

**Office for  
Students**



# **Transforming opportunity in higher education**

**An analysis of 2020-21 to 2024-25 access  
and participation plans**

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# Contents

<b>Commentary</b>	<b>1</b>
Introduction	1
A new approach	1
A promising response	3
What next?	4
Conclusion	5
<b>Executive summary</b>	<b>6</b>
Context	6
Aim of the analysis	7
Key findings	7
Next steps	10
<b>Introduction</b>	<b>12</b>
Reform through regulation	12
A new approach to access and participation plans	13
The assessment process	15
Closing the gaps: national and provider measures for access and participation	15
Holding providers to account	17
<b>Analysis: overview</b>	<b>18</b>
Plan approvals	18
Range and number of interventions	18
Analysis of provider targets and strategic commitments	20
<b>Analysis of provider ambitions</b>	<b>22</b>
KPM 2: Gap in participation at high-tariff universities and colleges between the most and least represented groups	23
KPM3: Gap in non-continuation between most and least represented groups	25
KPM 4: Gap in degree outcomes (1sts and 2:1s) between white students and black students	28
KPM 5: Gap in degree outcomes (1sts or 2:1s) between disabled students and non-disabled students	30
KPM 6: The proportion of plans that contain robust evaluation methods, focused on impact and leading to improved practice	32
KPM 7: Ratio of outcomes achieved through access and participation to money spent on access and participation	34
Students underrepresented in higher education	35
Whole provider approaches to access and participation	38
Student consultation	40
Collaboration	41
Small higher education providers	43
<b>Next steps</b>	<b>44</b>
<b>Annex A: Glossary of key terms</b>	<b>45</b>

# Commentary



**Chris Millward, Director for Fair Access and Participation**

## Introduction

1. As the regulator for higher education in England, a key part of the role of the Office for Students (OfS) is to ensure that students from all backgrounds have equal opportunities to benefit from higher education. This is not just about access: it is just as important that where a student comes from does not determine their chances of completing their course, achieving the top grades or progressing to a successful career after graduating. And in a busy first two years for the OfS, one thing we have sought to make clear is how focused we are on achieving this for future generations of students.
2. Today's young people are significantly more likely to go to university than their parents and grandparents were, but this expansion in higher education has not benefited all parts of society. Despite gradual progress in improving access for people from underrepresented and disadvantaged groups, equality gaps have remained stubbornly large. 'Slow and steady' progress is simply too slow when people's livelihoods and opportunities are at stake.

## A new approach

3. Universities and colleges have been formally accountable for widening access since the OfS's predecessor, the Office for Fair Access (OFFA), was set up in 2004. I am grateful to the two Directors of Fair Access who led this work, and to their teams, for cementing the position of fair access within the work of universities and colleges across the country.
4. But as many people told me when I was appointed, the persistence of stark gaps, not only in relation to access but also to student success, pointed to the need for radical reform to the regulatory approach.
5. This is exactly what we have done. The new approach we set out just over a year ago requires higher education providers more systematically to analyse the characteristics of their student body, identify gaps in access, success and progression between different groups of students, give an honest assessment of their progress in tackling those gaps, and make specific commitments to achieving further progress in the future. Put together, these elements form the access and participation plan that every provider wishing to charge higher tuition fees must have approved by the OfS. This plan then serves as the first condition of registration with the OfS, an essential prerequisite for providers to access public funding.

6. Access agreements, the precursor to access and participation plans, were agreed with OFFA on an annual basis. Providers told us that they could be more ambitious, innovative and strategic if they could plan and deliver this work over longer periods. So we have now moved to a five-year cycle, while requiring more frequent submissions from providers where we are not confident they will make enough progress.
7. This new approach reduces red tape for those that are doing well, and frees staff to concentrate on delivering activities that make a real difference. In making this change, we expected that providers would develop more strategic approaches, and that their plans would therefore contain less detail about specific interventions – or inputs – and focus more on the outcomes they were trying to achieve. As plans were concerned with the whole student lifecycle, we expected these strategies to involve all parts of the institution, bringing outreach and admissions teams together with colleagues working on student services, learning and teaching, and careers.
8. This focus on outcomes has also led us to reform our expectations on how much is spent. A huge amount of money has been invested in access work over the years, with only incremental progress in return. So the financial investment providers make in this work is now just one of a set of measures we use to assess the credibility of their plans. We expect any changes in investment – up or down – to be driven by securing better value for money through delivering better outcomes.
9. Providers are still setting their own targets, as they did under the previous regime. But for the first time, the OfS has also set national targets to eliminate some of the most pressing inequalities – specifically, gaps in entry and dropout rates between the most and least represented groups, and gaps in degree outcomes between white and black and between disabled and non-disabled students.
10. We expect providers to work towards these targets because they tackle two urgent priorities: the need to open up all of our universities to people from those communities where progression into higher education is lowest, and to ensure that every student has the same chance to succeed once they get there.
11. They are, though, by no means the only issues. Every student is different, but we know that some groups experience particular barriers to success. Wherever providers identify gaps – between any groups of their students, at any stage of their higher education experience – we have asked them to explain how they will address these. In this way, plans are tailored to the needs of underrepresented students at each provider and from all parts of the country.
12. At the time of writing, we have assessed over 200 of these new plans. Our assessment process has been rigorous, and guided by three key principles. First, our primary concern is to protect the interests of students, not those of universities and colleges. Secondly – unique to this aspect of our regulatory remit – we expect providers not just to meet baseline requirements, but to demonstrate continuous improvement in both outcomes and the practice underpinning those outcomes. And finally, we are committed to focusing our scrutiny towards those providers at highest risk of making insufficient progress, while reducing regulatory burden for those that are doing well.

13. These plans are central to our reforms, and the primary way we hold individual providers to account on this issue. But we are also working across the higher education sector as a whole to drive progress. Our new access and participation dashboard has significantly enhanced the availability and comparability of key data, allowing providers to assess more easily their own performance and understand how we will assess them. We are investing £60 million a year in Uni Connect, a nationwide network of universities and colleges working in partnership to deliver sustained outreach to around 100,000 young people per year in areas where higher education participation is particularly low.
14. We are also funding providers to work together to tackle common challenges, like closing the attainment gap for students of minority ethnicities, supporting student mental health and wellbeing, diversifying postgraduate education, and securing graduate-level jobs for students who study and work in their home region. And we have funded the Centre for Transforming Access and Students Outcomes in Higher Education (TASO), an independent 'what works' centre, which will generate and share evidence of the most effective approaches to improving access and participation.

## **A promising response**

15. This new regime is designed to achieve transformational change, so it is undoubtedly challenging. But having analysed the first round of these new plans, it is clear that providers have responded positively and their plans demonstrate a significant shift.
16. Last year, providers submitted access and participation plans to the newly established OfS for the first time. This set of plans preceded the new approach set out above, and for those who previously had an access agreement with OFFA, they were very similar. I visited universities and colleges all over the country in my first few months as Director for Fair Access and Participation, and although I was struck by the shared passion and commitment to making fair access and participation a reality, too often this was not reflected in the plans we received.
17. As a result, we applied eight conditions of registration to five providers, and refused two providers' plans. Inevitably, the conditions applied to the Universities of Oxford and Cambridge attracted the most attention, but we made interventions across all types of provider, reflecting the challenges for access in some parts of the sector and student success in others.
18. We made clear that we would not accept more of the same this year, and the picture has changed considerably under our new approach. To date, we have not needed to impose any additional conditions or refuse to approve any 2020-21 plans. And although more providers will be subject to enhanced monitoring requirements, our aim is to be able to remove these if providers can demonstrate they are delivering on new ways of working and more ambitious targets. This kind of appetite to take risks and try out new approaches is exactly what we want to see, and enhanced monitoring is the way we can keep abreast as work progresses: it should not be seen as a sanction or punishment.
19. The improvements we have seen this year were secured, in part, through extensive engagement between the OfS and providers. We held briefing events around the country, as well as a series of workshops on key topics like evaluation, objective setting and self-assessment. All providers with enhanced monitoring requirements on these topics were asked to participate, and one workshop sought specifically to address the needs of very small or

specialist providers, which we know face particular challenges in accessing and using data, and securing the skilled resource they need to evaluate their work effectively. I also visited 18 providers that needed to make significant improvements, to ensure there was no room for misunderstanding our expectations of them.

20. The result is that we have seen a real step change in ambition, not only in the outcomes providers are striving for, but also in their commitment to continuously improving the ways they work towards those outcomes. Changes to curricula, pedagogy and admissions policies have all been on the table, together with better evaluation.
21. There is also growing recognition that these issues cannot be tackled singlehandedly by one team in a university working in isolation. They require staff at all levels, across the whole institution, to share the same vision and sense of duty with all of their students. And all providers gave us specific examples of how the students they consulted in the development of their plans had changed or influenced the commitments.
22. Looking at our national targets, we are moving in the right direction. At present, people from the most advantaged areas are over six times as likely to attend one of the most selective universities as those from the most disadvantaged areas; if providers meet their targets, they will be less than four times as likely to do so within five years. At present, the dropout rate is 4.6 percentage points higher for students from the least represented groups; if providers meet their targets, this gap will drop to 2.9 percentage points within five years. At present, the gap between the proportion of white and black students who are awarded a first or upper second class degree is a staggering 22.0 percentage points; if providers meet their targets, this will fall to 11.2 percentage points within five years. And finally, the gap between the proportion of disabled and non-disabled students who are awarded a 1st or 2:1 degree currently stands at 2.8 percentage points; this will close to only one percentage point within five years – a level close to equality – if providers meet their targets. This puts us on the right track for the generational change we have set as our ambition.

## What next?

23. While there is much to celebrate in these plans, we need providers to deliver on them, and there is much more still to do. For some groups of students, gaps will remain too wide or take too long to close even if providers meet their targets.
24. At current rates of progress, we could hope to see equal access to our most selective universities for young people – regardless of where they grow up – within 20 years. But this will require significant work to raise attainment in schools, to develop clear pathways combining academic, financial and personal support, and to develop admissions processes that do not rely on public examination results alone as the way to identify potential. In addition, our national target will not be achieved unless universities also embrace those harder-to-reach students who are looking to return to education later in life and provide more flexible learning opportunities for them. On dropout rates, providers look set to close their own gaps, but the gap will persist at a national level unless we start to see these rates level out across different providers. And our analysis indicates that, if progress is maintained in the longer term, we could see equality in degree awarding rates between white and black students by the end of the decade. These are significant shifts compared with the piecemeal progress we are used to

seeing year on year, but they point to further interventions beyond access and participation plans.

25. A number of other issues also need closer attention. Some smaller groups are still critically underrepresented in higher education – for example, care leavers, people estranged from their families, young people from military families, and people from Gypsy, Roma and Traveller communities. There is a need for better understanding of the very specific and complex barriers these groups face in accessing and succeeding in higher education. Relatively few providers have set ambitions to improve access for mature students. And we need increasingly to understand the effect of intersecting characteristics: the low levels of participation by men from the most disadvantaged areas, for example, and the barriers faced by students of minority ethnicities with mental health conditions.
26. We have asked some providers to look again at the assessments they have made of their most pressing challenges and the ambitions they have set for themselves, and others to make improvements to their evaluation strategies. And while universities must live up to what they say about opportunity in higher education, the inequality we see reflects broader social patterns: by definition, it cannot be addressed effectively without a joined-up approach.
27. For example, the qualifications a person achieves in compulsory education are a key predictor of whether they will go to university, and we know that school attainment tends to be lowest in the places with the most disadvantage. These disparities are then compounded in higher education. Issues such as these could be tackled much more effectively through a joint effort between universities, colleges and schools, together with local authorities and third sector organisations. We will take steps to promote this during the coming year as we review our approach to funding.
28. The interventions we have made so far are about managing risk, not about placing universities in ‘special measures’. But we will not hesitate to use our powers to improve progress where gaps are widest or slowest to close. Our monitoring and intervention will therefore give all providers and their students the opportunity to demonstrate the impact of their work, while taking action where progress is insufficient.

## **Conclusion**

29. Regulation is a means to an end: better outcomes for all students. Higher education can transform the lives of individual students and the places where they study and work. But this will only benefit all parts of the country and all types of people if there is a fair and equal opportunity for all. That’s the challenge we have set for universities in this country and we’re expecting them to deliver on it.

## Executive summary

30. This report analyses access and participation plans submitted by higher education providers to the Office for Students for the period 2020-21 to 2024-25. It covers those providers – 171 in total – with an approved access and participation plan as of 31 October 2019. It does not give details of individual plans and targets, but looks across all of the plans.

### Context

31. Access and participation plans are a key element of the OfS's new approach to access and participation. The new approach reflects our ambition to make greater and swifter progress in closing persistent gaps in outcomes for students from underrepresented groups in higher education.

32. All universities and colleges<sup>1</sup> wanting to charge the higher fee limit for tuition fees<sup>2</sup> must have an access and participation plan approved by the OfS. The plan must set out what steps they will be taking to reduce the gaps in their institutions between different groups of students in relation to access to, success in and progression beyond higher education. It must include both year-on-year and longer-term targets for reducing these gaps, based on their own student populations and priorities.

33. The OfS has made clear its expectation that access and participation plans should be ambitious. They should demonstrate continuous improvement through clearly articulated strategic aims, measurable objectives, evidence-based activity and robust evaluation.

34. This is the second round of access and participation plans to be assessed under Condition A1 of the regulatory framework established by the OfS in 2018, and the first set following the publication of new regulatory guidance in February 2019.<sup>3</sup> Our assessment of each plan included not only approval, but also a risk assessment which determines the way in which we will monitor each provider to ensure it delivers on its plans.

