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Evaluation of the Open University HE in FE (validation) project

Ecorys UK

March 2026

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1.0 Executive summary

This executive summary provides an overview of the HE in FE (validation) project evaluation (the “pilot”). It assesses how well the pilot met its aims, the pilot’s value for money and the learnings that can be derived for future consideration.

1.1 Pilot context and aims

The Higher Education (HE) in Further Education (FE) pilot validation project (the “pilot”) was established in response to long-standing structural issues within the higher education sector, particularly barriers preventing FE colleges from offering new higher-level provision. The OfS commissioned the Open University (OU) to deliver the pilot using its powers under the section 50 of the Higher Education and Research Act (HERA), supported by £10 million of government funding from the Department for Education.¹ The pilot explored challenges such as HE cold spots, limited local progression opportunities, and constraints on student choice and access to high-quality local provision. The pilot also created an opportunity for the OfS to explore how commissioning arrangements could operate in practice, which could inform future consideration of how such arrangements might be applied more widely.

The pilot aimed to create new routes for tertiary education providers to enter or expand HE delivery via high-quality Level 4 and 5 courses in areas with low qualification attainment, limited local provision, or low progression to HE. It also aimed to support providers in developing and delivering new HE programmes that would not have been feasible without additional expertise, resources, and validation support from the OU.

The OfS set initial expectations for the project to deliver validation partnerships using the three delivery models, with at least one FE college enrolling students on a new HE programme by September 2023. The overall aim was to support 11 FE colleges and 33 programmes. Of the nine FE colleges initially involved in the project, six secured validation and five continued participating in the pilot to the end of the funded period. In total, 29 potential new HE programmes were proposed by providers, of which 23 progressed to the development stage and 14 were approved. Ten of the approved programmes launched, while four were approved but did not launch.

1.2 Evaluation objectives and approach

The evaluation aimed to understand whether the intended outcomes and impacts of the pilot were likely to be achieved, assess the viability of commissioning validation arrangements and explore the extent to which the pilot delivered value for money. It sought to generate learning for the OfS, government and the sector, as this was the first time the OfS had exercised its commissioning powers under section 50 of HERA. The evaluation objectives were addressed through a

¹ OfS launches pilot for colleges to offer more vocational and technical qualifications - Office for Students

mixed-method, theory-based approach grounded in the Theory of Change (ToC) which informed the research questions, the data collection tools, and the contribution analysis.

Evidence was collected across three phases via qualitative data collection and secondary data analysis:

1. Scoping interviews with OU and OfS stakeholders and document review, which helped refine the ToC and informed the development of the evaluation framework.
2. Primary data collection from participating and non-participating FE colleges, to understand their experiences with application, set-up, implementation, early outcomes, and reasons for withdrawal (where applicable). This included interviews with validation leads, teaching staff, students, senior leaders and employers to understand processes, capability development, quality of provision, and how well courses met local skills needs.
3. Follow-up interviews to address evidence gaps relating to sustainability, capability development, HE cold spots and value for money.

The evidence was appraised using a contribution analysis framework, enabling the evaluation team to assess the strength of causal mechanisms and alternative explanations, and build a robust story about how activities contributed to short-term and intermediate outcomes.

1.3 Impact assessment of the extent to which the pilot met its aims

This report presents the results of the contribution analysis and describes the extent to which the pilot achieved its intended activities, outputs and outcomes, as identified in the Theory of Change, including how and why these occurred. The main findings were:

- ▶ **The OfS successfully commissioned and launched the pilot**, establishing governance and monitoring structures that enabled iterative learning and informed potential future use of section 50 HERA commissioning powers, although early clarity on FE college eligibility and expected outcomes of the pilot was limited.
- ▶ **The OU rapidly implemented effective project management structures**, including dedicated teams and regular governance mechanisms. It created supportive and flexible ways of working that facilitated collaboration with the OfS and FE colleges.
- ▶ **Three validation models and supporting operational systems were successfully designed and/or operationalised**, by the OU, though capacity constraints within participating FE colleges meant one model was unused and FE colleges frequently moved between models. Monitoring processes enabled continuous refinement during delivery.
- ▶ **The application process was implemented at pace but was constrained** by unclear eligibility criteria, late awareness-raising and short application windows. This resulted in fewer applications from FE colleges and several early withdrawals due to mismatches between participating FE colleges' capacity and their expectations of the resource demands of developing HE provision.
- ▶ **OU support enabled participating FE colleges to build capability and progress towards programme approval**, with tailored guidance, flexible timelines and movement between

models. This helped providers engage effectively despite capacity pressures due to the level of resources required for implementation.

- ▶ **Participating FE colleges strengthened internal processes and governance structures**, supporting institutional and programme approval. They have gained the ability to develop HE curricula independently, understand regulatory and compliance requirements, strengthen governance and quality assurance, respond to local skills needs, and to pursue new HE opportunities beyond the funded project. However, long-term sustainability remains uncertain due to workload demands, relatively small student cohorts and wider organisational pressures.
- ▶ **Employer engagement informed several programme proposals**, although depth and consistency varied. While labour market intelligence and existing employer relationships helped shape provision in some cold-spot areas, short timelines and limited development capacity restricted broader stakeholder engagement.
- ▶ **New Level 4/5 programmes were validated and launched, increasing HE options in some cold-spot areas**, but compressed timelines, limited marketing, and provider withdrawals resulted in low levels of participation and limited evidence of early impact.

1.4 Value for money

Although the pilot generated higher-than-typical unit costs due to intensive support, rapid implementation and one-off setup tasks, it delivered strong strategic value for money. The £10 million investment (of which £9 million was spent and nearly £1 million returned unspent) supported the development of new validation models, strengthened FE colleges' capability to design and deliver high-quality HE provision, and created reusable systems, tools, and learning for the OfS, future validating partners and the wider sector (where all parties are in agreement). Despite lower participation and the absence of a robust business-as-usual comparator, stakeholders consistently highlighted substantial capacity building benefits and improvements to governance, quality assurance and curriculum development, representing good long-term value.

1.5 Conclusions

The pilot successfully tested a regulatory mechanism, using a specific condition of registration to commission validation arrangements for the first time. This enabled the OU to develop and implement new validation models, governance processes and monitoring structures. This generated significant learning for future commissioning, even though early ambiguity around eligibility for FE colleges and outcomes for the OU to monitor initially slowed progress.

The pilot validated and launched new Level 4/5 programmes across FE colleges, improving local access to HE in targeted cold-spot areas and aligning new provision with employer-identified skills needs. However, the overall scale and reach fell short of expectations due to lower than anticipated participation from FE colleges, provider withdrawals and tight timelines. These factors, alongside the subsequent small student cohorts, limited the broader impact on HE availability and progression.

The pilot substantially strengthened participating FE colleges' capabilities, supporting them in developing internal processes, governance structures and curriculum design skills that enabled

institutional and programme approvals which would not otherwise have been feasible. Some participating FE colleges continued their provision through alternative validation arrangements beyond the end of the programme. However, the sustainability of provision remained uncertain for those FE colleges that were unsure whether they could maintain delivery without ongoing external support.

1.6 Summary of key learning

If the OfS was to use its commissioning powers again, future commissioning arrangements need clearer upfront communication, both in defining roles between the OfS and the validating partner, and in setting early, stable eligibility criteria and expectations for FE colleges. Defining “skills gaps” and “cold spots” early and streamlining application processes in any future interventions would help providers confidently apply and ensure that provision better meets local needs. Strong, regular communication channels were essential in this pilot, with FE colleges valuing a single OU contact, structured feedback, and specialist support.

The pilot showed that many FE colleges required more time and clearer guidance to build capability, meaning development timelines, application windows and employer engagement periods should be longer and better aligned with academic cycles. The administrative burden felt by participating FE colleges was high, in part due to a lack of standardised policy templates, suggesting that future commissioning arrangements should provide these from the outset. Financial viability also emerged as a challenge: stronger financial transparency between the validating partner and commissioner, clearer cost expectations for participating FE colleges outlined by the validating partner, and some direct development funding for FE colleges, would support more sustainable delivery.

2.0 Pilot context and aims

This section outlines the background to establishing the HE in FE (validation) project and summarises its aims and describes the process that those participating in the pilot followed.

2.1 Pilot context

Under section 50 of the Higher Education and Research Act 2017 (HERA),² the Office for Students (OfS) was given the power to commission a validating partner to provide validation services.³ The OfS set out its intention to use these powers in its regulatory framework, which states that the OfS can enter into commissioning arrangements with existing HE providers to improve the validation system and address barriers that providers may face when seeking a validation partner.⁴

Following a request from the Secretary of State (SoS) for Education in May 2022,⁵ the OfS used these powers for the first time to commission the Open University (OU) to operate the HE in FE (validation) pilot project (“the pilot”).⁶ The pilot involved a model in which the OU offered a validation service for high-quality vocational and technical (Level 4 and 5) courses. The Department for Education (DfE) provided funding of up to £10 million which the OfS awarded to the OU to enable it to deliver the pilot, enter into validation arrangements with further education (FE) colleges and other suitable providers.

The pilot was established to address identified issues and challenges in the HE sector, including:

- ▶ Barriers to entry for new and existing FE providers to offer new HE provision (such as capacity, capability and local competition).
- ▶ HE cold spots (in geographical areas and diversity/choice of provision, especially Level 4 and 5 technical and vocational courses) where gaps in provision and addressing local skills needs do not support equality of opportunity.

Addressing these barriers through this pilot provides an opportunity to test how the OfS’s section 50 HERA powers might work in practice to intervene and commission validation arrangements. As well as providing the opportunity for the OfS to explore how commissioning arrangements could operate in practice which could inform future consideration of how such arrangements may be applied more widely.

² [Higher Education and Research Act 2017](#)

³ Validation arrangements are where an established higher education (HE) provider validates courses delivered by a different provider

⁴ [Regulatory framework for higher education in England - Office for Students](#)

⁵ [Secretary of State guidance letter](#)

⁶ [OfS launches pilot for colleges to offer more vocational and technical qualifications - Office for Students](#)

2.2 Pilot aims

In addressing these challenges, the pilot aimed to:

- ▶ Explore new ways for tertiary education providers to enter or expand HE provision, which includes piloting OfS powers to commission validation arrangements.
- ▶ Increase the availability of high-quality HE courses across England, with a particular focus on areas with low attainment of qualifications at Level 4 and above; a lack of local HE provision and high demand for new provision to meet local skills needs; and lower than average progression rates into HE.
- ▶ Enable FE providers to develop and deliver new HE courses and provision that would not have otherwise been offered (due to gaps in internal expertise and infrastructure/resources).

2.3 Pilot process

The OfS chose to work with a single provider at this stage in order to test how commissioning arrangements may work in practice. Following the OU's expression of interest in May 2022, the OfS made a decision to allow project activity to begin at risk prior to the grant agreement being formally in place. A specific condition of registration applied to the OU in August 2022 formalised the commissioning arrangements. The OU Validation Project grant funding award letter outlined the terms and conditions of the funding placed on the OU (by the OfS) to govern the project.

The OU operationalised three validation models in collaboration with DfE:

- ▶ Delegated validation
- ▶ Enabled validation
- ▶ Collaborative provision

'Enabled validation' was a new model designed for this pilot to support colleges with some experience or capacity in delivering HE, offering a 'medium' level of support in between delegated and collaborative models. Collaborative provision offered the most support to providers (with limited experience or capacity in delivering HE) and was a redeveloped model originally piloted in Scotland under different regulatory requirements.

