

Access and participation

Issue

1. Progress on access and participation following reforms agreed by the board in December 2018 and emerging issues for OfS regulation and funding in the future.

Recommendations/decisions required by the board

2. The board is invited to:
 - a. Note the emerging findings from monitoring of 2019-20 access and participation plans and the latest admissions data, and that a summary report will be published in late autumn 2021.
 - b. Note the issues highlighted for OfS regulation and funding of access and participation in the future, which are:
 - i. The extent to which outreach to schools and colleges will need to support catch-up as we move out of lockdown.
 - ii. The approach to targeting students that are under-represented, e.g. addressing intersections such as white working class and capitalising on individualised free school meals data.
 - iii. How to ensure access and participation activities to support student success build on robust quality and standards.
 - iv. How to capitalise on the proposed Lifelong Learning Entitlement.
 - v. Our risk appetite and regulatory approach to monitoring 2020-21 onwards access and participation plans, taking into account the disruption to schooling and its impact on grading during the pandemic.
 - vi. How to achieve our aims in a way that minimises regulatory and administrative burden.
 - c. Note the board's view will help to inform our approach to future regulatory guidance on access and participation plans, to the funding of access and participation following the spending review, and the work of the incoming Director for Fair Access and Participation.

Further information

3. Available from Chris Millward, Director for Fair Access and Participation or Sarah Howls, Head of Access and Participation Regulation and Funding.

Background

Legal context

4. Our work on access and participation has regard to the general duties under section 2 of the Higher Education and Research Act (HERA), including the 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.¹ Sections 29 to 32 of HERA set out the power to approve an access and participation plan and specify the content of the plan, which is underpinned by the Higher Education (Access and Participation Plans) (England) Regulations 2018.² The way in which we regulate access and participation is set out in condition A1 of the regulatory framework for higher education in England.³
5. Promoting equality of opportunity in relation to access and participation is central to the OfS meeting its strategic objective to ensure that every student, whatever their background, has a fulfilling experience of higher education that enriches their lives and careers.⁴
6. In December 2018, following consultation, the board agreed reforms to our regulation and funding of access and participation. This included placing access and participation plans on a more strategic footing from 2020-21 onwards, enabling plans to be approved for a maximum of five years, and requiring from providers a robust self-assessment of performance, clear aims, objectives and targets, and evidence-informed strategic measures to deliver them. It also included investment in activities that providers could not conduct alone, particularly collaborative outreach in local areas between universities and colleges so that it is targeted, joined up and efficient, and the sharing of evaluation findings through a national ‘what works’ centre. This is delivered through the Uni Connect programme and the Transforming Access and Student Opportunity (TASO) centre.
7. Further background information about our reforms to access and participation regulation, the key findings from our analysis of the 2020-21 access and participation plans and information in respect of Uni Connect and the ‘what works’ centre can be found at the **Annexes** to this paper.

Impact of the COVID-19 pandemic on access and participation

8. On 23 March 2020, the UK went into the first national lockdown as a result of the COVID-19 pandemic. As noted in our annual review of equality objectives, which was discussed at the

¹ [Higher Education and Research Act 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

² [The Higher Education \(Access and Participation Plans\) \(England\) Regulations 2018 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

³ See: ‘The regulatory framework for higher education in England’ – Office for Students: <https://www.officeforstudents.org.uk/advice-and-guidance/regulation/the-regulatory-framework-for-higher-education-in-england/>

⁴ See: ‘Office for Students Strategy 2018 to 2021’, ‘OfS 2018.18’ Office for Students: <https://staging.officeforstudents.org.uk/media/2101/ofs-strategy-2018-21.pdf>

meeting of the board in July 2021, the differential impact of the pandemic on different communities and areas of the country had immediate impacts on current higher education students (for example, in terms of increased and more acute digital poverty and reduced access to appropriate study space).⁵ The paper also noted the potential longer-term impact of the pandemic on future higher education students, particularly the anticipated widening of the gap in learning outcomes between the most and least advantaged pupils.

9. The Centre for Economic Performance reported in October 2020 that, during the first lockdown, 74 per cent of private school pupils received lessons for full school days as opposed 38 per cent in state schools.⁶ Furthermore, around 25 per cent of state school pupils were reported as receiving no formal schooling or tutoring during that period at all.
10. From the outset of the pandemic, in our March 2020 communication with the sector, we were clear that providers were expected to continue to deliver the commitments in their access and participation plans, stating that: 'It is particularly important that providers deliver in full the financial commitments made to current student. After this period we will assess how providers sought to meet their commitments, but in doing so will take into account the circumstances and assess whether a provider has made reasonable decisions that take into account the needs of students, especially students from underrepresented groups. Annex B provides further detail on our expectations of providers during the pandemic.'
11. In addition, in recognition of the additional hardship students faced, the Government made a total of £70 million extra funding available to the sector (£20 million in December 2020 and £50 million February 2021) to support students in hardship.

Outreach

12. As with all aspects of higher education delivery, HE providers and Uni Connect partnerships had to rapidly pivot their activity to on-line provision. The OfS produced a series of briefing notes during the first lockdown, one of which focussed on the delivery of outreach and included a number of examples of how providers and partnerships had adapted so they could continue to deliver their outreach activity.⁷ In May 2021, the OfS published an emerging insight report on COVID-19, based on their engagement with Uni Connect partnerships.⁸ The key findings from the report were:

- The disruption to secondary education significantly challenged partnerships that traditionally delivered outreach face-to-face via schools and colleges and caused many activities to be cancelled or postponed.

⁵ See: 'Annual Equality and Diversity Report 2020-21', 13 July 2021, para 16-49, Office for Students: <https://hub.officeforstudents.org.uk/media/5576/bd-2021-july-71-annual-equality-and-diversity-report-2020-21.docx>

⁶ See: 'Generation COVID: Emerging work and education inequalities', October 2020, CEP: [cep-covid-19-011.pdf](https://cep.ac.uk/wp-content/uploads/2020/10/Generation-COVID-2020.pdf) (lse.ac.uk)

⁷ See: 'Supporting disadvantaged students through higher education outreach', Office for Students: <https://www.officeforstudents.org.uk/publications/coronavirus-briefing-note-higher-education-outreach/>

⁸ See: 'Emerging insight report: Covid-19 and Uni Connect', Office for Students: <https://www.officeforstudents.org.uk/publications/emerging-insight-report-covid-19-and-uni-connect/>

- Partnerships rapidly upskilled to adapt existing activities and materials for online delivery, in some cases supporting learners with more flexibility and choice. However, some activities, such as information, advice and guidance (IAG) and mentoring, were easier to adapt than others, such as campus visits and summer schools. Few new activities had been designed specifically in response to the restrictions imposed.
- New barriers to engaging learners during the pandemic, including access to technology, meant that online outreach had not always been able to successfully reach Uni Connect target learners and other underrepresented groups who need the most support to make informed choices about higher education (HE).
- There is evidence that some aspects of online mentoring and multi-activity engagement had been as effective as face-to-face delivery, but that less immersive, online approaches to activities such as summer schools may be less effective in helping to prepare learners for student life.
- Further evaluation is needed to understand the impact of mode of delivery on both levels of engagement and learner outcomes to ensure new blended approaches to outreach activities capitalise on the strengths of online delivery and are at least as effective as the previous face-to-face offer.

