participation plan.

Subscriptions and memberships

216. Investment on subscriptions to networks or services that support your access and participation plan is countable within your plan. This might include, for example, membership of collaborative networks or subscribing to academic journals focused on access and participation. This may

⁵⁹ www.practitioners.slc.co.uk/

include bodies such as Supporting Professionalism in Admissions (SPA)⁶⁰ and the Higher Education Access Tracker⁶¹, which support professional practice.

⁶⁰ www.spa.ac.uk/

⁶¹ <http://heat.ac.uk/>

Glossary

Access activities

Actions relating to support for young and mature students from underrepresented backgrounds to enter higher education, for example through aspiration or attainment raising outreach activities in schools, summer schools, peer mentoring schemes, or progression agreements.

Activities

Work to improve access, success and progression, as opposed to financial support given to students. For example, mentoring is an activity, but a scholarship is not.

Basic fee cap

The level of tuition fee up to which an access and participation plan is not required. This is set by the government and varies according to year of entry. There are different basic fee levels for full time and part time courses, sandwich and year abroad or Erasmus years and, subject to government consultation, accelerated degrees.

Collaborative activity

Collaboration between multiple higher education providers and other organisations to provide activities that support access and participation. Collaboration could be done in numerous ways, for example between providers, employers, schools and third sector organisations. Where a single higher education provider is delivering activities to schools, colleges or other stakeholders, we would not normally define that as collaboration.

Continuing students

Students in their second, or later, years of study. For example, students who were entrants in 2018-19 will be continuing students from 2019-20 until the completion of their course.

Continuous improvement

Year-on-year improvement in your access and participation work, through action to reduce the gaps in access, success and progression for underrepresented groups among your own students, and improve your practice, including through better evaluation and sustained engagement with schools from early years and with employers.

ELQ students

Students who already hold a higher education qualification and are studying a course that leads to a qualification equivalent to or lower than one they already hold, as defined in the Education (Student Support) Regulations 2011 (UK statutory instrument 2011 No. 1986)⁶². These students are not

⁶² www.legislation.gov.uk/ukSI/2011/1986/contents/made

usually covered by fee regulations⁶³. For information about ELQ exceptions, see UK statutory instruments 2008 No. 1640⁶⁵; 2011 No. 1986⁶⁶, 2014 No. 2765⁶⁷ and 2017 No. 114⁶⁸.

Entrant/year of entry

When we refer to entrants, or year of entry, we mean the academic year in which students started their courses, including those who deferred entry. For example, students who deferred entry from 2018-19 to 2019-20 would be classed as 2019-20 entrants. From 2020-21 onwards these students would be classified as continuing students. The definition of academic year is covered in the Education (Student Support) Regulations 2011 (UK statutory instrument 2011 No. 1986⁶⁹) within regulation 2.

Financial support

There are four main types of financial support given by higher education providers to their students:

- bursaries and scholarships (financial awards paid to students)
- fee waivers (a discount on the tuition fee charged)
- hardship funds
- 'in-kind' support, e.g. discounted accommodation, free entrance to sports facilities or credit the student can spend on campus facilities such as childcare or printing.

Note: OfS regulates financial support that is specifically for students from low-income backgrounds and other underrepresented groups, so the data we collect through access and participation plans includes only this financial support. Providers may offer other support as well: for example, merit-based scholarships open to all students, including those from more advantaged backgrounds.

FTE

Full time equivalent

⁶³ www.offa.org.uk/glossary/#regfees

⁶⁴ www.legislation.gov.uk/uksi/2008/1640/contents/made

⁶⁵ www.legislation.gov.uk/uksi/2008/1640/contents/made

⁶⁶ www.legislation.gov.uk/uksi/2011/1986/contents/made

⁶⁷ www.legislation.gov.uk/uksi/2014/2765/contents/made

⁶⁸ www.legislation.gov.uk/uksi/2017/114/contents/made

⁶⁹ www.legislation.gov.uk/uksi/2011/1986/contents/made

HEIDI

Higher Education Information Database for Institutions⁷⁰. A web-based management information service, run by the Higher Education Statistics Agency⁷¹ that provides quantitative data about equality and diversity in higher education.