The OU publicised the project and opened applications to eligible colleges in October 2022 (Wave 1). Due to a low response, two further application waves followed (Wave 2 and Wave 2+). Applications were assessed by the OfS and the OU and, where approved, FE colleges entered the validation process. This included contracting, with a 56-day due diligence period between approval of successful applicants and final contracting to minimise risk, and an initial discovery visit during which the OU spent time in the colleges to better understand their needs and assess capacity to deliver the model they had applied for.

Figure 1. Pilot eligibility criteria for providers

Eligibility for the pilot was assessed against criteria set out in the OU's Specific Condition of Registration agreed with the OfS. These criteria were refined and expanded over the course of the project. Applications were required to demonstrate a clear local need for new Level 4 and 5 provision, including limited alternative provision within reasonable travelling distance, unmet learner or employer demand, and that they have been unable to secure validation for the programme (or similar) for the last three calendar years.

Additional criteria focused on place-based need, including location within an Education Investment Area and lower than average local attainment at Level 4 and above, as well as programme suitability, sustainability and alignment with Higher Technical Qualification pathways.

Providers were also required not to hold degree-awarding powers, not to have an existing HE partner for similar provision, and to meet defined requirements relating to prior experience, future sustainability, eligible programmes, and local employer skills needs.

Once the validation model had been agreed, FE colleges began developing new HE programmes with support from the OU. Once designed, programmes were required to go through a formal review process in line with the OU's requirements. The final step was approval by the OU's Curriculum and Partnership Committee.

The OfS set initial expectations for the project to deliver validation partnerships using the three delivery models, with at least one FE college enrolling students on a new HE programme by September 2023. The overall aim was to support 11 FE colleges and 33 programmes.

Of the nine colleges initially involved in the project, six secured validation. Three withdrew prior to approval and one withdrew having been approved, leaving five providers active through to the end of the funded period. In total, 29 potential new HE programmes were proposed by providers, of which 23 progressed to the development stage and 15 were approved. Ten of the approved programmes launched in the project timeframe (before end of July 2025), while five were approved but did not launch (though one of these is due to launch in September 2026).

Programme launches were phased over time, with one launching in September 2023, six in September 2024, three in September 2025, and one planned for September 2026. All programmes that launched were delivered under the enabled validation model. Of the 15 approved programmes overall, two were approved under collaborative provision but did not launch; the remaining approvals were through enabled validation.

3.0 Evaluation aims and approach

This section presents the approach to evaluating the HE in FE (validation) project, setting out the evaluation aims and research questions, and outlining our methodology.

3.1 Evaluation objectives

Ecorys was commissioned in January 2025 to carry out an evaluation of the HE in FE (validation) project. Rob Smith, a Professor of Education at Birmingham City University, played an advisory role in the evaluation, feeding in his expertise of FE in HE at key points in the study. The evaluation took a mixed-method approach consisting of three distinct phases (outlined in Section 3.3) to address the overarching objectives:

- ▶ To understand if the intended impacts and outcomes of the pilot were likely to be achieved.
- ▶ To understand the extent to which commissioning validation arrangements were a viable intervention to protect students from non-continuation where the market presents barriers to HE for some providers.
- ▶ To understand whether and how the pilot delivered value for money (VfM).

The evaluation findings were also intended to help the OfS and government stakeholders make evidence-informed decisions about potential future interventions. This evaluation report shares the findings with the sector to outline risks, challenges and best practices in validation, and to build awareness of what is required to implement effective validation partnership arrangements.

3.2 Evaluation approach

The evaluation employed a theory-based evaluation (TBE) approach, using the revised Theory of Change (ToC) (Appendix A) to guide the research. Research questions focused on the process, impact and value-for-money elements to be explored and assessed by the evaluation, and these directly informed the research tools, such as the interview topic guides.

By embedding the research questions in the data collection tools, we ensured we had all the data needed to assess ('test') the assumptions outlined in the ToC using a contribution analysis TBE approach (outlined in Appendix B). This helped to understand whether the pilot was on course to achieve its longer-term outcomes and impacts and to establish the potential value of commissioning similar validation partnership arrangements to support HE in FE in the future. The TBE approach also supported our process evaluation, serving as a framework for understanding which components of the validation partnership arrangements worked, for whom, and why. This informed our recommendations on how learnings from the pilot could be used to improve commissioning validation services in the future.

In addition to its process and impact components, the evaluation included a value for money (VfM) assessment of the pilot's (quantifiable and non-quantifiable) costs and benefits.⁷ This included seeking views on the VfM of the pilot from the OfS, OU and participating FE colleges, along with information on any additional costs they may have incurred as a result of their involvement in the programme.

3.3 Evaluation methodology

We used a mixed-method approach to assess the impact, process and VfM components of the evaluation. Our approach consists of three distinct phases to collect the data needed to address the evaluation objectives.

3.3.1 Phase 1: Scoping and initial process learning

The **scoping phase** started with an inception meeting with the OfS to discuss the evaluation requirements and approach, and to identify key documents and stakeholders to consult. We **reviewed key evidence**, including programme set-up documents, provider applications and OU monitoring reports. This helped us understand how the project management and governance arrangements for the pilot were established among the OfS, the OU, and participating FE colleges, as well as the progress and lessons learned to date. The review was supported by 11 **stakeholder interviews**, with key individuals from the OfS and the OU involved in project design and delivery, which reflected on the project context, design, set-up and implementation.

The work informed our initial understanding of the pilot and enabled us to outline the causal mechanisms involved. It was supported by a workshop with the OfS and the OU, during which we tested and refined the existing ToC and its underlying assumptions. We produced an **evaluation framework** which set out eight hypotheses for the evaluation to test, based on the causal assumptions outlined in the ToC.

3.3.2 Phase 2: Collecting data and evidence

The main phase of data collection involved **case studies with three of the participating FE colleges and consultations with two of the FE colleges who withdrew from the pilot**. This allowed us to explore how FE providers experienced the pilot and captured their perspectives on its application, setup and implementation. We gathered evidence to assess the extent to which intended outcomes and impacts were on course to be achieved and how the pilot had contributed towards this.

Case studies with participating FE colleges included a multi-stage approach, which consisted of consultations with:

- ▶ **Validation project leads**, to discuss the application process, engagement and support from the OU and the process of launching new HE provision, including whether and how staff increased their knowledge, skills and confidence.

⁷ The VfM analysis was informed by the eight steps set out in the Oxford Policy Management approach: Oxford Policy Management (2023) Assessing Value for Money: the Oxford Policy Management Approach. Available at: [opm-value-money-vfm-approach-v2-1.pdf](#)

- ▶ **Staff teaching validated courses**, to see whether, and how, their involvement had increased their relevant knowledge, skills and confidence to deliver HE and their perception of the quality and value of the course provision.
- ▶ **Students enrolled on validated courses**, exploring motivations and experience in applying to the course, their experience of it, and the wider impact of the provision on local student choice.
- ▶ **Senior leadership team staff**, to hear their perception on whether the support available to develop policies, procedures and governance structures had facilitated new HE programmes to be developed and sustained, whether new provision and increases in staff capability were sustainable beyond the pilot duration, and the perceived value of the pilot.
- ▶ **Employers or community stakeholders**, to understand how employers were engaged as part of the application process to effectively identify local skills needs, how the provision addressed local skills needs and met employers' needs, and the perceived future value of the new HE provision.

To test the strength of the causal mechanisms in the ToC, we also considered why eligible providers may not have been able or willing to take part in the pilot and the potential impact of not participating. To do this, we approached the FE colleges that had not remained actively involved in the pilot to understand their reasons for withdrawing. Interviews explored: the effectiveness of the support they received, the barriers to developing and launching new HE provision, and what else would have supported them in achieving validation of approved programmes within the pilot timelines and in sustaining delivery beyond the pilot funding.

Findings were written up into an analysis framework, and evidence was appraised against the contribution analysis framework (as outlined in Appendix 2). We produced a short interim **evaluation update** outlining the emerging findings from Phases 1 and 2, presenting and discussing findings with the OfS and the OU at a workshop. Any gaps in evidence were followed up to strengthen and further test the causal hypotheses in Phase 3, below.

3.3.3 Phase 3: Seek out additional evidence

In Phase 3, we aimed to address gaps through targeted data collection, having identified areas where the initial evidence gathered was deemed less robust or missing. We conducted five **stakeholder interviews** which included project managers at the OfS and the OU, and participating FE college staff. These interviews allowed for a retrospective review of the pilot and facilitated reflection on impacts, sustainability and VfM. The interviews also included specific questions around the pilot's ability to address HE 'cold spots', support and upskill staff, manage change, and set expectations for participating FE colleges.

Additional evidence was appraised against the contribution analysis framework and considered alongside data collected during Phases 1 and 2 of the evaluation. This allowed us to objectively assess each hypothesis in this final report, as detailed below in Section 4.

3.4 Evaluation limitations

Whilst the evaluation methodology was designed to be as robust as possible, there were some key limitations, particularly in collecting some of the data. The pilot involved a small number of FE colleges (nine), and four withdrew before completing it, limiting the potential sample size. We received no response from two participating FE colleges and from two that withdrew from the pilot. This meant our evidence, directly collected from FE colleges, was not representative of the whole sample and may have been skewed towards those FE colleges that were able to engage more actively in the pilot. However, the report also drew on monitoring information from the OU, which outlines the issues raised by all FE colleges throughout the pilot. A second wave of interviews (during Phase 3) allowed us to explore gaps identified or areas where evidence was less strong with previously engaged participants following the initial two phases of research.

There were also limitations in the quantitative data available for the evaluation. Due to the intervention being a pilot, it was difficult to anticipate or plan for the collection of financial data which could support a quantitative VfM assessment. Given that the pilot was developing a new validation model based on providing more intensive support to FE colleges, it was not possible to identify directly comparable schemes. Qualitative stakeholder feedback on costs compared to existing validation models is presented. However, given the differences in support provided, costs could not be robustly benchmarked against other programmes. As such, quantitative comparisons of cost 'per student' or 'per course' were not feasible.

There was limited published data on skills needs and cold spots, which are defined quite variably within the wider evidence base, preventing us from benchmarking the pilot's impact against the rest of the sector. Linked to this, the evaluation timescales prevented us from assessing some of the longer-term outcomes and impacts of the pilot, because some of the courses had not yet (or only recently) been launched.

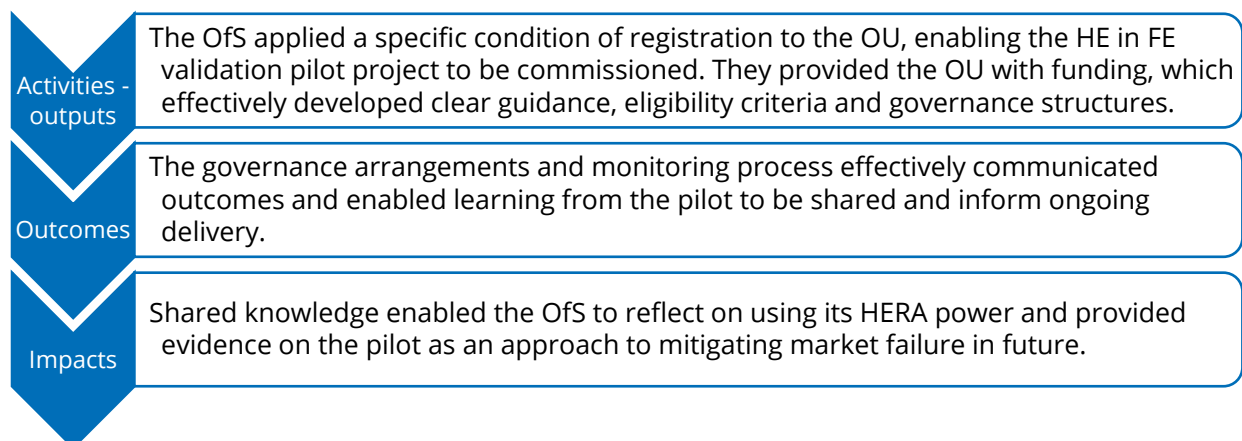
4.0 Impact assessment of the pilot

This section presents the results of the impact assessment and describes the extent to which the pilot achieved its intended activities, outputs and outcomes as identified in the Theory of Change, including how and why these occurred. It is structured in line with the hypotheses developed as part of the contribution analysis framework which outline the causal assumptions underpinning the logic in the Theory of Change.