Admissions

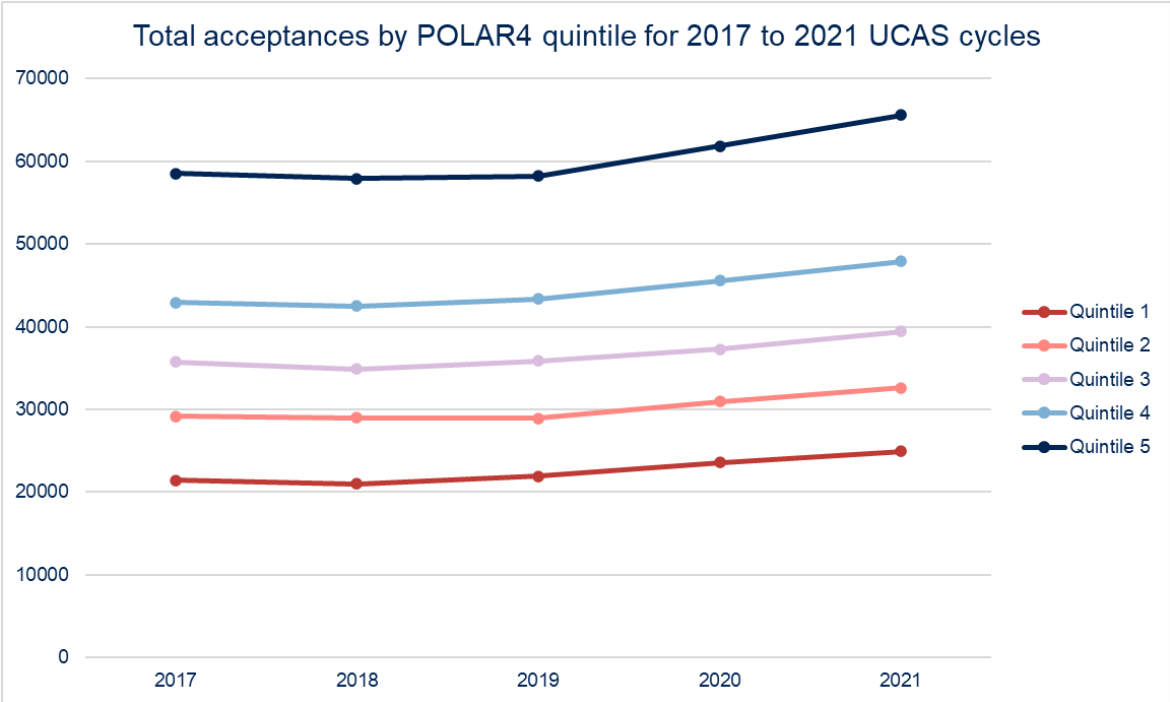
13. Concerns that the lock down in March 2020, the subsequent controversy over A level grades and the reversion back to teacher assessed grades, would result in fewer students from underrepresented groups entering HE were largely unfounded. The end of cycle series of reports published by UCAS in December 2020⁹ found:

- The UK 18 year old entry rate rose to a record 37 per cent from 34 percent in 2019.
- Record number of 18 year old acceptances from the lowest participation areas (POLAR4 Q1) at 29,020 students.
- Significant growth in mature student acceptances to 114,440, representing the largest single year growth since 2009.
- Record number of students declaring disabilities, mental health conditions or specific learning difficulties accepted into HE.
- The number of POLAR4 Q1 applicants placed in 15 most selective providers increased by 34.8 per cent in 2020 to 1,925 (in total, 34,045 UK 18 year olds were placed at this group of providers).

14. Emerging UCAS data for the latest applications cycle for 2021 entry again demonstrates significant growth in HE acceptances across the sector (figure 1). The data also shows that overall there has been an increase in the numbers of students from POLAR4 Q1 (the most underrepresented) accepted to higher education providers. However, there have been even

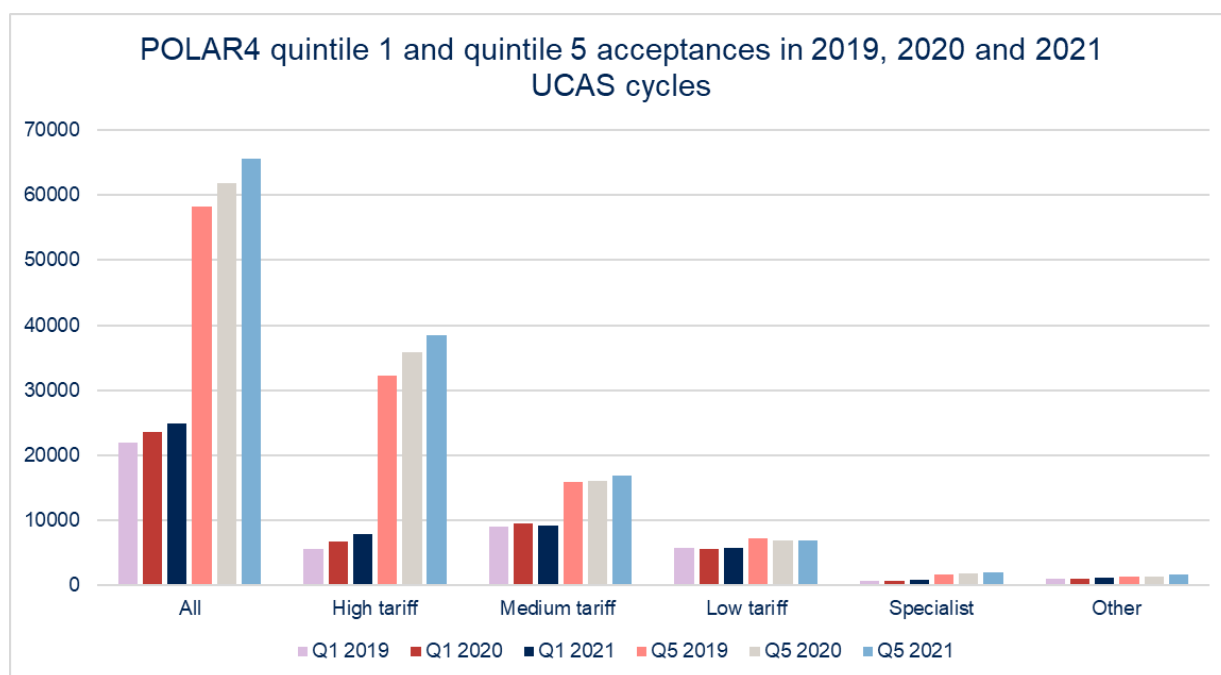
⁹ See: '2020 End of Cycle Report', Ucas: <https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-end-cycle-reports/2020-end-cycle-report>

higher increases in numbers of students accepted from POLAR Q5 (the least underrepresented). This is largely a result of significant growth occurring at the least socially diverse, higher-tariff groups of providers. Consequently, even though some individual higher-tariff providers may narrow their own access gap between POLAR Q1 and Q5, the relatively small numbers of underrepresented students at those providers means that at a sector level the structural gap between those groups has widened. Nationally, therefore, the access gap between students coming from areas of lowest HE participation and areas of highest participation (KPM1) has increased. Annex C provides supplementary notes about this data.