35. No plans have yet been refused in this round. However, the vast majority of providers – 164 of a total of 171 assessed so far – have had mitigations applied to them. These cover a range of issues, and may, for example, require providers to undertake further work, develop new interventions, or reset their targets. This reflects the high expectations we have set for improvement.

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<sup>1</sup> To help readability, we use the terms 'universities', 'universities and colleges', 'providers' and 'higher education providers' interchangeably. In this report, they refer specifically to the 171 providers that are the subject of this analysis.

<sup>2</sup> See 'Conditions of registration' ([www.officeforstudents.org.uk/advice-and-guidance/regulation/conditions-of-registration/initial-and-general-ongoing-conditions-of-registration/](http://www.officeforstudents.org.uk/advice-and-guidance/regulation/conditions-of-registration/initial-and-general-ongoing-conditions-of-registration/)).

<sup>3</sup> See 'Regulatory notice 1: Access and participation plan guidance' (OfS 2019.05), available at [www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/](http://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/).

## Aim of the analysis

36. Our aim in undertaking this analysis was to gain a better understanding of how likely we are to achieve our ambition to make stronger progress in eliminating inequality gaps across the sector. Some elements of this ambition are articulated in our Key Performance Measures (KPMs), which measure some of the most significant and persistent inequalities in student outcomes that we are striving to address, working with students, providers and others.<sup>4</sup>
37. Providers are not required to include these KPMs in their access and participation plans, as their targets and measures are tailored to their individual missions and contexts. But most plans refer to one or more of them in their year-on-year targets.
38. The report assesses the potential impact of these targets on the achievement of the participation KPMs. Put simply, it assumes that by 2024-25, all of the targets set by providers will be achieved, or on track to be achieved. On that basis, it asks how close this would bring us to meeting the KPMs.
39. The report looks at three main areas. First, the progress providers are planning to make to **reduce gaps in student access, success and progression** within their institutions, and how they are planning to embed **a more strategic approach** to access and participation. Second, the levels of **investment and evaluation** providers are committing to in their plans. And third, the ways in which they will be **collaborating with partners and consulting students** in the delivery of their plans.
40. The report also looks briefly at some of the issues faced by providers with small numbers of students and provision in developing their access and participation plans.
41. A technical report, published alongside this report, explains the methodology which underpins the analysis.<sup>5</sup>

## Key findings

42. The plans, taken together, demonstrate providers' commitment to reducing the gaps between underrepresented students and their peers. They have the potential to effect a real and positive step change: if successfully implemented, they should bring about significant progress towards reducing inequalities in access and participation.

## Reducing the gaps

43. We conducted this part of the analysis with reference to OfS KPMs 2 to 5. These KPMs identify significant sector-wide gaps in equality of opportunity between groups of students across every stage of the student lifecycle. They cover gaps in participation and non-continuation between the most and least represented groups, and differences in degree outcomes between white

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<sup>4</sup> See 'Participation performance measures' ([www.officeforstudents.org.uk/about/measures-of-our-success/participation-performance-measures/](http://www.officeforstudents.org.uk/about/measures-of-our-success/participation-performance-measures/)). These KPMs are discussed in more detail in paragraphs 72 to 74.

<sup>5</sup> Available alongside this report at [www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/](http://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/).

and black students, and between disabled and non-disabled students.<sup>6</sup> Key findings are set out in Table 1.

**Table 1: Key findings**

OfS Key Performance Measure	Analysis	Implications
<b>KPM 2:</b> Gap in participation at high-tariff universities and colleges between the most and least represented groups.	If all high-tariff universities and colleges with targets related to the gap between the most and least represented groups meet those targets, the ratio will have moved from a relatively persistent gap of 6.24:1 in 2017-18 to 3.72:1 in 2024-25. In the longer term, by 2038, the ratio will be much closer to 1:1.	The OfS KPM is based on 18- to 30-year-olds in the underlying population, rather than 18- to 20-year-olds in the population of students entering high-tariff providers, who are the focus of the access and participation plan targets. This means that at the current rate of progress, more interventions to raise mature learners' participation rates will be needed to achieve equality in these rates by 2038.
<b>KPM 3:</b> Gap in non-continuation between most and least represented groups.	If all universities and colleges with targets related to the continuation gap between the most and least represented groups meet those targets, this gap would be reduced from 4.6 percentage points in 2016-17 to 2.9 percentage points by 2024-25.	If this progress is maintained in the longer term, it is likely that providers will close their own continuation gaps. However, there will be a national gap relating to differences in continuation between providers. This gap will not close until the mid-2030s. At the current rate of progress, more interventions will be needed to improve continuation in those providers where it is lowest, to achieve equality in continuation rates across the sector by 2030.
<b>KPM 4:</b> Gap in degree outcomes (1sts and 2:1s) between white students and black students.	If all universities and colleges with targets related to the gap in degree award outcomes between black and white students meet those targets, the gap would reduce from 22.0 percentage points in 2017-18 to 11.2 percentage points in 2024-25.	If this progress is maintained in the longer term, it is likely that there will be equality in award rates between the two groups by around 2030. The rate of progress in the OfS KPM seeks initially to eliminate the element of the gap that cannot be associated with factors such as entry requirements, age and subject of study. Most providers did not use this as the basis for setting their targets, though, so there is a different trajectory in the plans.
<b>KPM 5:</b> Gap in degree outcomes (1sts and 2:1s) between disabled	If all universities and colleges with targets related to the gap in degree award outcomes between disabled students and non-disabled students	This would represent a narrowing of the gap to a level close to equality by 2025.

<sup>6</sup> See 'Participation performance measures'.

OfS Key Performance Measure	Analysis	Implications
students and non-disabled students.	meet those targets, the gap would close from 2.8 percentage points in 2017-18 to 1 percentage point in 2024-25.	

44. Many plans also include commitments to reduce gaps throughout the student lifecycle for groups they have identified locally as underrepresented and for smaller groups of underrepresented students such as care leavers, people who are estranged from their families, and people from Gypsy, Roma and Traveller communities. The report also analyses providers' ambitions for these and other underrepresented groups in higher education.

### A more strategic approach to access and participation

45. The analysis suggests that the stronger focus on student success in the OfS guidance has resulted in a strengthening of the 'whole provider' approach – providers appear to be taking a more holistic, strategic approach to access and participation.

46. For example, most describe how their access and participation strategy aligns with their learning, teaching and assessment policies. Many providers have committed to undertaking reviews of these and other policies such as contextual admissions. A number have committed to expanding existing outreach programmes, and others are undertaking curriculum redesign (often involving different student groups), reforming their pedagogical approaches, and developing employability strategies.

### Evaluation and investment

47. Universities and colleges have committed to investing a total of £551.8 million in 2020-21, rising to £564.5 million in 2024-25, to deliver the access, financial support, and research and evaluation elements of the commitments detailed in their plans.<sup>7</sup>

48. The OfS has moved away from viewing investment alone as a measure of success. As a result, it is not possible directly to compare investment figures between the 2019-20 plans and those for 2020-21 to 2024-25. However, it appears that investment in the areas where we continued to collect information has broadly been sustained between the 2019-20 plans and those for 2020-21 to 2024-25 access and participation.

49. Effective evaluation remains a challenge for many universities and colleges. A number have committed to building and improving their capacity to undertake robust evaluation over the next five years, drawing on assessment and evaluation tools made available by the OfS.

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<sup>7</sup> The OfS no longer collects information on expenditure to support student success and progression as this discourages inclusive practice, whereby providers adopt a whole institution approach to supporting underrepresented students.

## Collaboration and consultation

50. Most plans identified how providers would work collaboratively in local areas through Uni Connect (formerly the National Collaborative Outreach Programme), an OfS-funded initiative that brings together 29 partnerships across England to deliver outreach activity to schools, and provides a platform for joint working and delivery of outreach work.<sup>8</sup>
51. A number of high-tariff providers set common targets for their work together to provide pathways into their courses.
52. Providers employed a range of methods to consult with students on the development of their access and participation plans. A number went further, detailing their plans to involve students on an ongoing basis in the design, delivery, monitoring and evaluation of the plans.

## Next steps

53. The analysis paints a positive overall picture: there are high levels of ambition among providers to tackle inequalities in access, participation and student success. The challenge now will be to realise this ambition, and thereby to achieve better outcomes for students.
54. The analysis also suggests that a number of underrepresented student groups may not be adequately addressed. In particular:
  - a. **Mature students have not been prioritised by many providers** despite low and decreasing proportions of such students in their own populations and the sector more broadly. Unless current rates of progress improve significantly, more interventions to raise the participation rates of mature learners, including more flexible study opportunities, will be needed to achieve equality in participation rates by 2038.
  - b. While the inclusion of smaller groups of underrepresented students in access and participation plans is welcome, our analysis suggests that some of the approaches to addressing the needs of these groups are **in the early stages of development, or yet to be scoped**.

## What the OfS will be doing

55. The OfS will take action on a number of fronts to support and constructively challenge providers.
56. We will be holding providers to account for the delivery of their targets, as follows:
  - a. **We will monitor providers' delivery** of their plans through annual impact reports. Those providers with enhanced monitoring will be expected, in many cases, to submit additional information either with or in advance of their first impact report.

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<sup>8</sup> See [www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/uni-connect/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/uni-connect/).

- b. **We are designing and testing a ‘student submission’** with a view to enabling students to produce their own report of the progress made by their provider. This could be submitted to the OfS independently of the provider’s impact reports, and students could also use it to hold their providers to account.

57. We expect this monitoring and intervention work with providers to help them understand the effectiveness of the interventions set out in access and participation plans. We will use this evidence to influence the adoption by the sector of effective practice, with a particular focus on providers at higher risk in relation to the access and participation regulatory condition.

58. During 2020-21, we will develop and support initiatives focused on specific groups of students:

- a. We will develop further regulatory and funding incentives for mature student participation.
- b. We will focus on regulatory requirements and incentives that will address low levels of continuation in some providers.
- c. We will work with providers to improve understanding of the causes and characteristics of the gap in degree outcomes between black and white students, and to promote effective practice in this area.
- d. We will work with the new Disabled Students’ Commission to identify and promote effective practice in relation to supporting specific groups of disabled students.
- e. More generally, we will continue to invest in and improve:
  - i. Sustained collaborative outreach through our Uni Connect programme.
  - ii. The understanding of student populations, including the intersections between different groups, through the access and participation dataset and a new Associations Between Characteristics measure.
  - iii. Tracking of student progress from outreach through to higher education and into employment, through the Higher Education Access Tracker and similar services.
  - iv. Evaluation practice and the use of evaluation findings, through a new ‘what works’ centre, Transforming Access and Student Outcomes in Higher Education.<sup>9</sup>

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<sup>9</sup> The Centre for Transforming Access and Student Outcomes (TASO) (<https://www.taso-he.org/>) will use evidence and evaluation to understand and show how higher education contributes to social justice and mobility. It is an independent hub for higher education professionals to access leading research, toolkits, evaluation techniques and more, to help widen participation and improve equality across the student lifecycle.

# Introduction

59. The OfS aims to ensure equality of opportunity for all students, whatever their background. Recent years have seen increasing proportions of people from underrepresented groups going into higher education, but significant gaps remain. Our approach to access and participation is radical and ambitious: it reflects our belief that more and swifter progress is needed to eliminate these gaps. It also emphasises the importance not just of access, but of successful progression through university and on to further study or employment.
60. This introduction sets out the background to the recent access and participation reforms, and the refocusing of access and participation plans as a key part of our approach to securing better outcomes for students.

## Reform through regulation

61. Access and participation plans are part of a wider programme of work the OfS is undertaking to improve student outcomes. This programme spans our regulation of individual providers and the work we do across the sector to promote the student interest. It has five main elements:<sup>10</sup>
- a. We are implementing a more outcomes- and risk-based approach to regulating individual providers, through a new approach to access and participation plans.
  - b. We have invested in the National Collaborative Outreach Programme, which supports collaboration between providers, schools and other local partners across the country to deliver targeted and coherent outreach activity. The next stage of the programme – Uni Connect – will establish local ‘outreach hubs’ that will help teachers and advisors find out about outreach activity in their area, support schools and colleges in areas of low participation to access higher education outreach, and provide a platform for other local collaborative activity.
  - c. We are delivering a comprehensive access and participation evidence and impact strategy. This includes work to identify, stimulate and share effective practice and funding to establish a new ‘what works’ centre on access and participation.
  - d. We have developed targets in relation to four of the OfS’s five key performance measures relating to gaps in access and participation.
  - e. We have created and published, and will maintain, an access and participation dataset which provides a sector-level picture of the gaps in access, success and progression between underrepresented student groups and other student groups. It also enables an assessment of the performance of individual universities and colleges in closing their own gaps between different student groups.<sup>11</sup>

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<sup>10</sup> For more information, see ‘A new approach to regulating access and participation in English higher education: Consultation outcomes’ (OfS 2018.53), available at [www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation-outcomes/](http://www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation-outcomes/).

<sup>11</sup> See Access and participation data dashboard ([www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/](http://www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/)). The dataset will be updated and published in spring each year, and

## A new approach to access and participation plans

62. The OfS's regulatory framework, published in February 2018, sets out the conditions providers must satisfy if they want to be registered with the OfS.<sup>12</sup> The first condition (Condition A1) stipulates that any university or college wanting to charge the higher fee limit for tuition fees<sup>13</sup> must have an access and participation plan approved by the OfS's Director for Fair Access and Participation. The plan must set out what steps the provider will be taking to reduce its gaps between different groups of students in relation to access to, success in and progression beyond higher education.

