Effectiveness in implementation of access and participation plan reform: Part 1

23 October 2020

nous

Contents

Abbreviations and glossary

Term	Meaning
APP	Access and participation plan
BAME	Black, Asian and minority ethnic groups (usually with reference to students)
Codes	Used to categorise the qualitative analysis. A structured and hierarchical way of tagging references based on their content
Coding framework	Total list of codes that have been used to process qualitative data
FECs	Further education colleges
FTE	Full time equivalent is a unit that seeks to standardise a student's course load, with the normal course load of a full-time student. A full-time student is counted as one FTE, while a part-time student gets a score in proportion to the hours they study.
HEFCE	Higher Education Funding Council for England
HERA 2017	Higher Education and Research Act 2017
IMD	Index of Multiple Deprivation (England) is calculated from a basket of measures which classifies areas by level of deprivation. It is presented as five quintiles, where quintile 1 contains the most deprived 20 per cent of the English population, and quintile 5 the least deprived 20 per cent.
KLEs	Key lines of enquiry relating to the review of access and participation reform
KPI	Key performance indicator
KPM	Key performance measure
LPN	Low participation neighbourhoods (relating to POLAR4 quintile 1 classification)
MAXQDA	Qualitative analysis software allows for automated tagging of input data (access and participation plans) based on the prevalence of particular words or phrases.
NSS	National Student Survey
NUS	National Union of Students
OFFA	Office for Fair Access

Term	Meaning
OfS	Office for Students
POLAR4	Participation of Local Areas is a classification of geographical areas, based on rates of participation in higher education by young people. It is calculated using data on students who began their studies between 2009-10 and 2013-14. Areas are ranked by a measure of young participation and then divided into five equal sized groups – quintiles.
Qualitative	Refers to the qualitative review of code contents
Quantitative	Refers to the analysis in changing frequency of codes as coded by MyPocketSkill
Reference	Individual segments within a report that have been associated with a code, often paragraphs of text containing the keyword(s)
RN1 2019-20	Regulatory Notice 1: Access and participation plan guidance (OfS 2018.03) for 2019-20 plans
RN1 2020-21	Regulatory Notice 1: Access and participation plan guidance (OfS 2019.05) for 2020-21 to 2024-25 plans
UKPRN	UK Provider Reference Number
UKRI	UK Research and Innovation

1 Executive summary

1.1 Introduction

The Office for Students (the OfS) engaged Nous Group (Nous) to conduct a review of the effectiveness of its regulatory reform to access and participation. The review explores the following overarching research question:

> To what extent have the OfS's reforms relating to access and participation led to the increase in ambition and positive change in provider behaviour necessary for equality of opportunity in higher education?

The Nous review will be completed in two parts:

- **Part 1:** Analysis of changes in the content of the 2018-19 Office for Fair Access (OFFA) access agreements to the OfS 2019-20 access and participation plans and the five-year 2020-21 to 2024-25 access and participation plans.

- **Part 2:** In the next phase, Nous will carry out a stakeholder review to understand whether regulatory changes and the OfS guidance and actions have resulted in changes in behaviour that reflect a greater ambition and commitment to access and participation.

This two-part review contributes to a broader evidence base relating to the impact of the OfS's access and participation reforms. Another key element is the OfS report *Transforming Opportunity in Higher Education*[1], which sought to understand scale of ambition in relation to providers' outcomes targets for access and participation. Table 1 below provides the key lines of enquiry (KLEs), which address the overarching research question, detailing how the three reports will contribute to the evidence base.

Table 1 | Key lines of enquiry (KLEs)

KLEs	Report	Contribution to evidence base
To what extent do the 2020-21 plans reflect the ambition and provider behaviour change required to achieve equality of opportunity in higher education?	OfS Transforming opportunity in higher education	Scale of ambition reflected in providers' outcomes targets
	Nous review Part 1	**Changes in access and participation commitments in the plans over three years**
	Nous review Part 2	Stakeholder views on ambition and changing behaviour

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[1] See *Transforming Opportunity in Higher Education,* (OfS 2020.06) available at
https://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/

KLEs	Report	Contribution to evidence base
To what extent is changing ambition and behaviour in access and participation a consequence of the OfS's reforms?	**Nous review Part 1**	**Relationship between changing guidance and corresponding commitments in the access agreements and plans over three years**
	Nous review Part 2	Stakeholder views on factors influencing changing ambition and behaviour, including the range of OfS activities
How has OfS guidance, engagement and assessment processes influenced behaviour in relation to the development of access and participation plans?	Nous review Part 2	Stakeholder views on the influence of the OfS's guidance and support

About this report

This report presents Part 1 of the two-part Nous review. The findings are based on an analysis of providers' access agreements and access and participation plans using quantitative analysis of codes and qualitative techniques. The report is structured by key elements of the plans, while the coding and analysis in each section incorporates relevant content across the entirety of the plans. This is owing to inherent overlap between sections as well as an emphasis in the guidance to demonstrate an overarching theory of change through linkages across the plans. It is unrealistic to assess increased ambition through the analysis of the plans alone. The findings contribute to the broader evidence base (outlined in Table 1) in the following areas:

- Changes in access and participation commitments in the plans over three years through the analysis of the following elements:
    - **Assessment of performance** which reflects an in-depth understanding of providers' key issues for different student groups
    - **Evidence-informed strategic approach** which demonstrates effective links between issues identified and strategic measures to address them
    - **Whole provider approach** which demonstrates how providers align relevant strategies and operations to deliver the work successfully
    - **Student consultation** which demonstrates a commitment to understanding the issues that are affecting students and how best to address them
    - **Evaluation strategy** which demonstrates an evidence-informed approach to continuous improvement.
- Relationship between the changing guidance and corresponding commitments in the access agreements and plans over three years

The following section outlines the key findings from these two areas.

1.2 Key findings

This section outlines the key findings in relation to:

- Changes in access and participation commitments
- Relationship between OfS guidance and corresponding commitments.

Changes in access and participation commitments

The analysis uncovered the headline findings and issues in relation to the various elements of the access and participation plans outlined in Figure 1.