Source: UCAS day 28 release data 2021-22

Figure 2: Comparison of POLAR4 quintile 1 and quintile 5 acceptances for 2019, 2020 and 2021 UCAS cycles.



Source: UCAS day 28 release data 2021-22

15. The application and entrant data for both 2020 and 2021 UCAS cycles are encouraging in respect of the growth in the overall numbers from the most underrepresented groups accessing higher education, although the widening of the gap remains a concern and this pattern could extend into future years. Research suggests that the effects of lost learning in schools have been more severe for pupils from disadvantaged and underrepresented groups.¹⁰ Continued engagement by HE providers with schools is therefore critical in terms of both the contribution those providers can make through proactive support for raising attainment, but also in terms of the ways in which they cut through other academic, financial and cultural barriers to progression. The importance of such activities was highlighted in the most recent evaluation of Uni Connect.¹¹ Further information about the Uni Connect programme and the key findings from the most recent evaluation reports is in Annex D.
16. Equally important is the criteria HE providers use to recruit and select their own students. Understanding the context within which learners have achieved their qualifications is likely to be even more crucial if higher education is to avoid reinforcing the disadvantage and inequalities apparent in schools. The work that many providers are undertaking as part of their access and participation plans to review their admissions processes and criteria is, therefore, particularly important as we emerge from the pandemic, as are the reviews of admissions being conducted across government and the sector.

¹⁰ See: 'Lost learning, lost earning', Sutton Trust: <https://www.suttontrust.com/wp-content/uploads/2020/10/Lost-Learning-Lost-Earnings-1.pdf>

¹¹ See: 'Uni Connect phase 2 report', April 2021, Office for Students: <https://www.officeforstudents.org.uk/media/5f990894-a861-4208-a16a-3a793feeb368/uni-connect-phase-two-evaluation-detailed.pdf>

17. We expect to be able to analyse admissions data for individual universities and colleges during the coming months and this will position us to anticipate how this could inform deliver against the trajectories in access and participation plans. We can then consider our approach to regulatory risk and intervention in this area, and the implications for our KPM 2, which is concerned with reducing the gap between the most and least under-represented groups within the high tariff providers.

19-20 Access and participation plans – monitoring outcomes

18. The OfS undertakes annual monitoring of access and participation plans to ensure that HE providers are taking all reasonable steps to comply with the provisions of their plan as set out in condition A1 of the regulatory framework for England.

19. The 2019-20 access and participation plans were submitted and approved prior to the reforms to our approach agreed by the board in December 2018. Consequently, these plans would only cover the 2019-20 academic year and providers were advised largely to roll forward the targets and commitments agreed with OFFA in their 2018-19 access agreements for what was an interim year. For this reason and considering the impact of the pandemic on both providers and students, the OfS adopted a high-risk appetite in its monitoring of each provider's progress in delivering the provisions of its 2019-20 plan.

20. Our monitoring of these plans concluded in August 2021 and demonstrated that nearly all providers made reasonable decisions in light of the impact of the pandemic in respect of the delivery of the commitments in their plans, and had taken all reasonable steps to comply with the provisions of the plan as required under condition A1. As set out in the regulatory framework for England¹², in judging whether a provider has taken all reasonable steps, the OfS has regard to:

- a. The progress made by the provider in delivering the objectives and targets in its plan.
- b. The approach and actions the provider has taken to deliver the provisions of its plan.

21. The following section provides a high-level summary of emerging outcomes from 19-20 monitoring evaluation at sector-level. We aim to publish a full report of the monitoring outcomes in November 2021.