63. The framework as a whole is underpinned by two regulatory principles:

- a. **A student focus** – regulation is designed primarily to protect the interests of the students rather than those of providers.
- b. **Proportionality and targeting** – provision that presents a lower risk to students will be subject to less regulatory burden, while high-risk elements of provision face greater scrutiny.

64. The access and participation condition is underpinned by a third principle – **continuous improvement** – which acknowledges that market forces alone will not achieve the OfS's ambitions in relation to access and participation outcomes and the practice which underpins this. For this condition, then, the OfS additionally regulates individual providers to secure continuous improvement in student outcomes and practice in access and participation.

65. In 2018 we consulted extensively with providers, students and others on fundamental reform to access and participation plans, which emphasised the need for providers to be more ambitious and outcomes-focused.<sup>14</sup> The key elements were:

- a longer timescale based on risk, to a maximum of five years, to allow providers to take a more strategic view of their investment and activity, while ensuring that providers with weaker plans are appropriately monitored
- a requirement for providers to develop a small number of outcomes-focused targets to capture the impact of their work, aligning with the OfS's KPMs where appropriate

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providers will be expected to reflect on the revised data as they develop their annual impact reports, in which they report on their progress in meeting their targets.

<sup>12</sup> See 'Securing student success: Regulatory framework for higher education in England' (2018.01), available at [www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/](http://www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/).

<sup>13</sup> See pages 83-84 of the Regulatory framework.

<sup>14</sup> See 'A new approach to regulating access and participation in English higher education: Consultation' (OfS 2018.33), available at [www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation/](http://www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation/).

- predicted expenditure on measures to widen access to higher education, financial support for students, and investment in evaluating access and participation activity.

66. In February 2019 we published updated guidance for access and participation plans submitted from 2020-21.<sup>15</sup> From this time on, all plans must include:

- a detailed self-assessment of the provider's progress in closing equality gaps across all stages of the student lifecycle and among students from underrepresented groups
- clearly articulated and measurable aims and objectives relating to each underrepresented group and stage of the lifecycle identified in the performance assessment.
- ambitious, clearly defined outcomes-based targets reflecting areas for development, aligned to the OfS's KPMs where appropriate, and set over five years with milestones to monitor progress
- strategic measures which demonstrate continuous improvement in practice and outcomes for students in relation to access, success and progression
- evidence of how students from a range of backgrounds have been involved in the design, implementation and evaluation of the plan, and the mechanisms in place for students to engage in a meaningful way
- a robust and credible evaluation strategy
- how the plan will be monitored, including engagement of governing bodies and students in the process
- forecast investment in respect of access measures, financial support, and evaluation and research.

67. Following the publication of our guidance for 2020-21 plans, we held a series of workshops and meetings to support universities and colleges in the development of their plans. We discussed a range of topics, including evaluation, performance assessment, and target setting. We also addressed potential challenges for small and specialist providers. Providers with enhanced monitoring requirements relating to these and other topics were asked to attend. In addition, the Director for Fair Access and Participation visited 18 providers whose 2019-20 plans had been assessed as being at increased risk of a future breach of Condition A1. The purpose of these visits was to ensure that the providers fully understood our expectations for 2020-21 plans, and to discuss those areas of the new plan for which we would expect to see significant

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<sup>15</sup> See OfS 2019.05. The legal basis for this guidance, and for the conduct of access and participation plan assessments, resides in the Higher Education and Research Act 2017 (HERA), in particular general duties b),(c),(d),(e) and (g) in section 2(1). Section 29 empowers the Director for Fair Access and Participation to approve access and participation plans, and section 35 covers provision of advice on effective access and participation practice. This legal basis does not encompass imposing requirements with regard to the content of an access and participation plan, including the setting of specific targets. We also needed to have due regard to our duty under section 149(1) of the Equality Act 2010 in relation to advancing equality of opportunity, and to section 36 of HERA (protection of academic freedom).

improvements. Providers were further supported in the development of their plans by the development of the OfS access and participation dataset, which was published in March 2019.

## The assessment process

68. In order to approve an access and participation plan, the director needed assurance that the strategic measures the provider was proposing to deliver against the aims, objectives and targets it had set were ambitious, evidence-informed and credible, and would result in continuous improvement in outcomes for students. Plans also needed to demonstrate that the measures were focused on addressing those student groups and stages of the lifecycle for which the provider had identified gaps. We needed to be assured that they would make a meaningful contribution to equality of opportunity for underrepresented groups.
69. This meant that we would not simply accept 'more of the same'. We made clear to those providers with access and participation plans developed under the previous regulatory regime, or during the transition to the new one, that their plans would need to change to meet the new requirements.
70. Overall, providers responded positively. Many plans contained commitments to develop new activities, or to expand existing ones, to focus on those areas where improvement was most needed. There was a strong emphasis on evidence-based activity and evaluation. A number set out plans to review existing policies and processes, including admissions, curriculum, pedagogy, and the ways in which they work with students and employers.
71. Once plans had been approved by the director, we undertook a further assessment to determine the level of risk of a provider breaching Condition A1 in the future. This took into account:
- the extent of the gaps between different student groups in access, success and progression, on the basis of local and national data and other forms of evidence
  - the provider's progress in narrowing those gaps
  - the ambition and credibility of a provider's plan, including its assessment of performance
  - risks identified during monitoring or through reportable events.

## Closing the gaps: national and provider measures for access and participation

72. A critical marker of our ambition for access and participation is the targets set by universities and colleges in their plans to 2024-25 to reduce gaps in access, success and progression between their different students, and their longer-term trajectory to eradicate those gaps.
73. The OfS has set itself and the sector a number of ambitious key performance measures which cover some of the areas where there are persistent sector-wide gaps in equality of opportunity. These are:

- **KPM1** – to eliminate the gap in entry rates between the most and least represented groups of students
- **KPM2** – to eliminate the gap in entry rates at higher-tariff providers between the most and least represented groups of students
- **KPM3** – to eliminate the gap in non-continuation between the most and least represented groups of students
- **KPM4** – to eliminate the gap in degree outcomes between white and black students
- **KPM5** – to eliminate the gap in degree outcomes between disabled and non-disabled students.

74. Two further KPMs relate to areas where continuous improvement in activity and approach is needed. These are:

- **KPM6** – the proportion of access and participation plans that contain robust evaluation methods, focused on impact and leading to improved practice
- **KPM7** – a consideration of value for money, given the large sector-wide investment in access and participation plans.

75. Our KPMs do not cover all the underrepresented groups we have identified as priority groups. Additionally, some universities and colleges have small numbers of underrepresented students – this may mean that different numerical measures will be more robust. The KPMs do not, therefore, encompass the full range of objectives and strategic measures that providers are aiming to deliver, and are specific to their individual missions and contexts. For example, of those plans approved by 31 October 2019, we agreed 49 targets in respect of care leavers. Many more plans included written commitments to reduce the gaps at all stages of the student lifecycle for care leavers and other small groups such as estranged students, as well as groups identified locally as underrepresented.

76. Many providers have committed to working with schools to raise attainment and a small number have set targets on this. Others have established intersectional targets (for example, focused on white or black students from the most deprived areas<sup>16</sup>). Some providers set collaborative targets, predominantly in respect of outreach activity, and others have disaggregated their disabled students' data and focused on students with mental health conditions.

77. Our initial analysis of the plans also suggests that some student groups may not be adequately addressed. For example, mature students have not been prioritised by many providers despite low and decreasing proportions of such students in their own populations and the sector more broadly. Similarly, although other, smaller groups of underrepresented students, such as Gypsy, Roma and Traveller groups, children from military families and carers, are mentioned in many plans, some of the approaches to addressing the needs of these groups are in the early stages of development or are yet to be scoped.

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<sup>16</sup> As measured using the English Index of Multiple Deprivation.

78. In summary, although our guidance made clear the need for plans to include detailed performance assessments, evidence-based measures, and robust evaluation strategies, it was evident that data, evidence and evaluation continue to be areas for improvement, particularly for those providers with small numbers of higher education students.

## **Holding providers to account**

79. To date, there have been no refusals to approve 2020-21 plans. However, a significant number of providers have had some form of monitoring intervention imposed on them, and a small number have had their plans approved for less than the five-year maximum. A breakdown and analysis of these monitoring and mitigation interventions is given in paragraphs 86 to 90.

80. We will be monitoring providers' delivery of their plans through annual impact reports. Those providers with enhanced monitoring will be expected, in many cases, to submit additional information either with or in advance of the first impact report.

81. As part of this process, we are designing and testing a student submission with a view to enabling students to produce their own report of the progress made by their provider. These reports, which could be submitted to the OfS independently of the provider's impact reports, could be used by students to hold their university or college to account.

82. This monitoring and intervention work will form one part of our effort to improve understanding of the effectiveness of the interventions set out in access and participation plans. We will use this evidence to encourage providers – in particular, those at higher risk in relation to the access and participation condition – to adopt effective practice.

83. As we develop the impact report process, we are mindful of the need to ensure that it is proportionate and risk-based. Universities and colleges at higher risk of a future breach of Condition A1 will be required to provide more, or more detailed, information in their reports, while those with the lowest risk will be required to supply the minimum. We will capture financial information through the returns providers submit to us as part of the wider regulatory process.

## Analysis: overview

84. This part of the report provides an analysis of the approvals and interventions<sup>17</sup> we have put in place for 2020-21 access and participation plans, and an analysis of the measures and commitments providers have made to bring about improvements in outcomes for their students<sup>18</sup>.

### Plan approvals

85. Access and participation plans were approved by the Director for Fair Access and Participation if they met the criteria set out in paragraphs 28 to 30 of the OfS's 2019 access and participation plan guidance<sup>19</sup>.

86. As of 31 October 2019, 171 access and participation plans had been approved by the director. Of these:

- 157 plans were approved for up to the maximum five-year period
- five plans were approved for up to three years
- six plans were approved for up to two years
- three plans were approved for one year.

87. Shorter plan approval was often linked to a lack of data, for example where a higher education provider was new or had previous data collection issues. To date, no 2020-21 access and participation plans have been refused.

### Range and number of interventions

88. The relatively high proportion of universities and colleges receiving enhanced monitoring or formal communications reflects the extent of the gaps in outcomes which we are working to eliminate between underrepresented students and their peers in the English higher education system.

89. It is important to note that a provider assessed as being at higher risk, and the application of mitigations in response to that risk, do not equate to a provider being sanctioned. Nor does this mean that performance has worsened over time, or that the university or college is not committed to fair access and participation. The type and details of the risk mitigations applied by the OfS (a specific condition, enhanced monitoring, etc.) depends on the nature of the risks

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<sup>17</sup> The OfS can impose a range of interventions, including: **formal communications**, where we inform a provider of issues that might cause concerns if left unchecked; **enhanced monitoring**, where we actively monitor a provider's progress against action plans or targets; and **specific conditions of registration**, where we require a provider to make improvement in particular areas.

<sup>18</sup> The analysis covers the 171 access and participation plans approved by the director as of 31 October 2019.

<sup>19</sup> See OfS 2019.05.

presented and results in greater engagement with the OfS beyond the routine annual monitoring applied to all providers.

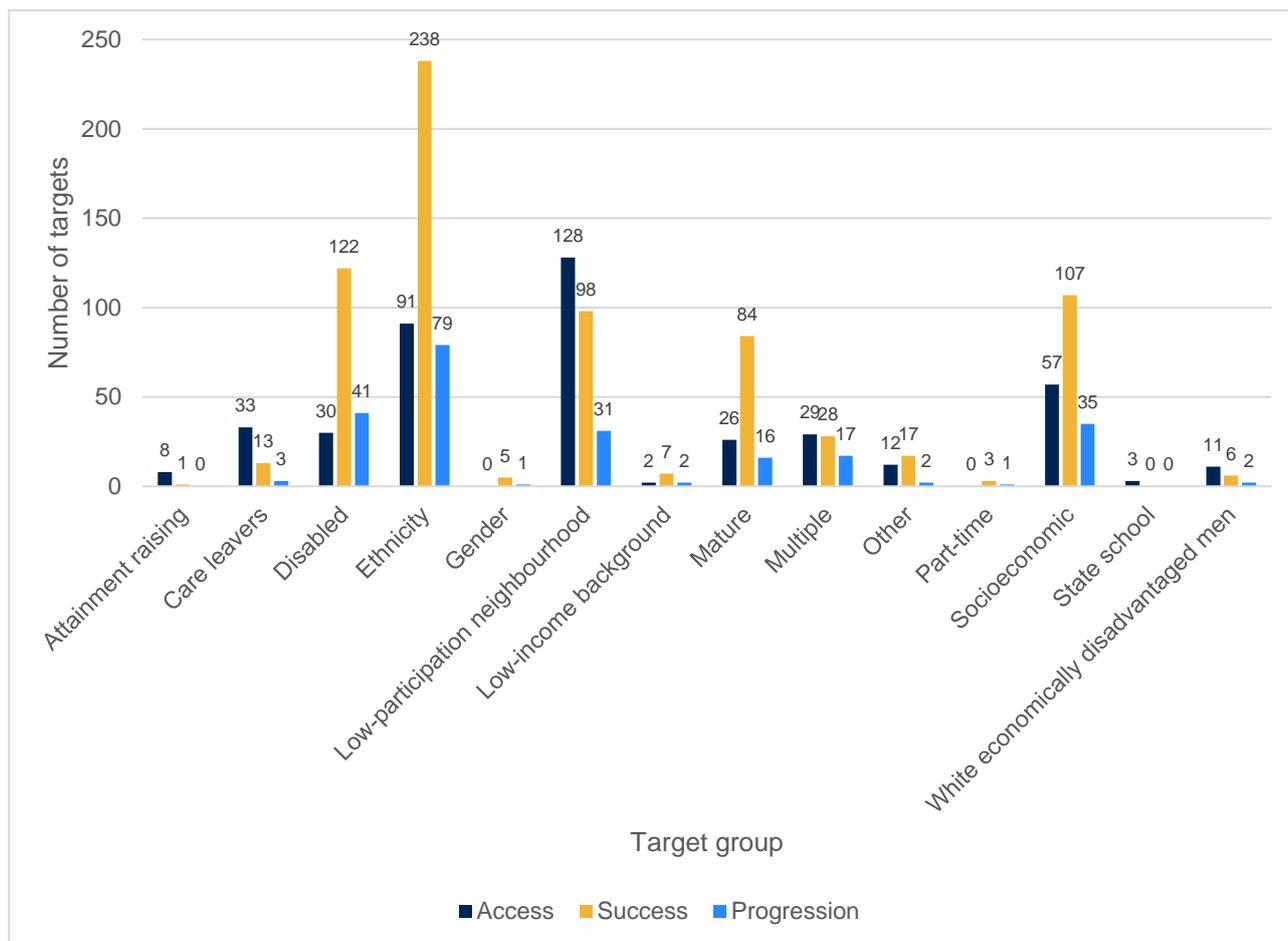
90. As of 31 October 2018, the following risk mitigations had been applied (some providers received more than one type of mitigation):

