

# Annex A: A new approach to regulating access and participation in English higher education

## Consultation outcomes

### Executive summary

1. In September 2018, the OfS published a consultation document setting out our proposed new approach to access and participation. The consultation ran from 7 September to 12 October 2018, and received around 200 responses. An independent analysis of those responses undertaken by CFE Research on behalf of the OfS, and validated by OfS staff, is published alongside this response.

2. The CFE Research report concludes that

‘overall there is broad support for all seven of the proposals put forward by the OfS in the consultation. There is a widespread perception that, together, the proposals will form the basis of an approach that will support the sector to take a more strategic, long-term view which meets the needs of current and potential students at each stage of the lifecycle. Most consultees are of the view that it will support improvements in the volume and quality of evaluation, which will in turn help to ensure planning and investment in access and participation is evidence-led, good practice is shared, and improvements are made to service delivery. The shift to an outcomes-focussed approach based on risk is also widely welcomed, as most perceive it will reduce burden on providers and offer the flexibility to respond to changes in local and national policy, as well as evidence of effective practice.’

### Our decisions

3. In light of our analysis of the consultation responses, we will be implementing the proposals as set out in the consultation, with some small amendments to reflect our consideration of responses:

#### The access and participation plan (APP) cycle

- a. The OfS will place the approval of access and participation plans onto a more strategic timescale, with the number of years during which a plan may be in force to be based on risk. This will be implemented from the next set of access and participation plans, which will cover the academic years 2020-21 to 2024-25. Plans will need to demonstrate clear long-term ambitions for how providers will achieve significant reductions in the gaps in access, success and progression over this period.

#### Annual monitoring and planning

- b. Providers will be required to publish and submit to the OfS an impact report each year, accompanied by an action plan setting out any steps that need to be taken to make improvements to their current plan. We will collect financial information about a provider's expenditure through the financial returns submitted by providers as part of OfS monitoring of the ongoing condition of registration on financial viability and sustainability (condition D). If a provider is subject to enhanced monitoring due to

increased risk of a future breach of ongoing condition A1, we may require a greater level of information.

### **Access and participation plan targets**

- c. Providers will be expected to set small number of outcomes-focused targets to capture the impact of their work. Some of these will be recommended by the OfS, and will align with our key performance measures and the targets the OfS Board has established as priorities for itself sector-wide, as appropriate to a provider's context. These will include:
- Gap in participation between most and least underrepresented groups
  - Gap in non-continuation between most and least represented groups
  - Gap in degree outcomes (1sts or 2:1s) between white students and black students
  - Gap in degree outcomes (1sts or 2:1s) between disabled students and non-disabled students.

### **Investment in access and participation plans**

- d. The OfS will collect predicted access spend disaggregated by pre-16 activity, post-16 activity and work with adults and communities in access and participation plans. We will also continue to collect information on the financial support that providers give to students, and set expectations that this financial support is both robustly evaluated and communicated clearly to students. We will no longer ask providers to report on spend on student success and progression.

### **Expectations on level of spend**

- e. The OfS will no longer set a minimum expectation of spend for providers' access and participation plans. Our focus will be more on the outcomes that providers achieve and their ambition for change. Our scrutiny of investment will be focused on whether we believe providers' plans to be credible, and whether they are investing enough resource to achieve their aims.

### **Principles of funding and investment**

- f. There was overwhelming agreement that the stated principles should underpin our future approach to funding and investment in access and participation, so we will be guided by these.

### **National collaborative outreach programme**

- g. The OfS board has agreed, in principle, to provide funding of £60 million per annum to support the programme during the 2019-20 and 2020-21 academic years. Future support beyond this point will depend on the outcomes of the Government's next spending review. However our ambition is to ensure that this infrastructure is sustained to support collaborative activity set out in the next round of access and participation plans.

### **Evaluation self-assessment tool**

- h. The OfS will expect providers to complete a self-assessment of their evaluation activities against a set of criteria as part of their access and participation plan. However, in contrast to the consultation proposal, we will not expect the self-assessment tool to be completed as part of the annual monitoring process.

### **Research on the use of tracking services**

- i. The OfS will work with HE providers, NCOP partnerships, the Evidence & Impact Exchange and the higher education tracking services to support improvements in the services provided and how they are used to support robust evaluation.

### **Transparency information condition**

- j. The OfS will undertake further work to explore whether it should extend the transparency information condition (condition F1) to include breakdowns by additional student characteristics of age and disability.

### **The access and participation dataset**

- k. The OfS will create, publish and maintain an access and participation dataset. This will provide a sector-level picture of the challenges in access and participation across the student lifecycle, and also at provider level. In addition it will provide clarity on how we assess performance across the lifecycle. This dataset will be published on the OfS website in time to inform the next set of access and participation plans.

## Introduction

4. In September 2018, the OfS published a consultation document setting out our proposed new approach to access and participation in English higher education.

5. The intention of the proposed approach was to ramp up the pace of improvement in equality of opportunity in student access, success and progression for groups of students that are currently underrepresented in higher education, and to drive transformational change rather than the incremental progress we have seen to date.

6. To achieve this, the proposed new approach focused on how we could:

- achieve significant reductions in the gaps in access, success and progression over the next five years
- ensure that our access and participation regulation and funding are outcome-based, risk-based, underpinned by evidence and joined up with other OfS regulatory activities.

## The OfS's functions

7. Our work on access and participation is underpinned by our general duties under Section 2 of the Higher Education and Research Act 2017 (HERA), including the general duty for the OfS to have regard to the need to promote equality of opportunity in connection with access to and participation in higher education.

8. The work is delivered through specific functions to apply a transparency condition (s.9), to approve access and participation plans (s.29), to provide advice on good practice (s.35) and to make grants to registered HE providers (s.39).

9. In the context of these functions, the proposed approach considered the following priority areas:

- the cycles of approval and monitoring of access and participation plans
- annual monitoring and planning
- access and participation plan targets
- funding and investment in access and participation
- evaluation
- our approach to data, including the transparency information condition and an access and participation dataset.

10. The consultation set out seven proposals relating to these areas.

## Main points of our consultation

11. In summary, we proposed that:

1. The OfS will place the approval of access and participation plans onto a more strategic timescale, with the number of years during which a plan may be in force to be based on risk. Plans should continue to demonstrate clear long-term ambitions for how providers will achieve significant reductions in the gaps in access, success and progression over the next five years. We will review progress against plans each year. Providers at increased risk of a future breach of condition A1 will normally be expected to submit plans every three years. Providers considered not at increased risk of a future breach of condition A1 will be expected to submit their plans every five

years. Where we have serious concerns about a future breach, we may expect more frequent resubmission.

2. Providers will be required to publish and submit to the OfS an impact report each year. Financial information previously collected in the annual access and participation monitoring process will be collected as part of wider OfS financial reporting processes. We will ensure that our requirements for impact reports are proportionate, with a lower burden for providers where the risk of a future breach of a condition is not increased.
3. Providers will be expected to include in their access and participation plans a set of strategic, outcomes-focused targets. A small number of these will be recommended by the OfS for use across all providers, and providers will also continue to be able to set outcomes-focused targets related to their own contexts.
4. The OfS will collect predicted access spend disaggregated by pre-16 activity, post-16 activity and work with adults and communities in access and participation plans. We will also continue to collect information on the financial support that providers give to students, and set expectations that this financial support is robustly evaluated, and communicated clearly to students. We will no longer require providers to report on student success and progression spend.
5. Providers will need to complete a self-assessment of their evaluation activities against a set of criteria, as part of their access and participation plans. The core purpose of the tool will be to identify and support continuous improvement in evaluation.
6. The OfS will undertake further work to explore if it should require providers to submit and publish transparency data by age and disability. This is in addition to data split by gender, ethnicity and socioeconomic background which is part of the transparency information condition F1 required by the current OfS regulatory framework.
7. The OfS will create, publish and maintain an access and participation dataset that provides a picture of access and participation across the higher education sector and at individual providers.

12. The consultation ran from 7 September to 12 October 2018, and received around 200 responses. An independent analysis of those responses, undertaken by CFE Research on behalf of the OfS, and verified by OfS staff, is published alongside this response<sup>1</sup>. The findings of the CFE report have informed our response to the consultation.

13. In addition, we held five consultation events in September in Birmingham, Bristol, Leeds and London which were attended by around 400 people. We are grateful for all the responses received, to which we have given careful consideration.

14. This response sets out how we will proceed with the proposals put forward in the consultation. If you would like to understand the consultation in more detail, including detail of the proposals and the information and evidence that helped to shape them, please see the consultation document<sup>2</sup>.

## Defining risk

15. The responses to the consultation highlighted the need for OfS to provide further information on how we will assess and monitor risk. We recognise the need for more clarity regarding our approach to risk, and in addition to the information included here, we will

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<sup>1</sup> [Link to CFE Research report to be added]

<sup>2</sup> <https://www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation/>

provide further information as part of our next set of regulatory guidance on the access and participation plans.

16. The OfS's risk-based approach is central to how we interact with providers. Our general approach to risk assessment, and how this will determine our use of powers of intervention, is set out in the Regulatory Framework (OfS 2018.01).

17. Throughout this document when referring to risk, or increased risk, our judgement of risk in relations to providers refers to the risk that a provider may breach Condition A1 in the future. In order to demonstrate that they satisfy Condition A1, providers must ensure that they are taking reasonable steps to comply with the provisions of their plan.

18. The Regulatory Framework sets out the following behaviours that may indicate compliance with the condition. The provider:

- is delivering the objectives and targets in its plan
- has a governing body that is appropriately engaged with monitoring of performance against the provisions of its plan
- is taking reasonable steps to comply with the provisions of its plan and has taken appropriate action where it appears that the intentions of the plan may not be delivered.

19. In the consultation responses, a number of respondents raised concerns about a lack of understanding of what the OfS means by risk. There is no formula being used to calculate risk, but our judgement of risk is related to the risk to equality of opportunity for underrepresented groups not improving, which will be informed by:

- the extent of the gaps between different student groups in respect of access, success and progression, on the basis of local and national data and other forms of evidence
- the rate of progress in narrowing those gaps
- the ambition and credibility of a provider's plan, including their assessment of performance.

20. While the extent of the gaps in equality of opportunity and the rate of progress is a consideration of risk, this does not mean that the providers with the largest gaps are automatically considered to be the greatest risk. Demonstrating that a provider understands their own performance through a reflective self-assessment of performance, and presenting a plan that is well resourced and addresses those gaps, along with robust evaluation will help to reduce potential risk.

## Our decisions

### Cycle of Plans

Proposal 1: The OfS will place the approval of access and participation plans onto a more strategic timescale, with the number of years during which a plan may be in force to be based on risk. Plans should continue to demonstrate clear long-term ambitions for how providers will achieve significant reductions in the gaps in access, success and progression over the next five years. We will review progress against plans each year. Providers at increased risk of a future breach of condition A1 will normally be expected to submit plans every three years. Providers considered not at increased risk of a future breach of condition A1 will be expected to submit their plans every five years. Where we have serious concerns about a future breach, we may expect more frequent resubmissions.

#### Summary of consultation responses:

- **There is broad support for the proposal that access and participation plans should normally remain in place for a period of at least three years, rather than annually as at present (61% of respondents strongly agree compared with 7% who strongly disagree).**
- **The majority of respondents support proposals for a longer APP cycle because it will enable higher education providers to think and plan more strategically.**
- **Respondents perceive that longer-term plans would encourage providers to be more innovative in their approaches, develop a wider range of activities and embed sustained interventions in partner schools and colleges.**
- **Providers report that a three to five year cycle, with milestones at key intervals, will better enable them to track and monitor progress and demonstrate the impact of their access and participation work.**
- **Consultees highlight that it will be important to maintain the flexibility to refine and re-submit plans in response to changes in policy, local circumstances and/or evaluation evidence, even for those that are not at increased risk of a future breach of condition A1.**
- **The main concern identified with this approach is the need for the OfS to be clear and rigorous in how they identify and monitor providers at increased risk of a future breach of condition A1.**

21. As proposed in the consultation, the OfS will place the approval of access and participation plans onto a more strategic timescale, with the number of years during which a plan may be in force to be based on risk. This will be enforced from the next set of access and participation plans, which will cover the academic years 2020-21 to 2024-25. Plans will need to demonstrate clear long-term ambitions for how providers will achieve significant reductions in the gaps in access, success and progression over this period.

22. We will review progress against plans each year. Providers at increased risk of a future breach of condition A1 will normally be expected to submit plans every three years. Providers considered not at increased risk of a future breach of condition A1 will be expected

to submit their plans every five years. Where we have serious concerns about a future breach, we may expect more frequent resubmission.

23. Following the initial approval of an access and participation plan for one year, approval will automatically roll over each subsequent year for a maximum period of five years, unless the OfS expressly notifies a provider in writing that a new plan needs to be submitted for approval. We would not normally expect a provider to be asked to resubmit its APP within the first year after submission.

24. We understand the need for the OfS to be clear about how we identify and monitor risk and provide guidance. We will ensure that our updated regulatory guidance, which will be published early in 2019 includes further detail on this.

25. In consultation responses, providers raised the importance of making sure there is flexibility within the system to account for changes. Providers will be able to resubmit their plan for approval in any year, in order to account for any significant changes to strategy. Smaller changes can be captured in the yearly action plans that will accompany the annual monitoring.

26. To ensure providers remain engaged with this important agenda, we will be monitoring data on an ongoing basis as it becomes available, in addition to an annual monitoring process. We will be engaging more actively with providers deemed to be at increased risk of a future breach of condition A1, including through the use of our regulatory powers such as enhanced monitoring. We will also be active in our engagement with HE providers to promote good practice in relation to access and participation.

### **Timetable for submission of plans**

27. We will aim to give providers a minimum of 12 weeks' notice to develop and submit a new plan. We plan to publish re-issued regulatory guidance in late February 2019, and therefore our provisional timetable is as follow:

<b>Submit by</b>	<b>Received decision by</b>
<b>End of May 2019 – Priority will be given to those with an early application cycle</b>	End August 2019
<b>End of June 2019</b>	End October 2019
<b>Mid Sept 2019</b>	Mid December 2019

28. We will aim to provide decisions on access and participation plans within 12 weeks of submission, depending on the complexity of feedback and negotiation needed to approve the plan. We will be looking to work closely with providers to support them in the development of their plans.

29. The order in which we assess plans will be influenced by providers' application deadlines, and the order in which they are submitted. Providers will need to ensure they comply with consumer law advice from the Competition and Markets Authority<sup>3</sup> in relation to how and when they advertise their fees.

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<sup>3</sup> <https://www.gov.uk/government/publications/higher-education-consumer-law-advice-for-providers>



## Monitoring of access and participation plans

Proposal 2: Providers will be required to publish and submit to the OfS an impact report each year. Financial information previously collected in the annual access and participation monitoring process will be collected as part of wider OfS financial reporting processes. We will ensure that our requirements for impact reports are proportionate, with a lower burden for providers where the risk of a future breach of a condition is not increased.