4.1 Commissioning validation partnership arrangements

The first hypothesis (Figure 2) discusses the processes needed for the OfS to commission and launch the pilot, including establishing governance and monitoring processes with the OU, and effectively capturing, sharing and incorporating learning.

Figure 2. H1: Commissioning validation partnership arrangements



The OfS applied a specific condition of registration to the OU to enable the commissioning of the pilot. This regulatory mechanism allowed the OfS to launch the pilot at pace, manage risk and maintain oversight. The OfS used both its regulatory powers (through the specific registration condition) and its funding terms and conditions (as set out in the OU Validation Project grant funding award letter) to ensure compliance, which was considered the right approach given the need to establish the pilot quickly.

However, under 'normal circumstances', enforcing a specific registration condition is perceived to carry negative connotations associated with regulatory enforcement. This meant that the OfS had to clearly communicate its intentions for using the mechanism for the pilot and set clear expectations and ways of working with the OU. Ultimately, the OfS's need to use a specific condition was widely understood by the OU, and both the OfS and the OU were prepared to enact this way of working.

Enforcing a specific condition of registration and terms and conditions enabled the OfS to commission the pilot and provide funding to the OU. However, the OfS had never enforced these section 50 HERA powers before, which required it to establish new processes and ensure

compliance. This meant it took longer than anticipated to start the commissioning process, develop the eligibility criteria, and communicate the pilot to providers. Once this was in place, the OfS provided funding to the OU, enabling it to **develop operational guidance, application criteria, and governance structures**. However, stakeholder feedback indicated confusion about the eligibility criteria for application and the pilot's expected outcomes, hindering the OU's ability to clearly establish them from the outset (see Section 4.4 for further discussion).

Governance structures and processes were established within both the OfS and the OU to manage the pilot. This included establishing a formal quarterly and annual monitoring report process and informal opportunities to share contextual learning. Collectively, these allowed the OU to capture progress and learning from their work with FE colleges to share with the OfS. The reports underpinned regular meetings between the OfS and the OU (sometimes alongside DfE), which enabled issues to be discussed and addressed.

The constrained pilot timelines impacted the OfS and the OU's ability to design an effective monitoring process before commencement. Stakeholders noted that the monitoring process could have been better designed from the outset if clearer outcomes and indicators were in place. Establishing monitoring requirements was also challenging because the pilot required flexibility to deliver in an agile way. In particular, there was initially a lack of shared understanding between the OfS and the OU on what financial data was sufficient on expenditure and forecasting, and the OfS strengthened financial monitoring processes as the pilot progressed.

Nevertheless, the evidence suggested that **governance arrangements and monitoring processes effectively communicated outcomes once they were in place, enabling learning from the pilot to be shared and to inform ongoing delivery**, supported by iterations to the process as the pilot progressed. Interviewees noted that the monitoring process was improved or supported by the role of an OfS dedicated contact which facilitated greater openness and collaboration.

Stakeholders praised the flexible ways of working between the OfS and the OU, which meant the monitoring process could be adapted in response to feedback. The monitoring reports themselves also served as a valuable tool to capture process learnings alongside quantitative indicators of progress. These qualitative reflections allowed the OU to share insights into its work with FE colleges and provided the OfS and DfE with a useful insight into the pilot, who both had no direct engagement with FE colleges as part of the pilot.

Shared knowledge has enabled the OfS to reflect on the use of its commissioning power under section 50 of HERA. OfS stakeholders explained that learning from the pilot enabled them to reflect on the strengths and limitations of using regulatory levers to commission validation at pace, and to position them well to prepare for future challenges. Specifically, the OfS has reflected on the future use of its section 50 HERA commissioning powers and identified several considerations, including how commissioning validation arrangements could operate in scenarios where some providers face barriers to delivering HE. OfS stakeholders described how learning from the pilot has been incorporated into future planning, such as the need for clearer communication when regulatory tools are used for 'positive' commissioning, stronger financial transparency expectations, and a better understanding of the true cost of validation services before scaling.

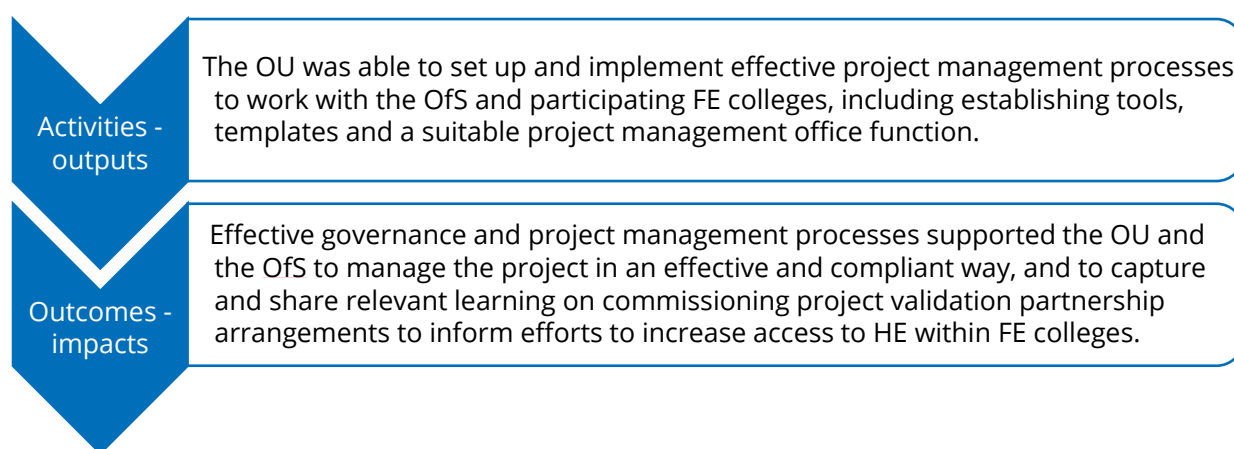
OU stakeholders agreed that the pilot was a valuable exercise to inform future commissioning, and learning can be applied to other regulatory areas going forward. Their views were supported by evidence from FE colleges about the value of participating in the pilot, which they considered a

strong justification for the OfS using commissioning powers in this way when required. Stakeholders emphasised that any similar interventions in the future should involve an element of co-design with providers, so that their capacity and needs are considered from the outset. In addition, stakeholders highlighted the importance of trust-based relationships and maintaining momentum in project delivery within high-risk, capacity-constrained environments.

4.2 Project management and governance

The second hypothesis (Figure 3) focuses on programme set-up and mechanisms established by the OU to enable it to work with FE colleges, capturing and sharing learning, which was fed back to the OfS and helped to shape ongoing delivery.

Figure 3. H2: Project management and governance



The OU was able to set up and implement effective project management processes to work with the OfS. Evidence from stakeholders and monitoring data confirms that the OU established a range of governance structures, including the recruitment of a core project management team and delivery staff, and the establishment of regular working groups, steering groups, and senior oversight. These were established alongside project management processes, including a project management office and monitoring reports, to support pilot delivery.

Stakeholders commented that these processes were established very quickly and were supported by the OU's ability to move swiftly (due to its organisational size, expertise and national reach) and its willingness and ability to take on the project set-up before the grant agreement was finalised. Alongside this, the OfS was highly responsive, which helped to progress the pilot at pace.

The OU established effective project management processes with FE colleges through a dedicated Senior Quality and Partnerships Quality Manager, who served as a single point of contact and met regularly with participating FE colleges. The OU took a flexible approach to project management, relying more on regular meetings than on formal reporting requirements for outcomes and progress. In practice, validation partnership arrangements for the pilot started while the validation partnership models were still under development. Fortunately, participating FE colleges were also prepared to work at pace and at risk, which they agreed was in part due to the OU's investment in establishing a trusting relationship with FE colleges from the outset.

The evidence clearly indicated that these governance and project management processes supported effective delivery. The OU's flexible approach was reported by FE colleges to meet their needs, and

interviewees were overall very positive about the project management support they received from the OU. In particular, FE colleges valued having a dedicated contact within the OU who was responsive and available for regular meetings when they had an opportunity to ask questions and discuss feedback, which facilitated iterative improvements and knowledge sharing. They also appreciated the OU staff's knowledge and understanding of FE which supported engagement.

Similarly, the OU recognised the value of having dedicated contacts within FE colleges. Most participating FE colleges thought that the OU's partnership model fostered good collaboration and trusting relationships, which contrasted with some of their previous experiences of validation partnership arrangements, which were described as more 'one-way' or 'hierarchical'.

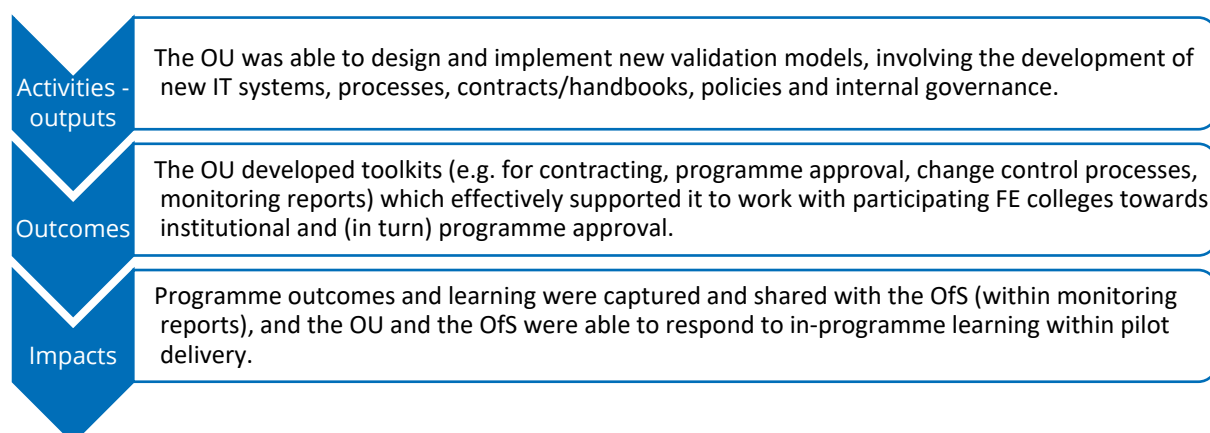
The governance and project management processes supported both the OU and the OfS to manage the pilot in a compliant way. A good working relationship between the OfS and OU enabled informal check-ins and prompt raising of issues, in addition to formal reporting and regular three-way meetings with DfE. This was facilitated by a dedicated point of contact within the OfS and a clear understanding of roles and responsibilities between the OfS and the OU. OfS stakeholders reported that this combination of written reports and informal discussions provided sufficient context to sustain oversight of the pilot, and that regular, open conversations with the OU helped the OfS understand current issues and collaboratively work towards resolutions.