Figure 1 | Key findings relating to elements of the plans
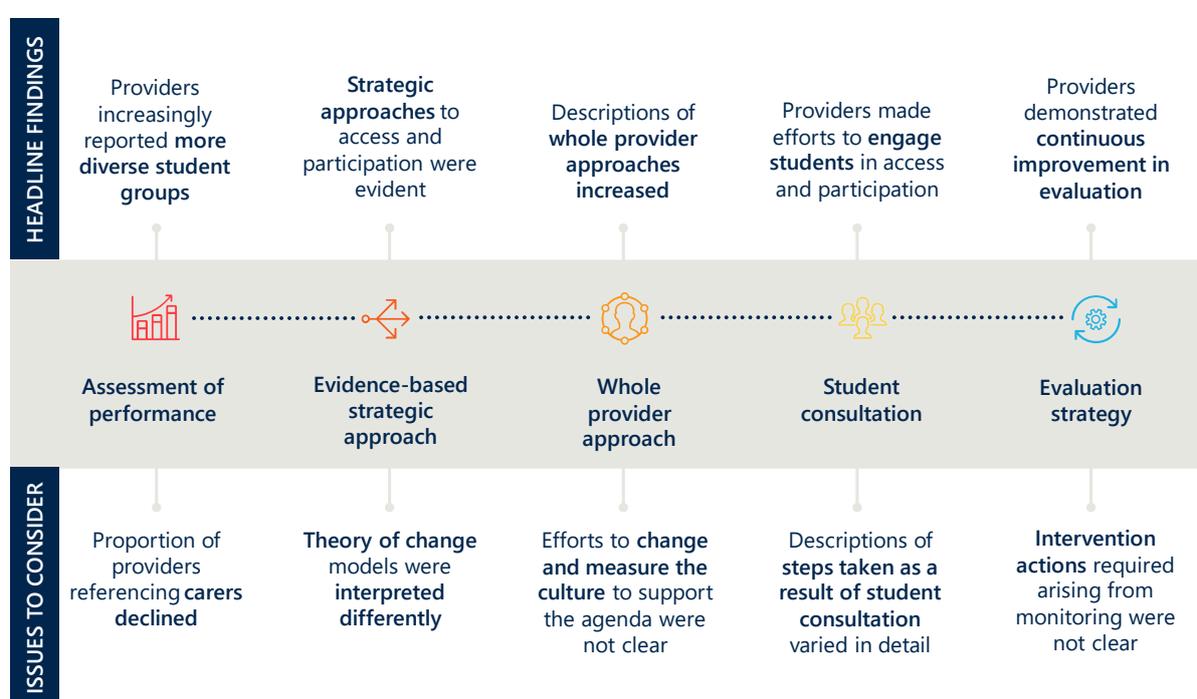
Providers increasingly reported more diverse student groups

The proportion of providers referencing a variety of student groups in their assessment of performance, targets and strategic measures increased rapidly in 2020-21. Plans were most advanced in the reporting of the compulsory student group categories outlined by the OfS in the Regulatory Notice 1 guidance (RN1)[2], including students from low socio-economic backgrounds, Black, Asian and minority ethnic (BAME) students, mature students, disabled students and care leavers. This was likely as a result of the introduction of the OfS data dashboard.[3] The 2020-21 plans also demonstrated increased regard for the outcomes of

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[2] OfS, *Regulatory Notice 1: Access and participation plan guidance* (OfS 2019.05 version), available at https://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/
[3] OfS, *Access and participation data dashboard*, https://www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/

broader student groups such as estranged, travellers, refugees and military, although the proportion of providers that directly referenced carers decreased.

More providers referred to disaggregated student groups and there was a broad commitment to address intersectionality. However, many (particularly smaller providers) highlighted challenges in measuring outcomes for these disaggregated or intersectional groups owing to presently immature data collection methods and/or small sample sizes that limit the statistical significance of any findings.

Strategic approaches to access and participation were evident

Providers described links between their assessment of performance and subsequent aims and strategic measures. The 2020-21 RN1 guidance (OfS 2019.05) suggested that providers conceptualise this approach through an overarching theory of change. As such, references to theory of change models increased in the 2020-21 plans, but the models were interpreted and reported differently by providers. Some referenced a theory of change in relation to their evaluative approach, whereas others used detailed logic chains to outline changes they expect to see for different stages of the lifecycle or by individual objectives. Further details or examples of effective practice may be required by the OfS to support sector wide progress towards a more strategic conceptual approach.

Providers continued to report evidence-informed spend on strategic initiatives and this was increasingly related to broader areas of the lifecycle. A common theme in the 2018-19 access agreements was the description of shifts in spend from financial support to access activities. The evolution of plans over the years shows that providers have shifted spend across the lifecycle in line with evidence of impact. There were also some identifiable trends in strategic initiatives, which can be seen to relate to the broader policy and political environment.

Descriptions of whole provider approaches increased

References to whole provider approaches have increased year-on-year. A common theme throughout all years was the alignment with equality and diversity, particularly through governance structures, but increasingly the plans provided tangible examples of shared measures and goals in relation to this. The evolution of the plans demonstrated increasing regard for broader strategic areas. Inclusive teaching, learning and assessment strategies were commonly referenced in the 2020-21 plans as this was suggested in the RN1 2020-21 guidance (OfS 2019.05). Some providers gave examples of how they have established school or faculty level roles to embed inclusive practice across the whole provider.

The 2020-21 RN1 guidance (OfS 2019.05) referred to the culture and leadership needed to support these changes. While reference was made to cultural change in some of the 2020-21 plans, it was not always clearly articulated how providers plan to make the necessary changes or measure the impact.

Providers made efforts to engage students in access and participation

There was evidence in all three years of plans that providers engaged students in the development, delivery and evaluation of the plans. Descriptions of student-led activities in

access and participation demonstrated that many providers engaged students in decision-making groups. There were more references to students leading campaigns and initiatives relating to access and participation in 2019-20 and 2020-21 than in 2018-19. The 2020-21 plans particularly demonstrated an uplift in student engagement in evaluation and monitoring. However, descriptions of steps taken as a result of student consultation varied in their level of detail. Some providers included broad statements, describing the partnership approaches or committee structures, which built student contributions into the plan. Others offered more detailed examples where student feedback had led to reviews or changes to specific initiatives or programmes.