### Summary of consultation responses:

- **There is broad support for the proposal that providers will be required to publish and submit to the OfS an impact report each year.**
- **Three-quarters of respondents agree that the submission of an action plan will make providers more accountable to their students, the OfS and the public for their performance in access and participation.**
- **Representatives from the further education sector agree most strongly that an action plan will make providers more accountable. NUS/student respondents were more likely to disagree.**
- **Respondents are particularly supportive of the statements that the proposed approach will be effective in improving providers' strategies to improve access and participation, and in capturing good practice and evaluation findings.**
- **As noted in Proposal 1, the main concern with this proposal is in relation to how the OfS will ensure there is clarity and rigour in how they identify and monitor providers at increased risk of a future breach of condition A1.**
- **A small proportion of respondents expressed uncertainty about the overall impact of the proposed approach on burden for higher education providers, particularly for smaller or specialist providers.**

30. As proposed in the consultation, providers will be expected to publish and submit to the OfS an impact report each year, accompanied by an action plan setting out any steps that need to be taken to make improvements to their current plan. The format and exact content of the report has not yet been designed but we are committed to working with different stakeholders, including students, to ensure that the report is fit for purpose, and that information is accessible for students and the public. The OfS will consider imposing requirements via specific conditions depending on the risks arising with particular providers.

31. We are committed to ensuring that the monitoring process reduces burden on lower-risk providers. We will take into consideration the needs of different types of providers, and ensure our requirements are proportionate to the size and context of the provider.

32. As proposed in the consultation, we will collect financial information about a provider's expenditure through the financial returns submitted by providers as part of monitoring of the ongoing condition of registration on financial viability and sustainability (condition D). The investment in access and participation will be disclosed in the provider's audited financial statements. As part of a requirement for enhanced monitoring, we may require a greater level of information from those providers at increased risk of a future breach of ongoing condition A1.

33. The impact report will focus on the outcomes providers have achieved, as well as identifying lessons learnt from approaches that have not worked as well as expected. Some concerns were raised in consultation responses about the importance of context. The report will allow for a narrative to be provided alongside information on outcomes in order to ensure context is not lost.

34. The OfS will be conducting ongoing monitoring of all the conditions of registration using national datasets, and the information submitted to us such as financial returns and TEF returns. This will include measures of fair access and participation. We will also look at how different conditions interact, and how the risk of not meeting one condition may impact the risk of not meeting others. For example how differential outcomes for different student groups impacts on TEF and Condition B3, in a context where we expect providers to deliver successful outcomes for all of their students.

35. These different sources of information from across the OfS will provide a holistic picture of a provider. Where the data we are monitoring raises any concerns regarding a provider's performance across any of the conditions of registration, we will investigate this further, and use our regulatory powers where required to address any issues.

36. Each year, a small sample of providers will be subject to a deeper investigation by the OfS. This will include a look at how providers are complying with the provisions set out in their access and participation plan.

37. Responses to the consultation highlighted that respondents did not feel this monitoring approach would be effective in engaging students in the monitoring of access and participation. Meaningful student engagement is a key component of the proposed reforms to access and participation plans. As with the 2019-20 access and participation plans, we will continue to expect providers to engage students in the planning, implementation and evaluation of access and participation plans, and in addition we will expect providers to give their student body the opportunity to include a commentary in their annual impact report. We will conduct further work with students, the NUS and the OfS student panel, to better understand how we can continue to support meaningful student engagement in access and participation plans.

## Targets

Proposal 3: Providers will be expected to include in their access and participation plans a set of strategic, outcomes-focused targets. A small number of these will be recommended by the OfS for use across all providers, and providers will also continue to be able to set outcomes-focused targets related to their own contexts.

### Summary of consultation responses:

- **There is broad support for the proposal that providers will be expected to include strategic, challenging and outcome-focused targets for access and participation, and that the proposal allows for comparability of performance across the sector and measurement of progress to improve access and participation.**
- **Providers broadly support the proposal that the OfS should specify measures it will encourage providers to use when setting targets related to OfS aims.**

- **Providers overwhelmingly support the proposal that providers should be able to set additional targets relative to their context.**
- **Providers highlight that context and flexibility in approach will afford providers the ability to demonstrate progress relative to their organisation.**
- **Providers welcome the setting of sector-wide aims and perceive that this will encourage a more focused and strategic approach for providers to follow.**
- **Respondents support the move to a standardised measure of success and suggest that this will incentivise providers to adopt a consistent approach to monitoring and evaluating their access and participation plans.**

38. As proposed in the consultation, providers will be expected to set a small number of outcomes-focused targets to capture the impact of their work. Some of these will be recommended by the OfS for use by all providers, and will align with the KPMs the OfS has set for itself sector-wide. We expect providers to focus within their access and participation plans on reducing the gaps in access, non-continuation, attainment, and progression to highly skilled employment or further study for students from under-represented groups, from disadvantaged backgrounds and with equalities characteristics, based on the position within their own institution and national data.

39. Providers will be asked to set targets using the following measures (details of how these measures are calculated can be found in Appendix 1):

- Gap in participation between most and least underrepresented groups
- Gap in non-continuation between most and least represented groups
- Gap in degree outcomes (1sts or 2:1s) between white students and black students
- Gap in degree outcomes (1sts or 2:1s) between disabled students and non-disabled students

40. To account for mission and context, providers will be able to set additional outcomes-focused targets to reflect the priorities they have identified in their self-assessment of performance across the student lifecycle for different student groups, drawing on the access and participation data-set we will provide. Our understanding of risk and performance will not be disproportionately affected by specific targets. When monitoring providers' performance, we will look at all the measures identified in the access and participation dataset, as well as the targets providers have identified. This will give a more holistic understanding of performance in relation to the provider's aims, rather than simply looking at each individual measure in isolation.

41. Responses to the consultation raised concerns about the use of POLAR. We would strongly encourage providers to use POLAR4 when setting targets as it is a robust and widely used measure of under-representation in higher education. To account for these concerns, however, the access and participation dataset will be expanded to include other measures of disadvantage, such as free school meals and other measures as the dataset develops over time. Where there is clear evidence that the use of POLAR4 will cause significant concern in the reliability of the data, following discussion with the OfS providers may choose to use other measures identified in the access and participation dataset.

42. We welcome collaborative targets being set in partnership with other providers to address any of the OfS specified-targets. For example, this might be a target across particular types of providers (such as the Realising Opportunities partnership), or a regional/geographical target (such as NCOP partnerships).

## Our approach to funding and investment

Proposal 4: The OfS will collect predicted access spend disaggregated by pre-16 activity, post-16 activity and work with adults and communities in access and participation plans. We will also continue to collect information on the financial support that providers give to students, and set expectations that this financial support is robustly evaluated, and communicated clearly to students. We will no longer require providers to report on student success and progression spend.

### Summary of consultation responses:

- **Although support for the proposal is widespread, a higher than average proportion of respondents from ‘medium/low’ tariff higher education providers and NUS/Student Union disagree with this proposal. There are concerns that unless the published data is appropriately contextualised, it could be misunderstood and potentially misused, resulting in an ‘unofficial league table’.**
- **Disaggregating access spend by post-16 activities, pre-16 activities and work with adults and communities does not appear to present an issue for most consultees and two-thirds agree with this proposal. Consultees perceive that disaggregating access spend could help to broaden provision and ensure resources are apportioned appropriately as part of long-term strategies. Respondents suggest that publishing information would help to facilitate benchmarking and increase transparency which, in addition to public accountability, would provide insights into the volume of spend on activities for different groups and potential gaps in provision.**
- **While it is recognised that the proposed changes could have a positive impact on the level of resource invested in access, some express concern that the proposal could result in an increased risk of providers diverting resources from success and progression; this in turn could have a detrimental impact on outcomes for these stages of the student lifecycle.**
- **There are higher levels of disagreement with the proposal to disaggregate access spend amongst higher education providers compared with other sub-groups. Providers are concerned that it will increase pressure to balance spend across the groups, even if one is a lower strategic priority.**
- **There are calls to further disaggregate pre-16 activity spend by primary and secondary phase. However, this is unlikely to be universally welcomed by the sector because of lack of organisational capacity and the administrative burden that process would place on staff, particularly in smaller providers.**

43. As proposed in the consultation, the OfS will collect predicted access spend disaggregated by pre-16 activity, post-16 activity and work with adults and communities in access and participation plans. We will also continue to collect information on the financial support that providers give to students, and set expectations that this financial support is robustly evaluated, and communicated clearly to students.

44. In consultation responses, some providers raised concerns that spend may be difficult to disaggregate in this way. Therefore when capturing access spend, we will include the means of capturing broader access spend that is not targeted at a particular age group.

However, given the distinctly different needs of this group, we would not expect providers to record significant levels of spend in this category. We will evaluate whether the level of disaggregation is appropriate following the first set of access and participation plans.

45. As proposed in the consultation, the OfS will also no longer ask providers to report on spend on student success and progression. We recognise the concern that some responses voiced, that this may result in less focus being put on these later stages of the student lifecycle.

46. We will continue to put significant focus on these important areas of the student lifecycle, and this is reflected in the OfS targets we have set for the sector, which we expect all provider to contribute to achieving. Our focus on outcomes, along with the ongoing monitoring of information across OfS such as the access and participation dataset, TEF outcomes, and the National Student Survey will secure robust oversight of and challenge to the progress providers are making. Where required we will use our regulatory powers, such as enhanced monitoring and specific conditions of registration, to engage more closely with providers.

47. We will evaluate the impact of this change, and may ask providers to report on investment in these areas in the future, if we feel the change has had a detrimental effect to progress against our strategic aims.

## Expectations on level of spend

48. In the consultation, we said that we are considering whether we need to continue to set a minimum expectation of level of spend in order to secure a sufficient level of activity in access and participation, as the OfS takes a more outcomes-focused approach to regulation and move our attention away from inputs.

### Summary of consultation responses:

- **Respondents are more equivocal in their perceptions of whether a strong focus on targets and outcomes would create enough pressure to secure sufficient funding for access and participation to achieve change, without an expectation of spend.**
- **Supporters argue that high or minimum spend thresholds do not necessarily correlate with successful outcomes. Expectations on spend are felt to detract from the development of strategic approaches and even provide perverse incentives to reduce activity in order to lower expenditure.**
- **Those that disagree with the proposal suggest that the OfS should produce guidance on an appropriate or minimum expected level of spend which takes account of the contextual differences between providers and that the OfS could consider producing guidelines without setting hard targets.**

49. We have carefully considered the views of respondents, and have decided that we will no longer set a minimum expectation of spend that providers will need to meet. Our focus will be on the outcomes that providers achieve and their ambition for change. Our interest in investment will be focused on whether we believe providers' plans to be credible, and whether they are investing enough resource to achieve their aims.

50. Where providers are not achieving the outcomes expected we will use our regulatory powers to investigate further and intervene where necessary. This includes enhanced

monitoring, which might include a requirement for more information, and applying specific conditions of registration.

## Principles of funding and investment

51. We consulted on the principles which will underpin our approach to funding and investment in access and participation:

- a. The funding we deliver should link directly to the outcomes we wish to achieve.
- b. Our decisions in respect of how we use our funding are made by having regard to our general duties.
- c. Our funding should be focused and targeted.
- d. Our funding should add value to the investment that providers make to support successful outcomes for students from underrepresented groups, and should support activity that otherwise would not take place.
- e. Our funding should support activity that delivers sector-wide benefits for students and addresses access and participation objectives which might not be delivered by the market alone.
- f. Our deployment of funds should be evidence-led.
- g. The impact and effectiveness of our funds should be evidenced to a level consistent with HM Treasury guidance.

### Summary of consultation responses:

- **There is overwhelming agreement that the principles OfS is proposing should underpin the approach to funding and investment in access and participation. The importance of funding that encourages collaboration and partnership working is highlighted. In this context, respondents suggest that the OfS may wish to consider whether it is appropriate to add a principle focused on funding in support of collaboration.**
- **‘Principles f and g’ recognise the role that evidence fulfils in ensuring funding is allocated appropriately and the importance of ensuring impact is captured to inform policy and funding decisions. While most support this principle, a minority of consultees express concern that an increased focus on evaluation, and enhanced expectations of evaluation at the local level in particular, could present challenges and have a negative impact on areas of work where it is difficult to measure impact.**

52. As set out in the consultation, our future funding approach is contingent on the outcomes of the ongoing government review of post-18 education and funding, and the government’s response to this. We will undertake a review of our funding for access and participation, including the student premium, once the government’s response to the review is published. Proposals for the future of the National Collaborative Outreach Programme are detailed below.

53. There was overwhelming agreement in response to the consultation that the principles should underpin our future approach to funding and investment in access and participation.

54. We have reflected on feedback asking us to consider a principle focussed on funding in support of collaboration.

55. Whilst we provide funding for collaborative approaches, for example through the National Collaborative Outreach Programme, this may not be appropriate for all aspects of our access and participation funding. We will continue to have due regard to the benefits of collaboration, as set out in our general duties.

## **National Collaborative Outreach Programme**

56. OfS investment in the National Collaborative Outreach Programme (NCOP) is an example of our access and participation funding principles in action.

57. The NCOP was established in 2017 with the aim of rapidly boosting higher education participation for those from underrepresented groups, with a focus on the geographic areas where this work can have the most impact. However in addition it has established a collaborative infrastructure for providers to work with each other and with schools and colleges and thereby establish greater coherence and efficiency for higher education outreach. Following a review of the NCOP we propose to build on this potential by expanding our ambitions for the partnerships supported by the programme. By broadening their role, we aim to support ongoing, sustainable, local collaboration to help schools and colleges access higher education outreach and provide a platform for wider collaboration, including joined up careers advice from before higher education to beyond it.

58. This work is intended to complement and add value to the work that providers undertake through their access and participation plans, in particular work that is best delivered in collaboration. Through the local partnerships the programme supports wider collaborative activity with local authorities and LEPs, as well as with key partners such as the new local careers leads and the opportunity areas.

59. The OfS board has agreed, in principle, to provide funding of £60 million per annum to support the programme during the 2019-20 and 2020-21 academic years. Future support beyond this point will depend on the outcomes of the spending review. However our ambition is to ensure that this infrastructure is sustained to support collaborative activity set out in the next round of access and participation plans.

## Evaluation

Proposal 5: Providers will need to complete a self-assessment of their evaluation activities against a set of criteria, as part of their APP. The core purpose of the tool will be to identify and support continuous improvement in evaluation.