Many stakeholders commented on how **governance and project management processes helped capture and share relevant learning** and were iteratively improved throughout the process. The level of information captured and reported in monitoring reports also indicated more systematic capturing of learning and impact. Whilst there was evidence of effective mechanisms for sharing learning between FE colleges, the OU and the OfS during project delivery, this evaluation is the first step in sharing learning more widely to inform efforts across the sector to increase access to HE in FE colleges.

4.3 Operational design and delivery

The third hypothesis (Figure 4) considers operational design, including the three validation models and delivery of the pilot.

Figure 4. H3: Operational design and delivery of the validation partnership arrangements



The evidence indicated that the OU successfully operationalised three validation models: **delegated validation**,⁸ **enabled validation** and **collaborative provision**. These models allowed for different levels of tailored support from the OU: participating FE colleges were matched or assigned to a model depending on their readiness to deliver HE, with providers expected to move between models as their capacity and experience increased (Figure 5).

The OU assessed each FE college application and assigned it to the most suitable model following an initial discovery visit. While this process was implemented successfully, one of the validation models (delegated validation) was not used in practice. While flexibility was built into the pilot's design, and movement between models was expected, data suggest that participating FE colleges often underestimated the demands of the validation process. This meant that moves into a more supportive model (and withdrawals) were more common than anticipated (see Section 4.5 for further discussion).

Figure 5. The three validation models

- 1. Delegated validation:** working with FE providers with experience and capacity in delivering HE
- 2. Enabled validation:** working with FE providers with some experience or capacity in delivering HE
- 3. Collaborative provision:** working with FE providers with limited experience or capacity in delivering HE

Project funding allowed the OU to recruit a project manager, and to develop policies, processes and guidance to accompany the new validation models. The OfS worked with the OU to ensure the validation models were clearly defined and could be articulated to FE colleges. The OU also improved existing IT systems, adapted them to meet the pilot's needs, and used the adapted tools effectively. Policies and processes developed for the pilot provided templates for reuse in future FE/HE collaborations as well as establishing fit for purpose IT systems.

Handbooks and change control mechanisms were developed, functioned well, and were used systematically, with formal and informal channels between the OU and the OfS enabling iterative, in-programme learning and efficient change implementation. The OU developed the partnership model, contract, and operational handbooks, which were provided to participating FE colleges along with guidance on their effective use. A clear process was developed for monitoring and managing change, and this was followed throughout, with changes (such as a college merger or change in timelines) formalised in a standardised form, and efficiently processed by the OU (sometimes within 24 hours).

⁸ The delegated validation model was being used by the OU before the HE in FE project; enabled validation and collaborative provision were implemented (enabled) or adapted (collaborative provision) as part of it.

Despite the development and delivery of handbooks and a change control process, the OU's final project report **highlighted the need for a toolkit** of *"policy documents to improve the resources available to partners from the beginning of the validation process."* The absence of a toolkit and/or templates earlier on in the project may have led to increased workloads and extended timescales for participating FE colleges.

As an established validating partner, the OU successfully leveraged its experience in contracting and programme approval processes during the pilot. OU systems were well established and successfully adapted for use in the pilot. Their knowledge of the sector and willingness to work at pace and in new ways was a key facilitator to the pilot's roll-out. Participating FE colleges were provided with support and guidance from a dedicated OU contact as they worked through the contracting process, which was necessarily comprehensive and robust. This included a 56-day due diligence period between the OfS's approval of successful applicants and final contracting, to minimise risk. In addition to fulfilling the approval and contracting process, participating colleges were required to follow a formal review process for each newly developed HE programme, with courses assessed and final approval granted by the OU Curriculum and Partnership Committee.

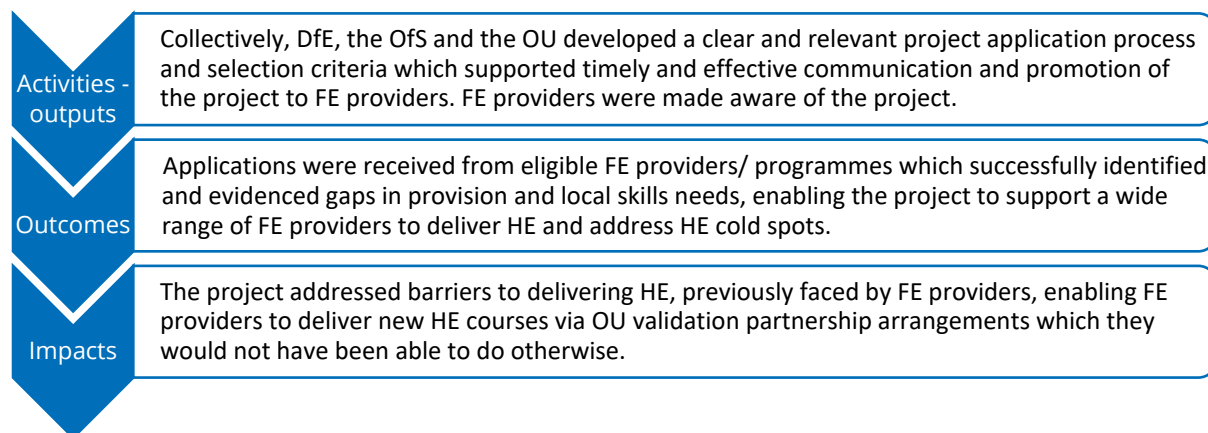
The OU produced quarterly (and annual) monitoring reports, sharing them with the OfS. Monitoring reports effectively captured programme development, institutional approval and progress against milestones, and the OU and OfS were able to respond to issues raised during delivery. The reports covered financial tracking and discussed any underspend/slippage within a wider narrative, systematically reporting on milestones, deliverables (on track/delayed/at risk/withdrawn), and any risks and mitigations. While monitoring reports were in place throughout the pilot's lifespan, tight timelines meant that monitoring processes, and the information covered in reports (especially financial details), continued to be refined while the programme was in operation.

Data indicated that the pilot was monitored effectively, with gaps in early reporting requirements (for example, opportunities to capture learning) identified and addressed by the OU (see Section 4.1 for further discussion of monitoring requirements). Alongside formal monitoring reports, the OU provided the OfS with regular updates, contextual information and intelligence, which helped build a holistic picture of progress and emerging issues. Regular, direct communication between the OU and the OfS, and between the OU and participating FE colleges, enabled feedback to be shared and supported in-programme learning.

4.4 Applications and recruitment

The fourth hypothesis (Figure 6) focuses on the application process, encompassing activities to raise awareness of the pilot among FE providers, and on recruitment.

Figure 6. H4: The application process and recruitment



Application criteria and processes were collaboratively designed by the OfS, the OU and DfE, and developed and implemented at pace. However, feedback suggests that the criteria and evidence requirements included in the project application form may have lacked the specificity FE colleges needed to make a clear assessment of their own eligibility and to articulate it. This relates to feedback on the clarity of the pilot scope, in terms of expected outcomes and eligibility, as discussed in Section 4.1.

OU-led webinars, support sessions and outreach activities helped address queries and clarify eligibility and application requirements. However, ongoing uncertainty, coupled with timing constraints, limited engagement and impacted the quality of applications – particularly as the short application window(s) fell during busy periods in the FE calendar. Refining the eligibility criteria during the pilot's lifespan introduced uncertainty, for example the late addition of conditions regarding distance to travel.⁹ Data also suggested that there was some inconsistency in how the OfS and the OU applied the application criteria when assessing applications, leading to some providers being deemed unsuccessful despite meeting OU expectations.

Activities to raise awareness of the pilot among FE providers were implemented, but later than expected and with limited reach. There appeared to be a mismatch in expectations about the scope and scale of promotion activities with eligible colleges, and whether the OU or the DfE was responsible for leading them. This initial confusion meant that awareness raising was increasingly coordinated by the OU, activities being scaled up when numbers in the first wave of applications proved smaller than expected.¹⁰ The OU team worked with the Association of Colleges to reach the FE sector through targeted email communications, hosting webinars and leveraging their existing networks to engage FE colleges.

⁹ This condition related to the distance students would need to travel to access HE provision.

¹⁰ As discussed in H1, the need to apply new HERA powers impacted pilot timings, including awareness raising.

Applications were received from eligible FE providers across two time periods. Low numbers during the initial application window (scheduled during the summer break) led the OfS and the OU to conduct a second wave of applications. The low volume of applications received suggests that some eligible FE providers had been deterred from applying in the first wave due to the short application window, its timing, and unclear application requirements. OU-led awareness-raising activities sought to maximise applications in this second application window.

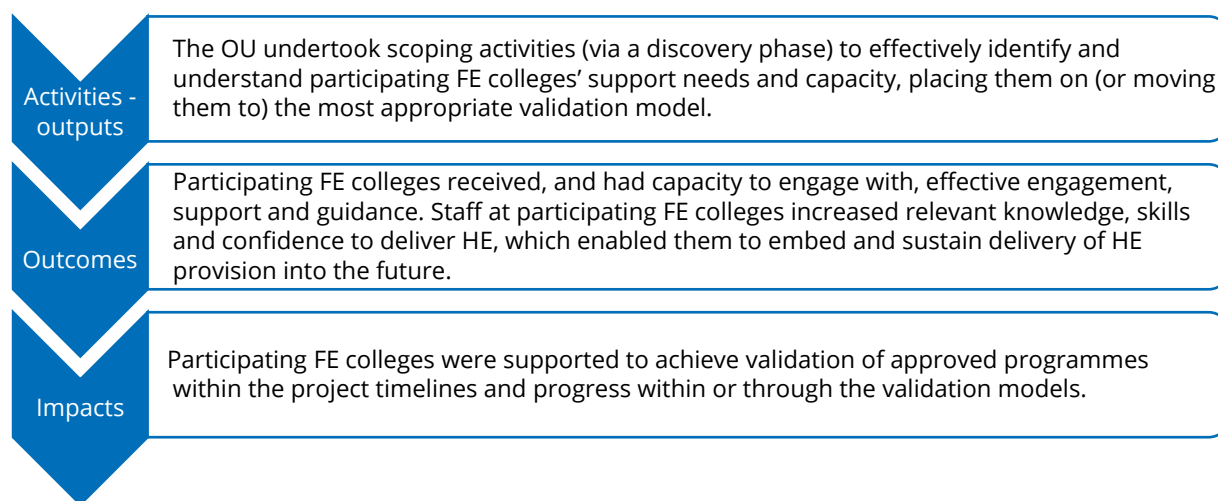
Despite some uncertainty around the eligibility criteria, FE colleges' applications largely addressed and evidenced a local need for HE provision and specific skills gaps. However, the strength of demand and providers' assessment of their own capacity to develop and deliver new HE courses varied considerably. It was this apparent mismatch between providers' self-assessed capability, and the scale of resource required, that led some FE colleges to withdraw from the pilot early (although this was often preceded by capacity building at the participating FE college). While successful applicants progressed through the approval process and developed provision aligned with employer and regional needs, the pool of providers taking part in the pilot was smaller than anticipated (and below recruitment outputs).

FE colleges applying to take part in the pilot were able to successfully evidence gaps in local provision and skills needs. However, there is less certainty about whether **participating colleges would have been able to deliver HE courses without OU validation partnership arrangements.** Evidence suggested that some of the participating FE colleges had previous experience of delivering HE under validation arrangements and were better able to navigate the pilot process. Participating FE colleges with less experience had found it more difficult to overcome barriers to entry, even as part of a collaborative model. Despite more withdrawals than anticipated, **all participating FE colleges (whether completing the validation process or not) had been able to build capacity to deliver HE in the future.**

4.5 Supporting delivery/providers

The fifth hypothesis (Figure 7) considered how effectively identifying the needs of participating FE colleges and assigning them to the most appropriate validation model influenced their engagement in the process. It also examines how effective support from the OU enabled participating FE colleges to build staff knowledge, skills and confidence to achieve programme approval and sustain the future delivery of HE provision.