Providers demonstrated continuous improvement in evaluation

Providers increasingly described efforts to assess their own evaluative performance, including through the OfS self-assessment evaluation toolkit. There was evidence that evaluation strategies and monitoring practices have improved over time and the latest plans demonstrated a better understanding of how monitoring practices are distinct from evaluation. However, few plans evidenced how providers would intervene to address issues relating to programmes that are off track or underperforming.

Relationship between OfS guidance and corresponding commitments

The analysis explored the relationship between the OfS RN1 guidance and the corresponding plan commitments, with the following overall key finding.

Providers are responsive to the changes in guidance

Year-by-year analysis of plans shows that changes in OfS guidance resulted in corresponding changes to providers' access and participation plan commitments. This is not surprising given the specific requirements set out in the access and participation guidance. The introduction of new requirements or changing emphasis nearly always resulted in an increase in related coded material. With respect to guidance that had remained the same, code frequency also tended to increase year-on-year, typically reflected by more detailed and nuanced responses in the relevant sections of the plans. This suggests that plans have become increasingly detailed over time.

1.3 Recommendations for access and participation plans

Although it was not the focus of this review, the research has highlighted two areas where the OfS could make changes to the guidance:

1. The different representations of theory of change models suggest that further guidance or good practice examples for the sector could be beneficial.
2. Future plan templates could include checkboxes to indicate clearly when evaluation design or financial support has been informed by some form of self-assessment

toolkit. This could also include the opportunity to indicate how useful the tools have been on a Likert scale.[4]

1.4 Avenues for further research in Part 2

As Part 1 of the two-part review, this report is deliberately observational in nature. There are methodological limitations related to the analysis of the content of plans over time, meaning that interpretations regarding the extent to which changes are attributable to the OfS's reforms are limited. Further details on methodological limitations are provided in Section 2.2. However, the analysis has highlighted avenues for further research to feed directly into stakeholder engagement. The second part of the review will seek to understand the following overarching questions:

- The extent to which observed changes in ambition and shifting behaviour are a reality

- The extent to which changing behaviour can be attributed to changing regulation as opposed to other external or internal variables (for example, national or local student campaigns or changes in leadership)

- Which actions taken by the OfS have been most influential in driving behavioural change (for example, making access and participation a top priority in the regulatory framework, emphasis by the OfS leadership of the importance of the agenda, changing plan guidance)

- The extent to which OfS guidance, resources, workshops, and briefing events supported the development of access and participation plans.

Indicative areas of research for exploration in Part 2 are outlined in Table 2.

Table 2 | Avenues for further research in Part 2

Section	Research areas for exploration
Ambition	1. How much of a priority is access and participation within higher education providers? 2. To what extent have providers become more ambitious as a result of changes to the OfS's access and participation regulation and associated activities?
Assessment of performance	3. How has the OfS data dashboard improved sector understanding of key issues in relation to access and participation? 4. How did new insights affect providers' overarching access and participation strategy?
Evidence-informed	5. How did the OfS's guidance support the development of a more coherent narrative in the plans?

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[4] A Likert scale is a psychometric rating scale in which respondents specify their level of agreement to a statement typically in five points: 1. strongly disagree, 2. disagree, 3. neither agree nor disagree, 4. agree, 5. strongly agree.
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Section	Research areas for exploration
strategic approach	6. How helpful was the OfS's guidance in supporting a more evidence-informed approach to planning?
Whole provider approach	7. How has the OfS's guidance improved efforts to implement whole provider approaches?
Student consultation	8. To what extent has the OfS's guidance led to more meaningful engagement of students from diverse backgrounds in the development, delivery and monitoring of the plans? 9. How effective was consultation and engagement from the student perspective in relation to the 2020-21 plans?
Evaluation strategy	10. To what extent have changes in the OfS's guidance and resources incentivised improvements in monitoring/evaluation?
OfS reforms and resources	11. How useful were the OfS's guidance, resources, workshops and briefing events in supporting the development of access and participation plans? 12. To what extent did the OfS's various reforms and resources support greater ambition in plan development and implementation?

2 Background

2.1 Introduction

The OfS engaged Nous to conduct a review of the effectiveness of its regulatory reform to access and participation. The review seeks to understand whether changes in regulation, from access agreements to access and participation plans, are leading to increased ambition and changes in behaviour required for better outcomes for underrepresented groups in higher education. The Nous review will be completed in two parts:

- **Part 1:** Analysis of changes in the content of the 2018-19 OFFA access agreements to the 2019-20 OfS access and participation plans and the five-year 2020-21 to 2024-25 access and participation plans.
- **Part 2:** Later this year, Nous will carry out a stakeholder review to understand whether regulatory changes and the OfS guidance and actions have resulted in changes in behaviour that reflect a greater ambition and commitment to access and participation.

This paper presents Part 1 of the Nous review.

The Nous review is part of a broader evaluation conducted by the OfS. *Transforming Opportunity in Higher Education*[5] reported quantitative analysis of the sector's targets to 2024-25 in relation to the OfS's Key Performance Measures (KPMs) 2-5. The KPMs aim to ensure that access, success and progression are not limited by background and identity, and that gaps are significantly reduced in the following areas:

- KPM1: participation between the most and least represented groups[6]
- KPM2: participation at higher tariff providers between the most and least represented groups
- KPM3: non-continuation between the most and least represented groups
- KPM4: degree outcomes (1sts or 2:1s) between white students and black students
- KPM5: degree outcomes (1sts or 2:1s) between disabled students and non-disabled students.[7]

The report found that providers' commitments set out in the targets '*should bring about significant progress towards reducing inequalities in access and participation*' if implemented successfully. The two-part Nous review aims to understand the extent to which behaviour is changing in a way that will support this successful implementation.

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[5] See *Transforming Opportunity in Higher Education* (OfS 2020.06), available at
https://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/
[6] Progress on KPM1 was not included (in OfS 2020.06) because the OfS has committed to setting the level of ambition once the government has responded to the post-18 review of education and funding. This is expected in autumn 2020.
[7] See *Participation Performance Measures* available at https://www.officeforstudents.org.uk/about/measures-of-our-success/participation-performance-measures/

Access and participation regulation has evolved

Reforms to access and participation regulation were part of broader changes to higher education regulation following the new Higher Education and Research Act (HERA) 2017[8]. The act established the OfS as the new regulatory body under the new legislation which was formed following the dissolution of the Higher Education Funding Council for England (HEFCE) and OFFA. The need to promote equality of opportunity is fifth of the seven OfS general duties under this act.