### Summary of consultation responses:

- **Consultees ‘tend to agree’ that the evaluation self-assessment tool will lead to improvements in evaluation practice; however, almost a fifth disagreed that it will achieve this objective.**
- **Those in support of a self-assessment tool perceive that it will help to improve evaluation practice by supporting and encouraging higher education providers to capture evidence of what works and to use this evidence to improve activities and approaches to delivery. Those who disagree with the proposal raise concerns about the level of resource required to implement the tool and the burden it could place on staff who may not have the skills to undertake the process effectively.**
- **It is currently understood by many to be a ‘template’, ‘toolkit’ or ‘how to guide’ to support the evaluation of access and participation, rather than as a tool to assess the strength of providers’ evaluation practice. Further consultation would capture an accurate view on the impact it is likely to have and any potential issues in relation to its implementation. A substantial proportion would like more information before they make a judgement.**
- **Some respondents questioned whether a tool is required and if other (existing) approaches would be more appropriate. Suggested alternatives include a peer review network; external assessors; and judgements made by the new Evidence and Impact Exchange. Others questioned whether it was the role of the regulator to get involved in the development of evaluation practice.**
- **Respondents would like to work closely with the OfS to develop and pilot the tool to ensure it is flexible, user-friendly, and fit for use in a range of different providers. They emphasise the importance of guidance to support providers to use and embed the tool within their organisations.**

60. As proposed in the consultation, we will expect all providers to complete a self-assessment of their evaluation activities against a set of criteria, as part of the access and participation plan. Once an assessment of performance has been made, providers will be expected to set out the actions they will undertake to improve practice using an action plan.

61. The core purpose of the tool will be to identify and support continuous improvement in evaluation. It will also enable the OfS to set clear expectations of effective evaluation practice.

62. After receiving feedback, and to ensure burden on providers is proportionate and risk-based, the OfS will not expect the self-assessment tool to be completed as part of annual monitoring process. However, we will expect the outcomes of providers’ use of evidence and evaluation to form a significant element of their impact reports.

63. Providers may wish to complete the self-assessment tool more frequently to identify areas for improvement and we may ask providers to complete it more regularly as part of enhanced monitoring.



64. The Evidence and Impact Exchange, which OfS is establishing as a 'what works centre' for access and participation from 2019, will provide support to HE providers with their evaluation work.

## **Research into the use of tracking services to support evaluation of access and participation activities**

65. As part of the consultation we asked respondents what support they felt the OfS could provide to enable more effective use of tracking services.

### **Summary of consultation responses:**

- **Respondents identify five areas where there could be a role for OfS in developing tracking services. These include:**
  - I. **identify administrative data to complement what is captured through the trackers, and provide support to link data**
  - II. **build capacity to engage with tracking services and produce guidance on the use of tracking data for evaluation**
  - III. **minimise and/or meet the cost to providers of accessing tracking data**
  - IV. **influence the type of data captured, to include geographical markers and spend**
  - V. **in the absence of a single national system, ensure existing services work collaboratively and use consistent definitions.**

66. The OfS will work with HE providers, NCOP partnerships, the Evidence & Impact Exchange and the higher education tracking services to support improvements in the services provided and how they are being used.

67. Tracking services are expected to play a central role in improving the impact of providers' access and participation activity, particularly in relation to effective targeting for access interventions and enhancing evaluation practice. Our work will also aim to support providers to meet the challenges that exist around accessing multiple national datasets and working with sensitive individualised data. It will include:

- identification of effective practice at provider level in the use of tracking services for targeting and evaluating activities
- a review of current tracking services and the data landscape, including a value for money assessment
- an appraisal of opportunities and challenges for building sector-wide infrastructure and capability
- an assessment of the potential role for longitudinal tracking in supporting OfS strategic objectives.

## **Our approach to data**

Proposal 6: The OfS will undertake further work to explore if it should require providers to submit and publish transparency data by age and disability. This is in addition to data split

by gender, ethnicity and socioeconomic background which is part of the transparency information condition F1 required by the current OfS regulatory framework.

#### **Summary of consultation responses:**

- **The majority of respondents support the proposal that the OfS should undertake further work to explore if it should require providers to submit and publish transparency data by age and disability.**
- **The majority of respondents perceive that collecting and understanding age and disability data would improve the evidence base surrounding the needs of mature and disabled students.**
- **Respondents' concerns with this proposal are centred on the availability and accuracy of data. There is a risk where insufficient data is available, that it will be difficult to draw reliable conclusions surrounding performance and impact of access and participation activities on these groups.**
- **Respondents highlight the necessity to distinguish between physical and mental health and disability in order to gain an accurate understanding of the needs of these students.**

68. As proposed in the consultation, the OfS will undertake further work to explore whether it should extend the transparency information condition (condition F1) to include breakdowns by additional student characteristics of age and disability.

69. Should this work result in the OfS seeking to include these additional student characteristics in the breakdown of the data, it will formally consult on its proposals in spring 2019.

**Proposal 7: The OfS will create, publish and maintain an access and participation dataset that provides a picture of access and participation across the higher education sector and at individual providers.**

#### **Summary of consultation responses:**

- **There is widespread support for the proposal to create, publish and maintain an access and participation dataset. Respondents recognise the value that a comprehensive, consistent and high quality source of data would add to the sector, aiding monitoring and evaluation as well as the development of access and participation strategies.**
- **Some consultees' primary concern is that publicly-available data could be subject to misuse or misinterpretation. They suggest that careful consideration should be given to the format of the data, including how it is presented, to ensure it is appropriately contextualised.**
- **A proportion of respondents emphasise the importance of incorporating existing metrics into the dataset to ensure consistency and comparability and to facilitate links to other relevant data sources, such as TEF, to minimise duplication.**
- **Consultees most commonly 'tend to agree' that the proposed datasets would help to hold providers to account on their performance against their targets.**

**Providers perceive that the dataset will help them to identify areas of strength, as well as weaknesses relative to other providers and identify priorities for improvement.**

- **Some consultees are unclear who will have access to the data and who will be using it in order to hold providers to account and this a concern. They perceive a risk that data will be misinterpreted and reported inaccurately, particularly by the media. A further perceived risk is that prospective students are misinformed as to the performance of individual providers, particularly if the data is taken out of context.**
- **Other measures of socio-economic status (beyond POLAR), and additional measures such as pre-entry qualification route, mode of study, care-leaver, young carer status, refugee/asylum seeker status and parental background are suggested for inclusion in the dataset.**

70. As proposed in the consultation, the OfS will create, publish and maintain an access and participation dataset. This will provide a sector-level picture of the challenges in access and participation across the student lifecycle, and also at provider level. In addition, it will provide clarity on how we assess performance across the lifecycle. This dataset will be published on the OfS website.

71. In the consultation responses, some providers raised concerns about the need for context to understand the dataset. While we do not currently plan to include any narrative at provider level, we will ensure that users can easily navigate to providers' access and participation plans to understand more about individual providers.

72. We will also produce a user's guide, suitable for students and the wider public, to support users to understand the information available in the dataset. We will work with potential users to ensure the format of the dataset and the information contained is fit for purpose, and accessible.

## **The access and participation dataset**

73. The first release of the access and participation dataset will be available to providers alongside new regulatory guidance for access and participation plans for 2020-21 onwards in late February, and will become publically available later in the year. The dataset will then evolve over time. It will provide a sector-level picture of the challenges in access and participation across the student lifecycle, and also at individual provider level. It will consist of a visual and interactive dashboard of data in the form of graphs, supported by access to additional and more granular supporting data tables.

74. The main dashboard will show gaps in access and participation for the following groups at each stage of the student lifecycle:

- POLAR – gap between quintile 1 and quintile 5 students
- Ethnicity – gap between white and black, Asian and minority ethnic (BAME) students
- Age – gap between young (under 21 on entry) and mature (21 and over on entry) students
- Disability – gap between disabled and non-disabled students.

75. The supporting data tables that will accompany the dashboard will allow users to explore and understand a wider range of characteristics in more granular detail. A breakdown of what will be included in the supporting data tables can be found in Appendix 1.

## **Development of the dataset**

76. The OfS expects to develop and refine the dataset as additional measures become available, and to accommodate changes in the wider data landscape:

- Ongoing OfS development work towards a more standardised set of measures to track the access and participation performance of the sector is expected to generate intersectional measures of disadvantage that can be incorporated into the dataset later in 2019.
- The introduction of the Graduate Outcomes survey (replacing the Destination of Leavers from Higher Education survey), and implementation of the Higher Education Statistics Agency's Data Futures programme will necessitate definitional changes to measures of continuation and progression.

77. An intersectional measure of disadvantage will be added to the supporting data tables following OfS development work during 2019. We are working with UCAS to understand any opportunities for alignment of the intersectional measure with the Multiple Equalities Measure (MEM). Alongside this, we will also seek to enhance the functionality of the dataset in terms of the ability to consider the intersection of any characteristic included with any other characteristic in the dataset.

78. We expect to incorporate information on household residual income (HRI) later in 2019. This will enable consideration of the gap between students with low HRI (based on Student Finance England's threshold for means tested contributions) and those with HRI above this threshold. The OfS will also explore the feasibility of examining gaps in outcomes between care leavers and those who have not been in care.

79. In future, we will also include an additional measure of student retention and completion that aligns with the definition that is required within the transparency information condition. This will be in addition to the established measure of continuation used in the UK Performance Indicators and the TEF. We will consider further opportunities to align definitions with those specified for the purposes of the transparency information condition wherever possible.

## **What happens next?**

80. We hope the information contained here will support providers to start considering the implications of the reforms on how we will regulate access and participation in their institution. We particularly encourage providers to begin to plan the setting of their targets, taking into account the OfS targets and our guidance.

81. We are currently developing our proposals further, and plan to issue a new regulatory notice covering access and participation plans for 2020-21 onwards in late February. At the same point in February we will also publish the evaluation self-assessment tool and make the access and participation dataset available to providers.

82. Following the publication of the evaluation self-assessment tool and the dataset we will be providing training in the form of workshops, and online resources to support the sector. We will also be running a conference to give providers additional opportunities to hear from OfS staff and ask questions about preparing their next access and participation plan.

## **Further information**

83. For more information about our work and our current approach to access and participation regulation and funding please visit the OfS website.

84. If you have any queries or wish to discuss the outcomes of the consultation, the impact on your provider or organisation, or require this document in an alternative format please email [apreview@officeforstudents.org.uk](mailto:apreview@officeforstudents.org.uk).

## Appendix 1

The supporting data tables that will accompany the dashboard will allow users to explore and understand a wider range of characteristics, as well as the characteristics listed in paragraph 5 in more granular detail. This will include the gaps in outcomes related to:

A. POLAR quintiles:

- I. gap between quintile 1 and quintile 5 students
- II. gaps between all quintiles
- III. gap between quintile 1 and 2 students, and quintile 3, 4 and 5 students
- IV. gaps between each quintile and the aggregation of all other quintiles (for example, quintile 1 students and the totality of quintile 2, 3, 4 and 5 students; quintile 2 students and the totality of quintile 1, 3, 4 and 5 students).

B. Ethnicity:

- I. gap between white and black, Asian and minority ethnic (BAME) students
- II. gap between white and black students
- III. gaps between all individual groups
- IV. gaps between each ethnic group and the aggregation of all other groups (for example, Asian students and the totality of white, black and minority ethnic students; black students and the totality of white, Asian and minority ethnic students).

C. Disability (based on self-declared disability status):

- I. gap between disabled and non-disabled students
- II. gaps between students with learning disabilities, physical disabilities, mental health disabilities/problems and no declared disability.

D. Age (on entry to their programme of study):

- I. gap between young (under 21 on entry) and mature (21 and over on entry) students
- II. gap between more granular age bands (under 21, 21 to 25, 26 to 30, 31 to 40, 41 to 50, and 51 and over).

E. Gender – gap between male and female students

F. English index of multiple deprivation (based on the 2015 IMD):

- I. gaps between all quintiles
- II. gap between quintile 1 and 2 students, and quintile 3, 4 and 5 students
- III. gaps between each quintile and the aggregation of all other quintiles (for example, quintile 1 students and the totality of quintile 2, 3, 4 and 5 students; quintile 2 students and the totality of quintile 1, 3, 4 and 5 students).

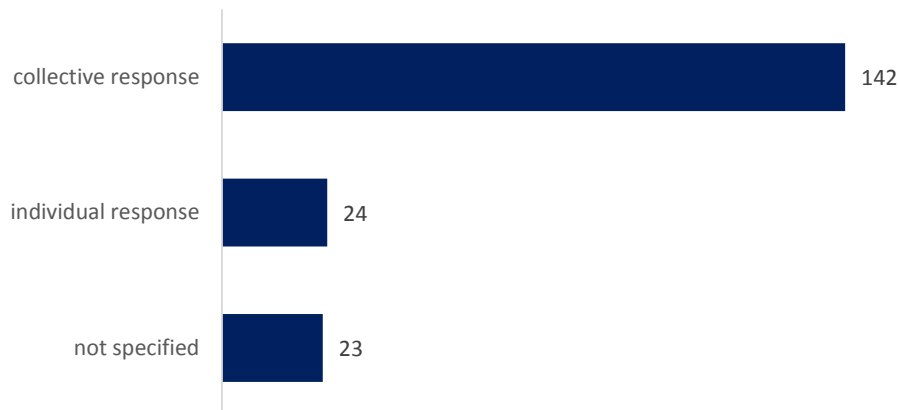
G. Free school meals (FSM) – gap between students who were eligible for FSM and those who were not.

H. The interaction of ethnicity (white and BAME students) and English index of multiple deprivation (quintile 1 and 2 students, and quintile 3, 4 and 5 students).