- a. **Specific condition of registration:** To date in the 2020-21 to 2024-25 assessment process, no providers have received a specific condition of registration (in the 2019-20 plan process, five providers were subject to specific conditions of registration).
- b. **Enhanced monitoring:** 90 providers have received enhanced monitoring requirements. These requirements are usually related to specific commitments made in the plans, such as: improving data, undertaking further research or reviews, developing new interventions, developing new targets, or revising existing ones. Providers are asked to report on these commitments at an appropriate time, which could be alongside the first impact report in 2022 but is often prior to this in 2020 or 2021. Enhanced monitoring has generally been imposed where one, some or all of the following apply:
  - i. There are significant gaps for underrepresented groups at any stage of the lifecycle, and limited progress has been made in closing those gaps.
  - ii. There will be large gaps for underrepresented groups at the end of the plan.
  - iii. The provider has committed to some or all of new activity, developmental activity, and reviews of existing activity which are judged to be crucial to the success of the plan.
  - iv. The provider has included new or developmental measures in its plan and there are concerns around the effectiveness of the development, implementation, monitoring and evaluation of these measures.
  - v. The provider will undertake substantial work to improve data or evaluation capabilities, or both, which may lead to future variations of the plan.
  - vi. The provider has committed to other work which is expected to lead to variations of the plan (e.g. it is planning to review or develop its current activity, research causes of underrepresentation and the barriers faced by particular groups, improve data capabilities, etc.)
- c. **Formal communication:** 79 providers have received formal communications. These normally highlight commitments in the plan or areas of activity that they will be expected to address in their first impact report in 2022: for example, to address attainment gaps (particularly for students of minority ethnicities), evaluate financial support, develop data and evaluation capabilities, review, develop and introduce strategies, and undertake research to better understand key gaps. Formal communications are also used to highlight the need to consider future variations to plans, for example to set new targets or amend existing ones.

## Analysis of provider targets and strategic commitments

91. To achieve improved outcomes for students, universities and colleges have also developed strategic approaches. This analysis considers how they have:
- a. Moved to a 'whole provider' approach to delivering the commitments in their access and participation plans. This includes improved leadership, governance and monitoring arrangements, and alignment between the access and participation plan and other provider-wide strategies.
  - b. Committed to engaging students in the design, delivery, monitoring and evaluation of access and participation plans.
  - c. Committed to taking a wide range of context-specific strategic measures, such as partnerships with schools and colleges, bridging programmes, mentoring schemes and employability schemes.
  - d. Committed to improving their evaluation practice as a result of using the OfS self-assessment of evaluation tool.
  - e. Committed to collaborations with other universities and colleges, the private sector, third sector organisations and regional partnerships.
92. Nationally, access and participation plans address gaps for many groups who are underrepresented in higher education, at all stages of the student lifecycle (access to, success during, and progression from university or college). Some particularly long-standing and significant gaps for underrepresented groups have been highlighted in OfS KPMs, and the statistical analysis in this report is based on the targets aligned with these that providers have set in their plans. However, providers were expected to consider all underrepresented groups in their student population where there were gaps at any stage of the student lifecycle. Therefore, each plan is tailored to the needs of the underrepresented students at the individual university or college.
93. The report does not include a commentary on progress against KPM1. This is because the OfS has committed to setting the level of ambition related to KPM1 once the government has responded to the post-18 review of education and funding.
94. Of the 1,389 targets included in plans, 430 were related to access, 729 to success (degree awards and continuation rates) and 230 to progression into employment or further study. Figure 1 sets out the number of targets for underrepresented groups by lifecycle stage.

**Figure 1: Number of numerical targets included in 2020-21 to 2024-25 access and participation plans, by underrepresented group and lifecycle stage**



Note: Only includes plans approved as of 31 October 2019.

95. Because of the variability of targets in access and participation plans, we have had to make a number of assumptions for this report. This includes adjusting ('re-basing') our calculations to reflect the populations of students used by the providers with approved plans to set their targets, rather than the wider populations used to set the KPMs.<sup>20</sup> For a full overview of the methodology and limitations of this analysis please refer to the technical analysis report published alongside this report.

96. Furthermore, the analysis of written commitments and themes is based on an initial qualitative analysis. The OfS will be commissioning a detailed qualitative analysis with a view to publishing a report later this year.

<sup>20</sup> The published OfS KPMs are calculated using different populations of students and providers from those available in the access and participation plan data used in this analysis. Therefore, to align the KPMs, the population is restricted to the one for which we have historical access and participation plan data.

## Analysis of provider ambitions

97. Our aim in undertaking this analysis was to gain a better understanding of how likely we are to achieve our ambition to make stronger progress in eliminating inequality gaps across the sector. Some elements of this ambition are articulated in our Participation KPMs, which measure some of the most significant and persistent inequalities in student outcomes.
98. Providers are not required to include these KPMs in their access and participation plans – their targets and measures are tailored to their individual missions and contexts – but most plans refer to one or more of them in their year-on-year targets.
99. The analysis assesses the potential impact of these targets on the achievement of the participation KPMs. Details of the methodology are explained in the technical report<sup>21</sup> published alongside this report.
100. To assess the progress of the targets in relation to our KPMs we needed to compare the impact that the targets would have by the end of 2024-25 for each KPM – demonstrated by the size of the gap in participation, non-continuation or attainment that remained at the end of five years – with the OfS KPM baseline position.
101. As indicated in paragraph 95, to align the KPMs with the data used in our analysis we recalculated them restricting the population to the one for which we have historical access and participation plan data. This resulted in a revised KPM against which we could assess the progress relating to the application of providers’ targets. Table 2 shows the re-based KPMs.

**Table 2: Re-based OfS KPMs using access and participation plan data**

	KPM2 (pp)	KPM2 (ratio)	KPM3 (pp)	KPM4 (pp)	KPM5 (pp)
Original KPM	19.8	4.81	4.4	23.1	2.8
Re-based KPM using restricted population	36.2	6.24	4.6	22.0	2.8

Note: ‘pp’ = ‘percentage point’.

102. The large difference between the original and re-based KPM2 is because the original KPM was based on 18- to 30-year-old entrants to high-tariff providers in England, whereas we have restricted our current analysis young entrants. Please refer to the technical report for further information.

<sup>21</sup> ‘Analysis of access and participation plan targets in relation to OfS key performance measures’ is available at: [www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/](http://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/).

## KPM 2: Gap in participation at high-tariff universities and colleges between the most and least represented groups

The OfS has set the following target for the sector and itself:

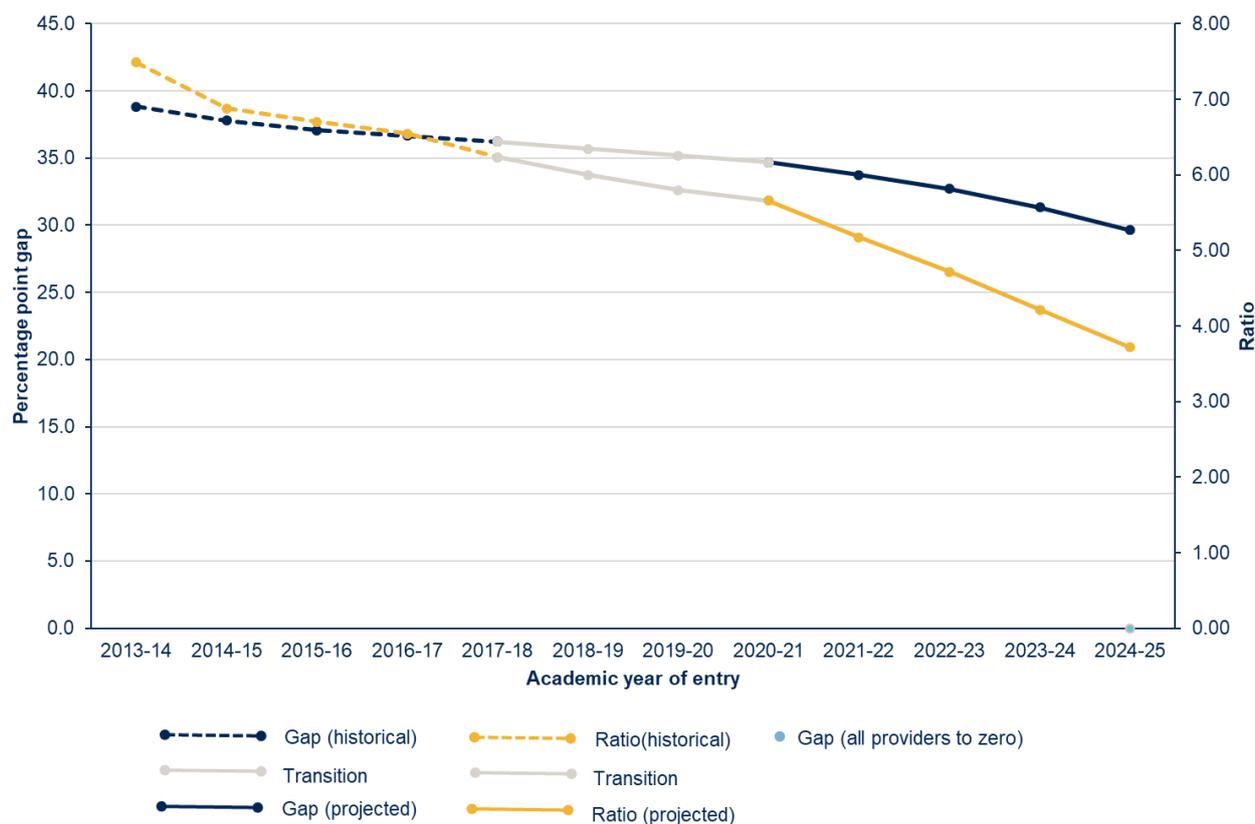
- To eliminate the gap in entry rates at high-tariff universities and colleges between the most and least represented groups (based on Participation of Local Areas (POLAR) quintiles 5 and 1 respectively) by 2038-39. For 18- and 19-year-olds, our target is to reduce the gap in participation between the most and least represented groups from a ratio of 5:1 to a ratio of 3:1 by 2024-25.

### Ambition

103. Of the 31 providers classified as high-tariff providers, 30 included targets relating to this KPM. The remaining provider has made a commitment to establish a target related to KPM2 during the academic year 2020-21. As shown in Figure 2, if all the universities and colleges with targets in this area meet their targets, the ratio between the most and least represented groups will reduce from 6.24:1 in 2017-18 to 3.72:1 by 2024-25.

104. If all providers achieved their targets by 2024-25, the sector gap will have reduced from 36.2 percentage points (2017-18) to 29.7 percentage points (2024-25). For the purposes of this analysis we have assumed that the number of quintile 5 entrants will remain constant, and so closing the gap will have been achieved by increasing the proportion of quintile 1 entrants from 6.9 per cent to 10.9 per cent. Assuming a small growth in the size of the quintile 1 population and no change in the rest of the sector, this would represent an increase of around 6,500 quintile 1 entrants admitted to high-tariff providers in the 2024-25 cohort compared with 2017-18.

**Figure 2: Historical and projected gap and ratio for access to high-tariff providers between POLAR4 quintile 1 and quintile 5 entrants (KPM2)**



105. Ten high-tariff providers committed to reaching at least a ratio of one entrant from the lowest participation areas to every three entrants from the highest participation areas by the end of the plan, in line with the OfS KPM. Where providers did not meet this level of ambition, it tended to be because the provider had a relatively larger gap as a starting point, and was therefore on a much steeper trajectory to that specified in the KPM.

106. However, several universities and colleges would be left with large access gaps at the end of the plan for students from low participation areas. These universities and colleges included longer-term written objectives indicating the progress they expect to make beyond 2024-25. Following negotiation, some included a commitment to review progress against this target at the midpoint of the plan and engage further with the OfS on their targets and trajectories in this area.