'The need to promote equality of opportunity in connection with access to and participation in higher education'

OfS general duty, HERA 2017

Access and participation plans were introduced in the OfS regulatory framework[9] in 2018 as the first ongoing condition of registration for providers wishing to charge fees above the basic amount to qualifying persons on qualifying courses. The plans require providers to outline their approach to improving equality of opportunity for underrepresented groups to access, succeed in and progress from higher education. The plans replaced access agreements, which were required under OFFA regulations up to the academic year 2018-19.

Access and participation plans place greater demands on providers to drive increased access and participation for underrepresented groups in the following ways:

- A focus on protecting the interests of students over the provider
- A greater focus on outcomes (for example, narrowing gaps in student access and outcomes for underrepresented groups) as opposed to inputs (for example, a university or college's spend on access programmes)
- A further shift of emphasis to the whole student lifecycle
- Evidence of continuous improvement in the plans, including more evidence-informed approaches and information about how providers will monitor and evaluate their progress
- Evidence of a more strategic approach to access and participation across the whole provider.

The 2020-21 plans represent an overhaul of the regulatory approach

The 2020-21 plans reflect a step-change in the evolution towards more strategic and proactive access and participation for the sector. The 2019-20 plans were intended as a one-year interim approach while the OfS developed and consulted on reforms to its approach to access and participation, which were agreed by the OfS Board in December 2018. Key to the reforms was placing access and participation plans on a more strategic footing. The 2020-21 plans saw a move from one to five-year timescales to allow greater ambition and to support effective long-term strategic planning.

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[8] See *Higher Education and Research Act 2017*, c29, available at
https://www.legislation.gov.uk/ukpga/2017/29/introduction/enacted
[9] See *Securing student success: Regulatory framework for higher education in England*, (OfS 2018.01) available at
https://www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/

The 2020-21 plans required providers to critically review their own student populations to identify access and participation gaps across the student lifecycle. Providers were expected to have strategic aims, objectives and outcome-based targets related to areas where there were gaps between underrepresented students at that provider. If they did not include a target, they were expected to give a clear rationale as to why not. They would have contributed to OfS KPMs that aligned with their own identified gaps, and beyond this, they would have a plan that precisely addressed their own material gaps.

2.2 Methodology

The methodology for this report involved automated keyword analysis and qualitative analysis, outlined in detail below. It builds on the previous comprehensive work undertaken by MyPocketSkill[10] on behalf of the OfS, to code the access agreements for 2018-19 and access and participation plans for 2019-20 and 2020-21 to 2024-25.

Automated keyword analysis

1. **Automated qualitative coding:** Extensive preparatory work was undertaken by MyPocketSkill to develop code frameworks as inputs for qualitative analysis software. Code frameworks were established for each of the last three years of access agreements and plans, aligned with the structure of the regulatory instructions. Analysis of provider's access and participation plan content was undertaken using a keyword search approach built into MAXQDA software.

2. **Creation of a central database:** MyPocketSkill's code frameworks are the underlying dataset for Nous' analysis. There is variation in the frameworks each year, so a matching exercise was undertaken to align the three outputs. Nous combined all three MyPocketSkill code frameworks into one database.

3. **Segmentation by key fields:** Using the UK Provider Reference Number (UKPRN) as a unique identifier, Nous expanded the database to include additional fields required to allow more nuanced analysis, including: UK region; size by full-time equivalent (FTE); tariff-type (high and not high-tariff); and provider type.

4. **Trend analysis:** For each year and code level, Nous reviewed both the volume of references and the number of unique providers that made at least one reference. Reference volume is considered only as a partial proxy for quality of provider response.

5. **Keyword evidence base:** Keyword analysis findings are indicative only. This analysis has been complemented by substantial qualitative analysis to better understand the causes of variation.

Qualitative analysis

6. **Identification of areas for deeper exploration:** The qualitative analysis is informed by the key lines of enquiry (Table 1), which aim to understand the extent to which the 2020-21 plans reflect the ambition and provider behaviour change required to achieve

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[10] MyPocketSkill, 2020, available at https://www.mypocketskill.com/

equality of opportunity in higher education. To answer this, the analysis focused on providers' assessment of performance, evidence-informed strategic approaches, whole provider approaches, student consultation and evaluation strategy. Nous identified changes in coding frequency over the three years of plans which point to noteworthy changes in these areas as part of our quantitative analysis.

7. **Manual review of relevant codes:** For the codes identified as of interest, Nous undertook a manual review of the relevant data assigned to the MAXQDA codes to gain qualitative insights into changes in provider behaviour over the years. The codes that are featured in this report are described in Appendix A.

8. **Sampling of reports:** To gain a more holistic view of how reports have changed, Nous reviewed a sample to complement the review of code content.

9. **Review of relevant guidance:** Where notable changes were identified, Nous reviewed the relevant guidance for each year to determine the extent to which changes in guidance related to shifts in focus.

Methodological limitations

Analysis of access and participation plan contents has provided an indication of ambition and future behavioural change through a comparison of commitments and behaviour over time. However, in isolation the findings are not sufficient to understand changing ambition, nor the extent to which changing behaviour is attributable to changes in regulation.

There were methodological limitations in reviewing changing code frequencies. The coding undertaken by MyPocketSkill, although comprehensive, was not entirely comparable across the three years of access agreements and plans. This was because of changes in guidance resulting in additional codes each year. Nous was therefore limited to exploring comparable codes across the years which addressed the KLEs, outlined in Section 1.1.

The findings from this part of the analysis have provided valuable insights that will inform the consultation with relevant stakeholders in Part 2.

3 Scale of ambition

Understanding the sector-wide scale of ambition relating to access and participation, and the extent to which this has changed as a result of OfS reforms are key research questions for this review. The regulatory guidance has always sought to drive providers towards greater ambition; however, the move from one-year to five-year timeframes in the 2020-21 access and participation plans represents a significant shift in expectations. One of the key motivators for the change was to encourage providers to think long term and to be more ambitious in their endeavours to reduce gaps in access and participation.