Figure 7. H5: Supporting delivery/providers



The OU assessed the support needs and capacity of the participating FE colleges through discovery visits and discussions, enabling it to place each FE college on the validation model that appeared most suitable. The process of aligning FE colleges with suitable validation models required a detailed evaluation of the participating FE colleges' previous experience in HE delivery, their strengths and gaps, alongside the distinct criteria of the validation frameworks. The evidence from the document review suggested that the scoping activities were delivered as planned and supported the OU team in matching FE colleges with the validation model that appeared most suitable.

However, OU stakeholders noted that, despite some participating FE colleges entering the pilot with previous HE delivery experience and confidence in their ability to deliver, they later found that these FE colleges had inconsistent understandings of validation requirements, stemming from their previous partnership arrangements. Some FE colleges also flagged capacity changes due to delays in the OU's project setup and the short student recruitment timeline. These FE colleges were therefore moved to different validation models to ensure they received the right level of support.

“A lot of the providers did move down from originally being assessed as being capable to be in the delegated model, to then being in the enabled model.” – OfS stakeholder

The validation models to which participating FE colleges were eventually assigned facilitated effective support, though their capacity remained limited. Most of the participating FE colleges approved the model and considered it a good fit. Those who moved to a different model shared feedback similar to that of OU staff stakeholders, reporting that once the process began, they recognised gaps in their capacity or internal structures and realised they needed more support.

However, one FE college reported that, after switching to a more intensive partnership model, they were unable to implement additional policies and procedures in time and therefore decided to

withdraw from the pilot. This evidence further confirms the hypothesis that being assigned to the right partnership model was crucial in enabling FE college staff to build their skills and capabilities to achieve validation and deliver approved programmes.

Staff at participating FE colleges increased their knowledge, skills and confidence through tailored support, mainly delivered through collaborative working and frequent feedback loops. They received extensive, tailored support from the OU, which helped their teams build the knowledge and skills necessary for programme approval and delivery. However, more time is needed to evidence the longer-term impact of the increased knowledge and skills on sustaining future delivery. OU and OfS stakeholders reported that partnership engagement and capacity-building required more adaptation and resources than anticipated, as several participating FE colleges moved to a partnership model with more intensive support.

Despite that, the OU delivered personalised guidance, written feedback on outputs, and weekly meetings to reflect on progress and provide ongoing feedback. Monitoring reports confirmed that training was delivered on academic regulations, reporting requirements, tutor induction and assessment processes. Where necessary, the OU provided external support, for example from subject experts to support curriculum development. Participating FE colleges (including those who withdrew from the pilot) valued the OU team's strong communication and professionalism.

“The Curriculum Teams at the Open University were absolutely wonderful, so they collaborated really well.” – Participating FE college

Some consulted staff from participating FE colleges described their increased understanding of HE regulatory requirements through the guidance provided, collaboration in curriculum development, and programme approval processes. Some also highlighted new learnings on Competition and Markets Authority (CMA) compliance student support processes, and the development of new skills in HE-specific policy and curriculum development. Their increased understanding of processes and the new skills improved their confidence in HE delivery.

However, there was limited evidence from participating FE colleges that structured training was delivered to teaching staff. Teaching staff from some FE colleges emphasised that they already had relevant knowledge and skills from their previous experience in HE courses development and delivery, and most development opportunities were limited to validation and programme leads. Therefore, they felt that the OU could have provided more structured pedagogical training directly aimed at teaching staff to further build on their existing skills and strengthen them.

Where FE colleges continued to participate in the pilot, the programmes were successfully approved.

15 programmes received validation approval across the FE colleges participating in enabled validation and collaborative provision partnership models. Stakeholders agreed that approvals and course development were resource-intensive. Some providers saw the timescales for programme approval as too tight, affecting student recruitment, and for some, this contributed to their decision to withdraw.

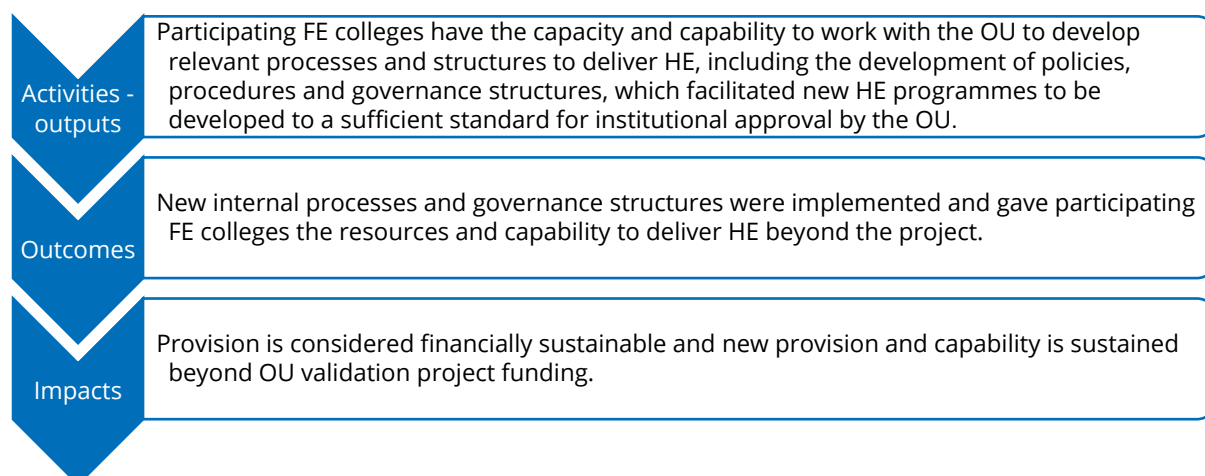
This, alongside moving participating FE colleges to new partnership models, required the OU to be flexible and agile in its approach. In some cases, where appropriate, the OU agreed to move deadlines for individual tasks and work around the provider's capacity and other commitments. In other cases, the OU agreed with the participating FE colleges to move the launch of courses to the following academic year. Stakeholders agreed that the OU's flexibility was essential in ensuring the

successful approval of programmes. Some FE colleges also agreed that, where they had already delivered similar programmes through previous validation partners, the preparation for programme approval was much easier and less time-consuming for this pilot – for example, where they had existing materials they could adapt. It also meant that these programmes already had a good visibility amongst the potential student cohort who were aware that the college offered a course of this nature. Therefore, the student recruitment process required less lead time, keeping programme approval within intended timelines.

4.6 Building capacity and capability

The sixth hypothesis (Figure 8) focused on FE colleges building their internal processes and governance structures to improve their capacity and capability and to be approved by the OU as a validated institution.

Figure 8. H6: Building capacity and capability



Participating FE colleges worked with the OU to develop and implement new processes and structures and achieve institutional approval for new HE programmes, but the capacity of FE colleges to engage with the development activities varied. Workshops held in second year of the pilot with the Association of Colleges helped gather feedback from participating FE colleges and strengthen the understanding of areas that needed development. As a result, it became apparent that FE colleges faced resource challenges and often lacked dedicated staff with relevant experience to facilitate HE (e.g. within admissions and marketing, and in-house legal expertise).

The OU stakeholders reported that, as a result, they had to increase the level of support provided, which increased their costs. Participating FE colleges also reported that the work required for the policy and governance structure development was more intense than they expected. For example, some FE colleges noted that they had to rewrite several policies. In some cases, the participating FE colleges supplemented their internal capacity by hiring external consultants. Although this allowed them to continue the development work, it also introduced additional costs at their own expense, as they did not receive any direct funding as part of the pilot. Whilst the FE colleges appreciated the overall flexibility in the OU's support, the required development work continued to strain FE colleges' resources and, in some cases, led to their decision to withdraw from the pilot. However, the FE colleges that continued to participate in the pilot reported that the development activities led to successful institutional approval.

There was consensus among all stakeholders that the funding should have been utilised to ensure that participating FE colleges had sufficient resources to engage effectively with the development activities. For example, it was suggested that the participating FE colleges could have used the funding to recruit additional staff to manage or support the delivery of activities associated with the development activities and institutional approval. Some FE colleges also suggested that more clarity on the time and resources required for the development activities could have helped them plan their resources more effectively. FE colleges shared some of this feedback with the OU during the pilot, and the OU had already considered enhancing the resources available to partners from the start of the validation process, such as the inclusion of a toolkit referencing compliant policy documents and mapping of the OfS's conditions of registration.

Participating FE colleges implemented new internal processes and governance structures, with some emerging evidence suggesting that the capability developed to deliver HE has been sustained and will support HE delivery beyond the pilot duration. The FE colleges emphasised that regular, structured support from the validating partner was also critical to building staff confidence and capability, as they required more hands-on support to address gaps in their higher education knowledge and regulatory understanding. They reported that the development activities (including regular meetings with an assigned partnership manager and academic development consultants) helped them develop required policies, establish governance to oversee their HE provision (e.g. Academic Boards) and strengthen their quality assurance systems.

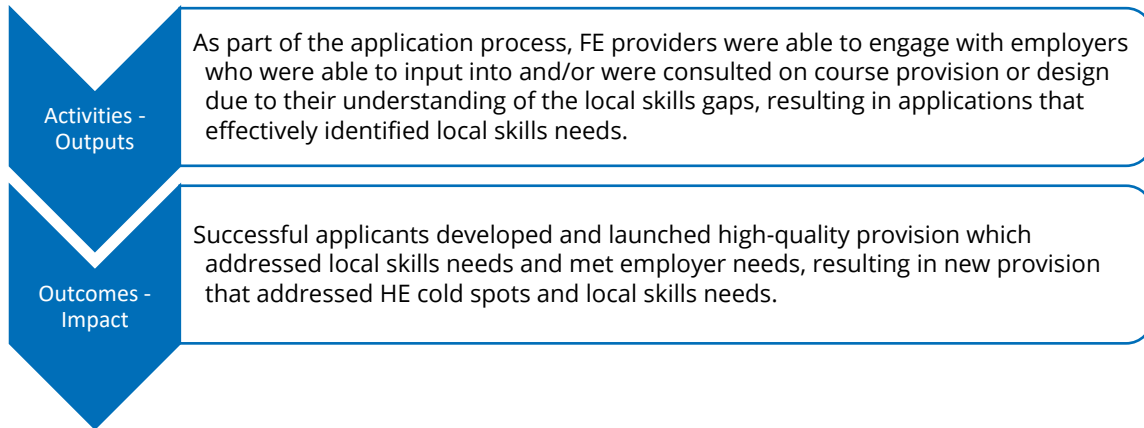
The FE colleges with established employer networks, prior HE experience and strong project leadership were better placed to develop and design programmes more efficiently – suggesting that providers that are new to working in this way may need additional support. Some participating FE colleges expressed confidence that they had the right systems and structures in place to support them in delivering HE provision beyond the pilot duration. The FE colleges that decided to withdraw from the pilot reported that they will be able to utilise the developed policies and enhanced structures to support HE delivery in the future, potentially through a different validation partner.

The evidence is inconclusive in confirming that the new HE provision developed as part of the OU validation project is considered financially sustainable. Out of the five FE colleges that remained engaged with the pilot, four decided to transition into commercial arrangements with OU. However, more time and evidence are needed to demonstrate that the provision is financially sustainable. Some FE colleges decided to withdraw from the pilot, citing financial challenges and the high level of resources required as important factors. Sustained investment is required to maintain a validation partnership beyond the initial resources required to establish it. However, other external factors were perceived to hinder the longer-term sustainability of the HE programmes, including small cohort sizes and demand for the HE programmes. The evaluation did not gather any evidence demonstrating the financial sustainability of the new provision.

