

Office for  
Students



# Monitoring outcomes

Access and participation plan  
monitoring outcomes for 2019-20

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## Executive summary

1. In November 2020, the Office for Students (OfS) set out the reporting requirements for monitoring access and participation plans (APPs) covering the academic year 2019-20.
2. The OfS received a total of 240 monitoring returns from providers.
3. This report provides an overview of the information providers have reported to the OfS about the progress they have made in relation to their access and participation plans. It does not provide a judgement on the actions taken by individual providers.
4. The OfS also invited students to make voluntary submissions to allow them to express their views on the progress their provider has made against their access and participation plan. A total of 118 student submissions were received and an overview of the information students provided is presented in this report.
5. Providers invested over £376 million in financial support for underrepresented students in 2019-20 which led to providers collectively investing more in both access activities and financial support for 2019-20 than predicted.
6. Analysis of student submissions showed that students agreed that their providers had broadly delivered on the commitments in their plans and had made reasonable decisions when responding to the impact of the coronavirus pandemic.
7. The monitoring process identified some cases where insufficient evidence was presented to provide assurance that a provider had taken all reasonable steps to comply with the provisions of its plan. Further information was requested from 20 per cent of providers with an APP, most of which were due to discrepancies between providers' expected and actual spend on financial support for underrepresented students.

# Introduction

8. Access and participation plans (APPs) set out how higher education providers will improve equality of opportunity for students from underrepresented groups to access, succeed in and progress from higher education. They include the provider's ambition for change, the targets it has set, the measures it will put in place to achieve that change, and the investment it will make to deliver the plan.
9. English higher education providers are required to have an approved APP if they are registered in the Approved (fee cap) category of the OfS Register and wish to charge above basic tuition fees for 'qualifying persons' on 'qualifying courses'.
10. As set out for ongoing condition of registration A1 of the OfS's regulatory framework: <sup>1</sup>

**Condition A1:** An Approved (fee cap) provider intending to charge fees above the basic amount to qualifying persons on qualifying courses must:

- i. Have in force an access and participation plan approved by the OfS in accordance with the Higher Education and Research Act 2017 (HERA).
- ii. Take all reasonable steps to comply with the provisions of the plan.

11. The 2019-20 APPs were submitted to the OfS for approval in 2018 (which was the year the OfS was established). The plans formed part of the registration process for many providers and were approved for one year. This enabled the OfS to consult on its future approach to access and participation during 2018, the outcomes of which were published in December 2018.<sup>2</sup> The reformed approach, which sought to place APPs on a more strategic footing by setting them over a five-year period and with a clear focus on improving student outcomes, was applied to APPs for 2020-21 onwards. The 2019-20 academic year was therefore treated as a transition year for the purposes of the APPs.
12. 'Regulatory notice 1: Access and participation plan guidance' sets out how the OfS intends to monitor APPs.<sup>3</sup> Further detail on our requirements in respect of the monitoring of the 2019-20 APPs was published and sent to providers on 26 November 2020.<sup>4</sup> This stated that we would consider five key sources of information to assess providers' progress in meeting the objectives and targets set out in their 2019-20 APP. These were:

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<sup>1</sup> See [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>2</sup> See [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>3</sup> See [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/).

<sup>4</sup> See [www.officeforstudents.org.uk/publications/monitoring-of-access-and-participation-plans-2019-20/](http://www.officeforstudents.org.uk/publications/monitoring-of-access-and-participation-plans-2019-20/).

- a. Information a provider submits to the OfS. This includes the access and participation monitoring return and the financial information submitted in providers' financial monitoring returns
  - b. Information submitted by providers' students in independent submissions
  - c. The latest available data in the access and participation dataset
  - d. Any submission made by a provider in relation to enhanced monitoring requirements or a specific condition of registration imposed when the plan was approved
  - e. Reportable events and other third party notifications.
13. Providers with an approved 2019-20 APP were required to submit their monitoring return to the OfS by 16 April 2021.
14. The OfS adopts a risk-based approach to monitoring compliance, targeting our work where it is most needed – on those providers most at risk of breaching our conditions – and focusing on reducing burden for those that do not pose a specific regulatory risk. Regulatory advice 15 provides guidance for registered providers on how we monitor them in relation to their conditions of registration, as well as the actions that we may take if we consider that a provider is at increased risk of breaching, or has breached, one or more of those conditions. The requirement for providers in the Approved (fee cap) category wishing to charge up to the higher fee limit is that they must have an agreed access and participation plan, which will deliver continuous improvement.<sup>5</sup>

We take a risk-based approach to targeting providers most at risk while focusing on reducing burden for others.