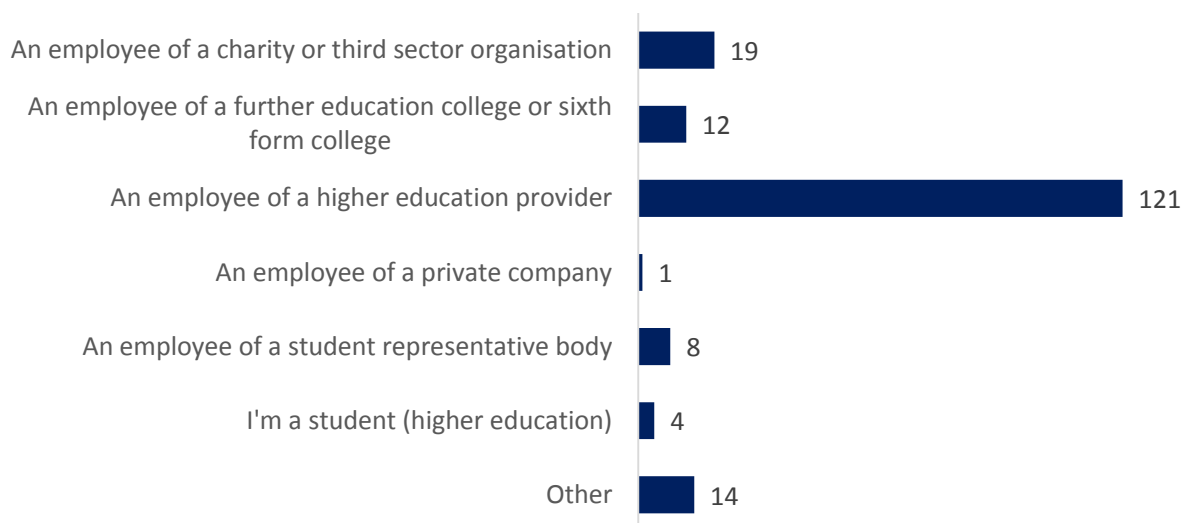
- I. The interaction of gender (male and females students) and POLAR quintiles (quintile 1 and 2 students, and quintile 3, 4 and 5 students)

### Summary of quantitative responses to the consultation on our future approach to access and participation

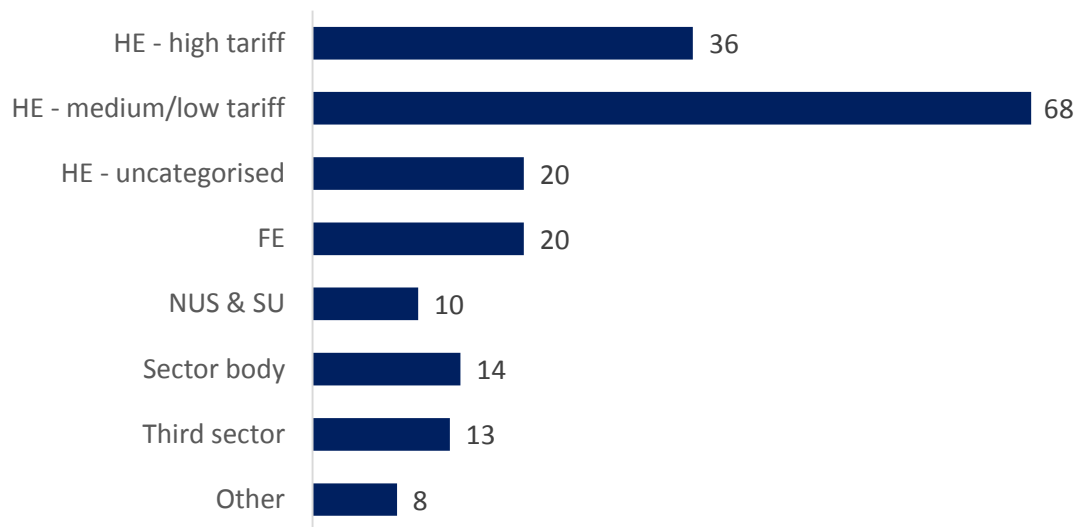
**FIGURE 1: ARE YOU SUBMITTING AN INDIVIDUAL OR COLLECTIVE RESPONSE?**



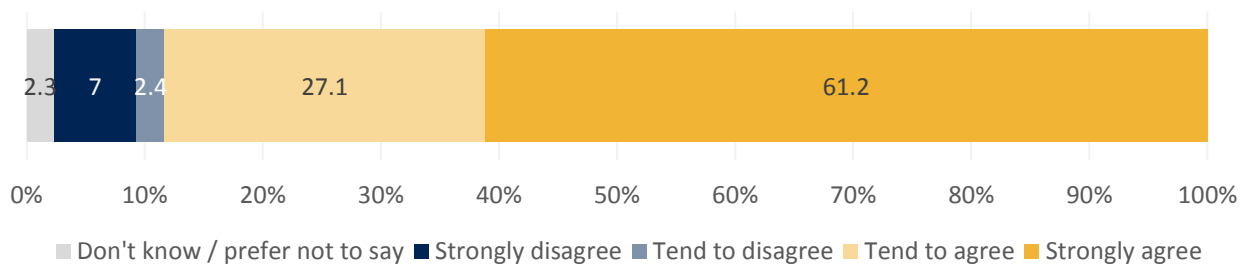
**FIGURE 2: JOB ROLE OF REPRESENTATIVE WHO SUBMITTED THE RESPONSE**



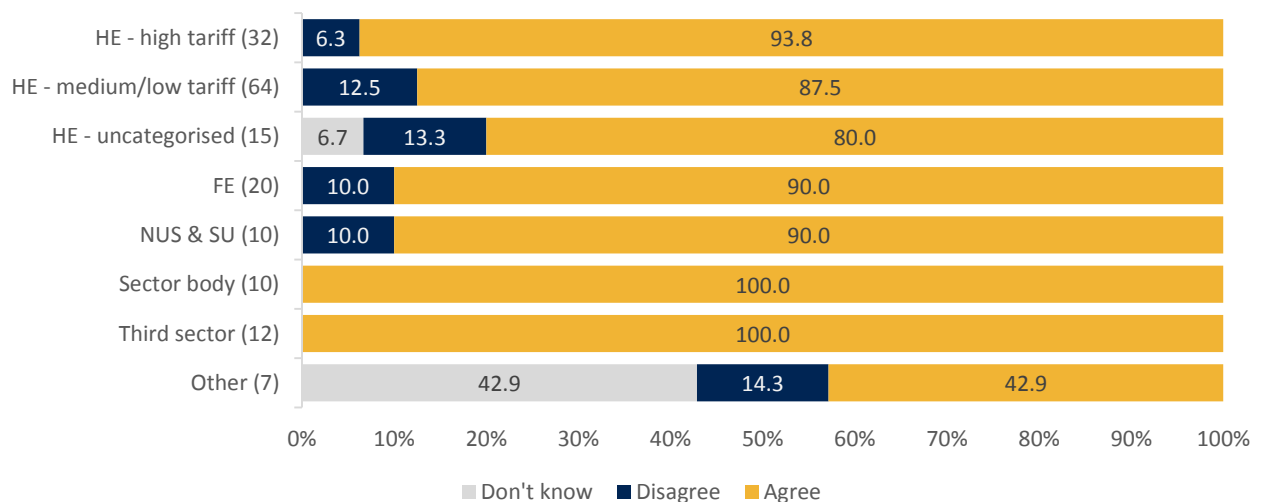
**FIGURE 3: SAMPLE CHARACTERISTICS BY 'ORGANISATION TYPE'**



**FIGURE 4: Q1. TO WHAT EXTENT DO YOU AGREE OR DISAGREE WITH THE PROPOSAL THAT PLANS SHOULD NORMALLY REMAIN IN PLACE FOR A PERIOD OF AT LEAST THREE YEARS, RATHER THAN ANNUALLY AS AT PRESENT? (BASE =170)**

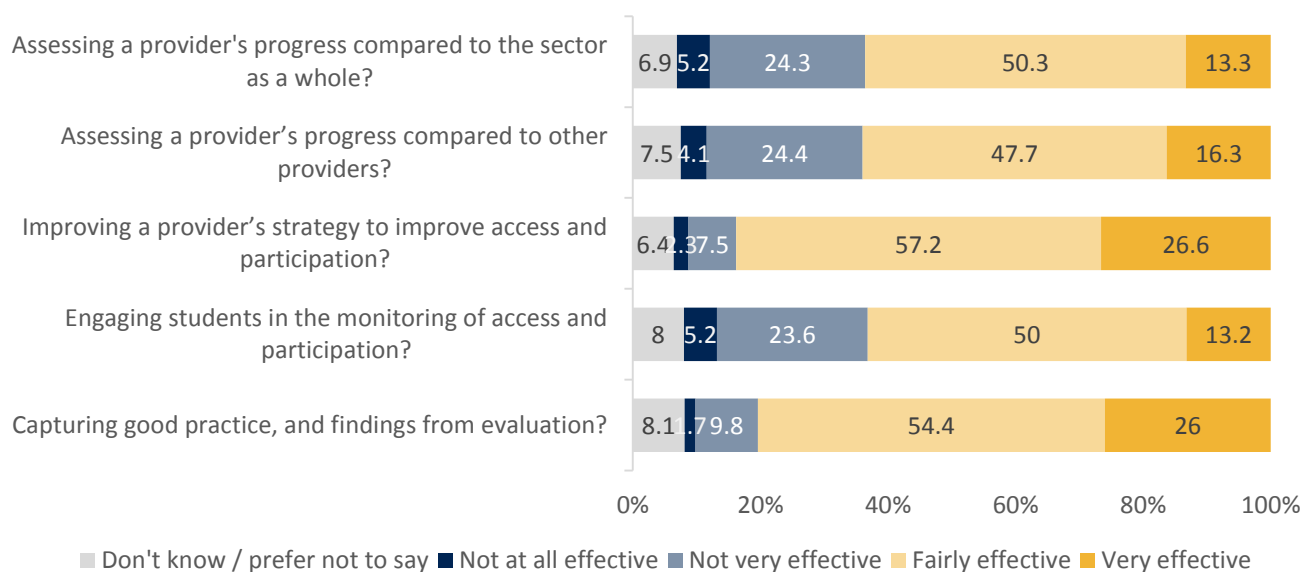


**FIGURE 5: AGGREGATED AGREEMENT WITH THE PROPOSAL THAT PLANS SHOULD NORMALLY REMAIN IN PLACE FOR A PERIOD OF AT LEAST THREE YEARS, RATHER THAN ANNUALLY AS AT PRESENT, BY ORGANISATION TYPE. (BASE=VARIED)**

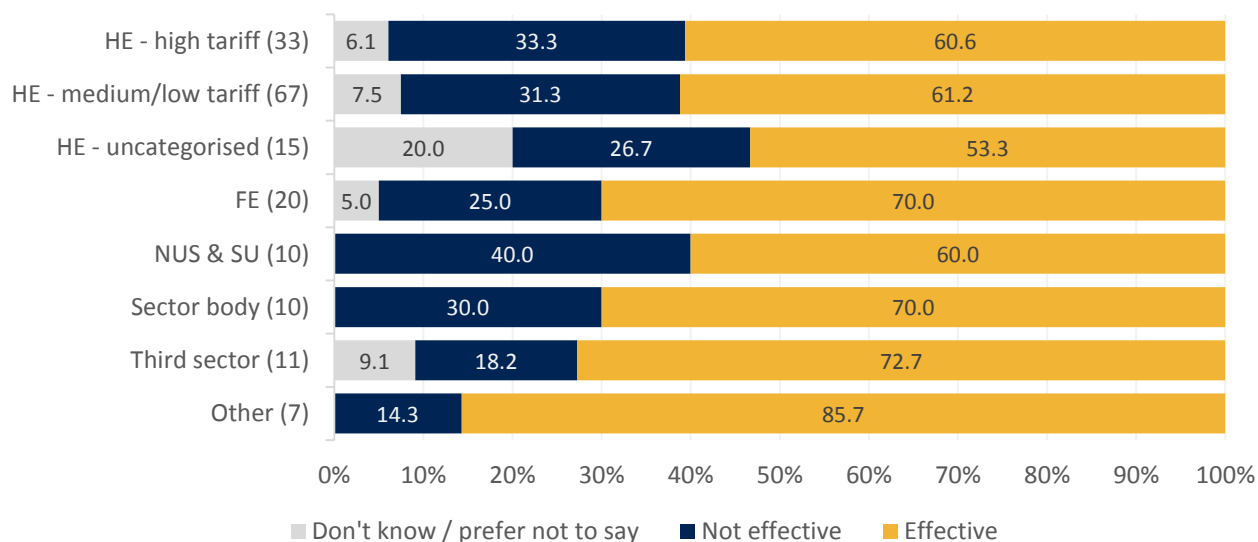




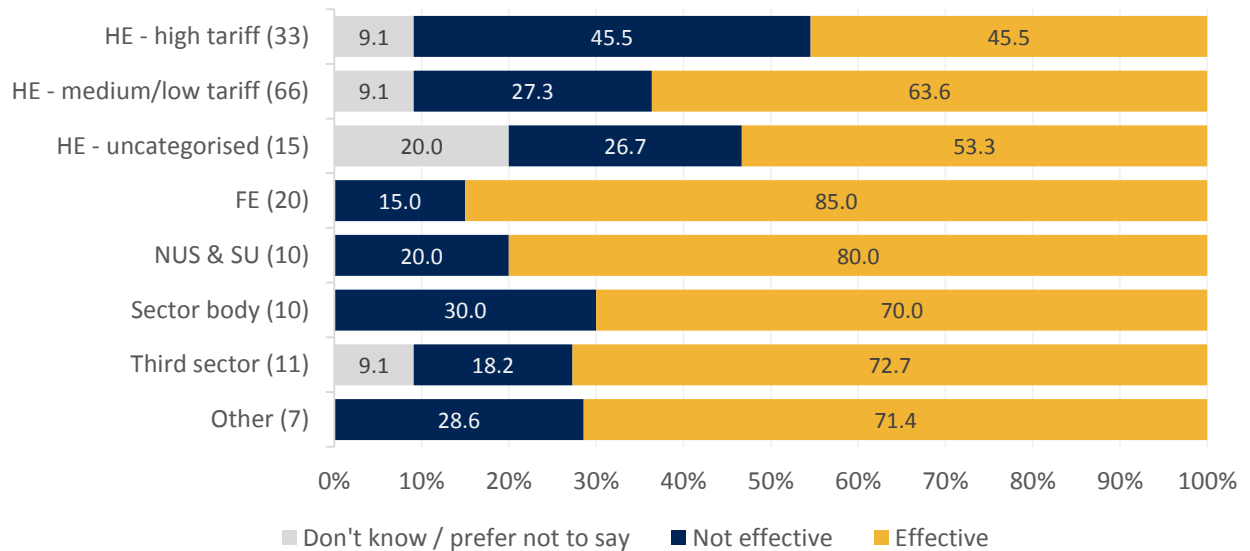
**FIGURE 6: HOW EFFECTIVE, IF AT ALL, WOULD THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR...**