Higher fee cap

The maximum regulated fee that can be charged under an access and participation plan. This is set by the government and varies according to year of entry. There are different fee caps for full time and part time courses, and sandwich and year abroad or Erasmus years, and subject to government consultation, accelerated degrees. Approved (fee cap) providers must not charge fees more than the higher fee cap.

Higher fee income

Any income from fees above the basic fee threshold. For example, if a provider charges £9,250 for a full time course in a year when the basic threshold is £6,165, the 'higher fee income per student' would be £3,085 (£9,250 – £6,165 = £3,085).

HERA

The Higher Education and Research Act 2017

Milestones

The yearly goals a higher education provider has set within an access and participation target to track progress.

Multiple dimensions of disadvantage

The intersection of two or more forms of disadvantage (for example, white British males from low socioeconomic backgrounds). This should provide institutions with a broader understanding of their student population to identify barriers to equality of opportunity. UCAS's multiple equality measure⁷² further demonstrates the importance of considering multiple-dimensions of disadvantage when looking at socioeconomic status.

NCOP

The National Collaborative Outreach Programme (NCOP) aims to support the most underrepresented young people in England to progress into higher education. It is running from 2016-17 to 2019-20 and consists of 29 consortia undertaking outreach activity in geographical areas where higher education participation of young people is low.

OfS

The Office for Students

⁷⁰ www.hesa.ac.uk/services/heidi-plus

⁷¹ www.hesa.ac.uk

⁷² www.ucas.com/corporate/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/equality-and-entry-rates-data-explorers

Outreach

Activity by higher education providers that helps to raise awareness, aspirations and attainment among people from underrepresented groups, e.g. summer schools that give a taste of higher education life, homework clubs for pupils who may not have anywhere to study at home, or providers forming and sustaining links with employers and communities.

Part time students (fee-regulated)

Those studying at an intensity of at least 25 per cent of a full time course, starting on or after 1 September 2012, excluding those studying on a course that leads to a qualification equivalent to or lower than one they already hold. This is because these students are covered by fee regulations.

POLAR

POLAR (Participation of Local Areas) is a classification of small areas across the UK according to the participation of young people in higher education for geographical areas ranging from regions to wards. There have been several iterations of POLAR, which are referred to as POLAR1, POLAR2, POLAR3 and POLAR4.

Progression activities

Actions relating to support for undergraduate students from underrepresented backgrounds as they prepare to progress to graduate employment or postgraduate study.

Protected characteristics

These are the personal characteristics upon which, under the Equality Act 2010, discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation⁷³.

Regulated fees

Tuition fees that are subject to government-set limits. Information about which categories of students and courses are covered by regulated fees is set out in The Student Fees (Qualifying Courses and Persons) (England) Regulations (statutory instrument 2007 No. 778)⁷⁴, as amended (in particular by statutory instrument 2008 No. 1640⁷⁵ for the ELQ policy). See also The Education (Student Support) Regulations 2011 (statutory instrument 2011 No. 1986)⁷⁶, as amended (in particular by statutory instrument 2014 No. 2765⁷⁷).

⁷³ www.equalityhumanrights.com/en/equality-act/equality-act-faqs

⁷⁴ www.legislation.gov.uk/ukSI/2007/778/contents/made

⁷⁵ www.legislation.gov.uk/ukSI/2008/1640/contents/made

⁷⁶ www.legislation.gov.uk/ukSI/2011/1986/contents/made

⁷⁷ www.legislation.gov.uk/ukSI/2014/2765/contents/made

Resource plan

Excel document submitted with the access and participation plan that captures student numbers, access and participation plan investment and targets/milestones.