15. The data in this report only relates to data from access and participation plan monitoring returns for 2019-20. We expect the monitoring of the first year of 2020-21 to 2024-25 access and participation plans to follow a similar format to 2019-20, and guidance will be published in due course.
16. The targets and expenditure data in this report is drawn from information from all 240 providers required to submit a monitoring return. The remaining analysis of the monitoring returns is based on 231 monitoring returns that were submitted by the end of April 2021, so any returns submitted or resubmitted later than this date have not been included.
17. A statistical analysis of providers' progress against targets has been included in this report under **Annex A**. The outcomes show that approximately 60 per cent of total statistical targets approved in 2019-20 were reported as having made expected progress.
18. The OfS has generated an impact report for each provider using the information in its monitoring return, which providers have been asked to publish on their websites.

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<sup>5</sup> See [www.officeforstudents.org.uk/publications/regulatory-advice-15-monitoring-and-intervention/](http://www.officeforstudents.org.uk/publications/regulatory-advice-15-monitoring-and-intervention/).

# Delivery of access and participation plans during the pandemic

## Making reasonable decisions and taking all reasonable steps

19. Each provider with an approved APP is required to take all reasonable steps to comply with the provisions of its plan as a condition of registration, as set out in the regulatory framework (see paragraph 10).<sup>6</sup>
20. On 25 March 2020, we wrote to providers with detailed information about the reporting requirements we would suspend and the information we would require during the coronavirus pandemic.<sup>7</sup> This included information relating to access and participation plans. In particular, the letter set out the OfS's expectations in respect of the continued delivery, in full, of the financial commitments made to students under both the 2019-20 and 2020-21 to 2024-25 access and participation plans. In this letter, we stated that we would assess whether a provider made reasonable decisions when taking into account the delivery of its commitments during the pandemic.
21. We subsequently provided further information about the OfS's expectations:<sup>8</sup>

'When making regulatory decisions in the future, we will look at whether a provider made reasonable decisions about the delivery of the commitments in its plans. It is critically important therefore that a provider has a clear rationale if it is not able to meet a commitment in its plan and is clear it has explored reasonable alternatives. As with all significant decisions in these uncertain times, this could mean recording the decisions clearly'.
22. This means that if a target or milestone had been missed and the strategic measures set out in the plan relevant to that target were not delivered, or only partially delivered, during the year as a result of the pandemic, we expected providers to have acted in accordance with these expectations.
23. Providers were asked to report on the impact of the pandemic on the delivery of both their 2019-20 and 2020-21 access and participation plans and to set out what steps they took to deliver their commitments. In responding to this, around 20 per cent of providers reported that they are anticipating worse outcomes for students, in particular for access and success, due to the impact of the coronavirus pandemic.
24. The OfS will monitor sector performance to understand whether equality gaps have widened or narrowed, and providers are expected to take all reasonable steps to comply

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<sup>6</sup> See the OfS regulatory framework: [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>7</sup> See our letter 'Regulatory requirements during the coronavirus (COVID-19) pandemic', at: [www.officeforstudents.org.uk/publications/regulatory-requirements-during-the-coronavirus-covid-19-pandemic/](http://www.officeforstudents.org.uk/publications/regulatory-requirements-during-the-coronavirus-covid-19-pandemic/).

<sup>8</sup> See our Regulatory requirements at: [www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/regulatory-requirements/](http://www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/regulatory-requirements/).

with the provisions of their access and participation plan.<sup>9</sup> The purpose of this report is to provide an overview of the information providers have reported to the OfS. It does not provide a judgement on the actions taken by individual providers.

25. The information reported in respect of providers' responses to the pandemic within the monitoring return will not be published as part of a provider's impact report. Whilst providers reported on the activities and actions they had taken in response to the pandemic, this was not always relevant to the plan and at times focused on whole cohorts of students rather than target groups. Therefore, this analysis focuses on the relevant common topics providers reported in their monitoring returns.

## Access

26. Many providers described how summer schools and outreach in schools, colleges and the community had to be suspended or adapted to be delivered online. A small number of providers reported cancelling their summer schools in 2020, with a handful also needing to be cancelled again in 2021. Providers reported mixed success with the move to remote outreach delivery. Some reported exceeding previous engagement levels and noted their ability to reach learners from beyond their typical geographical outreach areas, while others reported reduced engagement.
27. Some of the providers reporting poor progress on access targets in 2019-20 attributed this to the pandemic. While we accept that outreach activities were impacted by the pandemic during 2019-20, access data for most providers relates to entry prior to the first UK lockdown in March 2020. Some providers, particularly further education colleges, reported that their applicant numbers had decreased compared to previous years.