It is not possible to accurately assess how ambition has changed through the qualitative methods adopted in this element of the review (Part 1) because analysis of written commitments in an access and participation plan can only provide an indication of possible future behaviour. However, previous work undertaken by the OfS sought to understand this changing ambition through the quantitative analysis of the sector's targets to 2024-25 to reduce inequalities in access and participation.

Transforming Opportunity in Higher Education [11] reported a '*step change'* in ambition in the access and participation plans '*not only in the outcomes providers are striving for, but also in their commitment to continuously improving the ways they work towards those outcomes*'. The report involved quantitative analysis of the sector's targets to 2024-25 in relation to the OfS's KPMs 2-5 as outlined in Section 2.1. The report found that providers' commitments set out in the targets would represent significant progress to reducing inequalities by 2024-25.

Part 2 of this review will add further insights by exploring changing ambition and the factors affecting this directly with sector stakeholders. The following sections of this report provide insights into the extent to which implementation represents a shift in the behaviour necessary to meet the ambitious targets set.

3.1 Avenues for further research

The areas below are indicative ones for testing in consultation with stakeholders in Part 2 of the review.

> **Areas for exploration:**
> 1. How much of a priority is access and participation within higher education providers?
> 2. To what extent have providers become more ambitious as a result of changes to the OfS's access and participation regulation and associated activities?

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[11] See *Transforming Opportunity in Higher Education,* (OfS 2020.06) available at
https://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/
This report includes commentary for KPMs 2-5 on rates of progress beyond 2024-25.

4 Assessment of performance

This section seeks to understand the extent to which providers included broader groups of students in their 'assessment of performance'. The regulations require that all access and participation plans include a holistic assessment of providers' recent performance against a defined set of access and participation metrics. Providers are required to identify underrepresented student groups, or sub-groups, that experience equality gaps throughout their higher education experience. This section focuses on direct references to different student groups, on the basis that the inclusion of a wide range of groups provides a more nuanced view of recent performance.

The assessment of performance section of the regulatory guidance experienced the most change between 2018-19[12] and 2019-20[13] with the move to access and participation plans. The 2019-20 guidance provided a structured list of both compulsory and optional student categorisations. Compulsory categories included larger cohorts such as BAME groups. The OfS provided additional optional categories of student groups known to experience disadvantage to ensure that providers assessed their performance where they had statistically relevant cohorts. The 2020-21 guidance[14] included an additional request to consider the impact of intersectional characteristics.

The quantitative analysis of providers' references to student categories was complemented by a qualitative review of the relevant code references and detailed sampling of reports to understand any identified trends over the period. Key findings from the analysis were:

- References to categories of disadvantage increased.
- Providers committed to address intersections of disadvantage.
- Many providers identified that intersectionality of disadvantage was an important area where they did not currently have the capability to deliver meaningful findings. Some committed to improve data collection and analysis in this area.
- Small providers were limited by sample size.

Each is discussed in Sections 4.1, 4.2, 4.3.

4.1 References to categories of disadvantage increased

Overall, the absolute number of references to various student groups increased over the three years of access agreements and plans. It is worth noting that the absolute number of references may be slightly underrepresented in this section. Many providers included charts

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[12] OFFA, *Strategic guidance: developing your 2018-19 access agreement*, https://webarchive.nationalarchives.gov.uk/20180511111617/https://www.offa.org.uk/universities-and-colleges/guidance/annual-guidance/
[13] OfS, *Regulatory Notice 1: Access and participation plan guidance for 2019-20* (OfS 2018.03), available at https://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/
[14] OfS, *Regulatory Notice 1: Access and participation plan guidance for 2020-21* (OfS 2019.05), available at https://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/

and images as part of their assessment of performance sections and the image file type determined whether the text it contained was captured by MAXQDA software.

References to the compulsory categories of student disadvantage increased

At a sector level, the 2020-21 access and participation plans showed a substantial increase in both volume and percentage of providers, including references to the key measured student categories. Coding analysis focused on the representation of sub-groups that were listed in the RN1 2020-21 guidance (OfS 2029.05). The key groups that were made mandatory by the RN1 notice were referenced in all providers' plans, including students from low socio-economic backgrounds, BAME students, mature students, disabled students and care leavers. The OfS access and participation data dashboard was launched in time for the development of the 2020-21 plans and it is likely that this had a positive impact on providers' ability to assess their performance against these key categories.[15]

The 2020-21 plans saw providers disaggregate the student data more often than previously, in line with requests made in the guidance. More specifically, providers more frequently disaggregated the categories of 'BAME' and 'disabled' into their constituent parts. Over 80 per cent of providers implemented specific measures for Black and Asian students, while both mixed and other ethnicity categories saw increases of a similar scale. A similar pattern saw a 30 per cent increase in the total number of references to student groups with disabilities, supported by increased references to the disaggregated sub-categories of mental health (up 25 per cent) and physical disability (up 100 per cent). Figure 2 illustrates changes in code frequency relating to BAME categories over the three years of access agreements and plans.

Figure 2 | BAME category performance assessment references
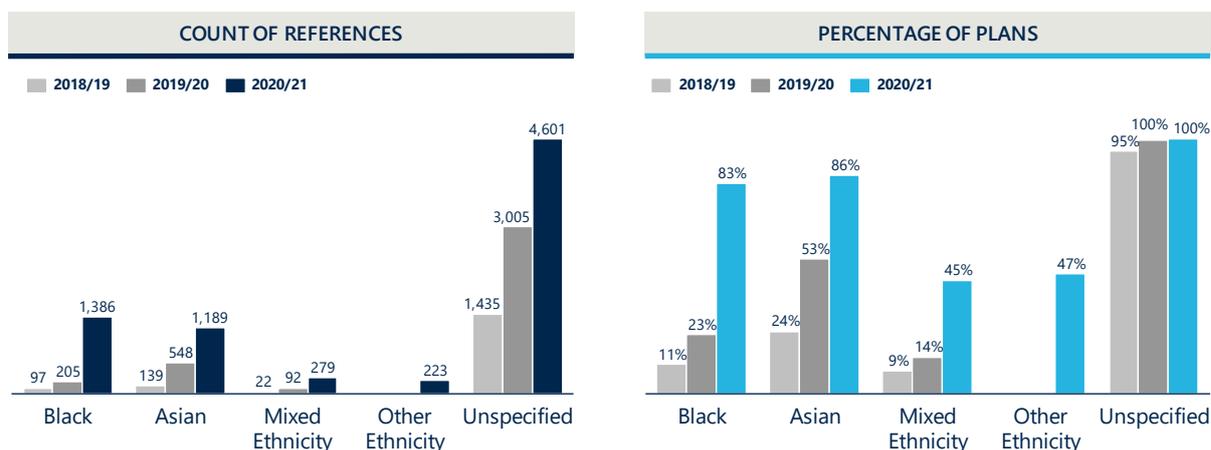
Socio-economic student groupings are more commonly referenced

2020-21 saw a substantial lift in the use of socio-economic student categories. Most notably references to socio-economic status and the use of descriptors such as low participation neighbourhoods (LPN) increased by 495 per cent and 110 per cent respectively (Figure 3).