4.7 Identify local skills needs

The seventh hypothesis (Figure 9) examined whether the pilot enabled participating FE college to identify local skills gaps through meaningful employer engagement and translate this into provision aligned with workforce demand.

Figure 9. H7: Identify local skills needs



FE colleges were able to engage employers during the application process, though the depth of engagement varied. Evidence from participating colleges indicated that employer engagement played a role in shaping several applications. For one participating FE college, the development of provision emerged from workforce shortages within the local and regional economy. Senior leaders and validation leads explained that workforce demand and the limited availability of higher-level training routes had created a sustained skills gap. Employers were consulted on module content and delivery structures and contributed to discussions on mentoring arrangements and the integration of relevant industry techniques into the programme. Local employment networks supported engagement events to promote the new programmes. At another FE college, the application was informed by labour market intelligence and student participation data. Labour market intelligence highlighted demand within public services and related sectors, while participation data, including progression gaps from existing accredited provision and indicators of deprivation, identified unmet need for local higher-level study.

“We’ve worked very hard with employers to listen to what they need from an apprentice.”
– Participating FE college

Applications were required to demonstrate alignment with workforce needs and priority sectors, and some applications were rejected where evidence was insufficient. Employer involvement during the validation panels (formal review meetings where the validating university assesses new programmes before delivery) provided further scrutiny of workforce relevance. However, the depth of employer engagement varied. Some FE colleges relied primarily on existing employer partnerships or previously gathered labour market intelligence rather than undertaking extensive new consultation specifically for the pilot. Structural factors also influenced the process. Stakeholders reported that compressed application timelines and the absence of dedicated development funding limited providers from undertaking wider engagement. FE colleges were also required to commit to programme proposals before contracts were finalised, which limited opportunities for additional employer consultation.

Input from employers informed programme design, often building on existing relationships. In some cases, employers contributed to programme development by advising on curriculum and delivery approaches. Employers were consulted on module design, mentoring arrangements and the integration of industry practices into teaching. This helped ensure that the provision reflected current workplace requirements.

However, the strength of evidence on how far labour market intelligence and employer insight shaped programme design was mixed. In some cases, identified workforce shortages directly informed curriculum content in technical subject areas, with employers contributing to module design and delivery approaches to ensure alignment with industry practice. However, this was not consistent across providers. While some FE colleges clearly demonstrated how local skills intelligence informed programme development, others provided less detailed evidence, making it difficult to assess how strongly employer input influenced final programme content.

There was limited evidence from employers themselves, and little comparative information on the level or nature of employer input in programme development outside of the pilot. It is therefore difficult to determine whether the level of employer engagement was significantly different from that of other higher education course development practices.

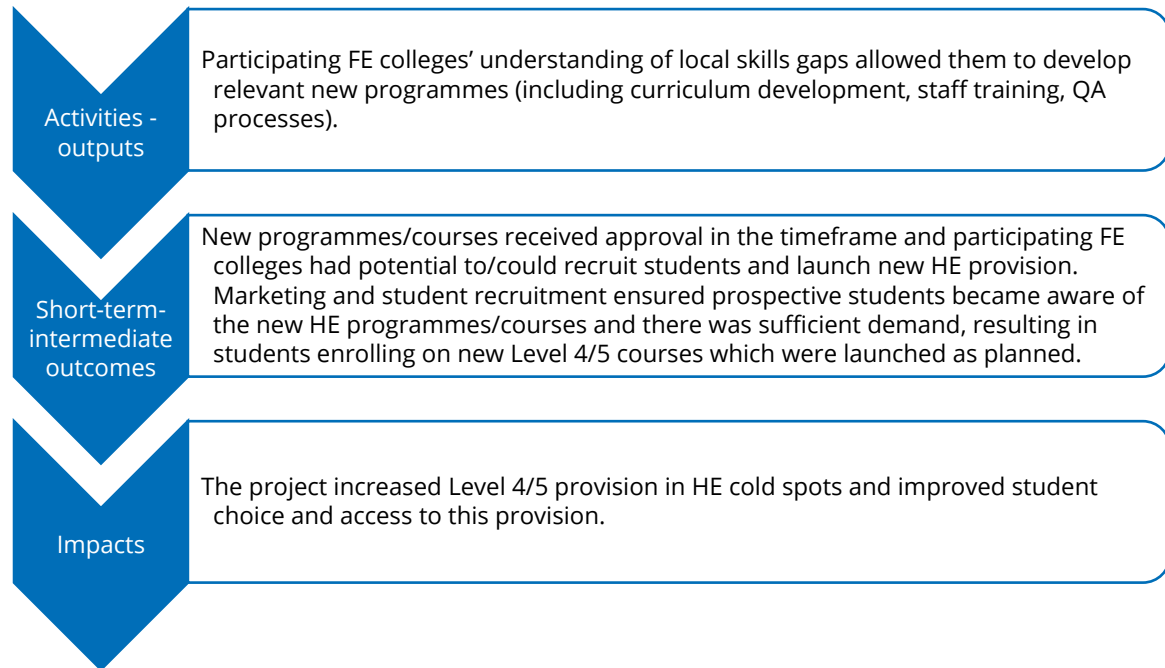
There was evidence that identified workforce gaps were translated into new programmes, with delivery and access explored further in Section 4.8. Recruitment indicated that new programmes had created progression routes into higher-level study within one FE college. These routes included students progressing from existing Level 3 accredited provision, as well as mature learners entering higher education, in some cases returning to education after time in the workforce. Teaching and programme staff reported positive engagement from students and highlighted links between the curriculum and local job opportunities.

Four FE colleges withdrew from the pilot during the process. Amongst the five that continued, programmes were successfully validated and launched. However, at some participating FE colleges, student recruitment numbers were lower than anticipated and cohort sizes were small. The expected deliverables and outputs for the pilot focused on validation and early recruitment, meaning there is limited evidence on long-term outcomes, such as whether programmes reduced skills shortages or increased higher education uptake.

4.8 Developing and launching new HE programmes

The eighth hypothesis (Figure 10) explored whether the pilot helped participating FE colleges develop the capacity and confidence to design, approve and launch new Level 4/5 provision, and whether this translated into increased provision and improved access in HE cold-spot areas.

Figure 10. H8: Developing and launching new HE programmes



Programme design drew on labour market intelligence and employer engagement (see Section 4.7), though the focus at this stage was on progressing courses through validation and into delivery.

Programmes progressed through validation, although compressed timelines created delays in some cases. Some participating FE colleges secured approval for new programmes during the pilot, demonstrating that the validation process could operate within the pilot timelines. In at least one case, a participating FE college was able to complete validation and launch a new programme within six months, supported by additional input and guidance through the pilot. This was a lot faster than typical validation timelines, as highlighted in OU monitoring reports, which demonstrates how the pilot enabled more rapid programme development in some contexts.

This was enabled through a combination of strong institutional capability and intensive support from the OU, including weekly consultancy that helped align curriculum design, quality and governance processes with HE requirements. Validation panels within the OU provided scrutiny of programme design and helped ensure academic standards were met. However, this process was not consistent across participating FE colleges. Late approvals and delays reduced the time available to promote courses and prepare for recruitment.

Marketing and recruitment activities raised awareness of new programmes among prospective students, though demand was sometimes limited. Once programmes were approved, participating FE colleges began marketing and recruiting students. Activities included promoting courses to existing students, working with employers, and advertising provision locally. Early recruitment was often supported by employer referrals and existing students within the FE colleges.

In one participating FE college, the first cohort was recruited under significant time pressure, although recruitment improved the following year when planning began earlier. However, as student recruitment was not one of the project outputs being measured, there was limited data on how effective marketing was or how many applicants went on to enrol. Recruitment worked best where FE colleges already had strong employer links, clear progression routes from Level 3, and started engaging students early. Recruitment was more difficult where timelines were short, marketing time was limited, or there were staffing and organisational pressures.

Provision increased in some HE cold spots, improving student choice and access, though the overall scale of change remained modest. There was evidence that Level 4/5 provision increased in several identified cold-spot areas, particularly where new courses were introduced in places with fewer existing HE options. The OU's end-of-project reporting confirmed that additional programmes became available in a few areas and that students were recruited locally.

Stakeholders highlighted the importance of offering higher-level studies at the local level, especially in rural and coastal areas. For learners with caring responsibilities, financial constraints or a limited ability to move away, local provision reduced barriers and supported progression. However, the wider impact was limited during the pilot period, with the success of courses dependent on growing their engagement and establishing their reputation over time (and therefore beyond the scope of this evaluation). Student numbers were generally low, and the number of participating FE colleges and programmes was lower than originally planned. Some providers withdrew from the pilot, reducing the pilot's reach and limiting conclusions about longer-term changes in student choice or participation in higher education.

5.0 Value for money assessment

This section presents the results of the value for money (VfM) analysis, outlining how VfM was judged and the key evidence used as the basis for this assessment.

Given the pilot was commissioned to test new validation partnership approaches and to design and deliver these at pace, the VfM analysis prioritises the learning and capacity-building benefits of the pilot. Outputs against aspirational targets and costs in comparison to the OU's typical delivery model (i.e. business as usual (BAU)) are also explored. However, reflecting the pilot's aims to develop new approaches and relationships, rather than to reduce resources and/or operational costs, less importance is attached to achievement against targets and to costs incurred than to learning. In practice, this means weighting the evidence of:

1. What it cost to set up and run the pilot;
2. How cost compares to BAU and reasons for variations;
3. What value the pilot created for participating FE colleges and the wider system
4. Learning derived from the pilot that has informed policy design and can continue to do so going forward.

Costs of running the pilot

To fund the pilot, the government provided a total of £10 million via the OfS to the OU. As of July 2025, £9.05 million had been spent, with the underspend returned to the DfE. Costs comprised OU costs to design, govern and deliver the programme, which included cost incurred in supporting FE colleges throughout the pilot. The underspend reflects the fact that the number of colleges participating in the pilot was lower than originally planned. Against an initial aspiration of 11 FE colleges and 33 programmes, by September 2025 the pilot had engaged nine FE colleges (four of which withdrew before completing the pilot), approved 15 programmes, and launched ten.

Costs in comparison to business-as-usual models

No quantitative data on BAU costs for directly comparable schemes was available, reflecting that the pilot represented new validation models by the OU that offered enhanced support to FE colleges. This means that no like-for-like comparison of costs between the pilot and other validation partnership models can be made. However, qualitative feedback showed that stakeholders judged the pilot to be significantly more resource-intensive and therefore more costly per unit (for example, per course, or per student) than seen under existing models. This is not surprising and reflects the fact that reducing cost per unit was not an aim of the pilot; rather it was aiming to develop new models of validation partnership and to support FE colleges to deliver high-quality Level 4 and 5 courses in areas with low qualification attainment, limited local provision, and/or low progression to HE.

“VfM is not just about learner numbers, it’s about building that capacity and sustained life.” – OfS stakeholder

The reported higher unit costs of the pilot incorporated the necessary set-up costs related to developing new models, along with the more intensive monitoring and management procedures used in the pilot. This resulted from the lower experience levels of FE colleges involved and the quicker pace of delivery. Set-up costs included the design of two new validation models (enabled validation and collaborative provision), developing new IT and partnership systems suitable for the pilot, the creation of policy toolkits specifically for less experienced providers, and undertaking resource intensive due diligence and student finance eligibility work. These represented one-off costs, as all outputs can continue to be used when working with FE colleges where all parties agree.