## Success

28. Changes to academic regulations were cited in a number of returns as additional measures by which student success had been supported. This included the introduction or extension of:
- no detriment and safety net policies, for example automatic progression into the next year of study and ensuring students would be awarded a grade that reflected the level at which they had been working prior to lockdown.
  - alternative methods and modes of assessment (open book, online, not timed)
  - the expansion of criteria for extenuating circumstances and providing additional time for assignment submissions without the need to request it or provide evidence (some providers said this particularly benefited students with caring responsibilities).
29. Providers often reported consulting their students on such changes, and some had stated that these measures would stay in place during 2020-21 in light of the continuing coronavirus pandemic. Where providers had validation agreements, they described how they had worked collaboratively with their validating partners to implement these policies. The OfS expects

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<sup>9</sup> See [www.officeforstudents.org.uk/publications/guidance-on-quality-and-standards-during-coronavirus-pandemic/](http://www.officeforstudents.org.uk/publications/guidance-on-quality-and-standards-during-coronavirus-pandemic/).

rigour to be maintained when a provider makes changes to its academic regulations, whatever the reasons for those changes.

30. The majority of providers reflected on the shift to blended teaching and learning practices. In relation to blended learning and teaching, providers predominantly focused on their offers of synchronous and asynchronous teaching, and whether provision had been delivered entirely remotely or online with elements of face-to-face. A number of providers reported seeking feedback from their students on the transition to blended teaching and learning, which they had largely identified as positive.
31. Providers did not always make it clear how underrepresented students were considered during the transition to online and blended learning, but (as described in paragraph 47) it is clear that for the most part, providers were able to demonstrate that they had actively sought to consider the particular needs of their disabled students.
32. In relation to teaching and learning practices, providers reported implementing changes to the curriculum to address attainment gaps, for example through changes to pedagogy and through curriculum enhancement and reform. This was, though, already planned within access and participation plans, rather than specifically responding to the coronavirus pandemic. Creating and fostering a sense of 'belonging' was seen as an important way to retain and ensure a high-quality experience for all students, and some providers described how this was especially important with the move to online learning.<sup>10</sup>
33. Mental health and wellbeing was a topic frequently highlighted in both provider and student submissions. Providers acknowledged how critical an issue this was to student success, particularly for underrepresented students given the additional and disproportionate pressures that the pandemic may have on them. For example, students with disabilities and care experienced students were often identified as groups in need of additional wellbeing and welfare support, such as check-ins to identify any additional support needs.
34. Many providers noted how they had expanded their student support services and reflected on the benefits of moving mental health and counselling services online. They noted, for example, that offering services at extended hours, removing the need for in-person attendance, and the sense of anonymity online services provided may have led to increased engagement.
35. Online service delivery was found to support more frequent welfare checks for groups of students, for example those deemed at risk of withdrawing and students who were required to isolate. In addition to this, continued investment in third party mental health and wellbeing services and resources was highlighted by some as crucial for student wellbeing.
36. Some providers anticipated worsening student success outcomes from 2020-21 onwards due to the pandemic. For example, 10 per cent of providers predicted worsening performance in respect of continuation. Some providers also reported increasing numbers of students requesting to withdraw or suspend their study.

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<sup>10</sup> See Thomas, Liz, 'Building student engagement and belonging in higher education at a time of change: final report from the What works? Student retention and success programme', July 2012, pages 91-92.

37. Some providers have identified a reduction in attainment gaps between different underrepresented groups and their peers, attributing this to changes to assessment and teaching and learning practices, which may have had a positive impact on reducing or removing existing barriers to success for these groups. A number of providers have committed to researching and evaluating the impact of these changes to assessment practices and no detriment policies on their student outcomes. It will be important that providers that have made changes to their teaching, learning and assessment approaches ensure that students continue to be rigorously assessed and that the qualifications they are awarded are credible.

## Progression

38. Many providers reported concerns about the impact the coronavirus pandemic was having on the graduate labour market, and how this would affect their graduates seeking employment. In response to this, providers reported that additional careers support had been offered, for example online industry engagement. Some providers suggested that the shift to online delivery of careers services had yielded an increase in the engagement with their students.
39. Whilst some providers acknowledged the difficulties associated with their graduates gaining different types of work experience during the pandemic, there were positive examples of how providers had responded. For example, some providers reported the creation of new in-house internship programmes or expanded existing internship programmes, and that work experience and internships had also moved online.
40. Placements were particularly affected by the pandemic, as well as some students being made redundant or furloughed. In response, one university offered a number of micro-placements to estranged students, care experienced students and students from low-income households.

## Financial support

Providers reported that they had spent over £376 million on financial support for underrepresented students.

41. Providers described the ways in which they met the financial support commitments made to students in their access and participation plans, and how additional support was made available during 2019-20 where necessary. As seen in Table 1, providers reported that they had spent over £376 million on financial support for underrepresented students in 2019-20.
42. In March 2020, the OfS stated that funds to support access and participation activity could be diverted to support the immediate needs of vulnerable students.<sup>11 12</sup> Where providers explicitly reported this within their forecast expenditure on access and participation activity, this mostly related to diverting expenditure from access and outreach activities to providing additional financial support.