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[15] OfS, *Access and participation data dashboard*, https://www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/

The pronounced rise in socio-economic (general) references was driven predominantly by the request of the OfS that providers utilise Index of Multiple Deprivation (IMD) as a standardised metric for social economic measurement. Direct references to the IMD method constituted over 2,700 of the references in 2020-21. There was a fall in references to 'low income' as a category, though sample analysis of the reports suggests this has been characterised by a move by providers to use the more descriptive categorisations such as socio-economic status. (Refer to the glossary for definitions.) Figure 3 illustrates changes in codes relating to socio-economic indicators over the three years of access agreements and plans.

Figure 3 | References to socio-economic indicators for underrepresented student groups
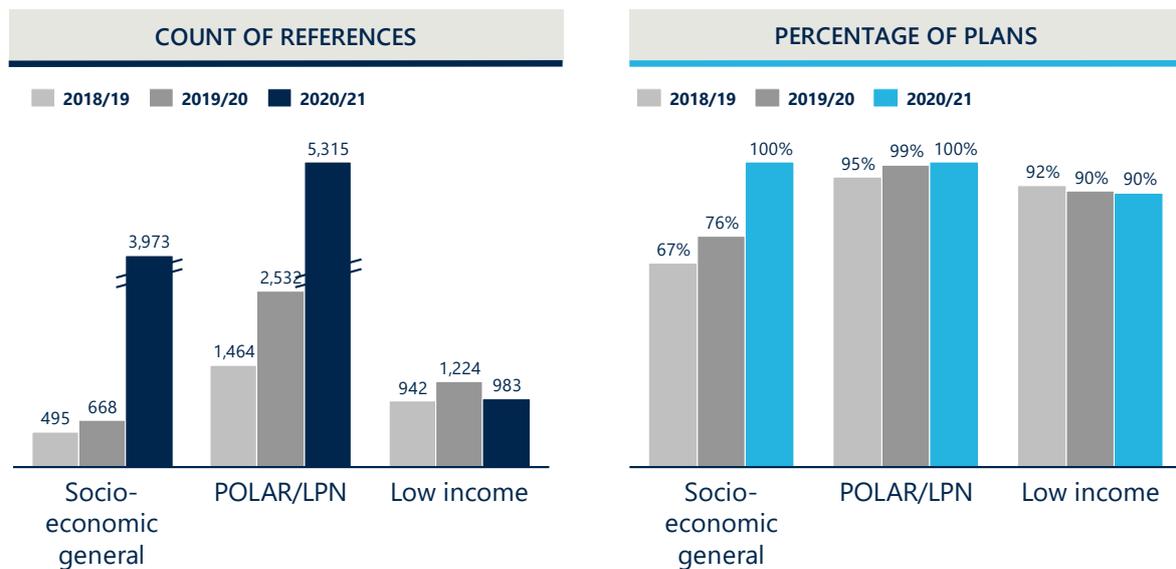
Note: // = break in scale

Optional student groups are more commonly reported

The analysis found that more providers broadened their assessment of performance to include a wider range of student groups that were not compulsory in the RN1 2020-21 guidance (OfS 2019.05). This included carers, people estranged from their families, Gypsy, Roma or traveller communities, refugees and students from military families. At a sector level the reference volume and percentage increased for all these categories, except for carers. Figure 4 illustrates changes in codes relating to the optional student groups in the RN1 over the three years of access agreements and plans.

Figure 4 | Optional wider student groups included in RN1 document

COUNT OF REFERENCES

◻ 2018/19 ◼ 2019/20 ◼ 2020/21

- Carers: 420, 347, 271
- Estranged: 333, 540
- Travellers: 123, 146
- Refugees: 194, 234
- Military: 143, 285

PERCENTAGE OF PLANS

◻ 2018/19 ◼ 2019/20 ◼ 2020/21

- Carers: 70%, 67%, 59%
- Estranged: 46%, 63%
- Travellers: 25%, 35%
- Refugees: 38%, 45%
- Military: 26%, 47%
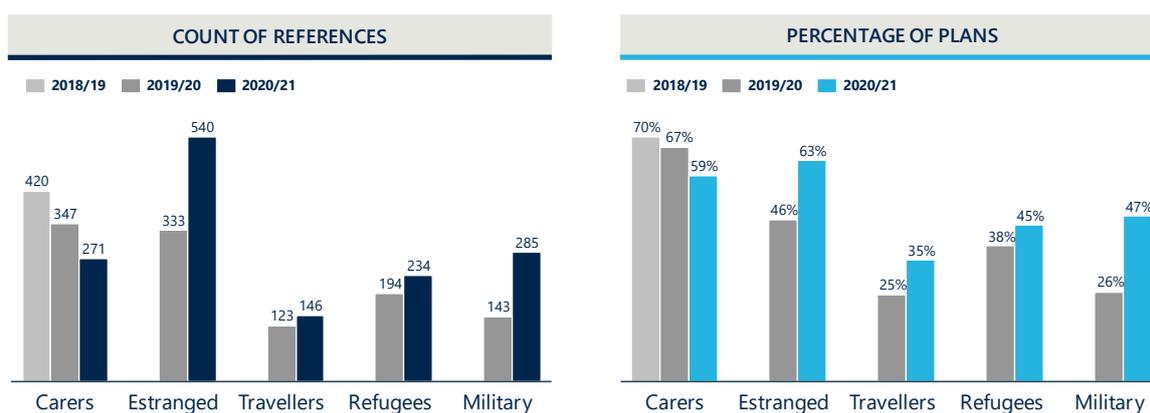
4.2 Providers committed to address intersections of disadvantage

In 2020-21, providers were expected to include assessment of performance with consideration for students with intersectional characteristics that are associated with disadvantage. This included common intersections such as ethnicity and income as well as the freedom for providers to explore any intersections that may be of relevance to their students.