The pilot also experienced fixed overheads, which – along with the more intensive monitoring and management costs – meant costs did not fall in line with the reduction in the number of providers taking part in the pilot, or the number of courses developed. For example, overhead costs related to establishing governance systems had already been incurred, and specialist staff required to meet the initial commissioning ambition had already been recruited to the pilot. As these assets had already been developed or put in place, they could not be reduced when FE colleges exited the pilot early. As a result, the expected cost per course and per student rose over time.

The VfM of the pilot to participating FE colleges and the wider sector

Monitoring reports and interviews showed that the development and approval processes were regarded as intense by participating FE colleges, notably increasing their workload. This was particularly the case among those participating FE colleges least familiar with the validation process and was exacerbated by the fact that expected standards were not perceived to have been fully set out when FE colleges first joined the pilot. FE colleges needed to spend time developing systems, ensuring they were compliant with regulations, preparing for institutional approval, and designing courses. These requirements contributed to some FE colleges exiting the pilot.

Despite the intensity of the process, there is strong evidence that the pilot provided FE colleges with a better understanding of what is involved in delivering HE provision. As noted in Section 4.6, there was a major capability uplift in quality assurance, governance, compliance, programme design, FE staff development, FE college employer engagement, and alignment with FE courses and local employer skill needs. FE colleges have gained the ability to develop HE curricula independently, understand regulatory and compliance requirements, strengthen governance and quality assurance, respond to local skills needs, and to pursue new HE opportunities beyond the funded project.

“The confidence that’s given us has been transformative.” – Participating FE college

Evidence also showed that many of those in the pilot could not have developed HE provision at the required standard without the support provided via the OU. This was felt to be especially true in areas lacking easy access to a potential validating partner; FE colleges seeking a validating partner may have less success if both organisations are competing locally (however that is defined – e.g. by geographic proximity or similar HE provision available within reasonable travelling distance). Even among colleges that exited the pilot, enduring benefits from developing a clearer understanding of HE requirements and strengthened internal systems were emphasised. In addition, the aforementioned reusable outputs add value to the pilot, as they can continue to be used when working with FE colleges where all parties agree.

Learning derived from the pilot and its relationship to VfM

The pilot captured feedback and learning in a range of ways, including reflections from stakeholders on the approval process and regulator support, workshops with participating FE colleges, and from FE colleges who withdrew from the pilot. The OU used this learning to refine onboarding tools and reporting and validation documents, and to determine realistic expectations in terms of the amount of support that different FE colleges needed from the OU. The experience gained has provided the OfS with valuable insights into commissioning and validation services, which can be applied to other regulatory areas going forward. This learning, combined with the capability building of FE colleges, presents a positive picture in terms of FE colleges' ability to sustain and potentially increase their HE offer going forward.

“[The investment has] put us in a very different position to where we were four years ago in relation to colleges and what we can do.” – OU stakeholder

On balance, the pilot offered good strategic VfM through providing learning for both the OfS and the OU, creating reusable models, and developing participating FE colleges' capability and confidence in delivering HE.

6.0 Overall conclusions and key learning

This section summarises the extent to which the HE in FE (validation) project has met its objectives as well as the key lessons emerging from the evaluation.

6.1 Overall conclusions

The pilot broadly achieved its intended aims as outlined below, though its longer-term impacts and future sustainability are still to be realised.

Explore new ways for tertiary education providers to enter or expand HE provision, which includes piloting OfS powers to commission validation arrangements

The evidence strongly indicated that the pilot successfully tested the OfS's commissioning powers, by trialling a new regulatory mechanism, and generated significant learning for future commissioning. The OfS used a specific condition of registration, and funding terms and conditions, to commission the validation pilot, implementing its section 50 HERA powers for the first time. This enabled the OU to launch the pilot and develop guidance, eligibility criteria and governance structures. However, a lack of clarity about eligibility criteria and expected outcomes early in the pilot hindered its initial implementation and slowed the commissioning process. Once underway, effective governance and monitoring arrangements were established between the OfS and OU, enabling shared learning as adaptations to the pilot's delivery were developed.

The pilot produced substantial learning about how commissioning powers could operate in practice, including considerations for future 'validator of last resort' models and clearer communication where regulatory levers are used for positive commissioning. The pilot also demonstrated the feasibility of new validation models and associated operational processes, providing a practical test of alternative approaches to expanding HE delivery in FE settings. So far, learning has primarily informed internal processes within the OfS and the OU rather than informing the wider sector. However, this evaluation report and supplementary learning digests will ensure relevant sector learning is more widely disseminated.

Increase the availability of high-quality HE courses across England

The pilot increased provision in some targeted areas and validated several (10) programmes. The pilot enabled the validation and launch of new Level 4/5 programmes in some FE colleges, including in recognised cold-spot areas, helping increase local availability of HE options. This new provision offered benefits for local access, progression routes, and meeting employer-identified skills needs, especially for learners facing barriers to travelling or relocating to participate in HE. Employer engagement and labour market intelligence shaped the design of several programmes, aligning them with recognised skills gaps in local economies.

However, participation in the pilot fell short of expectations, with nine FE colleges engaged, four of which withdrew. That reduced the geographic spread and limited the potential uplift in provision.

Recruitment to approved programmes was limited due to tight timelines, delayed institutional course approvals, and limited time to spread awareness among prospective students. While it is too early to assess the evidence for long-term impact on regional HE participation rates or for successfully targeting cold spots, progress towards these objectives has so far been limited by short implementation timescales and low participation rates. An assessment of how any published data may support future identification and monitoring of gaps in HE provision, with specific consideration of how these existing sources could be supplemented to identify/define cold spots, would contribute to benchmarking and/or monitoring progress towards addressing such cold spots

Enable colleges and other FE providers to develop and deliver new HE courses and provision that would not have otherwise been offered

The evidence strongly demonstrated that **the pilot enabled FE colleges to develop their HE capability and secure approvals that would not have been feasible without OU support.** Participating FE colleges developed extensive new internal processes and governance structures, enabling institutional approval and contributing to a long-term uplift in capability. Ten programmes were successfully validated, many of which would not have been developed without the OU's resource and expertise provided via the pilot. **Support from the OU was considered to be intensive, flexible and tailored to FE colleges' capacity,** which helped increase FE college staff's knowledge, skills and confidence in HE curriculum development, quality assurance, regulatory compliance and validation processes. Even FE colleges who withdrew indicated that the pilot significantly improved their understanding of HE requirements and boosted institutional capability.

The sustainability of FE colleges' ability to continue delivering HE beyond the pilot remains uncertain. The scale of resources required for validation contributed to several withdrawals from FE colleges and raised questions about sustainability under normal operating conditions without direct funding (and OU support) for many providers. Recruitment to many courses was low, with higher numbers needed for financial viability. In addition, specific training for teaching staff was limited, with capability development focused more on validation and programme leads than broader academic teams. While some colleges moved into commercial arrangements, the VfM assessment concluded that evidence of long-term financial viability is limited, and continued delivery is likely to depend on sufficient student demand, strengthened internal capacity, and access to future external support.

6.2 Summary of key learnings

The key learnings were centred around several prominent themes, as outlined below. This section considers the implications of these learnings on future validation projects.

Communication and relationship management

- ▶ As the OfS was new to exercising its section 50 HERA powers in this way, commissioning started slowly, and there was initial uncertainty over the division of responsibilities between the OfS and the OU, which delayed early delivery. **Regulatory commissioning powers can be effective but require clearer expectations and guidance from the outset.** Stakeholders needed reassurance that the specific registration condition was being used constructively, not punitively.

- ▶ The OU and OfS valued the informal, open dialogue as it built trust and enabled easy decision-making. This allowed issues to be resolved between formal check-ins and helped keep delivery on track. **Future use of the OfS's section 50 HERA powers should ensure the establishment of regular communication channels between the OfS and the commissioned partner(s).**
- ▶ FE colleges reported that communication was made clear and timely by having a single point of contact (with knowledge of FE), consolidated feedback, weekly touchpoints, and access to specialist support within the OU. **Future validation partnership models should prioritise close, validator-led support for FE colleges with dedicated resources at each stage of delivery.**
- ▶ The OfS noted that compressed timelines impacted early employer engagement, limiting the extent of their contribution to programme design. FE colleges reported that when consultation began early, it effectively shaped curricula and aligned with local demand. **In future programme development, there should be earlier opportunities for employer involvement.**

Capacity and capability building

- ▶ The OfS emphasised that quality, capacity and capability building for FE colleges should take precedence over speed of institutional approvals. In practice, many of the participating colleges had lower capacity than anticipated and were unclear about what validation entailed, which required the OU to adapt and intensify support. **Clearer communication from validators at the outset about what validation means, with early discussion with FE colleges about support needs, can help ensure providers understand what is required and are ready to engage fully.**
- ▶ The OU reported that, for some FE colleges, the pilot sustained HE development and opened new opportunities. Some FE colleges described it as transformative, expanding their ability to serve students and local communities. **Future programmes should continue to create opportunities that help FE colleges build long-term HE capability, so the benefits continue well beyond the life of the pilot.**
- ▶ Participating FE colleges said the pilot strengthened their HE provision, institutional capability and legal and regulatory compliance. Support and legal guidance from the OU helped participating FE colleges build reusable quality systems for sustainable HE in cold-spot areas aligned to local skills needs. FE colleges also valued the OU's support and external consultants for course and assessment design. **Future initiatives should retain models like the discovery approach, which helped FE colleges build robust quality assurance systems that can be embedded across college practice and reused when developing new courses.**

Timelines

- ▶ The OfS, OU and FE colleges agreed that the compressed and misaligned timelines created programme-wide challenges. This limited FE colleges' ability to engage with the pilot, drove significant workload pressures and contributed to withdrawals due to a lack of capacity. **Future programmes could consider longer application and delivery timelines to allow sufficient time for partnership approval, capacity and capability building, and curriculum development and validation.**
- ▶ For many FE colleges, meeting the detailed requirements of validation created a heavy administrative burden. Without shared templates, colleges had to create or retrofit policies from scratch, slowing applications and increasing risk. **Future programmes should consider promoting the sharing of templates and good-practice examples to reduce unnecessary administrative burden, enabling colleges to spend less time on administration and focus more on the quality of their courses.**

Funding and financial viability

- ▶ The OfS would like stronger financial transparency and a clearer grasp of the true costs of validation services before any future scaling. **Future models could set out financial assumptions and expectations more clearly at the outset to inform commissioning.** They could also include clear KPIs and intended outcomes, underpinned by a transparent outcomes framework with proportionate monitoring and financial reporting.
- ▶ The OU and FE colleges felt that the lack of direct funding for providers shifted financial risk onto FE colleges during programme development. While initial validation was covered, ongoing partnership costs and low recruitment undermined viability of new provision, prompting some FE colleges to seek alternative validators. The lack of dedicated delivery funding also strained resources. **In the future, it may be helpful to allocate delivery funding directly to providers to support staff time for development and setup activities.**

Applications and eligibility processes:

- ▶ Eligibility criteria, particularly around defining local skills needs and cold spots, were not clearly designed from the outset. This resulted in inconsistent evidence from applicants, as the OU had to develop the application form and template without standardised definitions. **Future programmes should clearly define "skills gaps" and "HE cold spots" from the outset and specify acceptable evidence, so eligible providers can self-identify, make applications confidently and align proposals to demonstrable need.**
- ▶ FE colleges struggled with the application form and shifting eligibility criteria, which discouraged applications or prompted later withdrawal; this limited overall participation. **Future projects should consider streamlining application processes, making criteria stable and transparent, and providing support to validators to help them with this process.**

6.2.1 Wider learning for the sector

Alongside lessons for future similar projects (with the aim of expanding HE provision in cold spots in the future), evaluation findings highlighted a series of wider sector learnings for colleges and their validating partners. These are discussed in more depth in the accompanying learning digests.¹¹

Lessons for practice: Building partnerships (between validators and delivery partners)

- ▶ **Establishing partnerships that operate through open and honest communication**, where partners routinely share information, raise issues early, manage risk collaboratively, and maintain a constructive dialogue that supports effective decision making and joint problem solving.
- ▶ **Promoting responsiveness**, with clarity around roles and responsibilities, predictable communication channels, timely turnaround times for feedback, realistic expectations and recognition of college workload pressures. This is likely to result in positive working relationships, sustained momentum, and reduced stress for college teams.
- ▶ **Building capability and confidence to deliver HE sustainably**, with embedded processes for curriculum design, CMA compliance, governance, programme management and quality assurance that continue to operate effectively beyond the formal partnership period.