22. Further detailed information about the 19-20 monitoring outcomes can be found at Annex C.

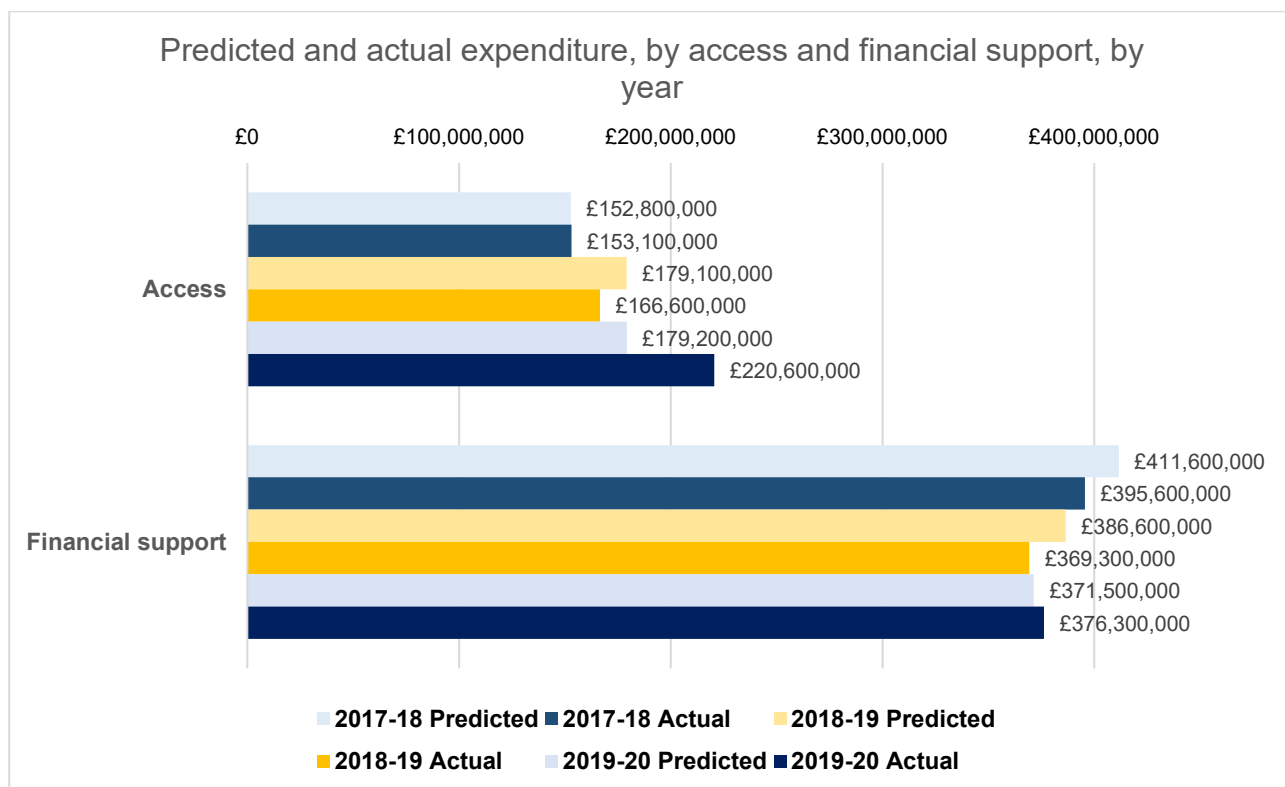
Expenditure during 19-20

23. Providers were expected to meet their financial support commitments to students in full in both the 2019-20 and 2020-21 academic years.

24. Our analysis shows that expenditure in both access and financial support for students was greater than forecast across the sector for the 2019-20 academic year. This contrasts with previous years in which actual spend was less than predicted.

¹² [OfS 2018.01 Securing student success: Regulatory framework for higher education in England \(officeforstudents.org.uk\)](https://www.officeforstudents.org.uk)

Figure 1: Predicted and actual expenditure for access and financial support, by year (rounded)



Source: OfS annual financial return 2020 data (HEPs); OfS access and participation plan 2019-20 monitoring data (FECs), 2019-20 access and participation plans, OfS access and participation monitoring data 2017-18 and 2018-19, OFFA access agreement outcomes, 2017-18 and 2018-19

25. While across the sector as a whole there was a 1 per cent increase in the actual financial support on that predicted, a number of providers did report an underspend on their financial support against that predicted in their 2019-20 plans. Further information was requested from these providers to explain the variance, with the most common reasons cited as fewer eligible students than predicted and normal variance in financial planning. Further detail in respect of financial support is in Annex E.

26. The monitoring process identified four providers at higher risk of non-compliance with A1 ongoing conditions of registration, due to a lack of information, worsening outcomes for students and unsatisfactory explanations on whether they had taken all reasonable steps to honour the commitments made to students. Given our higher risk appetite for the 2019-20 plans, we have communicated concerns and set out our future expectations to three of those providers.

27. We are currently exploring options for regulatory intervention with respect to one provider where the information provided in the monitoring return raised concerns about the credibility of the measures set out in its most recent access and participation plan to address the worsening position for under-represented students.

Impact of the pandemic on 2020-21 onwards access and participation activity

28. As part of the monitoring information collected, providers and their students were asked to explain the impact of the pandemic on implementation of the commitments detailed in their

2020-21 onward access and participation plan, and the mitigating actions they had taken in the case of any negative impacts.¹³

29. Many universities and colleges reported an increase in applications (for both 2020-21 and 2021-22) and in enrolments (2020-21) for under-represented groups, which has been confirmed by UCAS data (see paragraphs 14 and 15). However, most reported that the pandemic presented increased risks to the 'success' stage of the student lifecycle, that is continuation and attainment, as well as the broader student experience.
30. Providers reported taking action to mitigate the impact of the pandemic on their students in the following areas:
 - a. Access: Providers reported the cancellation of outreach activities in 2019-20, citing the lack of capacity within schools to engage. The majority of providers reported shifting from face-to-face delivery to online during both 2019-20 and 2020-21, with some providers stating that outreach activity will be blended in future. Some providers reported that through online delivery of outreach they have had greater geographical reach in regions where they have not previously targeted their outreach.
 - b. Academic regulations: Providers reported changing their academic regulations to allow for changes to assessment timings, mode and progression through each year of study, but also through the use of no detriment and safety net policies. The aims of these changes were to support all students to achieve, reduce pressures on support staff, and avoid face-to face-assessment models. Some providers, when considering the impact of the pandemic on their 2020-21 and onwards plans, have described how these amended and additional measures have had the greatest benefit for disabled students. Some providers have also attributed some of these measures to reducing awarding gaps within their own institution. There is some limited emerging evidence which examines the effect of no detriment policies across student groups, and we will continue to keep abreast of this topic, given its importance to our work on quality and standards as well as access and participation.¹⁴
 - c. Mental health and wellbeing: providers reported adapting and increasing their mental health and wellbeing provision. The measures described by providers varies from regular contact with specific target groups, for example care experienced students, to expansion of counselling services.
 - d. Continuation: providers noted that underrepresented students were disproportionately impacted by the pandemic, but also that they increased and targeted support available for those students. Providers reported that they anticipate a detrimental impact on continuation rates particularly for underrepresented students, with some providers reporting an increase in requests from students to withdraw and defer in-year.

¹³ 118 student submissions were received.

¹⁴ See: 'University of Exeter degree outcomes statement 2021: Supplemental report', University of Exeter: [https://www.exeter.ac.uk/media/universityofexeter/tqae/documents/DOS21_Supplemental_Report_on_the_No_Detriment_Policy_2019-20_\(Final_for_Publication\).pdf](https://www.exeter.ac.uk/media/universityofexeter/tqae/documents/DOS21_Supplemental_Report_on_the_No_Detriment_Policy_2019-20_(Final_for_Publication).pdf)

- e. Inclusion: to mitigate a lack of face-to face contact and academic support from tutors and peers, and to ensure that all students were able to learn and achieve, providers noted that they needed to adopt more inclusive online learning and teaching policies.
- f. Progression to employment: As with other student and professional services, most providers stated that their careers services moved to online delivery. Placements and internships were commonly reported to have been hindered by the pandemic, as well as graduate recruitment schemes. However, a number of providers reported the creation of online internships and work experience, as well as micro-experiences, with only a small number of providers reporting they were unable to secure any form of work experience for their students.

Student submissions

31. Students were asked to directly input into the access and participation plan monitoring process via a voluntary student submission for each provider, which was intended as a pilot before full implementation for our monitoring of 2020-21 onwards plans. We received a submission from students at approximately half of the providers with a 2019-20 plan. In addition to securing recent, relevant information to support our regulatory activity, the student submission process is intended to support meaningful dialogue between providers and their students, enabling students to both hold their providers to account and have a greater influence on their work to improve equality of opportunity.
32. The student submissions provided a more current view of student experience than the data was able to provide and offered insights into students' experience. Some of the key themes that have emerged from the submissions are:
- Transparency of providers in respect of progress and performance
 - The disproportionate effect of the pandemic on particular student groups
 - The benefits of a more blended learning approach
 - The quality of support provided to students
33. Further detail on these themes and other aspects of the student submissions can be found in Annex E.