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<sup>11</sup> The government identified the following student groups as vulnerable during the coronavirus pandemic: international students, care leavers, estranged students, disabled students, and student who live with people in high risk groups. See [www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/provider-faq/](http://www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/provider-faq/).

<sup>12</sup> See [www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/regulatory-requirements/](http://www.officeforstudents.org.uk/advice-and-guidance/coronavirus/provider-guide-to-coronavirus/regulatory-requirements/).

43. Over 100 providers reported creating and/or amending financial support in response to the coronavirus pandemic. This most commonly included:
- a. the creation or extension of additional hardship funding
  - b. providing additional funding through established bursaries
  - c. providing or loaning laptop and IT equipment and expanding the eligibility criteria for such schemes.
44. Some providers also reported how they had offered rent refunds and rebates. Where providers reported offering this, most did not specify whether this was targeted at underrepresented or vulnerable students, so it figured as support for all students.
45. Sir Michael Barber's review into online teaching and learning during the pandemic highlighted the importance of providers quickly overcoming any digital access issues that their students may have been experiencing.<sup>13</sup> Students facing 'digital poverty' were frequently identified in monitoring returns and many of the additional measures providers put in place to support these students sought to address this, for example through the loan of laptops or grants for hardware.<sup>14</sup>

## Support for disabled students

46. The Disabled Students' Commission (DSC) asked the OfS to invite providers to respond to the recommendations from the Three Months To Make A Difference report.<sup>15</sup> Providers were asked to provide summary information about whether they had adopted the recommendations.
47. The seven recommendations that providers were asked to consider, and a summary for how providers responded, are as follows:

### **Provide disabled applicants with support and guidance that is reflective of the COVID-19 pandemic in the clearing process.**

- Many providers did not focus on the clearing element of this recommendation and reported on access and admissions more generally. Providers commonly reported how disability support teams were involved in virtual open days as well as the use of inclusive and accessibility tools on the platforms used.

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<sup>13</sup> See [www.officeforstudents.org.uk/publications/gravity-assist-propelling-higher-education-towards-a-brighter-future/](http://www.officeforstudents.org.uk/publications/gravity-assist-propelling-higher-education-towards-a-brighter-future/).

<sup>14</sup> The OfS defines that a student is in 'digital poverty' if they are without access to one of the core items of digital infrastructure, which are: appropriate hardware; appropriate software; reliable access to the internet; technical support and repair when required; a trained teacher or instructor; and/or an appropriate study space.

<sup>15</sup> See <https://www.advance-he.ac.uk/knowledge-hub/three-months-make-difference>.

### **Ensure ease of access to funding for individual-level reasonable adjustments.**

- Providers frequently discussed the availability of and signposting to hardship funding to account for any delays in receiving Disabled Student Allowance (DSA) and, for some providers, the use of interim reasonable adjustment policies which provide disabled students with reasonable adjustments until final DSA assessment decisions were made.

### **Ensure student support meets and considers the requirements of disabled students during the pandemic.**

- Responses to this recommendation focused on communicating changes to policies, for example assessments, and providing additional wellbeing and mental health support and communicating changes to the delivery of these types of support.

### **Consider disabled students when making university campuses and accommodation COVID-19 secure.**

- Measures frequently reported on for this recommendation were the use of PPE (clear and not clear face masks and face shields), use of lanyards, changes to the physical space on campus, for example one-way systems, and how this was communicated to students.

### **Facilitate disabled students' participation in welcome and induction weeks and ongoing social activities.**

- Providers reported mostly on the delivery of welcome and induction weeks for this recommendation, for example by describing how all activities were online or a mixture of in-person and online.

### **Ensure blended learning is delivered inclusively and the benefits of blended learning are considered in long-term planning.**

- Changes to assessments, learning materials being made in advance, and the adoption of synchronous and asynchronous learning were commonly reported by providers in response to this recommendation. Only a handful of providers reported the use of interpreters.

### **Embed accessibility as standard across all learning platforms and technologies.**

- Training on accessibility functions and how to use online platforms was a common response from providers, and some reported on the use of live captions. Some providers also stated that they have ensured that their website is accessible as well.