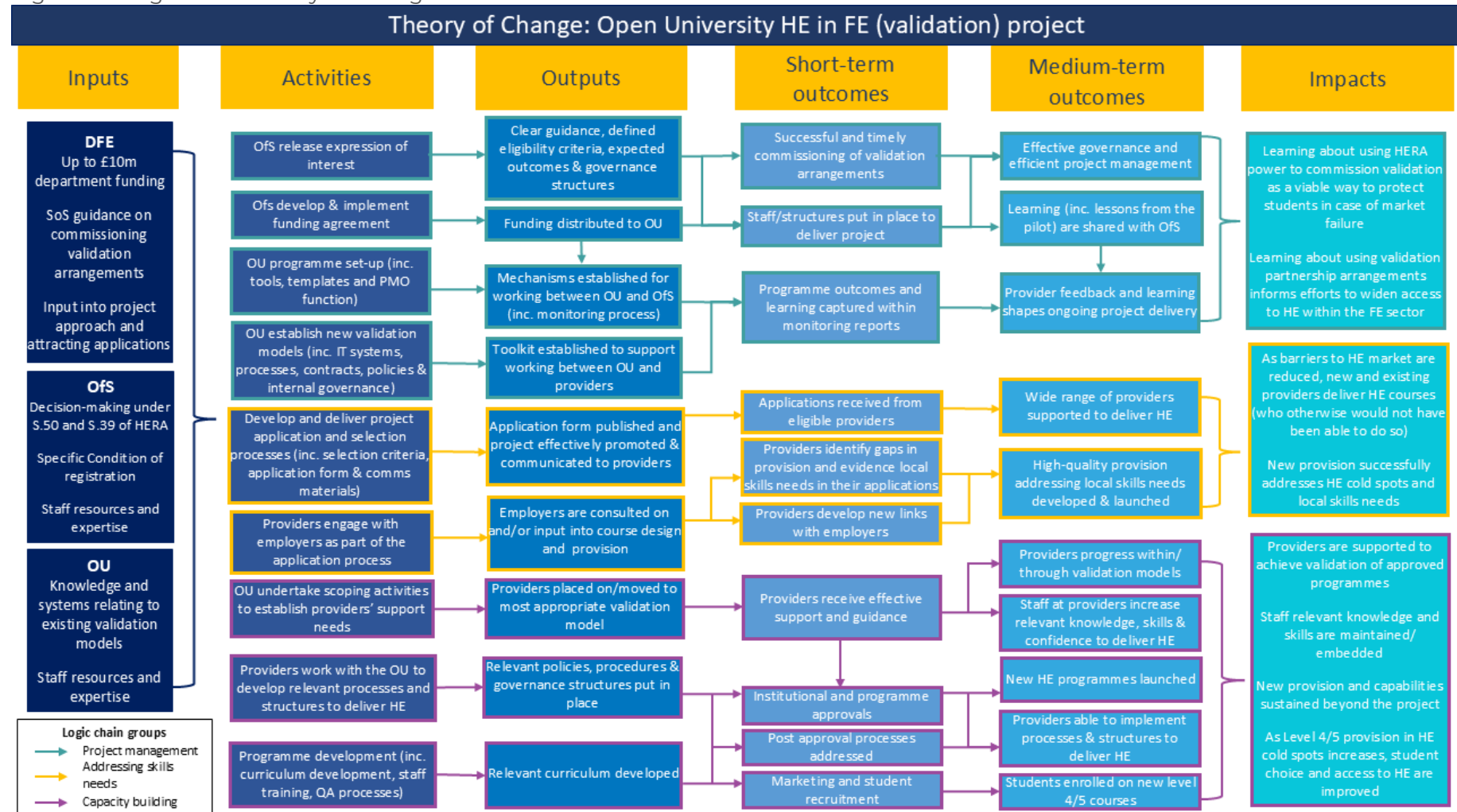
Lessons for practice: Building provision

- ▶ **Working closely with employers** means HE providers are better able to shape stronger, more relevant HE courses that reflect local job needs.
- ▶ **Providing clear progression routes** from Level 3 courses to Level 4/5 expands student choice, offering a realistic route forward, particularly for those who would not usually see university as an option, widening access and equality of opportunity.

¹¹ The digests are available alongside this report at [Evaluation of the Open University HE in FE \(validation\) project - Office for Students](#).

Appendix A: Programme Theory of Change

Figure 11. Programme Theory of Change



Appendix B: Contribution analysis framework

The extent to which the pilot's short-term and intermediate outcomes have been achieved was tested and explored using a contribution analysis approach. The aims of the contribution analysis were to:

- ▶ Assess the contribution of the HE in FE (validation) project towards the key outcomes, drawing upon the available evidence to consider how or whether the intervention, alongside other factors, contributed towards the observed outcomes.
- ▶ Develop an understanding of why outcomes have occurred (or not) through assessment of the causal mechanisms (inputs, activities, outputs).

The programme Theory of Change (ToC) (see Appendix A) provided the basis for the contribution analysis. We extrapolated the causal assumptions within the ToC into hypotheses which we 'tested' throughout the evaluation, iteratively applying evidence as it was collected to assess the extent to which, and how, inputs and activities have contributed to short-term and intermediate outcomes. As such, the hypotheses underpinned both the research tools and analysis framework, aligning data collection and findings with the ToC.

The ToC was divided into three sequential 'strands' which run horizontally from left to right in the ToC diagram, as denoted by the colour coded boxes in the diagram (in Appendix A). These related to 1. project management, 2. addressing skills needs, and 3. capacity building. The logic within each of these strands was sequential, but the three strands are working to different timescales, with certain outputs and outcomes from the earlier 'strands' needing to be achieved to enable the activities to happen in the later strands. Whilst many of the impacts identified in the ToC were longer-term and thus out of scope for this evaluation, we were able to assess some of the impacts associated with the earlier strand around project management.

Table 1 sets out the steps to using contribution analysis within our evaluation of the HE in FE (validation) project.

Table 1. Using contribution analysis within the evaluation

Using contribution analysis within the evaluation

1. **Set out the problem to be addressed** – as established through the document review and early stakeholder interviews, new and existing FE providers experience barriers to offering new HE provision despite the existence of HE cold spots throughout the country. The pilot aimed to explore new ways for tertiary education providers to enter or expand HE provision and increase the availability of high-quality HE courses by enabling FE providers to develop and deliver new HE courses and provision that would not have otherwise been offered.
2. **Develop a theory of change or logic model** – OfS developed a logic model at the outset of the programme. This was reviewed and developed as part of the scoping phase and the evaluation will test the associated causal hypotheses over the course of the evaluation.

Using contribution analysis within the evaluation

3. **Populate the model with existing data and evidence** – consultations with stakeholders and (participating and non-participating) FE colleges alongside a review of programme documents and wider evidence will allow us to collect data against these hypotheses. Any potential data gaps or areas for further exploration will be identified and explored in step 5.
4. **Assemble and assess the ‘performance story’** – the evaluation will critically appraise the nature and extent of the programme’s contribution to achieving its outcomes, and how this was achieved. We will present the ‘performance story’ within our evaluation update and discuss with OfS during a follow-up workshop.
5. **Seek out additional evidence** – to strengthen and further test the main arguments any gaps in evidence will be followed-up through the second wave of stakeholder interviews, a review of additional monitoring reports, and the wider evidence review which will be ongoing throughout the evaluation.
6. **Revise the ‘performance story’** – following adjustments at interim stage, a full account of contribution analysis will be provided within the final report and presented to OfS.

The contribution analysis drew on all relevant primary and secondary data. We gathered evidence relating to the hypotheses listed above using a matrix approach to support triangulation and appraisal of data. The matrixes listed evidence from the different sources, assess whether it supported the hypotheses and what contributed to that assessment. Researchers appraised the strength of evidence and considered any other factors that could have led to this outcome. Table 2 shows an example of what this looked like in practice for one hypothesis (identifying local skills needs). Researchers populated a version of Table 2 below for all the hypotheses.

Table 2. Matrix analysis example

H7 Identifying local skills needs	Confirming/ refuting	Strength of evidence	Gaps in the evidence	Alternative explanations
FE providers were able to engage with employers as part of the application process who were able to input into, and/or were consulted on, course provision or design due to their understanding of the local skills	Broadly confirming. Evidence that providers engaged with employers as intended, who inputted into course design. Strong arguments that courses met existing skills needs. However, evidence suggests	Moderate. Applications demonstrated local workforce need, and OU validation panels engaged employers during programme development. Strong triangulated evidence in specific case studies supported by	Unclear whether employer engagement was prioritised more as a result of the HE in FE project. Limited direct employer testimony across all providers. Limited data on depth and intensity of consultation in all cases. Limited insight into non-	In some cases, provision may have been driven by existing strategic ambitions or previous bid development rather than the pilot. Colleges with established HE expansion plans may have progressed similar provision independently. Employer

H7 Identifying local skills needs	Confirming/ refuting	Strength of evidence	Gaps in the evidence	Alternative explanations
gaps, resulting in applications.	collaboration would have happened as part of the launch of any new HE programme and was not newly carried out for this project.	documents. However, depth of engagement varied across FE colleges and was not consistently evidenced in all cases.	participating colleges.	engagement may have reflected ongoing relationships rather than new activity stimulated by the pilot.
Successful applicants developed and launched high quality provision which addressed local skills needs and met employer needs, resulting in new provision that addressed HE cold spots and local skills needs.	Broadly confirming. Emerging evidence that courses are high quality and meet employers' needs, suggesting that new provision will plug identified skills gaps. Where provision was launched, it was generally well aligned to local skills gaps and HE cold spots. However, while evidence indicated meaningful alignment in several cases, scale was limited and evidence less robust given how newly launched courses are.	Moderate. Monitoring data confirmed programme validation and launch in priority sectors and geographically targeted as intended, with evidence of recruitment and retention in some cases. Positive stakeholder and student accounts support alignment. However, participation was limited in scale and provision is relatively new, so data on long-term employment outcomes and employer satisfaction is not yet available.	Monitoring focused on recruitment/ validation rather than impact of skills gaps, with limited employer satisfaction data post-launch. More objective evidence on whether courses are plugging local skills gaps will be needed e.g. data on student employment outcomes. There are no measurable workforce capacity indicators.	OU validation may have formalised provision that colleges were already planning to introduce. Recruitment patterns - particularly the high proportion of internal progression (students moving from lower-level courses to higher-level study within the same college) - suggest unmet progression opportunities within colleges were also driving demand.



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