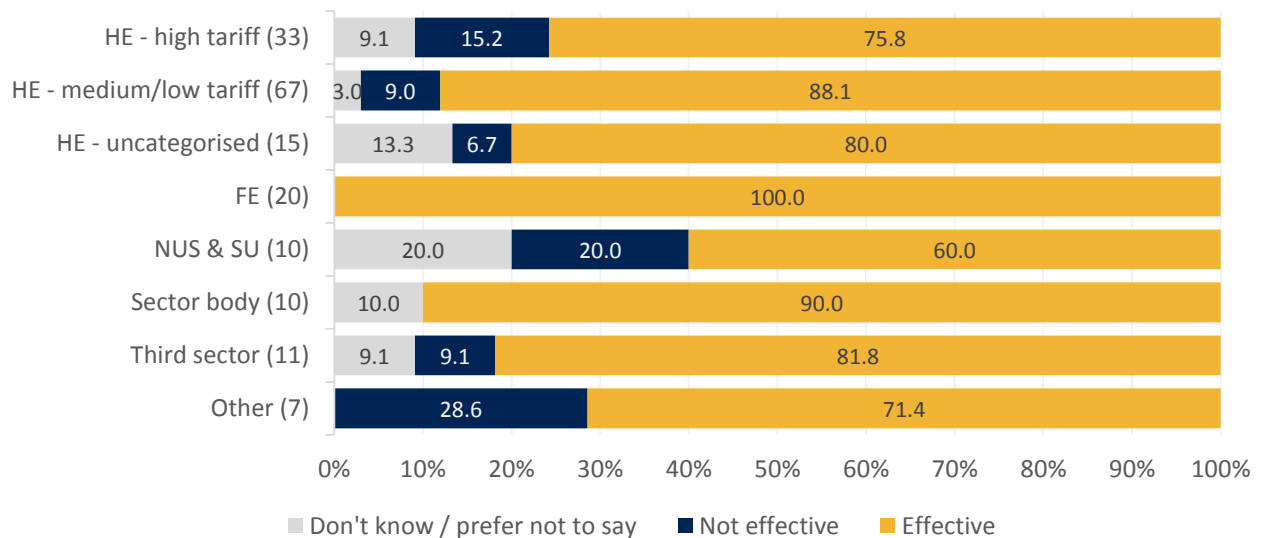
**FIGURE 7: AGGREGATED AGREEMENT WITH THE STATEMENT OF HOW EFFECTIVE, IF AT ALL, THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR ASSESSING A PROVIDER'S PROGRESS COMPARED TO THE SECTOR AS A WHOLE, BY ORGANISATION TYPE.**



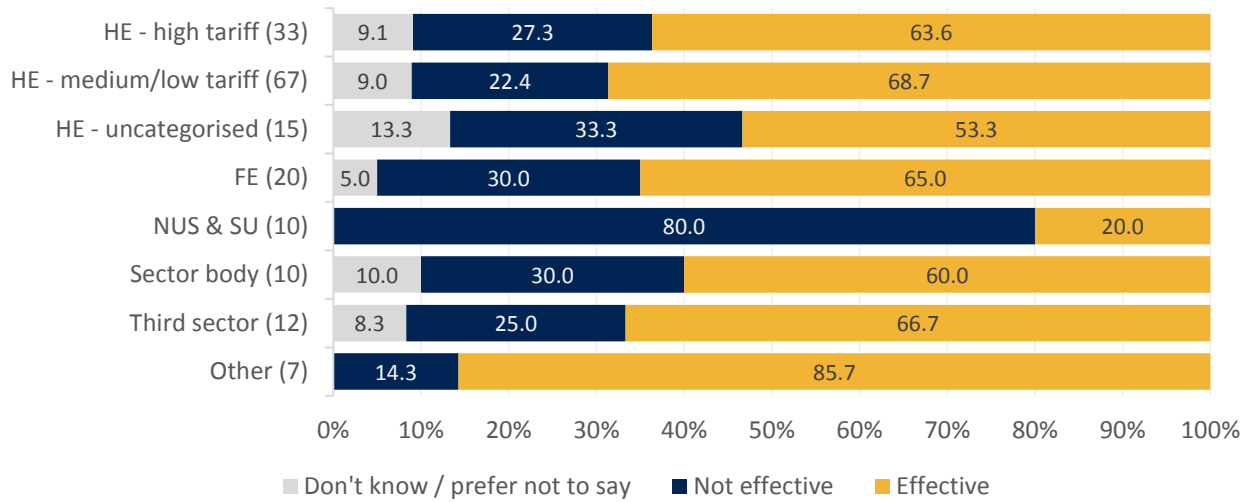
**FIGURE 8: AGGREGATED AGREEMENT WITH THE STATEMENT OF HOW EFFECTIVE, IF AT ALL, THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR ASSESSING A PROVIDER'S PROGRESS COMPARED TO OTHER PROVIDERS, BY ORGANISATION TYPE.**



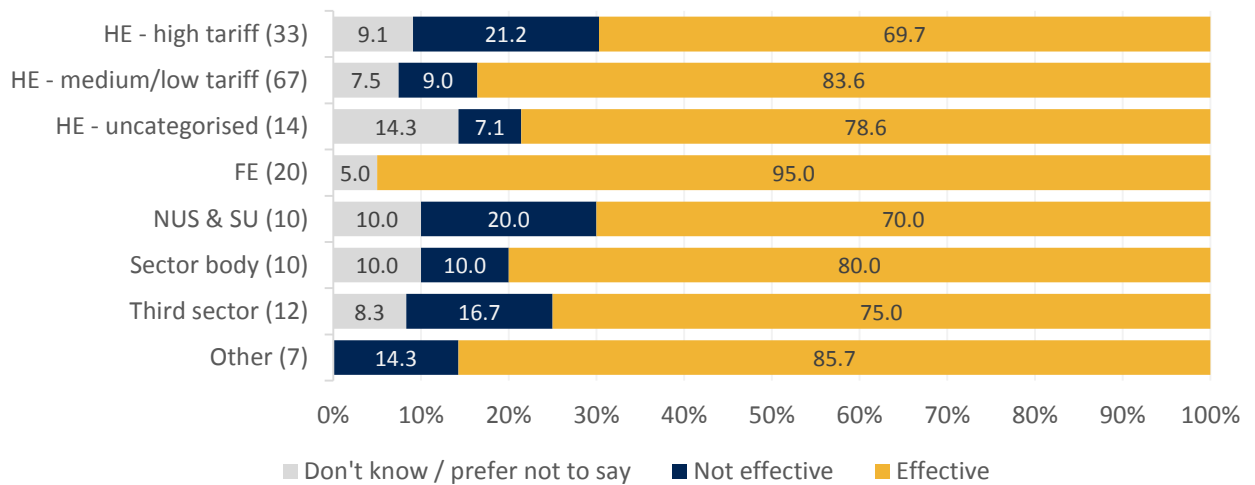
**FIGURE 9: AGGREGATED AGREEMENT WITH THE STATEMENT OF HOW EFFECTIVE, IF AT ALL, THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR IMPROVING A PROVIDER'S STRATEGY TO IMPROVE ACCESS AND PARTICIPATION, BY ORGANISATION TYPE.**



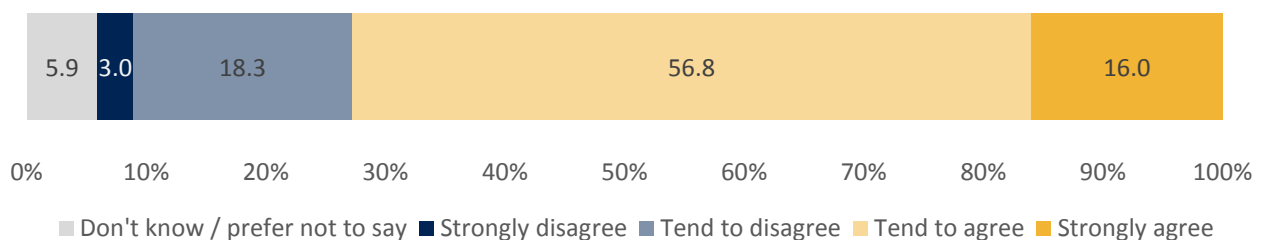
**FIGURE 10: AGGREGATED AGREEMENT WITH THE STATEMENT OF HOW EFFECTIVE, IF AT ALL, THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR ENGAGING STUDENTS IN THE MONITORING OF ACCESS AND PARTICIPATION, BY ORGANISATION TYPE.**



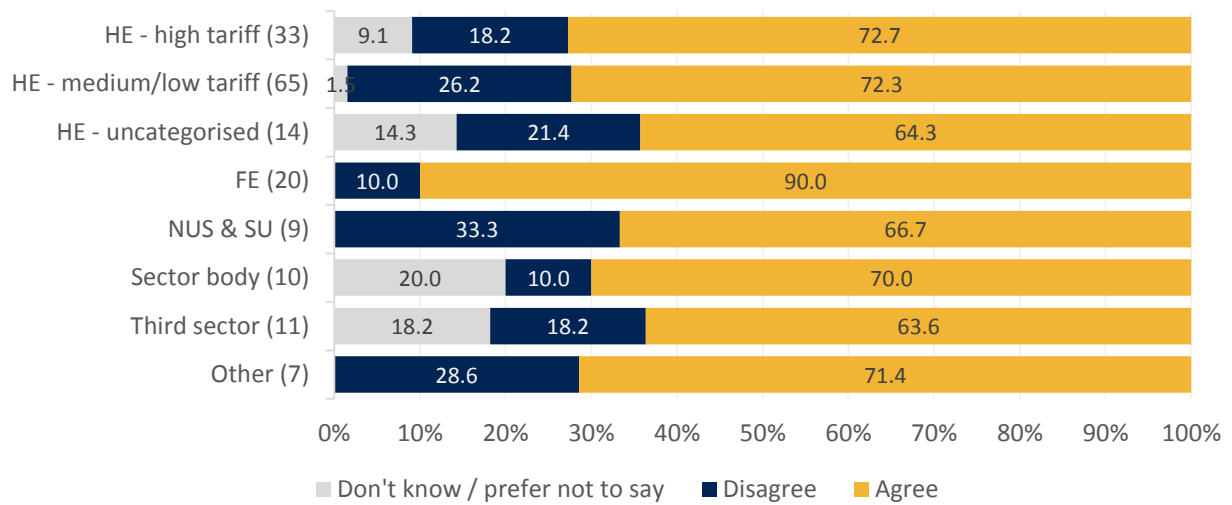
**FIGURE 11: AGGREGATED AGREEMENT WITH THE STATEMENT OF HOW EFFECTIVE, IF AT ALL, THE PROPOSED APPROACH OF ANNUAL IMPACT REPORTS AND ACTION PLANS BE FOR CAPTURING GOOD PRACTICE AND FINDINGS FROM EVALUATION, BY ORGANISATION TYPE.**



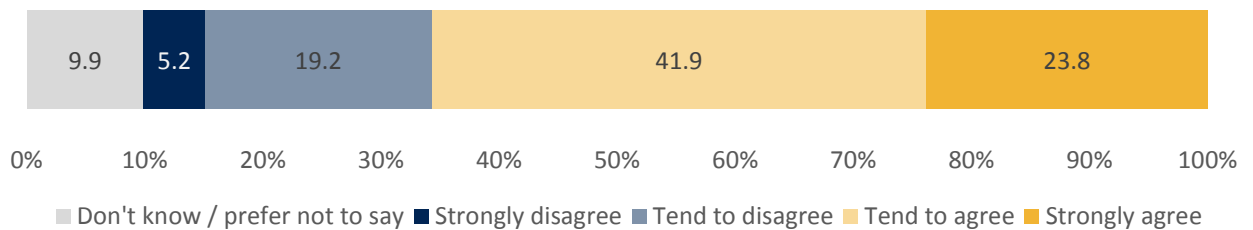
**FIGURE 12: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT THE SUBMISSION OF AN ACTION PLAN WOULD MAKE PROVIDERS MORE ACCOUNTABLE TO THEIR STUDENTS, THE OFS, AND THE PUBLIC FOR THEIR PERFORMANCE IN ACCESS AND PARTICIPATION?**



**FIGURE 13: AGGREGATED AGREEMENT THAT THE SUBMISSION OF AN ACTION PLAN WOULD MAKE PROVIDERS MORE ACCOUNTABLE TO THEIR STUDENTS, THE OFS, AND THE PUBLIC FOR THEIR PERFORMANCE IN ACCESS AND PARTICIPATION, BY ORGANISATION TYPE.**

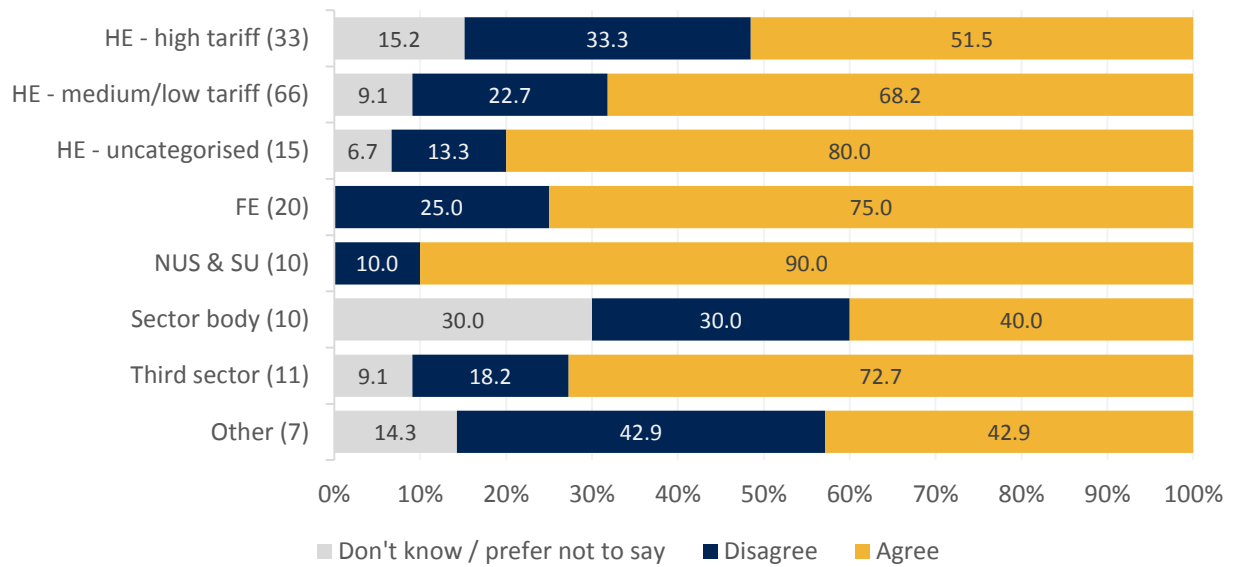


**FIGURE 14: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT THE APPROACH OF A LONGER-CYCLE PLAN WITH ANNUAL IMPACT REPORTING, AND ONGOING OFS MONITORING, WILL REDUCE THE LEVEL OF BURDEN FOR LOW RISK PROVIDERS AND APPLY GREATER SCRUTINY FOR PROVIDERS AT INCREASED RISK OF A FUTURE BREACH OF ONE OR MORE CONDITIONS?**