Access and participation: the next phase

34. Our work over the past three years has led to the development of an outcomes-focussed, evidence-based and strategic approach to access and participation that is designed to deliver continuous improvement in practice and student outcomes. Its implementation has set in place the framework within which the sector can make meaningful and measurable progress towards equality of opportunity within HE. It is also a framework that allows OfS and the sector to respond to new challenges and evolving priorities through variations to plans.
35. HE providers' responses to the challenges of the pandemic have included changes to learning, teaching and assessment practices that may continue into the future. It has forced providers to innovate and to expand their student support and wellbeing functions. It has also revealed

previously hidden disadvantages such as access to technology and space to study for students, prompting providers to establish new forms of student support.

36. However, it is not only the challenges of the pandemic that are likely to influence our access and participation priorities. The Government has already set out its plans to radically change the way post-compulsory education is financed, with the aim of levelling up the incentives between further and higher education through the Skills and Post-16 Education Bill. If enacted, the Bill would introduce a lifelong learning entitlement (LLE), which would transform the way in which HE is financed and impact on how the OfS can regulate through access and participation plans. We expect that HE providers would seek to adapt to the new system by forging stronger relationships with colleges and employers, and by developing provision that can meet the needs of people who want to learn flexibly later in life.
37. On 25 August, the OfS launched the Higher Education Short Course Trail Challenge competition, which will distribute £2million of funding for the development of HE short courses.¹⁵ The competition is an important step towards delivering the LLE, enabling testing of how innovations in the supply of short courses could meet demand from students and employers, and a new model of student finance to support this. In addition, the new phase of the Uni Connect programme will place greater emphasis on the need to engage with adults as well as young learners, and to further enhance partnerships' strategic engagements with local partners including FE colleges and employers.
38. We anticipate that government will also want higher education providers to contribute their resources and expertise to the effort to address lost learning in schools as a result of the pandemic. This work and the measures to increase lifelong learning with employers could be crucial for the government's aim to 'level up' between different parts of England. The areas with the lowest rates of higher education participation tend to be post-industrial towns and parts of cities in the north and Midlands as well as coastal towns, which also have large populations of low-income white communities that have been a concern for the Education Select Committee.¹⁶ These areas are already a priority for access and participation plans and Uni Connect, but there may be a need to focus more closely on addressing attainment gaps in school, and enabling progression from employment for students who enter higher education from and graduate into these parts of the country.
39. As we implement the new OfS strategy, we will also want to ensure that our approach to quality and standards and equality of opportunity are integrated and reinforce each other. This can be pursued through the use of common data and measures across the two, including improvements to data such as the Association Between Characteristics of Students (ABCS) measure. But we will want also to demonstrate more clearly our expectations of providers in areas where they are highlighting potential tensions, for example addressing attainment gaps while upholding standards.

¹⁵ [Higher education short course trial - Office for Students](#)

¹⁶ ['Forgotten' White working-class pupils let down by decades of neglect, MPs say - Committees - UK Parliament](#)

Key issues

40. In conclusion, we have identified the following issues for consideration as we move into the next phase of delivering our A&P work:
- a. The extent to which outreach to schools and colleges will need to focus on catch-up as we move out of lockdown
 - b. The approach to targeting students that are under-represented, e.g. addressing intersections such as white students on free schools meals in areas of low participation, capitalising on individualised free school meals data.
 - c. How to ensure access and participation activities to support student success build on robust quality and standards.
 - d. How to capitalise on the proposed Lifelong Learning Entitlement.
 - e. Our risk appetite and regulatory approach to monitoring 2020-21 onwards access and participation plans, taking into account the disruption to schooling and its impact on grading during the pandemic.
 - f. How to achieve our aims in a way that minimises regulatory and administrative burden.
41. The board's views on this will help to inform our approach to future regulatory guidance on access and participation plans, to the funding of access and participation following the spending review, and to the work of the incoming Director for Fair Access and Participation.

Risk implications

42. Corporate and operational risks are captured through the OfS risk register and we will continue to report to the board any emerging high-level risks, particularly those which relate to our general duty to promote equality of opportunity under section 2 of HERA and to our powers to approve access and participation plans under section 29.
43. We continue to actively manage risks associated with the reputational damage to the OfS and loss of credibility if we do not meet the access and participation ambitions we have set ourselves, or we do not meet the expectations of students and other stakeholders.

Communications and engagement

44. We continue to engage at both sector and individual provider level in respect of access and participation. It will be important to take every opportunity to effectively articulate that our focus on an outcomes-based approach to access and participation provides the measures through which we are able to demonstrate improved equality of opportunity at all stages of the student lifecycle.
45. We will ensure that we use key points in the year to promote our and the sector's work in access and participation. This will include activity later in the autumn when we publish the 2019-20 access and participation plan monitoring outcomes report as well as guidance for the 2020-21 onwards plans monitoring process and in March 2022 when the updated access and participation data dashboard is published.

46. Furthermore, we anticipate that the newly appointed Director for Fair Access and Participation will seek to engage with the sector and other stakeholders through articles, blog posts and speaking engagements.

Paper publication date

47. Subject to advice from the board at this meeting, we will publish this paper on our website by the end of October 2021. The board is advised that the information contained in the paper derived from UCAS data may need to be redacted.

Annex A

Background summary of 2018 access and participation reforms

1. Following an open consultation, the board agreed in December 2018 to introduce major reforms to our approach to access and participation, including our individual provider regulation through access and participation plans.¹⁷ The ambitious package of reforms set out an outcomes and risk-based approach, using both provider and sector level regulation to drive continuous improvement in student outcomes and practice in the sector. This meant:
 - placing access and participation plans on a more strategic footing from 2020-21 onwards allowing plans to be approved for a maximum of five years and requiring a robust assessment of performance with clear aims, objectives, targets and evidence-informed strategic measures to deliver them
 - continuing to use OfS funding to support provider and sector level activity, including through the Uni Connect national outreach programme
 - developing the access and participation data dashboard to understand provider progress on closing equality of opportunity gaps year on year
 - investing in the Centre for Transforming Access and Student Outcomes in Higher Education in Higher Education (TASO), the what works centre for access and participation in HE
 - continuing to build the evidence base through effective evaluation and research
 - collating and sharing effective practice across the sector.
2. At its meeting in January 2020 the board was provided with an update on progress of the access and participation reforms.¹⁸ As set out in that paper, the core purpose of the reforms was to make greater and swifter progress in closing persistent gaps in outcomes for students from underrepresented groups across the lifecycle. Our ambition was to achieve equality of opportunity in respect of student outcomes within a generation, which could only be delivered if providers demonstrated the same level of ambition in their plans. A critical marker of that ambition is the targets they have set up to 2024-25 and the trajectory that places them on in terms of reducing their gaps.
3. On 29 January 2020 we published an analysis of 171 access and participation plans covering the period 2020-21 to 2024-25 that had been approved as at 31 October 2019.¹⁹ This showed that a high level of progress against the OfS key performance measures would be made by 2024-25 if providers met the targets they had set in their plans. Alongside the targets, providers