Intersectionality of disadvantage was referenced by 75 per cent of providers in 2020-21. The most commonly reported intersections were between ethnicity and gender, and ethnicity and POLAR quintile. A few providers in their 2020-21 reports explicitly mentioned that the OfS access and participation data dashboard aided their analysis of intersectionality. Providers highlighted that the dashboard had been useful as it provided easily accessible references at all stages of the student lifecycle from which they could assess their own data.

> **'The new APP dashboard, created by the OfS is an excellent tool for helping us to identify [students experiencing intersectionality of disadvantage] on an annual basis.'**
>
> *Blackburn College, 2020-21 Access and participation plan*

Many providers identified that intersectionality of disadvantage was an important area where they did not currently have the capability to deliver meaningful findings. Some committed to improve data collection and analysis in this area.

4.3 Small providers were limited by sample size

Small providers regularly flagged that they did not have a large enough sample size to assess their performance across all categories. There was a clear positive correlation between a provider's student FTE and the volume of references to each of the various

underrepresented sub-groups. Figure 5 illustrates the percentage of providers referencing underrepresented groups by size in the 2020-21 plans.

Figure 5 | Percentage of providers to reference chosen sub-groups (by enrolment size)

PERCENTAGE OF PLANS (2020-21)

Small (<=1,000 FTE)　Medium (1,001 - 9,999 FTE)　Large (>=10,000 FTE)

	Small	Medium	Large
Socio-economic	92%	97%	100%
Asian	70%	91%	96%
Black	53%	89%	96%
Carers	74%	92%	98%
Estranged	47%	75%	90%
Refugees	45%	51%	69%
Military	42%	54%	53%
Travellers	41%	42%	45%
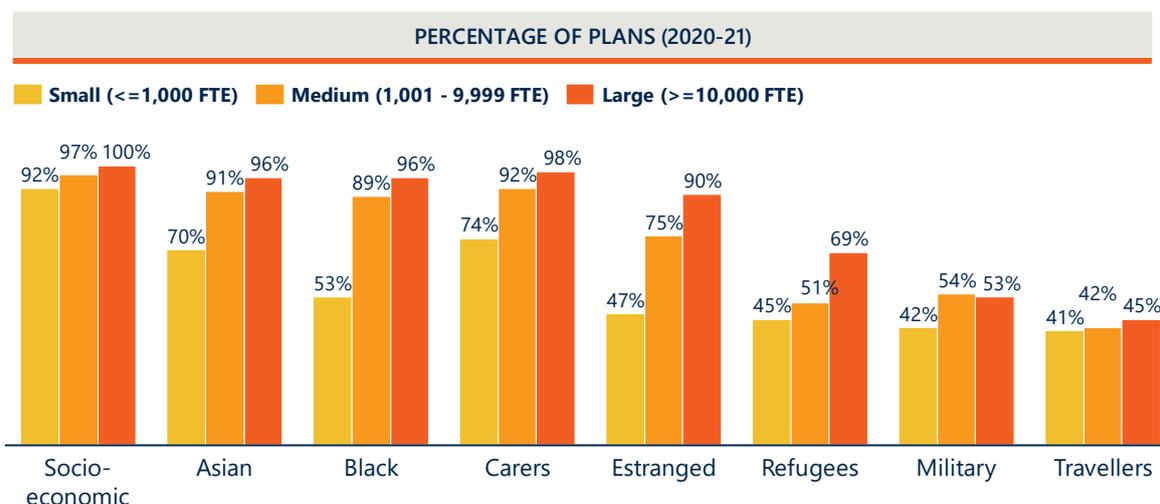
Smaller providers were similarly less likely to refer to intersectionality of disadvantage and more likely to report challenges in this area. Approximately 90 per cent of large providers referenced intersectionality compared with only 39 per cent of small. The lack of statistical significance of the results owing to small sample sizes was the most common challenge reported. Some examples are provided in Figure 6.

Figure 6 | Small providers referenced sample size as a barrier (2020-21)

Hereford Arts College	**RTC Education LTD**
'Disaggregating of ethnic groups is difficult to do meaningfully although it does show that we recruit more from mixed ethnicities. We commit to continuing development of data analysis in this area as our recruitment of BAME students increases.'	'The size of our student body means that, even at the highest level of comparison, none of the gaps between the profile/outcomes of different underrepresented intersectional groups and their peers reaches statistical significance.'
South Essex College of Further and Higher Education	**Activate Learning**
'We are exploring updates to our existing data capture and reporting systems to include a broader range of student personal characteristics in order to increase the impact at programme and provider level of our widening participation initiatives and/or further inform and granularise our approach to intersectionality.'	'We have looked at various intersections; however, because the different disadvantaged groups are so small within the institution, it is hard to see any effects at present. We will continue to monitor different intersections as our work to widen access to the institution comes to fruition.'

4.4 Avenues for further research

The findings from the analysis highlight areas to test through consultation with stakeholders in Part 2 of the review.

Areas for exploration:

3. How has the OfS data dashboard improved sector understanding of key issues in relation to access and participation?

4. How did new insights affect providers' overarching access and participation strategy?

5 Evidence-informed strategic approach

This section seeks to understand the extent to which providers are taking strategic, evidence-informed approaches to planning, designing and investing in strategic measures to address the issues identified through their assessment of performance. The OfS emphasises the importance of a strategic approach to access and participation, calling for a clear articulation of the linkages between assessment of performance and targets, and the investment and strategic measures to address them, outlined in Figure 7.

Figure 7 | Evidence-informed approach to access and participation

Although OFFA and the OfS set clear expectations for strategic and evidence-informed approaches to addressing issues in all three years of guidance, the RN1 2020-21 guidance (OfS 2019.05) pushed this further. For the first time the guidance asked providers to demonstrate the change they expect to see through an overarching evidence-informed theory of change. Theory of change is intended to act as a framework to identify strategic measures, which will affect the necessary change and highlight where investment is needed.