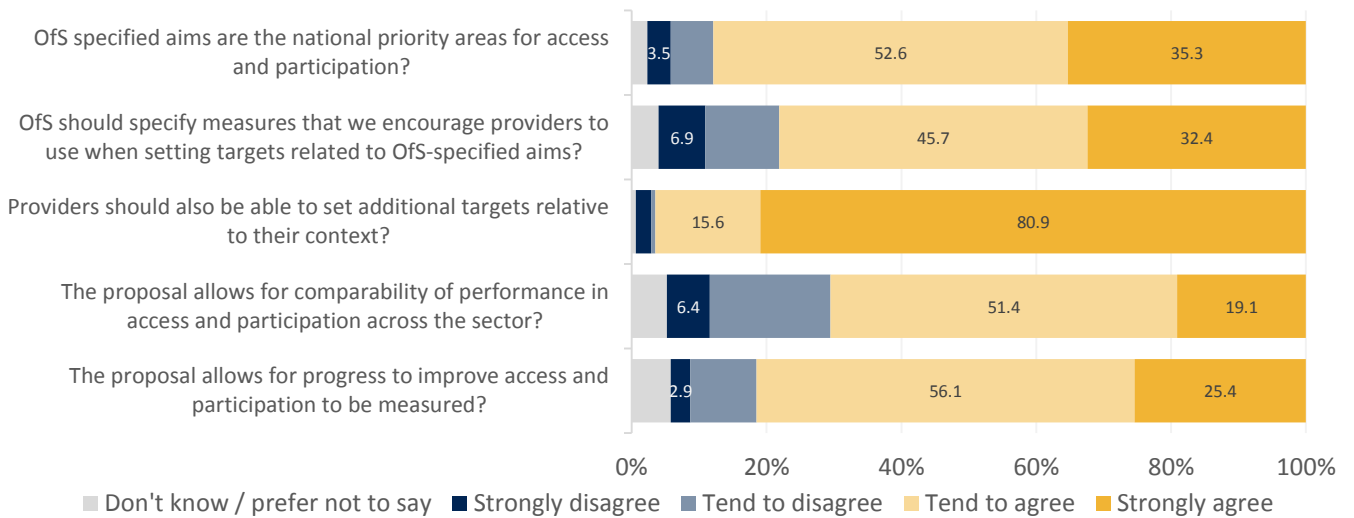


**FIGURE 15: AGGREGATED AGREEMENT THAT THE APPROACH OF A LONGER-CYCLE PLAN WITH ANNUAL IMPACT REPORTING, AND ONGOING OFS MONITORING, WILL REDUCE THE LEVEL OF**

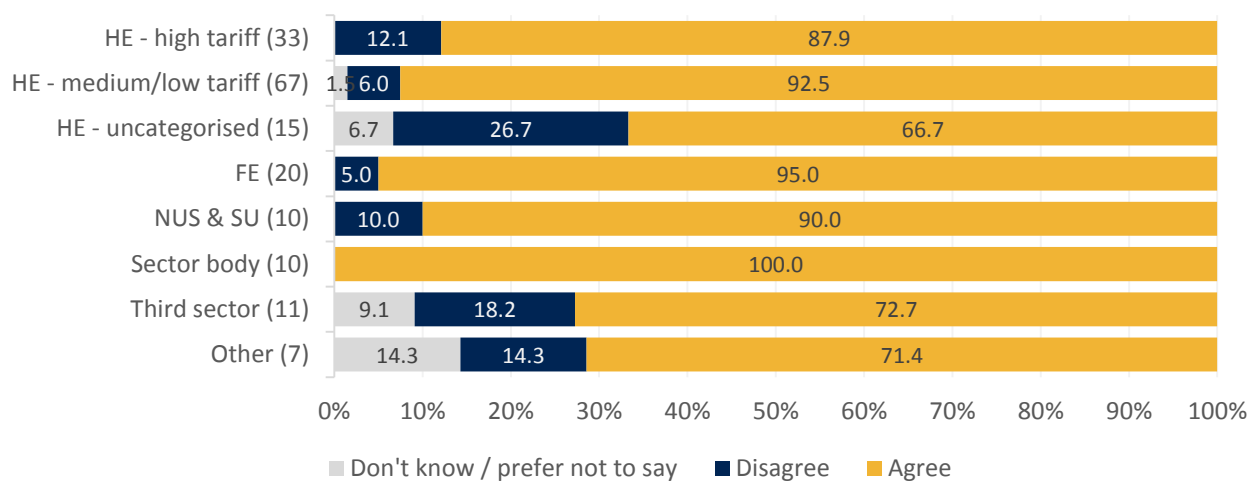
**BURDEN FOR LOW RISK PROVIDERS AND APPLY GREATER SCRUTINY FOR PROVIDERS AT INCREASED RISK OF A FUTURE BREACH OF ONE OR MORE CONDITIONS, BY ORGANISATION TYPE.**



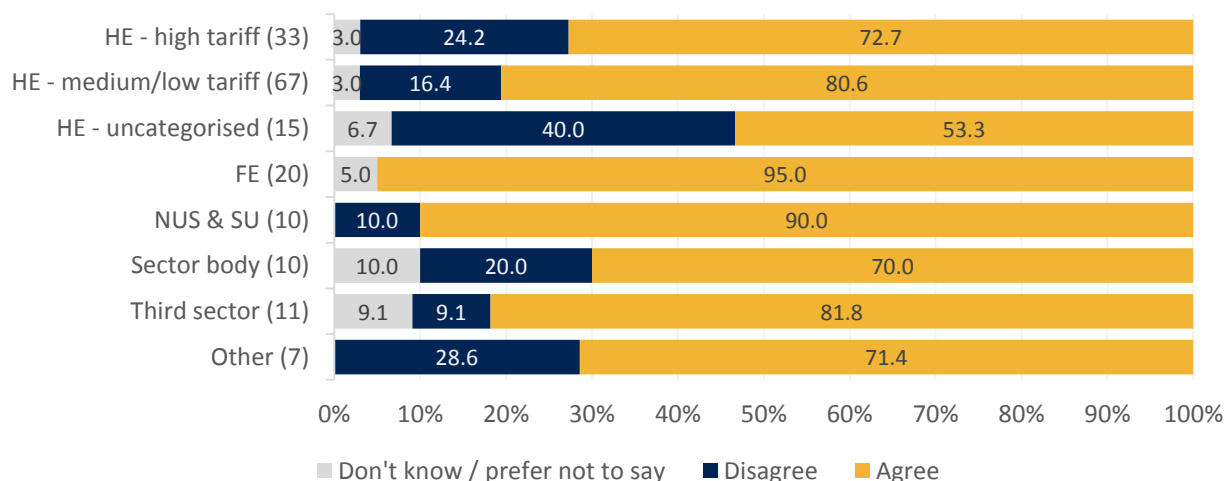
**FIGURE 16: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT...**



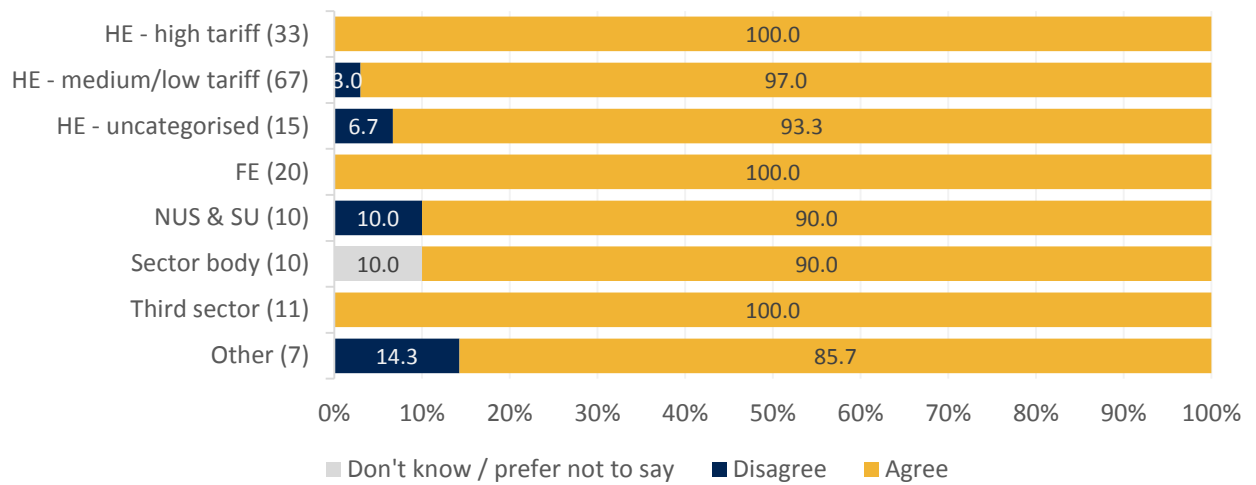
**FIGURE 17: AGGREGATED AGREEMENT WITH THE STATED OFS SPECIFIED-AIMS ARE THE NATIONAL PRIORITY AREAS FOR ACCESS AND PARTICIPATION, BY ORGANISATION TYPE.**



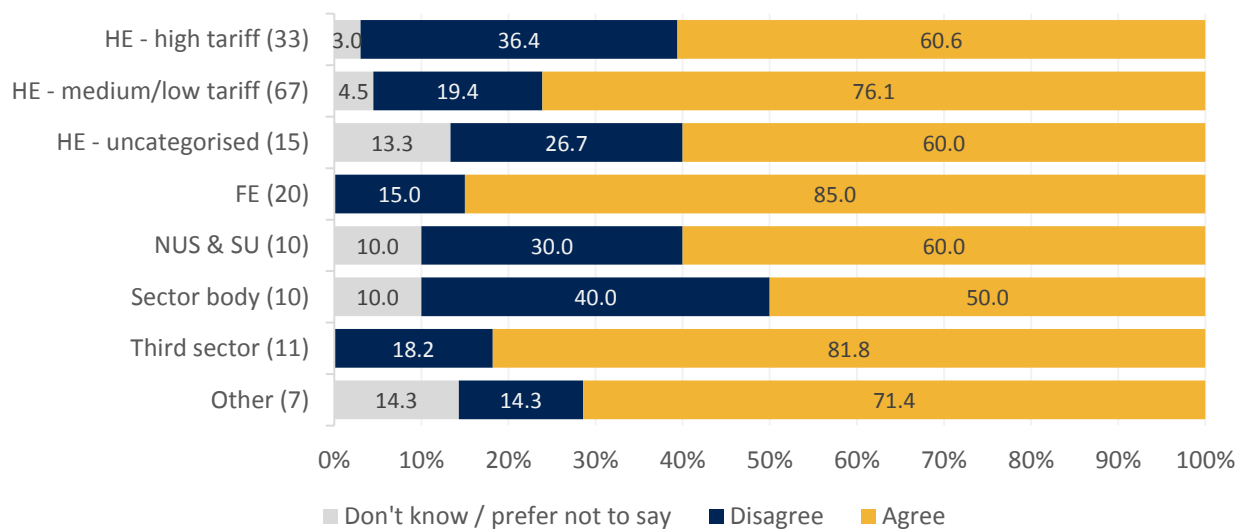
**FIGURE 18: AGGREGATED AGREEMENT THAT THE OFS SHOULD SPECIFY MEASURES THAT THEY ENCOURAGE PROVIDERS TO USE WHEN SETTING TARGETS RELATED TO OFS-SPECIFIED AIMS, BY ORGANISATION TYPE.**



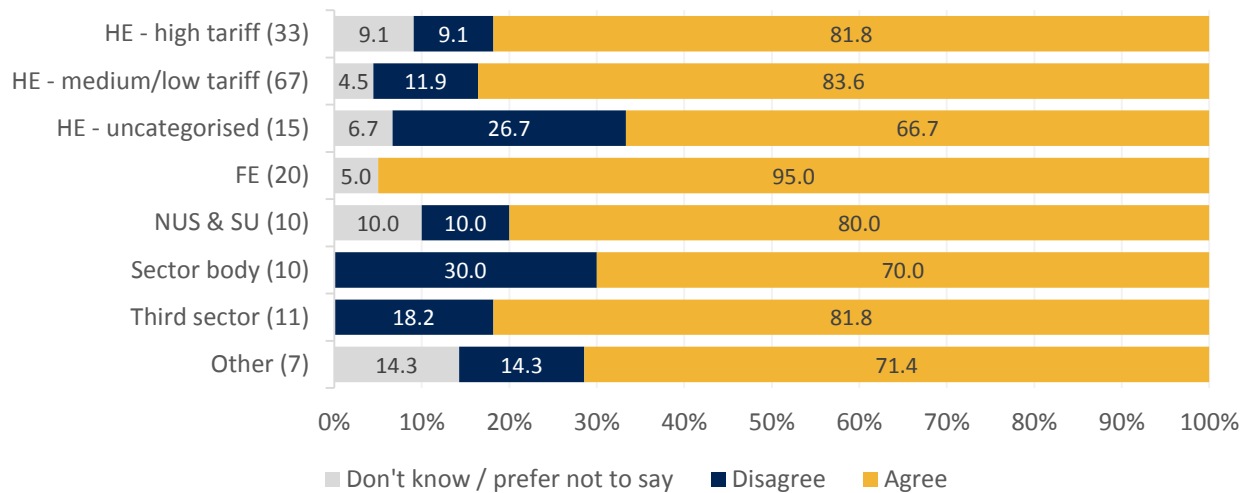
**FIGURE 19: AGGREGATED AGREEMENT WITH THE PROPOSAL THAT THE OFS SHOULD SPECIFY MEASURES THAT PROVIDERS SHOULD BE ABLE TO SET ADDITIONAL TARGETS RELATIVE TO THEIR CONTEXT, BY ORGANISATION TYPE.**



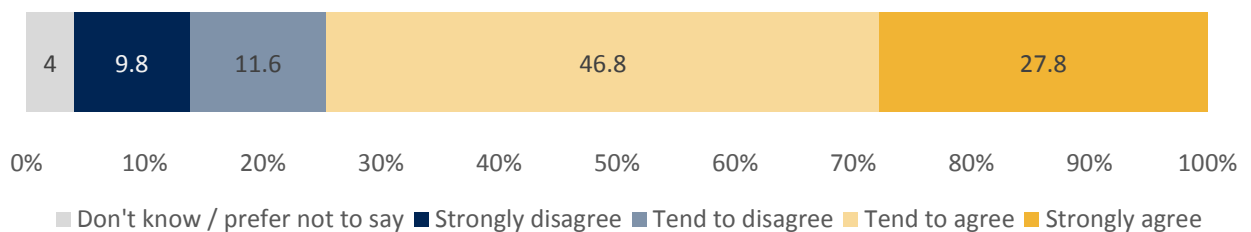
**FIGURE 20: AGGREGATED AGREEMENT THAT THE PROPOSAL ALLOWS FOR COMPARABILITY OF PERFORMANCE IN ACCESS AND PARTICIPATION ACROSS THE SECTOR BY AGREEMENT, BY ORGANISATION TYPE.**