### Commitments in access and participation plans

107. To achieve these ambitions, high-tariff universities and colleges have committed to a range of strategic measures, including:

- a. Contextual admissions. Several universities and colleges intend to undertake comprehensive reviews of their existing systems while others intend exploring the use of contextual admissions for the first time. Some are seeking to extend their existing systems to cover more student groups.

- b. Developing-raising attainment activity with schools and colleges. For some providers this will be done through school sponsorship arrangements, while others will work with target schools to rigorously test attainment-raising approaches with a view to setting targets later should they prove effective. Eight universities and colleges included an attainment-raising access target in their plan.
- c. Introducing bridging programmes and foundation provision with robust evaluation frameworks.

108. Some universities and colleges, particularly in London, have committed to further research and data analysis in respect of participation gaps between POLAR4 quintile 1 students and quintile 5 students. For some this included analysing the intersections between higher education participation and other characteristics. A number of London universities and colleges have committed to extending their outreach programmes to areas outside London, to help reduce their gaps between POLAR4 quintile 1 and 5 students. High-tariff universities also included access targets relating to their specific mission and context, focusing for example on multiple characteristics in their local area, students from areas of multiple deprivation and using other measures they considered to be appropriate to their particular circumstances such as Acorn.<sup>22</sup>

109. Several universities and colleges committed to enhancing collaborative activity to improve access gaps. Some of these commitments relate to working with institutes of technology and with third sector organisations such as IntoUniversity, the Brilliant Club and the Sutton Trust. In addition, 13 high-tariff universities and colleges have included a common collaborative target to support pathways into their courses as part of the Realising Opportunities programme.

### **KPM3: Gap in non-continuation between most and least represented groups**

The OfS has set the following target for the sector and itself:

- To eliminate the unexplained gap in non-continuation between most and least represented groups by 2024-25, and to eliminate the absolute gap (caused by both structural and unexplained factors) by 2030-31.

#### **Ambition**

110. Of the 171 providers' plans analysed, 73 universities and colleges included targets related to KPM3 in their plans. If all universities and colleges meet these targets, the higher education participation (POLAR4) gap will be reduced from 4.6 percentage points in 2016-17 to 2.9 percentage points by 2024-25. All universities and colleges that have large non-continuation gaps have included commitments related to addressing this gap in their plan.

<sup>22</sup> Acorn is a postcode-based tool that categorises the UK's population by level of socioeconomic advantage.

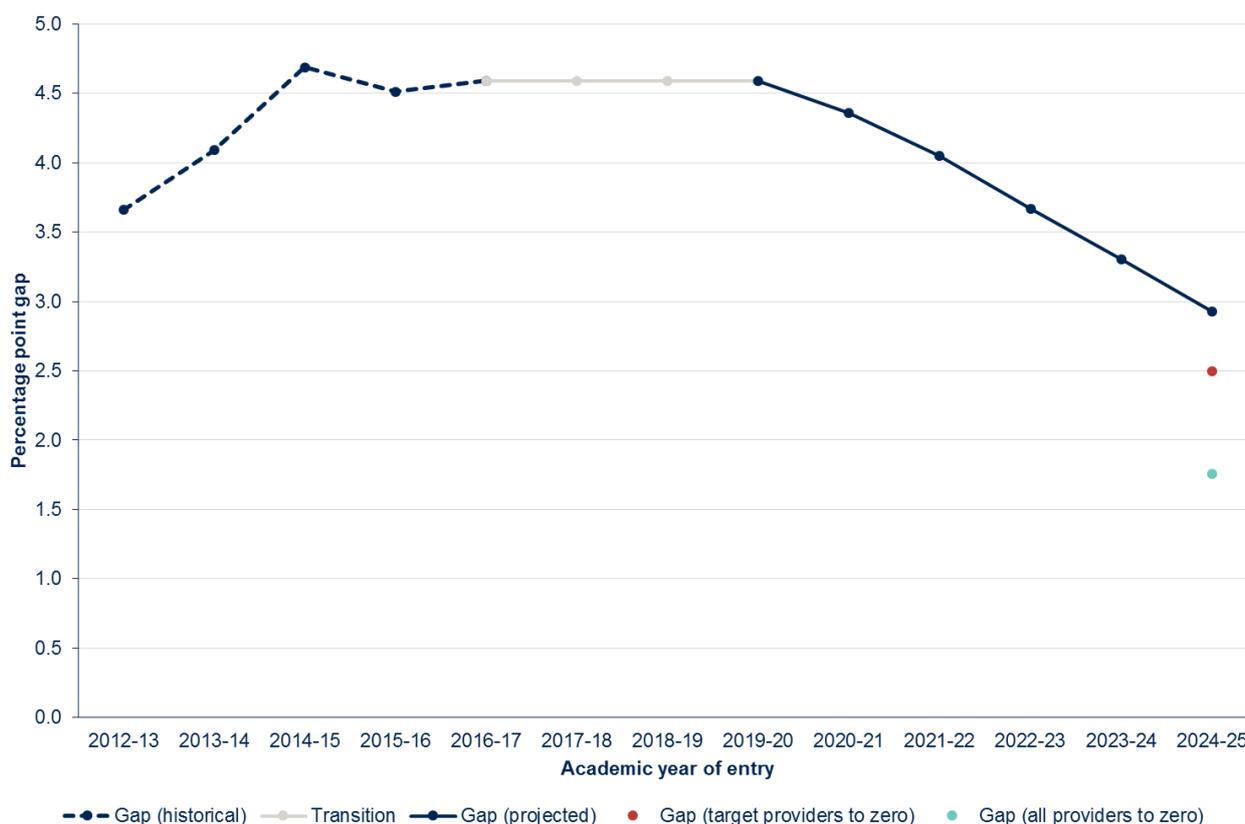
111. If we compare provider ambition in 2020-21 to 2024-25 plans with the historical trajectory shown in Figure 3, the targets appear to reverse the steadily increasing gap seen between 2012-13 and 2016-17. The gap in continuation rates is projected to return to 2012-13 levels by 2022-23 if all targets are met and to reduce further by 2024-25. Assuming no change in the size of the sector, these projections represent an additional 500 quintile 1 entrants continuing in the 2024-25 cohort compared with 2016-17 levels.
112. Furthermore, there is a relatively small difference between the gap remaining in 2024-25 if all providers meet their targets (the dark blue dot), and the gap if all the same providers had a target to reduce this gap to zero (the red dot). This suggests that providers have been ambitious in addressing the non-continuation gap between the most and least represented groups in their access and participation plans.
113. However, should all universities and colleges with approved access and participation plans close their own gap in continuation rates to zero, a national gap would remain in 2024-25, due to the sector-wide distribution of POLAR4 quintile 1 and quintile 5 students (the light blue dot in Figure 3). This is because quintile 5 students are concentrated in higher-tariff providers, which tend to have a lower non-continuation rate than lower-tariff providers. Therefore, more will need to be done by all universities and colleges, not just those with a target in this area, to address the sector-wide non-continuation gap. Although an individual provider cannot be solely responsible for affecting how student groups are distributed across the sector, it can help to reduce the impact of these distributions by improving the outcomes for all its own students. Regulatory interventions such as the Teaching Excellence and Student Outcomes Framework (TEF)<sup>23</sup> and baseline quality conditions of registration<sup>24</sup> will work alongside access and participation plans to improve continuation outcomes for all students.

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<sup>23</sup> The TEF is a national exercise, introduced by the government in England. It assesses excellence in teaching at universities and colleges, and how well they ensure excellent outcomes for their students in terms of graduate-level employment or further study.

<sup>24</sup> These are the 'B' conditions in OfS 2018.01.

**Figure 3: Historical and projected gap in non-continuation between POLAR4 quintile 1 and quintile 5 students (KPM3)**



### Commitments in access and participation plans

114. To achieve these ambitions universities and colleges have committed to:

- a. Improving data analysis and research to better understand the barriers for underrepresented students and develop further measures particular to their own circumstances. Many universities and colleges committed to reviewing their objectives and targets as a result of this analysis.
- b. Improving student engagement, for example by developing the use of learner analytics.
- c. Reviewing the curriculum and academic delivery.

115. Almost all universities and colleges included commitments related to financial support for students in their plans, totalling £331.2 million of sector-wide investment in 2020-21. Universities and colleges cited closing the gap in non-continuation between underrepresented students and their peers as the main objective of financial support, and have committed to using the OfS financial support toolkit to evaluate its impact. The types of financial support offered to students mainly include bursaries based on household income or for specific underrepresented groups, together with hardship funds.

116. Some universities and colleges explored in their plans the interaction between Condition B3 (related to student outcomes overall) and Condition A1 (related to access and participation plans) of the OfS regulatory framework. These providers have described how they aim to improve continuation rates overall for all students, in addition to closing any gaps between underrepresented students and their peers.

## KPM 4: Gap in degree outcomes (1sts and 2:1s) between white students and black students

The OfS has set the following target for the sector and itself:

- To eliminate the unexplained gap in degree outcomes (1sts and 2:1s) between white students and black students by 2024-25, and to eliminate the absolute gap (caused by both structural and unexplained factors) by 2030-31.

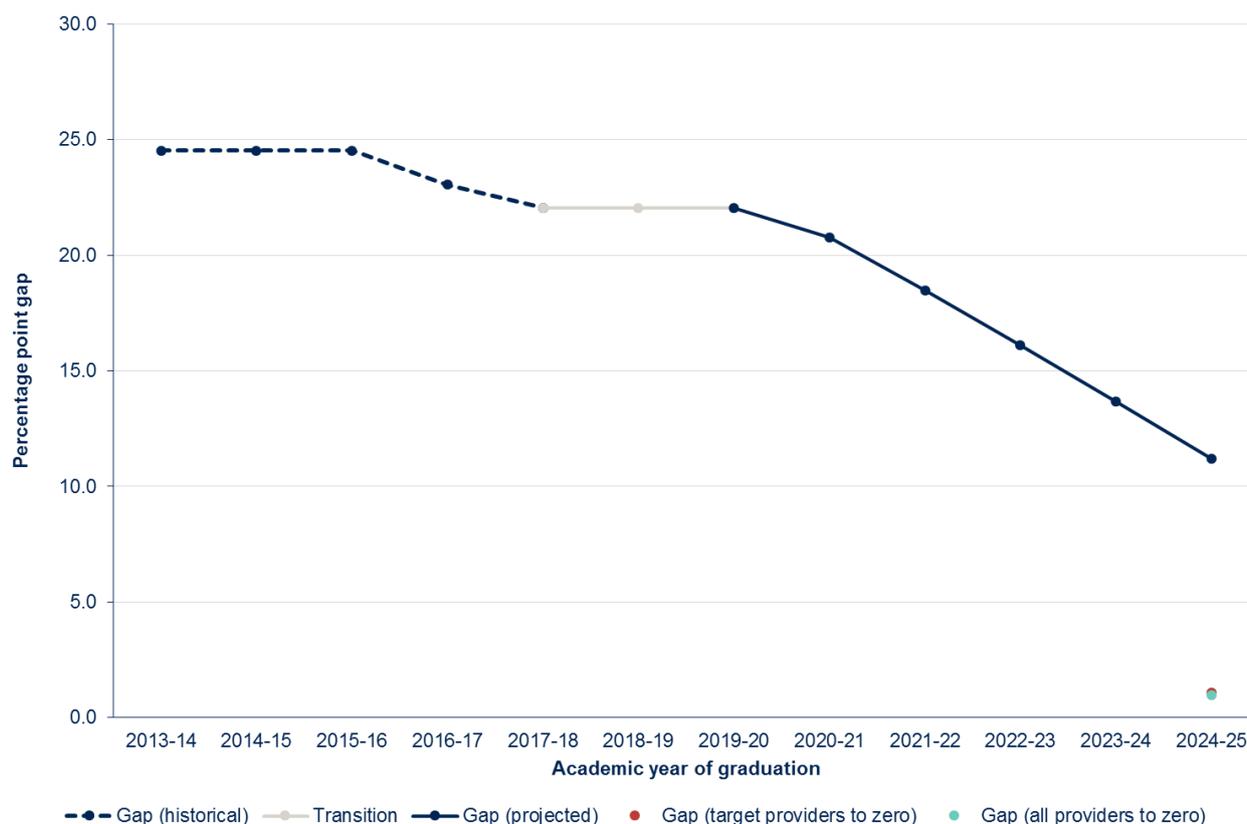
### Ambition

117. As shown in Figure 5, if all universities and colleges that have included targets in their plans meet their targets, the gap in degree outcomes between black and white students would reduce from 22 percentage points in 2017-18 to 11.2 percentage points in 2024-25<sup>25</sup>. Assuming no change in the size of the graduating cohorts, these projections represent an additional 1,900 black students being awarded a 1st or 2:1 in the 2024-25 cohort compared with 2017-18 levels.
118. This represents a step change in ambition compared with historical rates of closing the gap. However, Figure 4 also shows a relatively large difference between the gap remaining in 2024-25 if all providers meet their targets (the dark blue dot), and the gap if all these same providers had a target to reduce this gap to zero (the red dot). This shows there is more work for providers and the OfS to do to reduce the gap in degree award outcomes between black and white students.
119. Many universities and colleges aimed to halve the existing gap by 2024-25, especially those that had not yet been able to understand the element of the gap relating to structural factors such as entry qualifications, age and subject of study, and the elements that could not be identified. Several will still have large gaps remaining at the end of the plan in 2024-25. These providers included longer-term written objectives indicating what progress they would expect to make beyond 2024-25. Some included a commitment to review progress against this target at a midpoint of the plan and engage further with the OfS on their targets and trajectories in this area.
120. Figure 4 shows a relatively small structural gap of 1.0 percentage points as a result of the sector-wide distribution of black and white students. Therefore, it is possible for the sector-wide gap to be almost closed by individual providers targeting their own gaps.