¹⁷ See: 'A new approach to regulating access and participation', 6 December 2020, Office for Students: [bd-2018-december-41-access-and-participation-main-paper.pdf](https://www.officeforstudents.org.uk/media/2018/12/2018-december-41-access-and-participation-main-paper.pdf) ([officeforstudents.org.uk](https://www.officeforstudents.org.uk))

¹⁸ See: 'Access and participation: implementation of the reforms', 28 January 2020, Office for Students: [bd-2020-january-61-access-and-participation-implementation-of-the-reforms.pdf](https://www.officeforstudents.org.uk/media/2020/01/2020-january-61-access-and-participation-implementation-of-the-reforms.pdf) ([officeforstudents.org.uk](https://www.officeforstudents.org.uk))

¹⁹ See: 'Transforming opportunity in higher education', 'OfS 2020.06' Office for Students: [transforming-opportunity-in-higher-education.pdf](https://www.officeforstudents.org.uk/media/2020/01/transforming-opportunity-in-higher-education.pdf) ([officeforstudents.org.uk](https://www.officeforstudents.org.uk))

also committed to a broad range of activity reflecting their strategic priorities in respect of access and participation. A number committed to expanding existing outreach programmes, deepening relationships with schools and reviewing and enhancing their admissions processes, while others were going to undertake curriculum re-design, expand their pedagogical approaches and develop their employment strategies.

The Centre for Transforming Access and Student Outcomes in Higher Education (TASO)

4. TASO was set up in 2019 and is funded by the OfS on an initial grant until 2023. It is an affiliate What Works Centre, is part of the Government's What Works Movement and is committed to the generation, synthesis and dissemination of high quality evidence on what works with regard to access and participation.
5. TASO uses evidence and evaluation to understand and show how higher education contributes to social mobility and inclusion. It was established originally by a consortium from King's College London, Nottingham Trent University and the Behavioural Insights Team, but has since been 'spun out' as an independent charity.
6. Current areas of research and evaluation activity by TASO includes:
 - Evaluation of summer schools
 - Race equality gaps
 - Teaching and learning in the time of COVID
 - Mature learners
 - Multi-intervention outreach and mentoring
 - Supporting access and student success for learners with experience of children's social care.
7. The research activities of TASO are concentrated into themes. These are: Effectiveness of Widening Participation Outreach; Gaps in the Student Experience; Employment and Employability; Mental Health and Disability. Each theme follows an evidence cycle of Phases 1–3. In Phase 1 gaps are identified through a synthesis of current evidence which is systematically collated and considered. Phase 2 is the generation phase where original research is commissioned / conducted in-house to fill gaps in current knowledge base. Phase 3 is the review and dissemination phase.

Annex B

OfS expectations of providers during the COVID-19 pandemic

1. We clarified our expectations in relation to access and participation in the following ways, as detailed in the July 2020 board paper²⁰:
 - a. We communicated that providers should continue to deliver the commitments in their approved access and participation plans for 2019-20 and 2020-21 onwards, notwithstanding the impact of the pandemic.
 - b. We confirmed that financial commitments to students within approved plans, which are focused on the most disadvantaged students, should continue to be met in full.
 - c. We clarified that providers could move funding earmarked for activities that could not be undertaken, such as face to face engagement with schools, to address student hardship and mental health needs, provided that it was focused on vulnerable students or those from under-represented groups. We were clear that where changes were made to the commitments in plans, providers would need to demonstrate that they had made reasonable decisions in light of the pandemic.
 - d. We sent a letter to the 29 partnerships of the Uni Connect Programme in March 2020, outlining our expectations for them to explore and deliver alternative modes of engagement during the coronavirus pandemic. In particular, we asked them to address how their approaches could support broader groups of underrepresented students (not just those in target schools and wards) and also focus their provision of impartial information, advice and guidance on the needs of students applying to higher education in the current admissions cycle. In response, the partnerships rapidly put in place plans to deliver as many activities as possible online, including for example; online mentoring and tutoring, live and pre-recorded workshops, webinars, 1-2-1 emails and live chat, videos and phone calls. Partnerships have also been involved in activities to map and address gaps in advice to Year 13s and to identify the most appropriate technology considering safeguarding issues. Recognising the issue of digital exclusion in their local areas, some partnerships are also working with their LEPs, local schools and colleges and third party providers to help underrepresented learners gain access to digital devices and internet access in order to continue engaging with the online IAG and outreach offered by the Uni Connect programme.
 - e. From June 2020 onwards, we worked with partnerships to ensure that they are equipped to support Year 12 students, particularly those who may be interested in applying to courses with early recruitment cycles. We have also conducted research on digital IAG and outreach platforms offered by third party providers, so that partnerships are able to draw on rigorous and tested platforms. Work is ongoing with Discover Uni, UCAS and the Student Loans Company to ensure that Uni Connect messages to Year 12 and 13 students are up-to-date, consistent and coordinated. We are also working

²⁰ See: 'Coronavirus (Covid-19) response', 2 July 2020, Office for Students: "[bd-2020-july-41-covid-19-response.pdf](https://www.officeforstudents.org.uk/media/2020/07/2020-07-01-covid-19-response.pdf) ([officeforstudents.org.uk](https://www.officeforstudents.org.uk))

with UCAS to explore options to route relevant students and advisers to the Uni Connect programme and their local partnership.

2. Separate to these coronavirus-related regulatory expectations, we also published Briefing Notes to identify how providers are addressing common issues arising from the pandemic, covering international students, student mental health and wellbeing, care experienced and estranged students, IAG for students, research students, and shortly disabled students, graduate employment and outreach to schools and colleges.
3. We engaged with sector and student representatives to identify the barriers facing specific groups of students during the pandemic in order to facilitate the sharing of approaches to solving common problems, to inform our re-booting of regulatory requirements for access and participation, and to identify issues that could be addressed by other sector and government agencies. This included a series of online roundtables during June 2020 with the Disabled Students Commission to identify the particular barriers facing students with disabilities in relation to the clearing process, blended learning, and transition and induction this year, and an online conference to address the support needs of black, Asian and minority ethnic students during the pandemic.