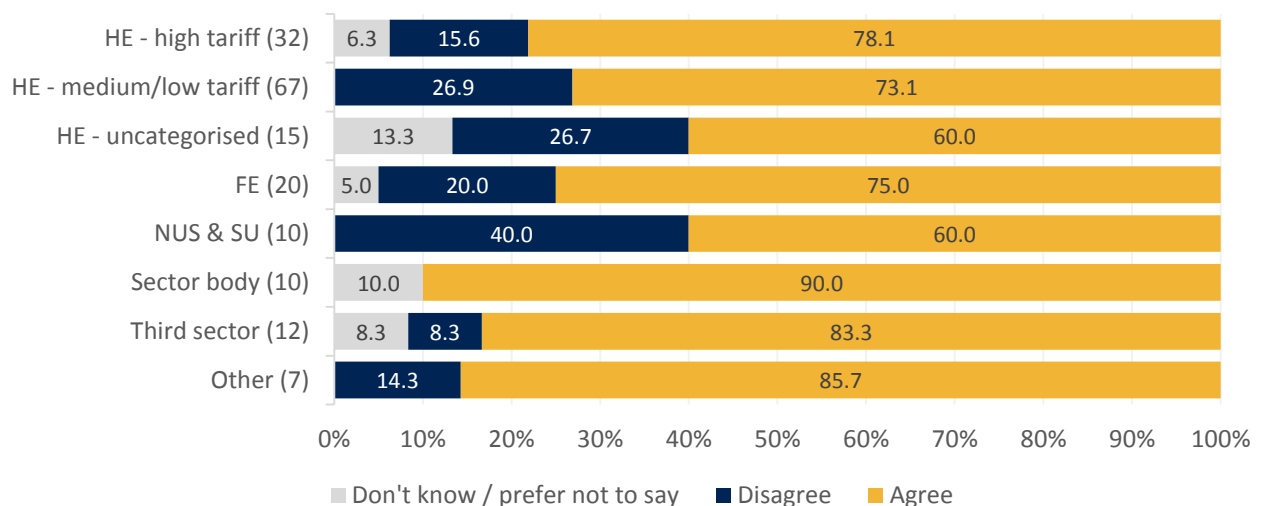
**FIGURE 21: AGGREGATED AGREEMENT WITH THE PROPOSAL ALLOWS FOR PROGRESS TO IMPROVE ACCESS AND PARTICIPATION TO BE MEASURED, BY ORGANISATION TYPE.**



**FIGURE 22: TO WHAT EXTENT DO YOU AGREE OR DISAGREE WITH THE PROPOSAL TO COLLECT AND PUBLISH, IN A TRANSPARENT WAY, ACCESS INVESTMENT?**

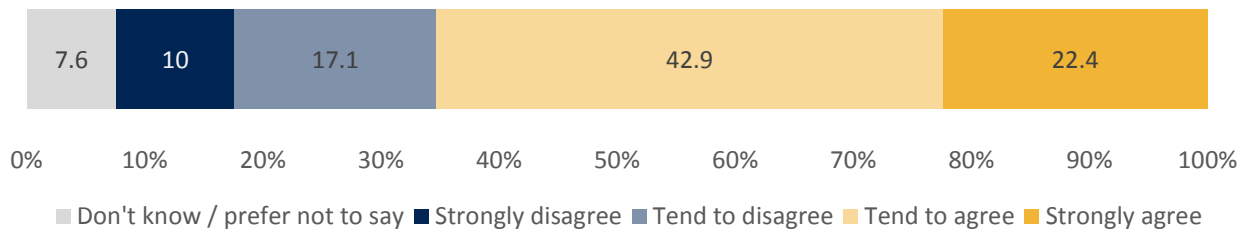


**FIGURE 23: AGGREGATED AGREEMENT WITH THE PROPOSAL TO COLLECT AND PUBLISH, IN A TRANSPARENT WAY, ACCESS INVESTMENT, BY ORGANISATION TYPE.**

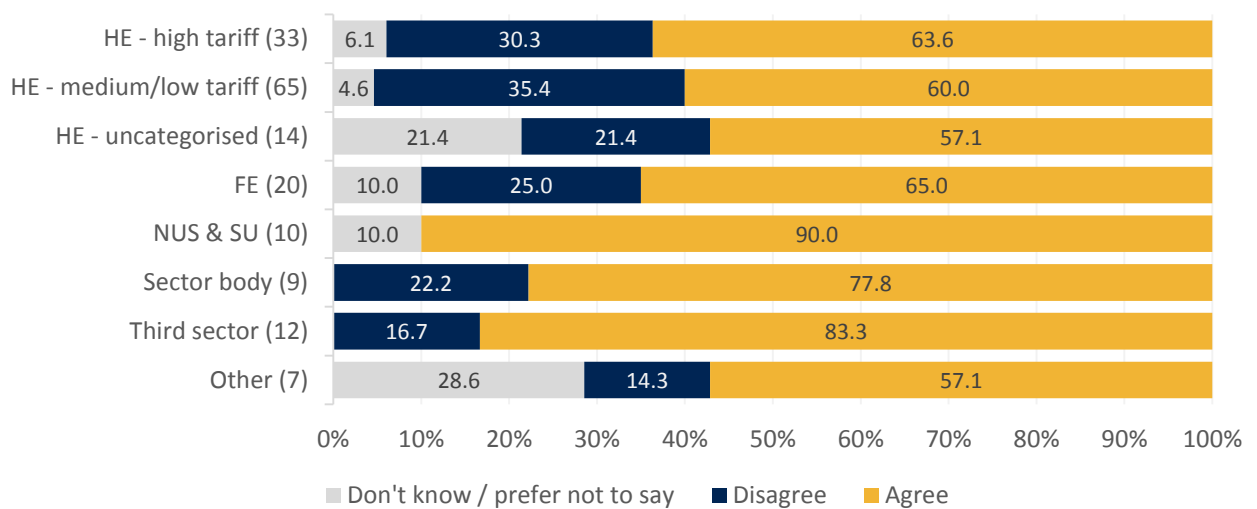




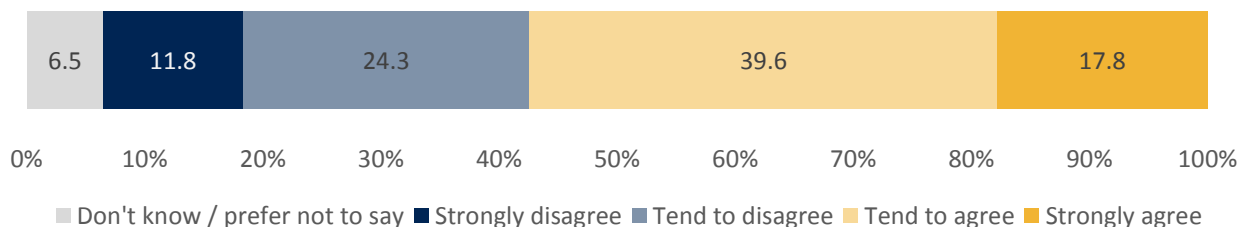
**FIGURE 24: TO WHAT EXTENT DO YOU AGREE OR DISAGREE WITH THE PROPOSAL TO DISAGGREGATE ACCESS SPEND BY POST-16, PRE-16 AND WORK WITH ADULTS AND COMMUNITIES?**



**FIGURE 25: AGGREGATED AGREEMENT WITH THE PROPOSAL TO DISAGGREGATE ACCESS SPEND BY POST-16, PRE-16 AND WORK WITH ADULTS AND COMMUNITIES, BY ORGANISATION TYPE.**

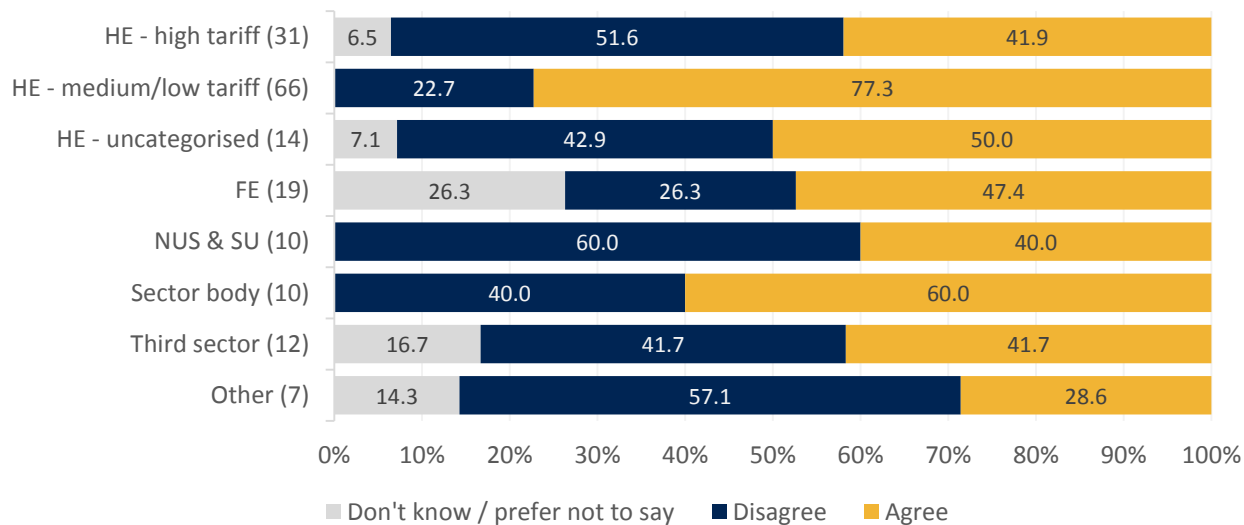


**FIGURE 26: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT A STRONG FOCUS ON TARGETS AND OUTCOMES ALONE, CREATES ENOUGH PRESSURE TO SECURE SUFFICIENT FUNDING IN ACCESS AND PARTICIPATION TO ACHIEVE CHANGE, WITHOUT AN EXPECTATION OF SPEND?**

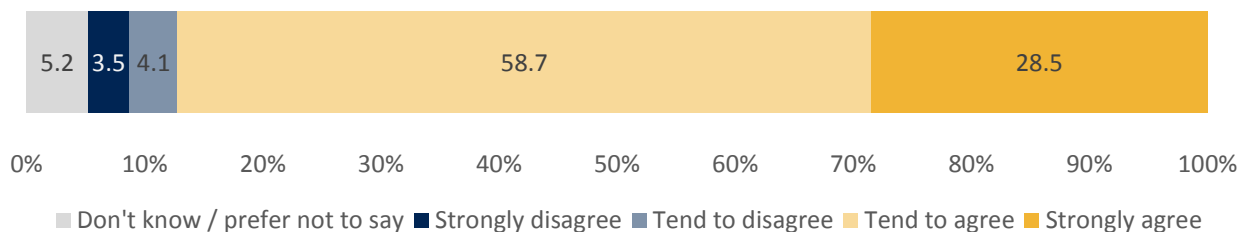


**FIGURE 27: AGGREGATED AGREEMENT THAT A STRONG FOCUS ON TARGETS AND OUTCOMES ALONE, CREATES ENOUGH PRESSURE TO SECURE SUFFICIENT FUNDING IN ACCESS AND PARTICIPATION TO ACHIEVE CHANGE, WITHOUT AN EXPECTATION OF SPEND, BY ORGANISATION**

**TYPE.**

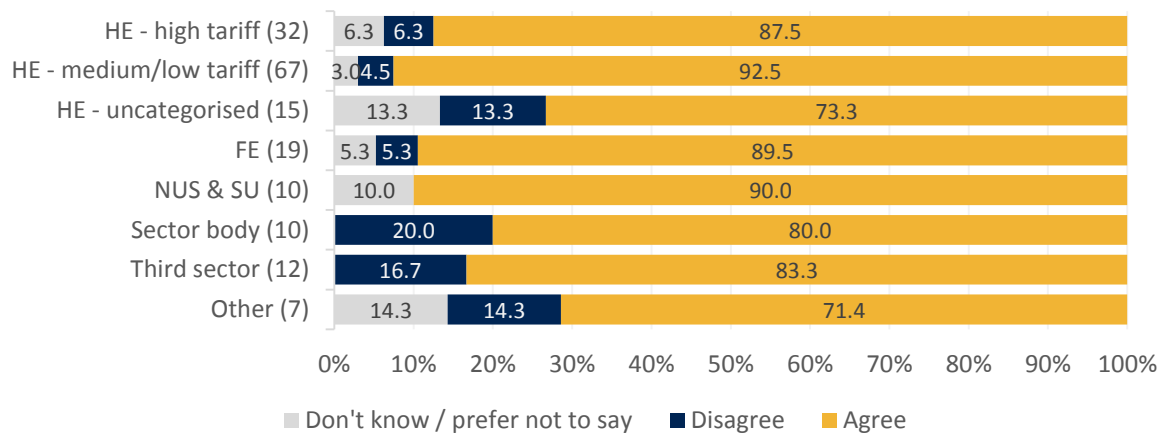


**FIGURE 28: TO WHAT EXTENT DO YOU AGREE OR DISAGREE WITH THE PRINCIPLES IN PARAGRAPH 140 WHICH WE PROPOSE SHOULD UNDERPIN OUR APPROACH TO FUNDING AND INVESTMENT IN ACCESS AND PARTICIPATION?**

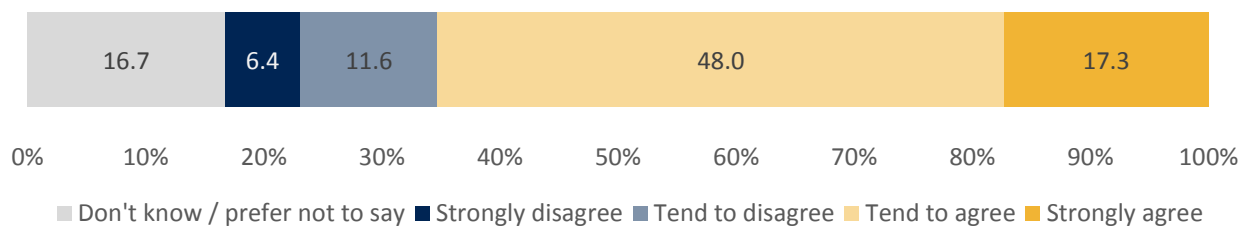


**FIGURE 29: AGGREGATED AGREEMENT WITH THE PRINCIPLES IN PARAGRAPH 140 WHICH WE PROPOSE SHOULD UNDERPIN OUR APPROACH TO FUNDING AND INVESTMENT IN ACCESS AND**