# Student submissions

## Summary

48. Regulatory notice 1 requires providers to demonstrate how students have had the opportunity to express their views about the plan before it was submitted for approval, what steps were taken as a result of students' view, and describe how they would be involved in the ongoing monitoring of the plan.<sup>16</sup> The OfS was keen to hear directly from students and get their views on the progress their provider had made on the delivery of its plan. Therefore we encouraged students to complete a student submission and provided guidance on how to do so on our website.<sup>17</sup> The submissions were voluntary and in total 118 student submissions were received.
49. Students were asked to consult with their peers before completing the submission and the submissions received were often a reflection of these discussions. Whilst the focus of the submissions was on their providers' access and participation activity, the submissions reflected the diverse nature of students' experiences across a range of activities during 2019-20.
50. It was clear that many of the submissions were well-researched, and as such were a valuable source of evidence about a provider's performance in relation to the delivery of its access and participation plan. We have used the findings from the student submissions to inform the next set of guidance for students and we aim to develop further resources for students engaging in access and participation work.
51. The submissions indicated that students broadly believed that providers had made sufficient progress against their targets and had made reasonable decisions in light of the coronavirus pandemic. Students also broadly accepted the reasons given by their providers for not meeting targets and recognised the efforts that providers made. They also reported that providers had generally been transparent with the student body, including by sharing predicted and actual figures relating to targets and activities with students to aid them in completing the student submission.

Students broadly believed that providers had made sufficient progress against their targets and had made reasonable decisions in light of the coronavirus pandemic.

52. The submissions highlighted how the pandemic had a disproportionate impact on the most disadvantaged students and caused others to become more vulnerable, given the changes to personal circumstances such as health or finance. For example, many students noted that those who were more likely to be financially dependent on part-time work, such as mature students and those from areas of low participation, faced greater uncertainty about continuing

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<sup>16</sup> See Regulatory notice 1: [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/).

<sup>17</sup> See [www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plan-monitoring/student-submissions/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plan-monitoring/student-submissions/).

employment alongside their studies, which created significant financial pressures. Some students also reported acute digital poverty due to lockdown and their location.

## **Mental health and wellbeing**

53. The mental health and wellbeing of students was raised in many submissions, despite the guidance not specifically asking about this. The key issues raised have therefore been included in this report in order to accurately reflect the content of the student submissions and the experiences of students.
54. Students reported experiencing higher levels of mental ill health due to the pandemic, particularly those from disadvantaged groups.
55. This rise in mental ill health was reportedly met with a range of targeted support available to students, including: one-to-one appointments with wellbeing advisors; online and in-person Cognitive Behavioural Therapy (CBT); online resources procured by the provider offering some students 24/7 access to support from trained clinicians; and online resources.
56. Students also reported on the general wellbeing of the student population in the reporting period. Feelings of isolation and loneliness were widespread, along with concerns such as difficulties in engaging with studies, financial burdens and fears of campus restrictions.
57. Some student submissions commented on the changing nature of wellbeing and pastoral support through the adoption of online and home learning. They felt that the usual informal ways of students demonstrating or exploring whether they may require additional support, such as chance face-to-face interactions with tutors, had been replaced by more formal, structured online engagements. Students felt that having to use formal avenues straight away could deter them from properly identifying and seeking the help that they needed.
58. Through home learning and isolation, students reported that a sense of community had been lost, and that they saw this as crucial to encouraging fair access and recruiting underrepresented students. Students highlighted the benefits of the work done by both providers and students' unions to facilitate social interactions through virtual lunches and extracurricular events which, they said, had been a challenge during the pandemic.
59. Some LGBT+ students, international students, and students belonging to faith groups were highlighted in the student submissions as groups which had faced particular challenges during 2019-20. It was reported that some LGBT+ students took the view that they had lost a 'safe space' by not being on a campus.
60. Some black, Asian and minority ethnic students were reported as finding it challenging to be away from the informal communities they had developed at their provider, which they said highlighted their lack of formal representation within their provider.
61. A few submissions reported that students who belonged to faith groups no longer had a suitable environment in which to practise their faith due to campus closures and social distancing.

62. International students, while not covered by the provisions of access and participation plans, reportedly experienced the same concerns as others, as well as the added pressure of uncertain international travel.

## Academic support

63. Students reported that providers had offered a range of academic support that students considered to be beneficial, for example access to online learning material, financial support; and laptop and IT equipment loans.

64. In many of the submissions, communication was a key concern. For example, students felt that it was at times slow and sometimes did not include a clear rationale for why decisions were made.

65. Furthermore, students reported that they considered some aspects of support, such as safety net and no detriment policies, and digital support funds and hardship funds, to be at times inadequate, slow to be implemented and reactive rather than proactive. Some students felt there were inconsistencies within the support offered and how this affected different underrepresented groups.

## Online teaching and learning

66. There were mixed views on the shift to online teaching and learning. In many of the submissions, communication was again a key concern, for the reasons given in paragraph 64.

67. The student submissions demonstrated that the change in the delivery of teaching and learning had both drawbacks and benefits, which differentially affected student groups. For example, commuter students, mature students, and those with care responsibilities reported benefits from virtual and recorded learning to fit around their own commitments.