Annex C

Notes on analysis on UCAS day 28 data

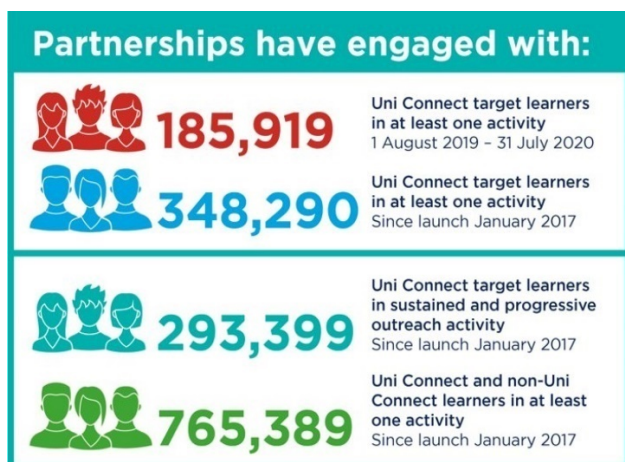
1. The graphs in the main paper show data for UK-domiciled 18-year-old placed applicants to providers in England, as recorded by UCAS 28 days after Joint Council for Qualifications (JCQ) results day.
2. Providers included in this analysis are Office for Students (OfS) registered providers, or those with designation for student support for continuing students, including providers teaching under sub-contractual arrangements and joint medical schools, that use the UCAS undergraduate scheme for admission of full-time undergraduate students.
3. The methodology used to allocate providers to groups (High tariff, Medium tariff, Low tariff, Specialist and Other) is given in 'Consultation on recurrent funding for 2021-22: Technical guidance to accompany provider level modelling', is available from <https://www.officeforstudents.org.uk/publications/consultation-on-recurrent-funding-for-2021-22/>. 'Other' providers in this workbook also includes Further education and sixth form colleges. Higher tariff providers are those included in the OfS KPM2 definition, listed in the Annex to the methodology <https://www.officeforstudents.org.uk/about/asures-of-our-success/participation-performance-asures/gap-in-participation-at-higher-tariff-providers-between-the-most-and-least-represented-groups/>. Note that applications to providers through a joint medical school are classified as applications to 'Other' providers in these statistics.
4. The population estimates used to calculate entry rates for UK-domiciled 18-year-olds are from UCAS published data <https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/statistical-releases-daily-clearing-analysis-2021>.
5. UCAS undergraduate scheme data covers admissions to full-time undergraduate courses.
6. The data includes acceptances for direct entry only, e.g. acceptance of application submitted in 2021 UCAS cycle for entry into 2021-22 academic year.
7. Records of Prior Acceptance (RPA) are excluded from this analysis.
8. Though UCAS data is partial, full data will ultimately be provided to the OfS by HESA.

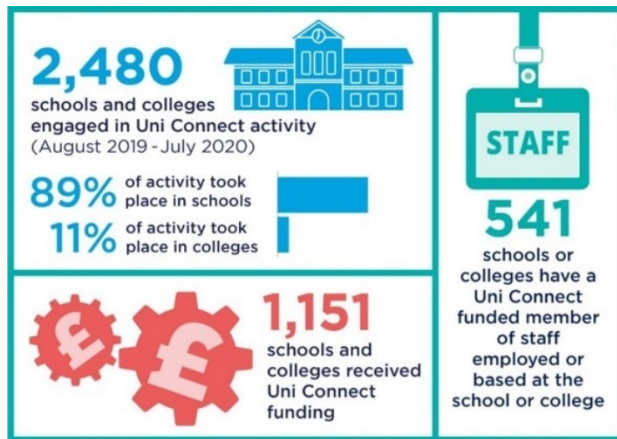
Annex D

Uni Connect background and evaluation findings

1. The Uni Connect programme, funded by the OFS, aims to improve equality of opportunity for underrepresented students to access higher education and is intended to complement the commitments individual providers make through their access and participation plans.
2. Since 2017 the Uni Connect programme (formerly the National Collaborative Outreach Programme – NCOP), has supported 29 partnerships to deliver high quality, impartial and sustained programmes of higher education information, advice and guidance (IAG) and outreach to schools and colleges across England. Uni Connect aims to equip young and adult learners from underrepresented groups to make an informed choice about their options in relation to the full range of routes into and through higher education and to minimise the barriers they may face when choosing the option that will unlock their potential.
3. Collaboration is at the core of the programme, successfully supporting a strategic local infrastructure of universities, colleges and other partners that can cut through competitive barriers, offer an efficient and low-burden route for schools and colleges to engage, and address outreach ‘cold spots’ for underrepresented groups. This has been particularly important during the past year as it has enabled schools and colleges to focus resources on the academic performance of young people from disadvantaged groups disproportionately impacted by the pandemic.

Summary statistics





Evaluation

4. The programme has been subject to formative and impact evaluation since it began in 2017 and reports on phase two of the programme were published in March and May 2021. Some of the headline findings from the Ipsos Mori survey of schools and colleges²¹ are:

- Key motivations in schools and colleges to engage with the programme were to raise the higher education expectations of learners, the quality of the activities on offer and that they were free at the point of delivery
- Continued engagement due to quality of activities (the most important reason cited), alignment to the needs of the school or college and the groups of learners targeted
- Barriers or challenges to engagement tended to be internal to the schools or colleges such as lack of awareness of the Uni Connect offer, lack of staff time.
- Targeted outreach activity highly rated by schools and colleges
- Perceived benefits to learners include increased knowledge of HE options, increased understanding of the benefits of HE and increased confidence to make informed decisions
- Benefits to schools and colleges include contribution to achieving Gatsby benchmarks, the provision of financial support, access to expert knowledge, enriched curriculum, additional resources for learners and addressing gap in outreach provision.

5. CFE Research reported in its third independent review of evaluation evidence²² that:

‘According to tracking data, although learners across the programme are engaging in a range of activities, it is most common for individuals to participate in multiple sessions of one type of activity rather than multi-intervention programmes. Although there is local evaluation evidence to indicate that multi-intervention programmes have a positive impact,

²¹ [Formative evaluation of Uni Connect phase two: survey of school and college staff - Office for Students](#)

²² [Third independent review of evaluation evidence submitted by Uni Connect partnerships - Office for Students](#)

the evidence presented here suggests that it is the total number of hours spent engaging in Uni Connect, rather than the number or type of activities engaged in, that leads to positive change. This indicates that the fundamental principle of Uni Connect – to provide sustained and progressive support throughout Key Stages 4 and 5 – is well-founded and should continue’.

Phase 3 (2021-22 to 2024-25)

6. In December 2020 the OfS consulted on a new approach to the Uni Connect programme from 2021-22 to 2024-25. Following this consultation the OfS agreed, in principle, that phase three of the Uni Connect programme will start in academic year 2021-22 and run through to the end of academic year 2024-25, although funding for the programme is subject to confirmation on an annual basis. The funding for the programme in 2021-22 is £40m, a reduction of £20m compared to previous phases.
7. The new approach to Uni Connect from 2021-22 to 2024-25 continues to aim to contribute to reducing the gap in higher education participation between the most and least represented groups and will support an increased focus on adult learners and further education colleges within the programme.