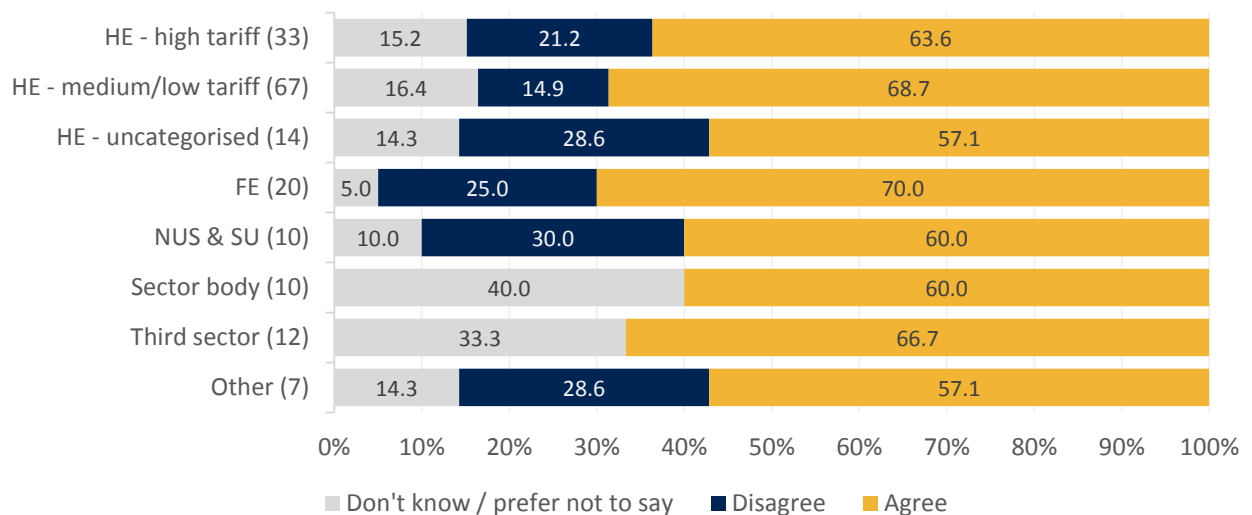
**PARTICIPATION, BY ORGANISATION TYPE**



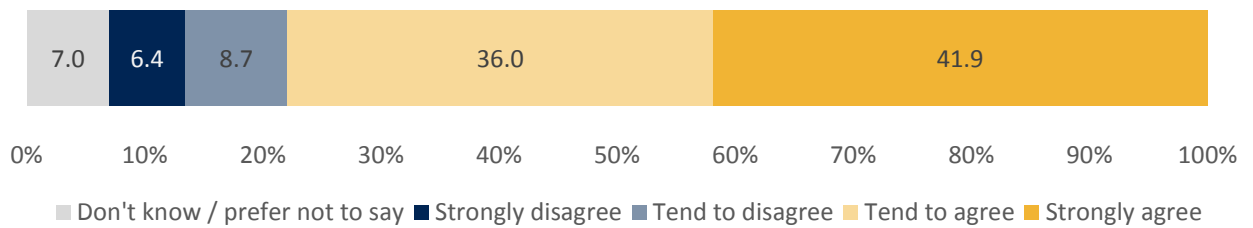
**FIGURE 30: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT AN EVALUATION SELF-ASSESSMENT TOOL WILL CONTRIBUTE TO IMPROVEMENTS IN EVALUATION PRACTICE?**



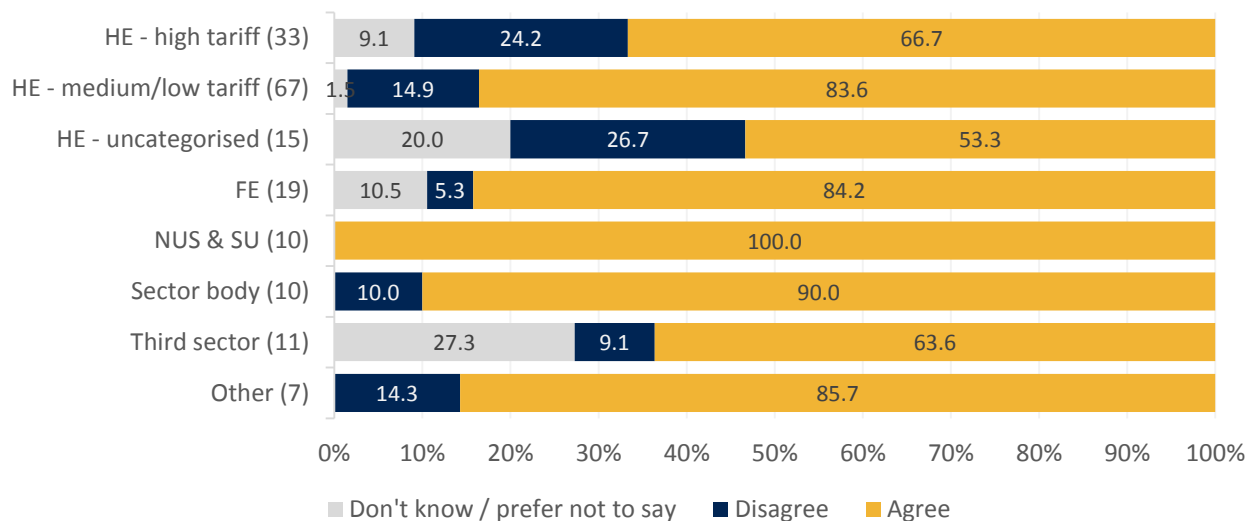
**FIGURE 31: AGGREGATED AGREEMENT WITH THAT AN EVALUATION SELF-ASSESSMENT TOOL WILL CONTRIBUTE TO IMPROVEMENTS IN EVALUATION PRACTICE, BY ORGANISATION TYPE.**



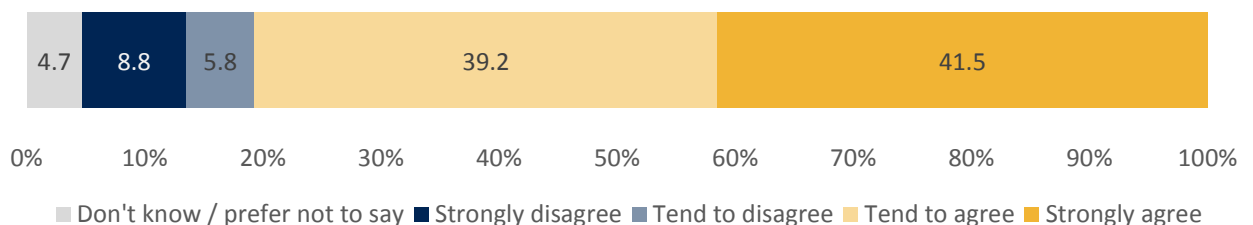
**FIGURE 32: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT OFS SHOULD UNDERTAKE FURTHER WORK TO EXPLORE WHETHER DATA SPLIT BY AGE COULD BE INCLUDED WITHIN THE TRANSPARENCY INFORMATION CONDITION?**



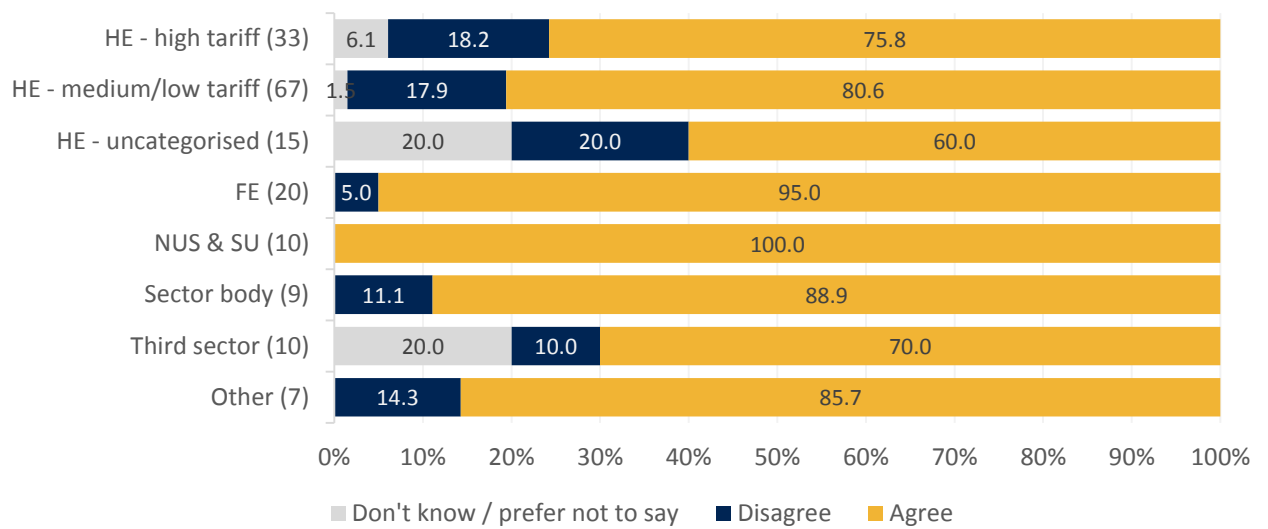
**FIGURE 33: AGGREGATED AGREEMENT WITH THE PROPOSAL THAT THE OFS SHOULD UNDERTAKE FURTHER WORK TO EXPLORE WHETHER DATA SPLIT BY AGE COULD BE INCLUDED WITHIN THE TRANSPARENCY INFORMATION CONDITION, BY ORGANISATION TYPE.**



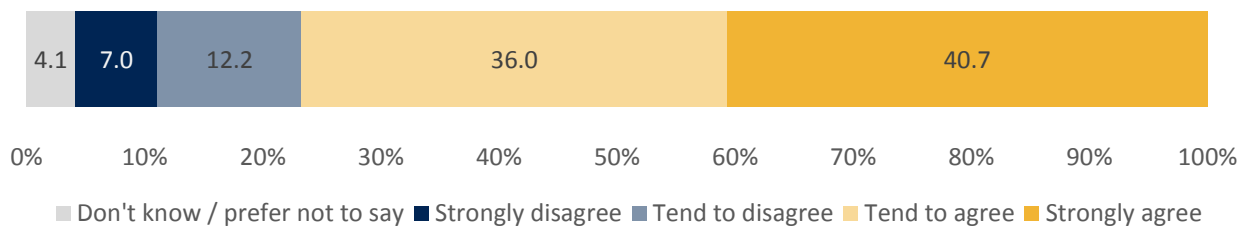
**FIGURE 34: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT OFS SHOULD UNDERTAKE FURTHER WORK TO EXPLORE WHETHER DATA SPLIT BY DISABILITY STATUS SHOULD BE INCLUDED WITHIN THE TRANSPARENCY INFORMATION CONDITION?**



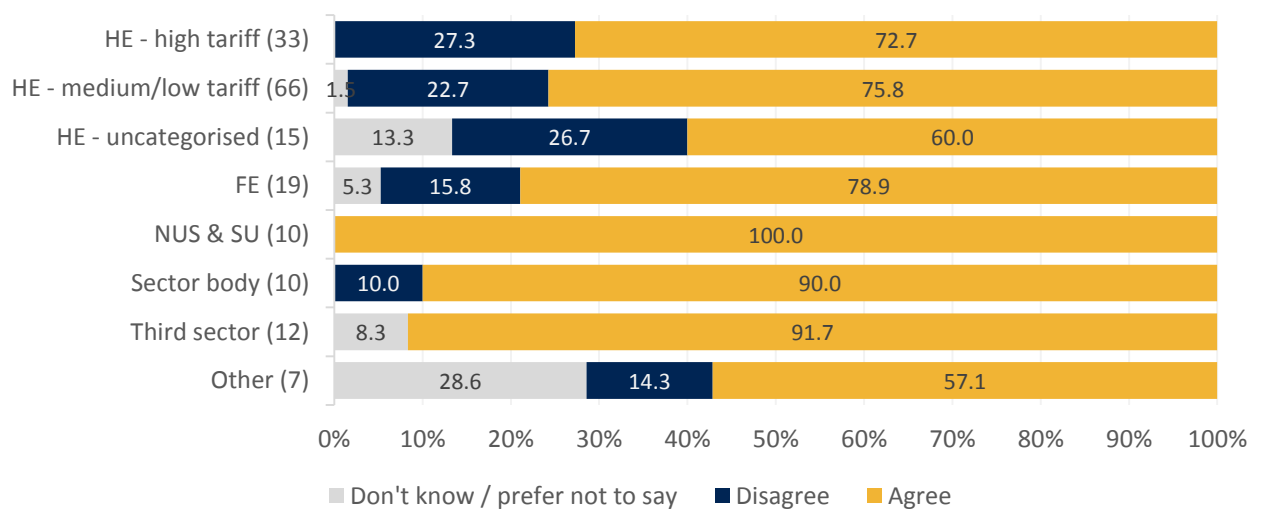
**FIGURE 35: AGGREGATED AGREEMENT WITH THE PROPOSAL THAT OFS SHOULD UNDERTAKE FURTHER WORK TO EXPLORE WHETHER DATA SPLIT BY DISABILITY STATUS SHOULD BE INCLUDED WITHIN THE TRANSPARENCY INFORMATION CONDITION, BY ORGANISATION TYPE.**



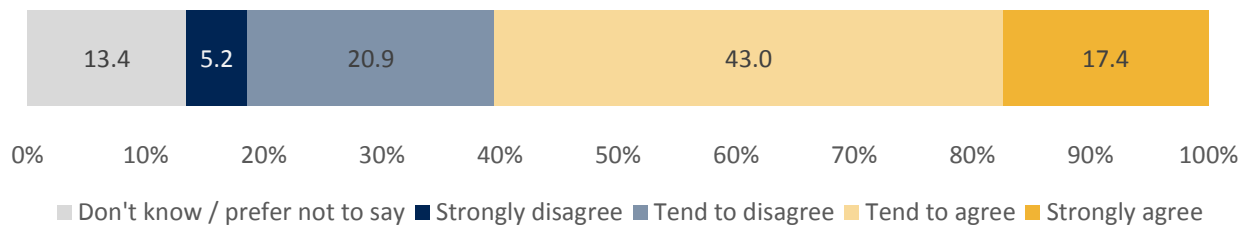
**Figure 36: Q7a. To what extent do you agree or disagree that OfS should create and maintain an access and participation dataset?**



**FIGURE 37: AGGREGATED AGREEMENT THAT OFS SHOULD CREATE AND MAINTAIN AN ACCESS AND PARTICIPATION DATASET, BY ORGANISATION TYPE.**



**FIGURE 38: TO WHAT EXTENT DO YOU AGREE OR DISAGREE THAT THE PROPOSED DATASETS WOULD SUPPORT YOU TO HOLD PROVIDERS TO ACCOUNT ON THEIR PERFORMANCE AGAINST TARGETS?**



**FIGURE 39: AGGREGATED AGREEMENT THAT THE PROPOSED DATASETS WOULD SUPPORT YOU TO HOLD PROVIDERS TO ACCOUNT ON THEIR PERFORMANCE AGAINST TARGETS, BY ORGANISATION TYPE.**