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<sup>25</sup> We have assumed that the proportion of white students will remain constant, and so closing the gap will have been achieved by increasing the attainment rate of black students from 61.0 per cent to 71.9 per cent.

**Figure 4: Historical and projected gap in degree outcomes (1sts and 2:1s) between white students and black students (KPM4)**



121. Over 65 per cent of universities and colleges (112 providers) included targets related to the degree outcome gap between black and white students. Also, a number of universities and colleges included a wider range of ethnic groups within their targets where this was justified by their self-assessment. Others included written commitments, particularly those with very small student numbers where a numerical target would be inappropriate. This demonstrates how widespread gaps in degree awards between white and black students are across the sector.

### Commitments in access and participation plans

122. As identified in paragraph 119, some of the factors that contribute to the non-continuation and attainment gaps are structural, such as entry qualification, subject of study, age of students, etc. However, once such structural factors are considered, significant unexplained differences remain, which are referred to as the unexplained gap. Several universities and colleges have committed to further research and data analysis. This includes analysis about the unexplained and structural gaps, with a view to informing targets, and research on the barriers and challenges black students experience to inform future strategies. Many universities and colleges have committed to conducting this research in collaboration with students, building on work between Universities UK and the National Union of Students, and others have committed to setting up new university centres and research departments specialising in curriculum and academic development, or attainment by students of minority ethnicities more specifically.

123. Some universities and colleges found small and fluctuating student numbers a challenge, which meant that they were unable to reliably assess the available data or conduct a robust analysis of the attainment of their black students. Nevertheless, a number acknowledged the

systemic nature of the differential outcomes for black students across the sector, so made written commitments and set targets related to the outcomes and experiences they would aim to deliver for their black students year on year.

124. To achieve these ambitions, some of the commitments universities and colleges have made include:
- a. Developing leadership and provider culture. Examples include: establishing provider level and department level key performance indicators; staff training such as unconscious bias training; strategic reviews of provider-wide communications; producing department or course-level data; implementing student success frameworks; and improving the diversity of staff, including senior staff.
  - b. Reviewing learning and teaching strategies. For example, reviewing the curriculum, methods of assessment and anonymous marking policies.
  - c. Developing outreach interventions. Examples include: peer-to-peer or student-to-university leader mentoring schemes; developing student networks; and embedding greater first-year or pre-sessional support.

## **KPM 5: Gap in degree outcomes (1sts or 2:1s) between disabled students and non-disabled students**

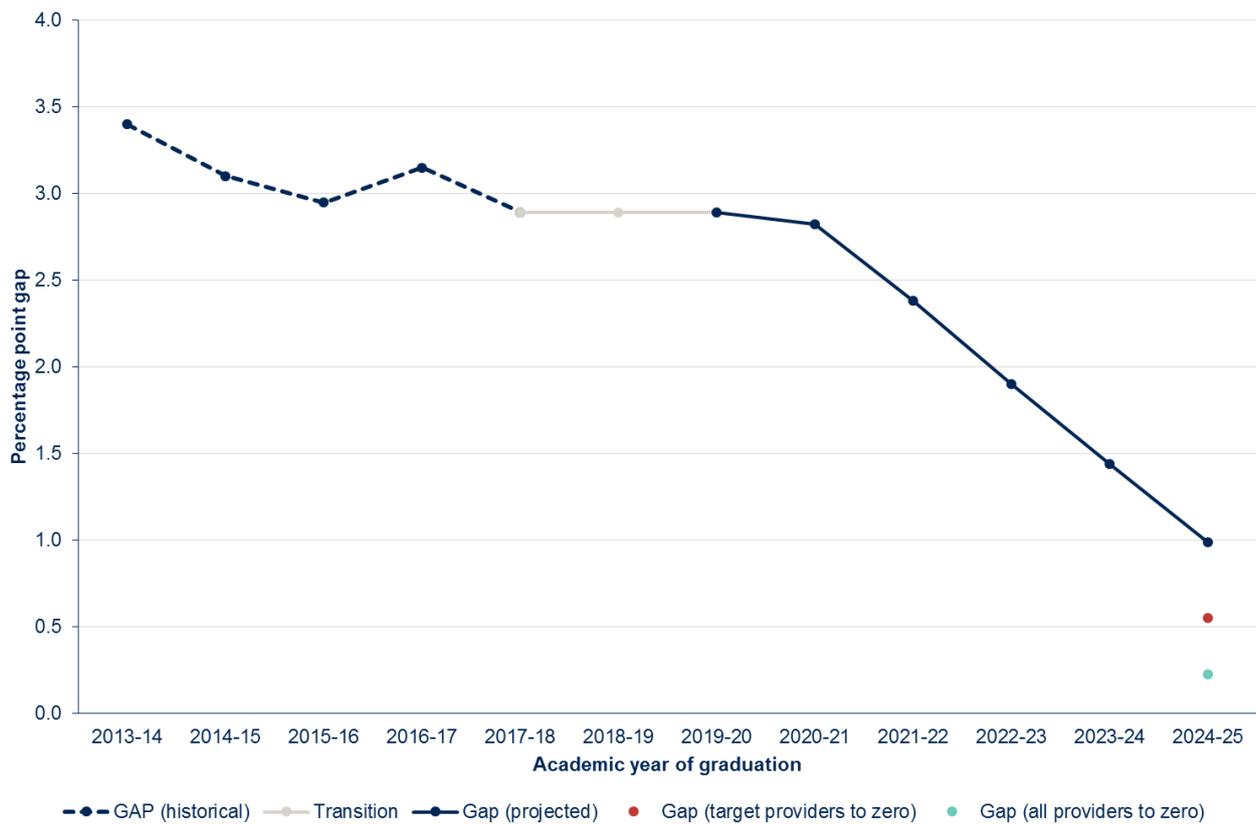
The OfS has set the following target for the sector and for itself:

- To eliminate the gap in degree outcomes (1sts and 2:1s) between disabled students and non-disabled students by 2024-25.

### **Ambition**

125. Of the 171 plans analysed, 69 universities and colleges included targets related to this KPM. If all universities and colleges with a target meet the ambition set out in their targets related to degree outcomes for disabled students compared with non-disabled students, the gap would close from 2.8 percentage points (2017-18) to 1 percentage point in 2024-25. Assuming no change in the size of the graduating cohorts, these projections represent an additional 750 disabled students being awarded a 1st or 2:1 in the 2024-25 cohort compared with 2017-18 levels.
126. Furthermore, as shown in Figure 5, there is a relatively small difference between the gap remaining in 2024-25 if all providers meet their targets (the dark blue dot), and the gap if all these same providers had a target to reduce this gap to zero (the red dot). This suggests that providers have been ambitious in address in addressing the degree award gap between disabled and non-disabled students in their access and participation plans. If we compare this with the historical trajectory shown in Figure 5, the targets appear to continue to reduce the steadily decreasing gap seen between 2013-14 and 2017-18.

**Figure 5: Historical and projected gap in degree outcomes (1sts and 2:1s) between disabled students and non-disabled students**



### Commitments in access and participation plans

127. To achieve these targets universities and colleges have made a number of commitments, including:

- a. Improving use of data and monitoring systems, for example using learner analytics or course level data.
- b. Reviewing exam access arrangements and use of assistive technologies.
- c. Staff training for teaching staff on inclusion and accessibility.
- d. New course approval, including requirements to have considered inclusivity in programme design.

## KPM 6: The proportion of plans that contain robust evaluation methods, focused on impact and leading to improved practice

All universities and colleges were required to include in their plans:

- A description of a robust and credible evaluation strategy which demonstrates continuous improvement in practice for the duration of the plan.
- A description of the mechanisms in place to enable the outcomes of evaluation to influence practice.

### Ambition

128. Access and participation plans have been approved on the basis that they contain robust evaluation methods, focused on impact and leading to improved practice. Universities and colleges have demonstrated a step change in ambition and approaches to evaluation as a result of increased expectations, practical guidance and an evaluation self-assessment tool to help them identify areas for improvement.

129. Our own evidence and evaluation strategy for access and participation identifies three priority areas for improvement, so that providers and the OfS:<sup>26</sup>

- commit to and prioritise a culture of evidence to support their work to eliminate inequality in higher education
- use evidence to understand and respond to national inequalities, and to design impactful programmes and funding
- evaluate to understand impact, learn and share high-quality evidence.

130. To deliver on this, we have:

- a. Launched TASO, the new ‘what works’ centre for higher education social mobility. The centre will identify, translate, generate and share the most effective access and participation approaches and support improvements in evaluation practice.
- b. Published and begun to act on research into the higher education access and participation data landscape, including a review of the effectiveness and efficiency of the higher education tracking services<sup>27</sup>, to ensure that we have robust evidence on the impact of outreach whatever the learner destination.

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<sup>26</sup> See ‘Strategy for evidence and evaluation in access and participation’ ([www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/strategy-for-evidence-and-evaluation-in-access-and-participation/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/strategy-for-evidence-and-evaluation-in-access-and-participation/)).

<sup>27</sup> The three main tracking services are the Higher Education Access Tracker (<https://heat.ac.uk/>), Aimhigher West Midlands (<http://aimhigherwm.ac.uk/>) and the East Midlands Widening Participation Research and Evaluation Partnership (<http://www.emwprep.ac.uk/>).

131. Evaluation is an area that has traditionally been underdeveloped in access and participation. However, if providers deliver on the evaluation commitments made in their plans, we can expect far greater understanding of the impact of different interventions over time, and this should yield stronger progress on reducing equality gaps. Every provider's plan includes a description of its evaluation strategy, including the mechanisms through which the results of evaluation will inform and improve practice. However, effective evaluation remains a challenge for many universities and colleges, and a number have therefore committed to build and improve their capacity to undertake robust evaluation over the course of the plan period.

### **Commitments in access and participation plans**

132. To achieve these ambitions universities and colleges have committed to:

- a. Developing areas identified by the OfS evaluation self-assessment tool as areas for improvement<sup>28</sup>.
- b. Taking a provider-wide approach to evaluation, including adopting frameworks such as the OfS standards of evaluation or the Network Evaluating & Researching University Participation Interventions (NERUPI) evaluation framework<sup>29</sup>, and providing training for staff. Some universities and colleges committed to developing both their overarching theories of change and intervention level models.
- c. Improving data collection for all underrepresented groups to underpin monitoring and evaluation.
- d. Sharing findings either within the provider, or sector wide through academic research or through initiatives such as TASO.
- e. Enhancing the involvement of students in evaluation.

133. Some universities and colleges used collaboration or outsourcing to secure evaluation expertise, especially where skills and resourcing were a barrier. Others described how they were learning from or capitalising on evaluation practices developed through collaborative partnerships such as Uni Connect.

134. Where universities and colleges are offering financial support, they were required to explain the objectives for this provision and how they plan to evaluate it. Several universities and colleges committed to using the financial support toolkit provided by the OfS to understand impact<sup>30</sup>. Universities and colleges with small numbers committed to using the non-statistical element of the tool. Some had already used the OfS financial toolkit in previous years and

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<sup>28</sup> See 'Standards of evidence and evaluation self-assessment tool' ([www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/standards-of-evidence-and-evaluation-self-assessment-tool/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/standards-of-evidence-and-evaluation-self-assessment-tool/)).

<sup>29</sup> See 'Standards of evidence and evaluating impact of outreach' ([www.officeforstudents.org.uk/publications/standards-of-evidence-and-evaluating-impact-of-outreach/](http://www.officeforstudents.org.uk/publications/standards-of-evidence-and-evaluating-impact-of-outreach/)). NERUPI (<http://www.nerupi.co.uk/>) is a provider-led network which provides a theoretical framework for evaluating and researching university participation interventions.

<sup>30</sup> See 'Financial support evaluation toolkit' ([www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/financial-support-evaluation-toolkit/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/financial-support-evaluation-toolkit/)).

changed their financial support offering in the 2020-21 to 2024-25 access and participation plan in light of its findings. These universities and colleges detailed how they intend to conduct continued evaluation to assess the impact of these changes.

135. Evidence on the evaluation of activity and investment will be collected during annual monitoring and a methodology for assessing this KPM will be established on this basis.

## KPM 7: Ratio of outcomes achieved through access and participation to money spent on access and participation

All universities and colleges were required to include in their plan:

- an estimate of a provider's level of investment in addressing the gaps in access and participation for underrepresented groups. This investment was disaggregated into access (pre-16, post-16, adults and the community, and other), financial support, and evaluation and research.

### Commitments in access and participation plans

136. As demonstrated in Table 3, universities and colleges have committed to investing £551.8 million in 2020-21, rising to £564.5 million in 2024-25, to deliver the access, financial support, and research and evaluation commitments detailed in their access and participation plans.