**Commuter students, mature students and those with care responsibilities said virtual learning fitted around their commitments.**

68. However, students from lower income backgrounds were more likely to be affected by digital poverty and had periods without substantial IT equipment and software to effectively engage in their studies.

69. There were positive accounts of disabled students' experiences during the pandemic, for example from those who benefitted from subtitles in lectures and additional communication formats, such as typing messages during lectures. However, some students with disabilities found the move to virtual learning and support a challenge, and felt that accessibility was not always being considered from the outset, which impacted their wellbeing. Feelings of isolation by not being around other people and engaging with a community, especially among those who were shielding due to health reasons, was a concern shared by some students. In consulting with disabled students, it was clear in the student submissions that with varying disabilities and support requirements came a range of experiences and levels of quality of support.

## Student and provider engagement

70. There were a range of ways in which students reported that they were able to get involved in developing, implementing and monitoring a provider's access and participation plan, as well as general involvement in their provider's governance and decision-making structures.
71. Whilst students did not always agree with their providers' activities or explanations, the student submissions, overall, included good examples of effective student and provider engagement.
72. The student submissions reported that the most common ways of engaging with a provider was through working with students' unions and via student representative roles. Some students described being involved in the response to the following key issues faced by students during 2019-20:
- Responding to students' health and safety concerns of on-campus teaching by implementing a hybrid teaching model when in-person teaching is allowed in accordance with government guidance.
  - Working with student representatives to accommodate students' concerns in establishing processes to allow them to attend libraries and laboratories in accordance with government guidance.
  - Embedding systems to enable students to raise concerns and give feedback directly to the provider through technologies such as Microsoft Teams.
  - Responding to student and societal concerns, including the increasing pressure to make the curriculum more inclusive.
  - Utilising the relationship with student unions to maintain an awareness of student perspectives.
73. Students commented that access and participation plans were generally inaccessible in terms of the language used and the data presented. This also made it difficult for students to make a connection between targets and activities.
74. There were reports that students working on access and participation delivery were unaware of the plan and the wider strategic activity. Suggestions were made on how providers could better inform and engage students in the delivery and monitoring of the plan, including training or inductions for students working on access and participation activities.

## Use of data

75. Students felt that providers should collect more rigorous and purposeful data from underrepresented students about their experiences, but should be mindful of the burden this can place on some groups. For example, they suggested sharing data between different teaching departments and support services to avoid repetition. Overall, students who reported this in their submissions demonstrated their understanding of the benefits of using data for designing and improving targeted support for underrepresented students.

# Expenditure

## Background

76. For 2019-20 access and participation plan monitoring, expenditure data for providers was collected as part of the annual financial return or through the APP monitoring itself (for further education colleges).<sup>18</sup> Whilst investment information predicated in the 2019-20 APPs relates to the academic year of 2019-20, the actual investment collected as part of the annual financial return relates to the 2019-20 financial year. Therefore, there may be some variance between the figures.
77. There are no predicted investment figures for research and evaluation for 2019-20 as this category of spend was added to the investment forecast information for the 2020-21 to 2024-24 APPs. However, providers were asked to report on their investment in research and evaluation in 2019-20 in their financial returns or the APP monitoring return for further education colleges. Providers were asked to provide forecast investment for student success and progression in their 2019-20 plans, but actual expenditure for these categories is no longer collected through the financial or APP monitoring returns.

## Outputs

**Table 1: Difference between forecast and actual access and participation spend in 2019-20 (rounded)**

Expenditure category	Predicted	Actual	Difference (£)	Difference (%)
Access	£179,200,000	£220,600,000	£41,500,000	23
Financial support	£371,500,000	£376,300,000	£4,700,000	1
Research and evaluation	-	£19,700,000	-	-

Source: OfS annual financial return 2020 data (higher education providers); OfS access and participation plan 2019-20 monitoring data (further education colleges); 2019-20 access and participation plans

Providers collectively invested more in access activities and financial support in 2019-20 than predicted.

78. Table 1 shows that providers collectively invested more in both access activities and financial support for 2019-20 than predicted. Through the monitoring returns, some providers noted that access activities were either moved online or suspended as a result of the coronavirus pandemic and were therefore less costly to deliver. However, many other providers reported spending more than predicted in their plans, leading to an overspend on access activity across the sector as a whole.

<sup>18</sup> See Regulatory advice 14, available at: [www.officeforstudents.org.uk/publications/guidance-for-providers-for-financial-monitoring-returns/](http://www.officeforstudents.org.uk/publications/guidance-for-providers-for-financial-monitoring-returns/).

79. We also found that some providers spent less than they predicted on financial support for students, but again other providers overspent against their predicted investment, leading to a slight sector-wide overspend. Paragraphs 41-45 describe in more detail how providers reported meeting their financial support commitments.