Student lifecycle

This term refers to the stages of a person's journey into, through and onwards from, higher education: that is to say, pre-application, application, undergraduate/postgraduate study, and then transitioning from study to work or other next steps. There are three stages to the student lifecycle: access, success and progression.

Success activities

Actions relating to support for students from underrepresented groups through their studies, for example through induction programmes and study skills support, aimed at reducing differences in experience and attainment with other students.

Target

An objective set by a higher education provider in its access and participation plan, which it will track over a five-year period. (See also milestones)

Underrepresented groups

For 2019-20 access and participation plans, we consider underrepresented groups of students to include students who share the following particular characteristics where data show gaps in equality of opportunity in relation to access, success and/or progression.

- students from areas of low higher education participation, low household income and/or low socioeconomic status
- students of particular ethnicities
- mature students
- disabled students
- care leavers.

In addition, there are groups of students where there is specific evidence that barriers exist that may prevent equality of opportunity. These are also included in our definition of underrepresented groups.

- carers
- people estranged from their families
- people from Gypsy, Roma and Traveller communities
- refugees
- people with specific learning difficulties and mental health problems
- children of military families.

There are also students from groups with protected characteristics under the Equality Act 2010 where data is not collected at a national level or where there are gaps in disclosure in the current national data, for example in relation to religion and belief and sexual orientation, which currently prevents us from determining whether they are underrepresented at different points of the student lifecycle.

Whole provider approach

An approach to access and participation embedded at all levels of an institution, not limited to a particular unit or department, engaging across all areas of the provider's work and inclusive of senior management.

Annex A - 2019-20 access and participation plan provider template

[Name of provider]

2019-20 access and participation plan

Template notes

Before preparing your access and participation plan you must read OfS Regulatory notice 1: Guidance on access and participation plans for 2019-20 (OfS2018.03).

*In this template, we have provided guidance in grey text to assist you in completing your access and participation plan; please delete out **all** of this grey text before submitting your plan.*

Your plan must be a single Microsoft Word document that should not normally exceed 20 pages of A4. There is no minimum length requirement.

*We will merge Tables 3 and 8 (fee and targets information) of your resource plan with this word document upon approval of your access and participation plan. So, **you do not need to include this information in your plan**. This will be the final, approved access and participation plan.*

Assessment of current performance

See page 19 of the guidance for a checklist of what you must include in this section.

Demonstrate that you understand your own performance and have developed your strategy for continuous improvement.

This section will inform the rest of your plan. Do not include information on how you will address your performance, or details of your activities and support measures, as these can be described in later sections.

Ambition and strategy

See page 21 of the guidance for a checklist of what you must include in this section.

*In this section, outline how you will respond to the areas for development identified in the **assessment of current performance** section of your access and participation plan.*

*Demonstrate the changes you aim to achieve and your strategic approach to doing so, addressing the whole student lifecycle (access, success and progression) and based on the evidence you have provided in your **assessment of performance**.*

We anticipate that this would be the longest section of your access and participation plan.

Access, student success and progression measures

See page 29 of the guidance for a checklist of what you must include in this section.

*In this section, give an overview of the activities and support measures you will undertake in 2019-20 to achieve your objectives and the priorities we have identified for access and participation. Demonstrate that the range of activities and support measures you plan to undertake in 2019-20 is a credible and effective response to the challenges you have set in your **ambition and strategy**.*

Investment

See page 32 of the guidance for a checklist of what you must include in this section.

In this section, set out the level of investment you intend to make in 2019-20.

*Through your **assessment of performance** you will have developed your **ambitions and strategy** and chosen **activities and support measures** to address the areas where you most need to improve, and to support the priorities we have identified. Demonstrate how your investment in access, student success and progression activities, and in financial support, reflect these.*

Provision of information to students

See page 35 of the guidance for a checklist of what you must include in this section.

Describe how you will meet our requirements to provide information to prospective and current students and how you will publish your approved plan.



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