**Table 3: Estimated access and participation investment, by type of spending (£M)**

	2020-21	2021-22	2022-23	2023-24	2024-25
<b>Total access activity investment</b>	<b>197.9</b>	<b>202.6</b>	<b>206.8</b>	<b>209.8</b>	<b>212.2</b>
Access (pre-16)	60.5	61.9	63.1	63.8	64.5
Access (post-16)	107.8	110.5	113.0	115.0	116.3
Access (adults and the community)	19.2	19.5	19.9	20.1	20.2
Access (other)	10.4	10.6	10.8	11.0	11.1
<b>Financial support</b>	<b>331.2</b>	<b>325.5</b>	<b>324.4</b>	<b>325.5</b>	<b>327.5</b>
Bursaries and scholarships	287.6	281.7	280.1	281.3	283.0
Fee waivers	11.7	11.2	11.3	10.8	10.9
Hardship funds	31.9	32.6	33.0	33.4	33.6
Research and evaluation	22.7	23.5	23.9	24.5	24.8
<b>Total</b>	<b>551.8</b>	<b>551.6</b>	<b>555.1</b>	<b>559.8</b>	<b>564.5</b>

Note: Only includes providers with plans approved as of 31 October 2019.

137. In line with the overall regulatory reforms described in paragraphs 62 to 67 universities and colleges were challenged to create more ambitious, outcomes-focused access and participation plans. Improved outcomes for students with similar or lower levels of investment, or an evidenced-based increase in spending, should demonstrate better value for money for the taxpayer and students.

138. Universities and colleges were not asked to provide projected investment on student success and progression, as this discourages inclusive practice, whereby providers adopt a whole-institution approach to supporting underrepresented students. However, for the first time, providers were asked to provide investment projections for research and evaluation.
139. The OfS has moved away from viewing investment alone as a measure of success, thereby removing the 'expectation of spending'. Instead, investment has been positioned as one of a set of measures to assess whether a provider has a credible strategy to achieve its ambitions. Ensuring universities and colleges invest in the most effective measures to address their most significant gaps in student outcomes will both better serve the student interest and secure better value for money.
140. Due to these changes in policy it is not possible to directly compare investment figures between 2019-20 access and participation plans and those for 2020-21 to 2024-25. However, it appears that investment in the areas for which we continued to collect information has broadly been sustained between the 2019-20 and 2020-21 to 2024-25 access and participation plans.
141. It is not possible to comment on progress against this KPM at this stage because universities and colleges have included forecast outcomes and spending, rather than actual figures. Actual outcomes data and spending information will be collected during annual monitoring, and a methodology for assessing this KPM will be established on the basis of this.

## **Students underrepresented in higher education**

142. As previously stated, the OfS KPMs do not encompass the range of targets and student groups covered in the access and participation plans. The following provides a broad overview of the number of targets set at each lifecycle stage, as well as examples of the measures universities and colleges will take to deliver them.

All universities and colleges were required to include in their plan consideration of the following groups of students, across the student lifecycle:

- Those living in areas of low higher education participation, or from backgrounds of lower household income or socioeconomic status.
- Black, Asian and minority ethnic students.
- Mature students.
- Disabled students (those in receipt of Disabled Students Allowances (DSA) and those who have declared a disability but are not in receipt of DSA).
- Care leavers.

Providers may have considered in their plans a wider set of student groups where national data indicates there are particular equality gaps and support needs that can be addressed in an access and participation plan, including:

- Carers.
- People estranged from their families.
- People from Gypsy, Roma and Traveller communities.
- Refugees.
- Children from military families.

Providers were required to write aims, objectives and targets, and a strategy to close the gaps identified at their university or college, taking consideration of national evidence.

## Ambition

143. An overview of the number of targets for each underrepresented group at each stage of the student lifecycle (access to, success during, and progression from higher education) can be seen in Figure 1. This demonstrates how plans cover a wide range of underrepresented groups at all stages of the student lifecycle, reflecting the particular challenges identified by each provider.
144. Universities and colleges were required to include written aims, objectives and targets for any group where there were gaps in outcomes between underrepresented students and their peers. Some areas of note from plans include the following:
- a. For those living in areas of low higher education participation or from lower household income or socioeconomic status backgrounds, there were 201 access targets, 218 success targets and 419 progression targets in total<sup>31</sup>. Of these, 11 targets related specifically to white economically disadvantaged men (sometimes known as white working-class men).
  - b. For most underrepresented groups, more targets related to the success stage of the student lifecycle than to access and progression. However, for care leavers, out of the 49 targets overall, 33 related to access, reflecting the early stage of work with this group in many universities and colleges, and the imperative to make initial progress by improving access rather than student success.
  - c. Almost all plans referenced mental health, and strategies related to student wellbeing such as developing mental health policies, including their intersection with specific groups that are underrepresented in higher education.
  - d. Over 30 per cent of plans mention support for the lesbian, gay, bisexual, transgender and other minority sexuality and gender identity (LGBT+) community.

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<sup>31</sup> Higher education participation, socioeconomic status, income, white economically disadvantaged students, and state school targets combined.

- e. There was an overall a lack of reported evidence and evaluation activities at the progression stage, more so than other stages of the student lifecycle.

### **Commitments in access and participation plans**

145. The type of commitments providers made in plans relating to the **access** stage of the student lifecycle included the following:

- a. Over half of providers included commitments relating to their admissions policies, including contextual admissions.
- b. Some providers committed to alternative routes into higher education.
- c. Many providers included commitments relating to schools, such as school sponsorship, school governance, and school staff engagement.
- d. A number of providers are working with college and employer partners to develop apprenticeship pathways.

146. The type of commitments providers made in plans relating to the **success** stage of the student lifecycle included the following:

- a. Some commitments related to student welfare, wellbeing and mental health, such as the development of mental health policies.
- b. Most plans included commitments relating to induction activity.
- c. Over half of plans made commitments relating to mentoring schemes, curriculum reviews, student support, identifying students at risk, study skills, tutor or pastoral support, and staff training.
- d. Some plans included commitments relating to flexible provision, foundation years, a focus on attendance, academic-based support, or online learning or support.

147. The type of commitments providers included in plans relating to the **progression** stage of the student lifecycle included:

- a. Careers support for specific underrepresented groups such as students with mental health difficulties and care leavers.
- b. Guaranteed work experience placements with partner employers.
- c. Developing mentoring networks between students, alumni and careers advisors.
- d. Enterprise programmes targeted at underrepresented students to support entrepreneurship, freelancing, self-employment and start-ups.
- e. Embedding employability into the teaching curriculum, and as part of curriculum reviews.

148. Many providers considered groups where national data on representation is not available, such as carers, students estranged from their families, or people from Gypsy, Roma, and Traveller communities. The types of commitments in plans relating to these groups included:

- a. Developing outreach programmes tailored to the needs of the specific group, including dedicated welcome and taster events or bespoke support.
- b. Commitments relating to improving data collection and analysis; for example, by adding questions at enrolment, and accessing regional data. Some universities and colleges committed to collecting information on non-continuation for LGBT+ students.
- c. Commitments relating to improved monitoring and tracking of students to provide more effective support.
- d. Commitments to sign up to quality marks such as the Stand Alone Pledge or the Armed Forces Covenant.
- e. Commitments to provide support and accommodation to students all year round.
- f. Commitments relating to working collaboratively, such as with local authorities, representative bodies, the armed forces, and third sector organisations, for example in regional partnerships.

## Whole provider approaches to access and participation

All universities and colleges were required to include in their plan:

- An overview of their whole provider approach which articulates their overarching, evidence-informed theory of change.
- Commitments on how they are taking a whole provider approach to meeting their access and participation strategic aims and objectives.
- Commitments on how their access and participation plan is linked to its other strategies such as equality, diversity and inclusion, learning, teaching and assessment and employability.

### Ambition

149. In response to the 2018 access and participation reforms, access and participation plans have moved from an annual submission cycle to a system where plans may be approved for up to five years. As a result, 2020-21 to 2024-25 access and participation plans are more strategic than in previous years. They contain less detail about specific interventions and inputs, but have a greater emphasis on the outcomes the university or college is aiming to deliver for its underrepresented students and how it is taking a whole provider strategic approach to achieve them.
150. Given the move to longer plan approval, there was an expectation that universities and colleges would develop longer-term strategies, demonstrating greater ambition, innovation and evaluation.

151. An initial qualitative analysis of plans indicates that the stronger focus on student success in the new approach has resulted in a strengthening of the whole provider approach to access and participation. For example, over half of plans describe how their access and participation strategy aligns with learning, teaching and assessment strategies, commitments related to admissions policies, and curriculum reviews.

### **Commitments in access and participation plans**

152. An evidence-based theory of change ensures that the access and participation plan has a clear purpose and understanding of steps necessary to deliver the desired change. Universities and colleges most often demonstrated an evidence-based theory of change in their plans by including:

- a clear narrative across the plan, where the evidence from the assessment of performance informed the aims, objectives and targets, which in turn informed the provider's strategy
- diagrams demonstrating their overarching theory of change or logic model, which reinforced the narrative throughout the plan
- evaluation strategies in their plans, with some specifically describing how the evidence generated from evaluation would inform their future strategy.

153. Access and participation plans demonstrated a whole provider approach through the commitments they outlined to improve student outcomes in a number of ways, such as:

- a. Involving students in the design and delivery of the commitments made in the plans (see paragraphs 154 to 157 for more information).
- b. Developing leadership and governance arrangements. For example, by strengthening commitments related to monitoring progress against the commitments in the plan and ensuring responsibility for access and participation rest with senior staff.
- c. Aligning access and participation plan commitments with provider-wide key performance indicators.
- d. Aligning access and participation plan commitments with other provider-wide strategies such as learning and teaching, employability, and equality and diversity strategies.
- e. Improving data collection and analysis capabilities and introducing or developing the use of student tracking systems such as learner analytics.
- f. Introducing inclusive programmes across the student lifecycle, which would be open to all students, but would meet the needs of underrepresented groups.
- g. Establishing or increasing the scope of research hubs, such as academic centres, to research and disseminate information related to access and participation in higher education.

## Student consultation

Providers were required in their access and participation plans to demonstrate how students had the opportunity to express their views on the content of the plan before it was submitted for approval, and what steps were taken as a result. This included:

- Evidence of how students from a range of backgrounds have been involved in the design, implementation and evaluation of the plan.
- A description of the mechanisms in place for students to engage in a meaningful way.

Some providers included a submission from students alongside their access and participation plan.

154. All providers included in their plan information about how they consulted students on its creation, and what steps they took as a result. Most providers included specific examples of how students had changed or influenced the commitments in the plan.

155. The methods of student consultation described in the plans included the following:

- a. Many providers consulted with identified student representatives such as students' union officers. This may have been as a group, or by speaking to individual student officers with responsibility for different underrepresented groups.
- b. Some providers conducted student focus groups or online surveys.
- c. Many providers included submissions written by students, and one provider included a link to a filmed student submission.
- d. Many universities and colleges included students on the steering groups created to write the plan.
- e. At one provider the senior leadership ran sessions open to all students to discuss issues relating to access and participation plans.
- f. Some providers trained students to enable them to provide constructive feedback on the commitments in the plan.

## Student involvement in the delivery, monitoring and evaluation of plans

156. Some providers only described how they consulted students on the content of the plan prior to approval, whereas others went further, detailing how they will engage students on an ongoing basis in the design, delivery, monitoring and evaluation of commitments in access and participation plans.

157. The types of commitments universities and colleges made included:

- a. Asking students how they would like to be involved on an ongoing basis in the delivery of the plan.

- b. Involving students on boards, committees and steering groups responsible for the monitoring and delivery of the access and participation plans. Some providers created formal partnership arrangements with their students' unions while others made commitments about co-creating provider policies with students.
- c. Holding periodic student forums or meetings specifically to discuss issues relating to access and participation. Some providers committed to developing student forums or networks for specific underrepresented groups.
- d. Developing and using student voice mechanisms already in existence, such as the National Student Survey, other student surveys, or course representative schemes.
- e. Tracking changes in student behaviour, for example through learner analytics.
- f. Ensuring there is a students' union rep with specific responsibility for access and participation.
- g. Seeking student feedback as part of a provider's evaluation strategy or academic research.
- h. Specific commitments, such as poster communication related to how action was taken as a result of student consultation and feedback ('You said... We did...'), allowing the students' union to bid to run access and participation projects, and drama or writing projects designed to communicate the experiences of underrepresented students.

## Collaboration

Providers were expected to include in their access and participation plans:

- Discussion of the main strategic measures the provider will use to deliver its aims and objectives. This included collaboration with other bodies across the student lifecycle as part of a whole provider approach.

Providers may also have included in their plans:

- A description of the provider's collaboration with students' unions or associations
- A description of how the provider is collaborating with other providers as part of its evaluation strategy; for example, by sharing good practice or developing evaluation centres.

158. Approximately 95 per cent of plans included specific discussion on how providers will use collaboration to achieve the aims, objectives and targets detailed in the plans.

159. The plans included 67 collaborative access targets, eight collaborative success targets, and 12 collaborative progression targets. However, in some of these targets the collaborative element of the targets is not described and therefore these numbers may be an overestimate. The types of collaborative targets included:

- shared targets related to access to high-tariff universities
- regional care leaver access targets
- access targets in collaboration with schools, including virtual schools
- progression targets in collaboration with employers.

160. Over 80 per cent of plans included reference to the National Collaborative Outreach Programme (now known as Uni Connect), and many included details of work which will be taking place as part of the outreach hubs being developed within the partnerships.

161. In addition to reforming provider-level regulation of access and participation, the OfS board agreed in December 2018 to continue to invest in this collaborative infrastructure on the basis that it is needed to underpin provider-level activity through targeted and coherent outreach in local areas across all parts of the country.