## Regulatory approach

80. The OfS took a risk-based and proportionate approach to its monitoring of the 2019-20 APPs. Providers were able to demonstrate compliance with the provisions of their plan by making the expected progress against their targets and milestones and successfully delivering the commitments made. In those cases where providers had not made expected progress against targets, information provided in their returns was assessed to determine whether they had provided sufficient evidence that they had taken all reasonable steps to deliver the provisions of the plan.
81. Further information was requested from 20 per cent of providers with an APP. These requests mostly related to whether providers had met financial support commitments due to discrepancies between a provider's expected and actual spend on financial support for underrepresented students. As described in paragraphs 19-25, we considered the reasons for any such discrepancies in making our regulatory judgements.

We asked for additional information from 20 per cent of providers to check they had met their financial commitments to students.

82. The monitoring process identified a small number of cases where the evidence submitted in the monitoring returns did not provide sufficient assurance that the provider was taking all reasonable steps to comply with the provisions of its plan. We have written to these providers setting out our concerns and our expectations in respect of the ongoing delivery of their access and participation commitments. We continue to review providers' progress in delivering their plans.
83. Providers were strongly encouraged to work with their students to understand students' views about the delivery of their access and participation plan. Where concerns were highlighted to us in a student submission in 2019-20, we took account of these to inform our judgement of whether a provider had taken all reasonable steps to deliver the provisions in its plan, and had made reasonable decisions about the delivery of its commitments during the pandemic. Where appropriate, we acknowledged these concerns and set out our expectation in the provider's monitoring outcomes letter that it should engage with students to further understand and remedy the issues that had been raised by its students.

# Annex A: Progress against targets

## Background

1. Providers were required to set out in their plans the groups of students they were prioritising and at which stage of the student lifecycle (access, success or progression). Providers were expected to focus on those student groups for which they identified the widest gaps in access, success and progression. There was also an expectation that for those providers which had 2018-19 access agreements, they would maintain and build on their existing ambitions and approaches in their 2019-20 plans, provided this was justified by their performance.<sup>19</sup> This meant that many providers continued with existing targets from their 2018-19 access agreement in the 2019-20 APP.
2. Providers were able to set statistical, outcomes-focused targets as well as activity-based targets that focused more on inputs. Only the statistical targets set by providers have been included in this report. All providers were set new outcomes-focused targets as part of their 2020-21 to 2024-25 access and participation plans.
3. In the monitoring returns, providers were required to indicate whether they had made expected, limited or no progress in relation to each of their targets. Where limited or no progress had been made, providers were asked to set out whether they had met the commitments in the plan related to the target, what additional steps they had taken, and what future steps they would take.
4. While the coronavirus pandemic affected providers' activity during the 2019-20 academic year, it would not have affected the data required to assess progress in meeting the milestones within the access, continuation and progression targets set out in the 2019-20 plans. For example, the most recent continuation data available at the time of publication is for the 2018-19 academic year. Similarly, access milestones for 2019-20 would be unaffected given the impact of the pandemic began during the latter part of the year.

## Outcomes

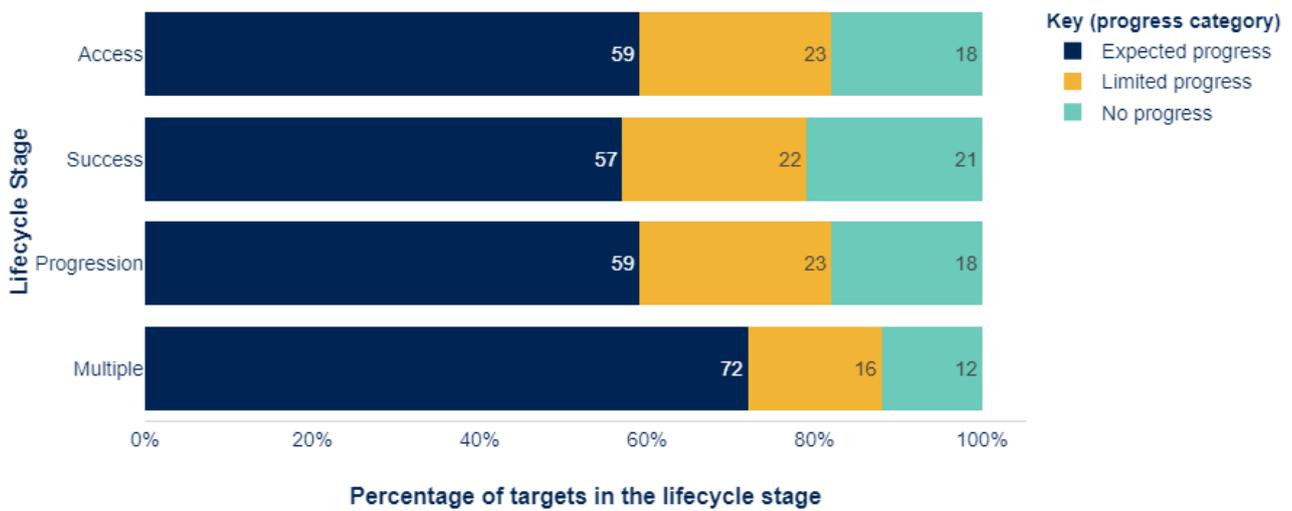
5. Approximately 60 per cent of total statistical targets approved in 2019-20 were reported as having made expected progress, as shown in Figure 1.