Annex E

Emerging findings from 19-20 monitoring of access and participation plans: additional information

Expenditure during 19-20

1. The OfS was clear with providers that it expected them to meet their financial support commitments to students in full in both the 2019-20 and 2020-21 academic year.
2. Our analysis shows that expenditure in access and financial support was greater than forecast across the sector²³ (**Table 1**):

Table 1: Difference between forecast and actual access and participation spend (rounded)

Categories of expenditure	Predicted Investment	Actual Investment	Difference (£)	Difference (%)
Access investment	£179,200,000	£220,600,000	£41,500,000	23
Financial support investment	£371,500,000	£376,300,000	£4,700,000	1
Research and evaluation investment	-	£19,700,000	-	-
Support for disabled students	-	£91,800,000	-	-

Source: OfS annual financial return 2020 data (HEPs); OfS access and participation plan 2019-20 monitoring data (FECs); 2019-20 access and participation plans

3. Providers were not asked to include predicted investment for research and evaluation until the 2020-21 APP process, so the collection of this information will be used as a baseline for future monitoring. Furthermore, only providers who were required to submit an OfS annual financial return had to report against this category of spend.
4. Expenditure related to support for disabled students is only collected as part of monitoring and investment information is not collected for this category of spend. This data will be published separately to the monitoring outcomes report.

Monitoring process summary

5. A total of 47 of the 240 providers which submitted a monitoring return were asked to provide additional information.
 - a. Of these, 42 were asked to provide further information relating to a reported underspend in financial support to students against that predicted in their plans. The most common explanations were:
 - Normal financial variance, including as a result of prudent financial planning to ensure bursaries and hardship funding would be made available for all who might be eligible and require it.

²³ Please note that financial data returned to the OfS relates to financial years whereas providers predicted investment relates to academic year.

- Under-recruitment of students resulting in a lower amount of higher fees income (HFI) to spend, though assurances were provided that all commitments to students were honoured. This also resulted in fewer students requiring or being eligible for financial support.
 - Financial underspends being used to target new types of emerging student hardship not always captured by routine reporting, such as digital access and pandemic related student support activity. For example, over 100 providers referenced the creation of COVID-related hardship or emergency funds or amended their existing financial support provision to include greater numbers of students and provide further sums of support.
- b. Three providers submitted incomplete returns and so were asked to resubmit with all required information included.
 - c. Two providers were asked to provide additional information relating to previous reporting commitments detailed in their A1 outcomes letter.
 - d. Four providers submitted their returns after the deadline.

Targets

6. As 19-20 was a transition year to reformed access and participation plans, providers were encouraged not to discontinue targets and to only set targets for key gaps identified in the assessment of performance, or if the provider's access and participation activity had not been previously regulated.
7. In addition, providers were required to transition from using POLAR3 to POLAR4 data and the DHLE was discontinued (with the Graduate Outcomes (GO) survey data not widely available for most providers to report against in the monitoring process). Therefore, we expected the reporting of these targets for 2019-20 to be in some cases irrelevant. All targets related data below on focuses on statistical targets and excludes all other targets covered by qualitative activity.
8. The table below shows the percentage of targets for each self-assessment performance summary returned by providers.

Table 2: Summary of providers' self-assessments of performance against targets set out in 19-20 access and participation plans

Self-assessment of performance	Percentage of targets
Performance not reported	1.51%
Expected progress	57.89%
Limited progress	22.31%
No progress	18.29%

Student submissions – key themes

9. Some of the themes that have emerged from the student submissions are:

- a. **Transparency:** There is evidence of providers being transparent with their student body, with student submissions often including predicted and actual figures relating to targets and activities. Students understood the challenges presented by the pandemic and were able to critically assess and often accept the reasons given by their providers for a lack of progress or changes in the delivery of commitments.
- b. **Students reported a disproportionate effect due to the pandemic on particular groups of students:** While all students often experienced similar issues, these were exacerbated for underrepresented students and target groups were reported as having particular impacts unique to them. Given that some students may identify with multiple characteristics or groups, there are almost certainly compounded intersectional issues.
 - i. Students with lower household incomes were most commonly reported as experiencing digital poverty, including lack of equipment and limited access to a stable internet connection. They, along with care experienced students were also more likely to have issues accessing technology to complete their studies and more likely to have to share equipment and workspaces.
 - ii. There is evidence of disabled students facing hardships unique to them, including inaccessible online content and lack of community. Some disabled students had to shield during the pandemic, which further impacted on access to learning materials and feelings of isolation. Mature students, in particular those with children of school age, faced difficulties similar to those having to share workspaces, with the added pressure of work commitments, possible financial struggles and childcare. Extended learning hours and asynchronous learning practices were seen to be beneficial to mature students with care responsibilities.
 - iii. LGBT+ and international students were also highlighted as having a unique, challenging experience during the pandemic. Vulnerable LGBT+ students often lost a 'safe space' by leaving accommodation at their provider, potentially being forced to remain in or return to an unsafe environment, and international students experienced additional pressures of uncertain international travel. Some students also described negative impacts on students of faith, in particular not having a suitable environment to practice their faith due to closures of religious institutions and campus faith-based facilities, and social distancing.
- c. **Opportunities:** Those student submissions that reported their providers had adapted well to the pandemic in moving to a digital learning and teaching environment, often noted the benefits for particular groups of students and a wish to retain blended learning with face to face as well as digitally delivered elements. In particular, improved accessibility for some and far greater geographical outreach potential was noted.
- d. **Effectiveness of access and participation activity:** There were examples given in some submissions of the support providers have given during the pandemic (hardship fund, no detriment policies, equipment loaning) not being perceived by

students as sufficient to meet their needs. While the support was generally well-received as good intentioned, there were instances of software not being funded for home learning and IT equipment not being substantial enough to meet the requirements of the course. There were also examples of some support reaching students too late to be helpful.

10. The student submission should prompt providers to engage more fully with their students on the design and implementation of access and participation activity in the future. In addition, where we have been made aware of student concerns, we have noted these in outcomes letters and encouraged providers to further consider the issues raised in partnership with students.

Student submissions – future process improvements

11. Overall, providers are working in a similar way to involve students in access and participation work and governance structures, including but not limited to:
 - invitations to staff meetings across the provider;
 - regular meetings between student representatives and key strategic stakeholders involved in access and participation activity;
 - appointing student governors on the governing board;
 - involvement in access and participation plan working groups;
 - and consultation through focus groups.
12. Some providers have demonstrated commitment to engaging students as critical friends through different roles and activities to deliver against their access and participation plans. We will want to showcase this kind of practice to support sector-wide improvements.
13. A variety of students, including the OfS student panel, were consulted with on the development and user testing of the student submission.
14. The majority of students reported that they found the OfS guidance and process of completing the submission easy, but with clear areas to improve on for future submissions and for future student engagement in access and participation. Both providers and students noted the need for improved training for student representatives on access and participation plans to support meaningful engagement.