162. Since the programme's inception in January 2017, 29 partnerships covering all parts of England have been subject to a national formative and impact evaluation. We published the full evaluation report in October 2019<sup>32</sup>. Some of the key findings are summarised below:

- a. Sustained and progressive outreach with multiple activities had a more positive impact on learners' higher education knowledge and attitudes than single or ad hoc outreach activity.
- b. Higher education knowledge and attitudes were high at the baseline learner survey and remained high or improved at the follow-up survey, though some groups were slightly less likely to show a positive change (learners with disabilities; black, Asian and minority ethnic students; and male students).
- c. Different types of outreach achieve different learner outcomes, for example:
  - i. Mentoring improved knowledge and awareness of higher education built confidence in finding information and post-18 decision making.
  - ii. Campus visits improved knowledge of available courses, the application process, expectations of student life, and graduate career prospects.

163. In addition to the emerging evidence of the effect of programme activities on learners, the formative element of the national evaluation has also found that the programme has minimised the outreach burden for schools and colleges, facilitating both innovative approaches to outreach and access to high-quality and impartial information, advice and guidance for young people. It has also improved knowledge sharing and professional development of outreach staff, raised teacher awareness of routes to and opportunities in higher education, and addressed higher education outreach cold spots.

164. In its second phase (which commenced in August 2019), the programme is being promoted as Uni Connect. In addition to continuing to deliver sustained and progressive outreach in

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<sup>32</sup> See 'NCOP: End of phase one report for the national formative and impact evaluations', available at [www.officeforstudents.org.uk/publications/ncop-end-of-phase-one-evaluation-report/](http://www.officeforstudents.org.uk/publications/ncop-end-of-phase-one-evaluation-report/).

targeted wards, the partnerships will have greater flexibility to work with a wider range of state-funded secondary schools and colleges across England through outreach hubs. This expanded remit will provide an impartial single point of contact for locally available outreach activities and the delivery of specific activities to those learners who are most underrepresented in high education.

165. Other types of collaboration referenced in plans included:

- school and college partnerships
- collaborations with other universities and colleges, either regionally or as part of established networks
- private and public sector partnerships, including local authorities
- charities and non-governmental organisations
- community groups.

## **Small higher education providers**

166. Providers with small total numbers of students and small higher education provision faced particular challenges in developing their access and participation plans, due to dealing with small numbers in data and limited resource.

167. We are committed to working with these providers as they develop their capability and review the regulatory requirements in light of this. Alongside this, small providers have responded to our guidance by:

- a. Looking at sources such as national data, reports and academic evidence in their assessment of performance to understand the issues most likely to affect their students. Some providers also used qualitative evidence. Some providers in this instance made commitments relating to how they might improve their data collection capabilities.
- b. Making written commitments where numerical targets would make individual students identifiable. These written commitments took the form of objectives related to the experience they would hope to achieve for their students on a year-on-year basis.
- c. Capitalising on being smaller by taking whole provider approaches to addressing gaps in equality of opportunity. This included working with students as individuals and using and developing student support systems.
- d. Considering the role of collaboration, outsourcing and staff training to build capability in areas such as data analysis and evaluation practice.

## Next steps

168. The 2020-21 to 2024-25 access and participation plans set out the ambitions of individual universities and colleges to reduce and eventually eliminate the gaps in access, success and progression for their own students. The OfS's job now is to ensure that they deliver on the commitments set out in their plans, both through our annual routine monitoring of their progress and the much closer engagement with those providers subject to enhanced monitoring or shorter plan approval. Maintaining the momentum generated through the development of the plans, and holding universities and colleges to account, will be critical over the coming years.
169. We are also putting in place our own measures to support universities and colleges to meet their individual commitments and contribute to the delivery of equality of opportunity nationally. In spring 2020, we will consult on proposals for OfS access and participation funding from 2021-22 onwards. Strategic and focused use of our funding, for example through Uni Connect, will complement the work universities and colleges undertake through their access and participation plans and help deliver national ambition where this will not necessarily be delivered through individual provider activity.
170. We will also continue to support the development of effective practice. Section 35 of the Higher Education and Research Act 2017 places a duty on the OfS to identify and share effective access and participation practice with the sector. Our aim here is to equip providers to select, develop and implement the strategic measures that will have the greatest impact on reducing the equality gaps identifiable for their students. We do this in a number of ways, including through an online resource, the 'A-Z of effective practice in access and participation'.<sup>33</sup> This work will be enhanced by the findings of our monitoring and intervention work with providers, which will help to demonstrate the effectiveness of the interventions set out in access and participation plans.
171. We aim to use this evidence to influence sector adoption of effective practice, with a particular focus on providers that are at higher risk in relation to the access and participation condition. We will, for example, expect providers subject to more intensive monitoring and intervention as a result of our risk assessment to demonstrate that they are drawing on the body of evidence we are identifying through this work to deliver the ambitions set out in their plans, or to explain why other approaches will be more effective.
172. We are also actively seeking to align our regulation of access and participation more closely with other elements of the regulatory framework such as the TEF and the quality conditions in the regulatory framework, to ensure that these different aspects of our regulation work consistently and coherently with one another. Our consultation on the TEF during 2020 will explore how it can more effectively support access and participation priorities.

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<sup>33</sup> See [www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/a-to-z-of-effective-practice-in-access-and-participation/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/a-to-z-of-effective-practice-in-access-and-participation/).

# Annex A: Glossary of key terms

## Access and participation plan (APP)

A plan produced by a provider in the Approved (fee cap) category of the OfS Register. The plan sets out how the provider will sustain or improve access to its provision for students from disadvantaged and underrepresented groups in higher education, and promote success for those students including non-continuation, attainment and employability. Plans must be approved by the Director for Fair Access and Participation.

## Acorn

Acorn is a postcode-based tool that categorises the UK's population by level of socioeconomic advantage.

## Armed Forces Covenant

The Armed Forces Covenant is a promise by the nation ensuring that those who serve or who have served in the armed forces, and their families, are treated fairly.

## Attainment

Attainment refers to the higher education outcomes achieved by students, such as the classes of degree awarded.

## Approved

Registration category for providers that wish their students to be able to access the student support system and do not want to be eligible for OfS grant funding or to have fee cap obligations.

## Approved (fee cap)

Registration category for providers that want to be eligible for OfS grant funding in return for a cap on the levels of fees they can charge, and, when charging the higher fee amount, an access and participation plan.

## Centre for Transforming Access and Students Outcomes in Higher Education (TASO)

An independent 'what works' centre which will generate and share evidence of the most effective approaches to improving access and participation.

## Conditions of registration

'Conditions' and 'conditions of registration' are general terms used to mean all types of condition that a provider must satisfy in order to be registered. They include:

- initial conditions of registration, which a provider must satisfy as part of its application to join the Register
- general ongoing conditions of registration, which a provider must satisfy after it has joined the Register to maintain its registered status
- specific conditions of registration, which are additional conditions imposed by the OfS on a particular provider to mitigate or manage specific risks or weaknesses that it has identified.

## **Condition A1**

A condition of registration with the OfS related to access and participation. An Approved (fee cap) provider intending to charge fees above the basic amount to qualifying persons on qualifying courses must:

- have in force an access and participation plan approved by the OfS in accordance with HERA.
- take all reasonable steps to comply with the provisions of the plan.

## **Condition B3**

A condition of registration with the OfS related to quality and standards. The provider must deliver successful outcomes for all of its students, which are recognised and valued by employers and/or enable further study.

## **Contextual admissions**

Contextual admissions allow admissions teams to identify applicants with the greatest potential to succeed in higher education, rather than relying on the highest-ranked exam results alone.

## **Continuation**

Continuation refers to a student's continuation from one year of study to the next.

## **Data**

Facts and figures, both quantitative and qualitative, which can be collected, processed and analysed to generate additional information.

## **Dropout rate**

The rate at which students are leaving their provider early without completing their studies. Also known as the 'non-continuation rate'.

## **Disabled Students Allowances (DSA)**

Disabled Students Allowances are part of the English package of student finance available to eligible students. Grants are provided to students who experience extra costs because of a mental health problem, a long-term illness or any other disability.

## **Enhanced monitoring**

Additional data or information required by the OfS from a provider, or an investigation of specific concerns where a provider is at risk of breaching one or more ongoing conditions of registration.

## **Equality of opportunity**

Equality of opportunity for students from all backgrounds to benefit from access to and participation in the higher education provided by English higher education providers.

## **Higher education**

As defined in Schedule 6 of the Education Reform Act 1988 (<http://www.legislation.gov.uk/ukpga/1988/40/schedule/6>). Higher education covers some Level 6 to Level 8 qualifications normally delivered by universities and colleges.

## **Higher education provider**

An organisation that delivers higher education, as defined in Schedule 6 of the Education Reform Act 1988. A provider can be a body with degree awarding powers or deliver higher education on behalf of another awarding body. Unless stated otherwise, in this document 'provider' or 'higher education provider' refers to a registered higher education provider, as defined in section 83 of HERA.

## **Higher Education and Research Act 2017 (HERA)**

The Act of Parliament determining laws related to higher education and research (<http://www.legislation.gov.uk/ukpga/2017/29/section/17>).

## **Higher Education Access Tracker (HEAT)**

This is a service that allows providers to monitor and evaluate outreach delivery, tracking whether participating students end up in higher education.

## **Higher fee limit**

An upper limit on the tuition fees which a provider in the Approved (fee cap) category of the Register may charge, as prescribed in regulations.

## **High-tariff**

This describes those providers that require the highest UCAS tariff points from applicants.

## **Impact report**

Impact reports are the primary tool for annual monitoring of access and participation plans. They focus on the outcomes providers have achieved, including progress against targets, and identifying lessons learnt from approaches that have not worked as well as expected. The reports will provide a narrative alongside information on outcomes, to place the findings in context.

## **Intersections of characteristics**

The consideration of multiple measures of disadvantage taken together to better understand inequalities. For example young, white, working-class men.

## **Key Performance Measures (KPMs)**

The most important national outcomes we are striving to achieve, working with students, providers and others.

## **LGBT+**

LGBT+ stands for lesbian, gay, bisexual, transgender and those of other minority sexualities and gender identities.

## **Lifecycle**

The stages that a student moves through on their higher education journey: access to higher education, success during higher education and progression from higher education.

## **Mature students**

Those aged 21 or over when they enter higher education.

## **Network Evaluating & Researching University Participation Interventions (NERUPI)**

A provider-led network which provides a theoretical framework for evaluating and researching university participation interventions (<http://www.nerupi.co.uk/>).

### **Sanction**

The OfS may impose a monetary penalty on, or suspend or deregister, a registered higher education provider where it appears that there is or has been a breach of a provider's ongoing conditions of registration.

### **Self-assessment**

This is when a provider carries out a reflective assessment of its performance to understand where there are gaps in equality.

### **Social mobility**

The movement of individuals or groups through a system of social hierarchy or stratification.

### **Specific conditions of registration**

The OfS may decide to impose a specific ongoing condition: where it considers that a provider presents a specific risk that is not addressed by a general ongoing condition; to mitigate an increased risk that a provider may breach an ongoing condition of registration; or to prevent or remedy a breach. The specific ongoing condition will be targeted to mitigate the specific risk that is posed and will be focused on actions or activities by the provider that the OfS may require, or prohibit, to ensure that the provider is able to satisfy its ongoing conditions of registration.

### **Specialist providers**

Providers that deliver courses relating to one sector or discipline, e.g. creative arts, performing arts, land-based provision, etc.

### **Stand Alone Pledge**

Providers that have signed the Stand Alone Pledge have publicly committed their institution to supporting students who are studying without the support or approval of a family network.

### **Office for Fair Access (OFFA)**

The independent regulator for fair access to higher education between 2004 and 2018. It was replaced by the Office for Students.

### **Office for Students (OfS)**

The independent regulator for higher education.

### **POLAR4**

The Participation of Local Areas (POLAR) classification groups areas across the UK based on the proportion of young people who participate in higher education. It looks at how likely young people are to participate in higher education across the UK and how this varies by area. POLAR classifies local areas into five groups – or quintiles – based on the proportion of young people who enter higher education aged 18 or 19 years old. Quintile 1 shows the lowest rate of participation. Quintile 5 shows the highest rate of participation.

## **Progression**

Progression from higher education may mean preparing students for employment, including highly skilled employment, or progressing to postgraduate study.

## **Provider**

An English higher education provider as defined in section 83 of HERA. A provider can be a body with degree awarding powers or deliver higher education on behalf of another awarding body. Providers are often universities and colleges.

## **Teaching Excellence and Student Outcomes Framework (TEF)**

A scheme for recognising excellent teaching, in addition to existing national quality requirements for providers. It provides information to help prospective students choose where to study.

## **Underrepresented students**

This includes all groups of potential or current students for whom the OfS can identify gaps in equality of opportunity in different parts of the student lifecycle. This includes students from areas of lower higher education participation, lower household income and lower socioeconomic status groups, some black, Asian and minority ethnic students, mature students, disabled students (those in receipt of DSA and those who have declared a disability but are not in receipt of DSA) and care leavers.

## **Uni Connect**

Uni Connect, formerly the National Collaborative Outreach Programme, is a nationwide network of universities and colleges working in partnership to deliver sustained outreach to around 100,000 young people per year in areas where higher education participation is unexpectedly low.

## **Value for money**

This involves meeting the need for efficiency, economy, effectiveness and prudence in the administration and expenditure of financial resources.

## **Whole provider approach**

A whole provider approach requires alignment and consistency across the institution to create an inclusive approach which all students benefit from, irrespective of their position in the provider.



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