60 per cent of targets were reported as having made expected progress.

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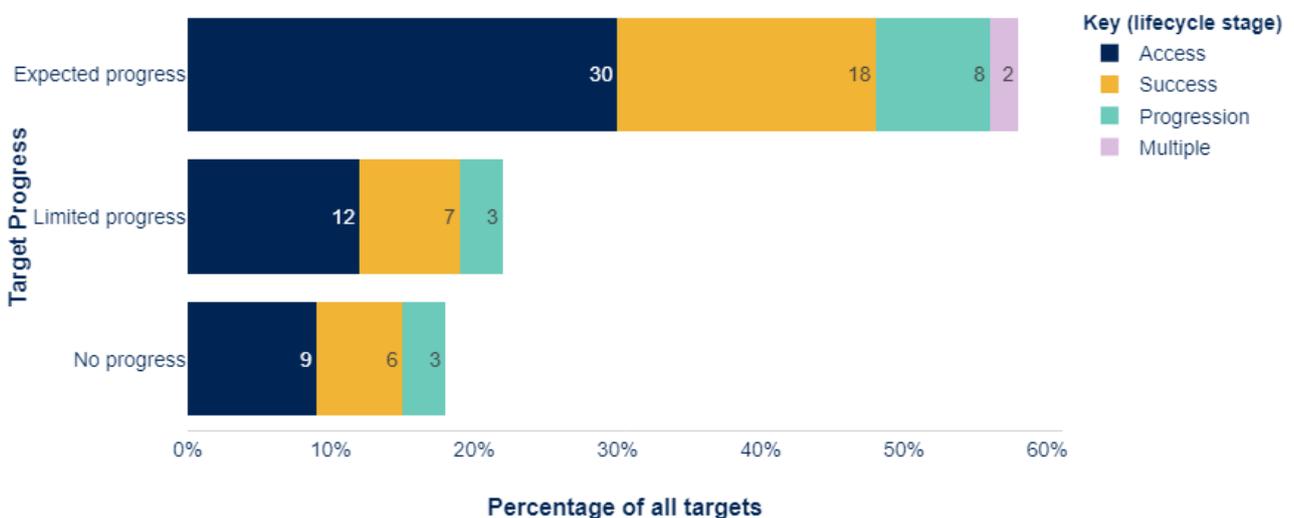
<sup>19</sup> See [www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/](http://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/).

**Figure 1: The proportion of targets that fall into each progress category from the total number of targets for that lifecycle stage**



6. Access, success and progression targets had similar rates of providers making expected, limited or no progress, as seen in Figure 2.
7. Whilst most progress had been made with regard to targets that covered multiple stages of the lifecycle and targets categorised as other stages of the lifecycle, the number of these targets was very small (1.8 per cent of all targets). Access and participation plans from 2020-21 onwards do not have an option to target more than one specific lifecycle stage.
8. For access and success targets, good progress has been made in relation to disabled students.
9. In relation to progression targets, providers generally made good progress in relation to targets **based on socioeconomic status and the most progress was made in the state school category.**

**Figure 2: The proportion of targets from the total number of targets by progress category and lifecycle stage**



10. For access, targets focused on gender saw the least progress made (using both categories of no and limited progress). We do not consider gender in isolation as an underrepresented group and for APPs from 2020-21 onwards, there are fewer targets using this category.<sup>20</sup> For the success and progression stages of the lifecycle, particularly for continuation, many targets that were not focused on specific groups, but instead related to whole cohorts of students, did not make expected progress. Furthermore, for progression, there was a very small number of targets set for care experienced students and white disadvantaged students where no progress was made.
11. For those targets against which expected progress has not been made, the OfS seeks to establish that the provider has taken all reasonable steps to deliver the provisions of its plan. As such, the OfS considered the additional information providers supplied in their monitoring returns which confirmed whether they had delivered the commitments in the plan related to the targets, what additional activity they undertook during the academic year, and what activity they may undertake to improve progress in future years. Our approach also took into account the transitional character of the 2019-20 year, which meant that many providers would have changed their targets and approach within their 2020-21 onwards plans.

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<sup>20</sup> See FAQ 'Can we consider gender as an underrepresented group?' at: [www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plans/faqs/](http://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plans/faqs/).



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