The quantitative analysis of codes relating to evidence-informed strategic approaches was complemented by a qualitative review of the relevant code references and detailed sampling of reports to understand any identified trends over the period. Key findings from the analysis were:

- Theory of change models were increasingly used
- Providers continued to report evidence-informed spend across the lifecycle
- There were identifiable trends in the strategic initiatives delivered

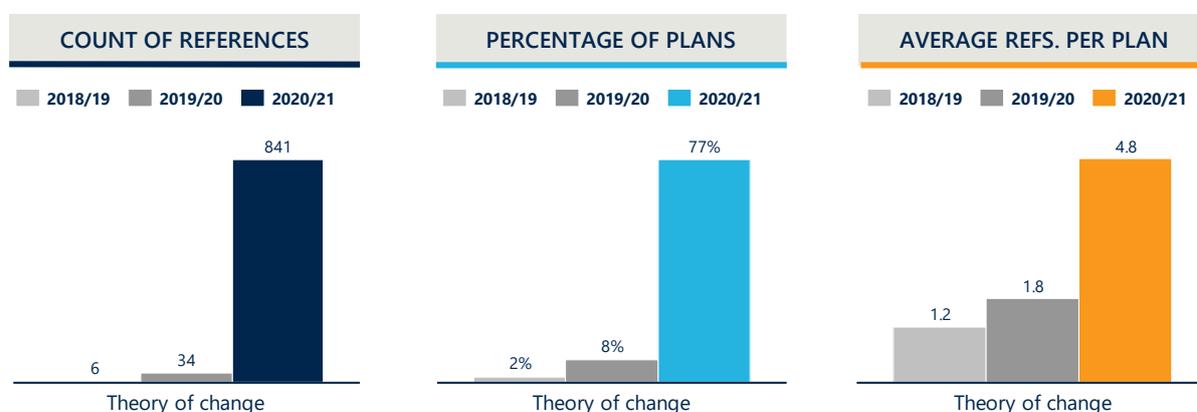Each is discussed in Section 5.1, 5.2, 5.3.

5.1 Theory of change models were increasingly used

'Theory of change is a description of how and why a desired change is expected to happen in a particular context.'

RN1 2020-21

The addition of a theory of change in the RN1 2020-21 guidance (OfS 2019.05) aimed to encourage providers to take a methodical and evidence-informed approach to addressing the issues identified in their self-assessment. This led to a large increase of references in the plans (2 per cent in 2018-19, 8 per cent in 2019-20 and up to 77 per cent in 2020-21), with large providers and those with high entry tariffs were more likely to include reference to a theory of change (86 per cent and 81 per cent respectively). Figure 8 illustrates changes in the frequency of references to theory of change over the three years of plans.

Figure 8 | References to theory of change

COUNT OF REFERENCES			PERCENTAGE OF PLANS			AVERAGE REFS. PER PLAN		
2018/19	2019/20	2020/21	2018/19	2019/20	2020/21	2018/19	2019/20	2020/21

COUNT OF REFERENCES: 6 (2018/19), 34 (2019/20), 841 (2020/21) — Theory of change

PERCENTAGE OF PLANS: 2% (2018/19), 8% (2019/20), 77% (2020/21) — Theory of change

AVERAGE REFS. PER PLAN: 1.2 (2018/19), 1.8 (2019/20), 4.8 (2020/21) — Theory of change

Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

A review of the 2020-21 plans suggests that theory of change provided a more tangible way for providers to articulate an evidence-informed approach. References to theories of change commonly related to evaluation; however, some used them to provide a holistic overview of what they are trying to achieve.

Theory of change models were interpreted differently

Theories of change appeared differently in different plans. Representations ranged from a reference to the use of a theory of change, through to detailed logic chains for multiple strategic objectives or student groups. In some instances, the theory of change diagram illustrated a range of interventions in one place but with no clear linkages between different activities and intended intermediate and long-term outcomes. Figure 9 illustrates a spectrum of complexity in terms of the way they were presented.

Figure 9 | Spectrum of theory of change representations

NO DIAGRAM	**HIGH-LEVEL THEORY OF CHANGE**	**LOGIC/OUTCOMES CHAIN**	**MULTIPLE LOGIC/OUTCOMES CHAINS**
Commitment to the development of a theory of change or descriptions of the use of theories of change or logic/outcomes chains to support delivery and evaluation	Diagram/s or descriptions of issues, intended outcomes and activities with no interim outcomes	Diagram illustrating linkages between identified issues, activities, intermediate and long-term outcomes at varying levels of detail for the whole institution	Multiple diagrams illustrating linkages broken down by different stages of the lifecycle, strategic objective or programme/ intervention
1	2	3	4

The different representations of theory of change highlight some challenges in interpreting the guidance. The guidance did not explicitly call for a theory of change diagram, but the Regulatory advice 6 did encourage the inclusion of a logic or outcomes chain diagram associated with a theory of change '*to identify where there might be causal links, and identify which activities are linked to which outcomes.*'[16] Providers therefore used a range of different approaches and at varying levels of detail, and there appears to have been some confusion about the distinction between a theory of change and detailed logic or outcomes chains.

> The different representations of theory of change models suggest that further guidance or good practice examples for the sector could be beneficial.

5.2 Providers continued to report evidence-informed spend across the lifecycle

There was no clear uplift over the three years of access agreements and plans in codes relating to evidence-informed spend. Slightly higher proportions of 2018-19 access agreements (78 per cent) were coded as describing evidence-informed spend than 2019-20 and 2020-21 access and participation plans (61 per cent and 72 per cent respectively). This may be because detailing evidence-informed expenditure was a key feature of the access agreement guidance, whereas the 2020-21 plans did not require a breakdown of investment on access and participation activities.[17] Figure 10 illustrates changes in code frequency relating to evidence-informed spend over the years.

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[16] OfS, *Regulatory advice 6, How to prepare your access and participation plan, 2019*, (OfS 2019.06) available at https://www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/
[17] The latest plans required a breakdown of investment on access, financial support and research and evaluation only.

Figure 10 | References to evidence-informed spend
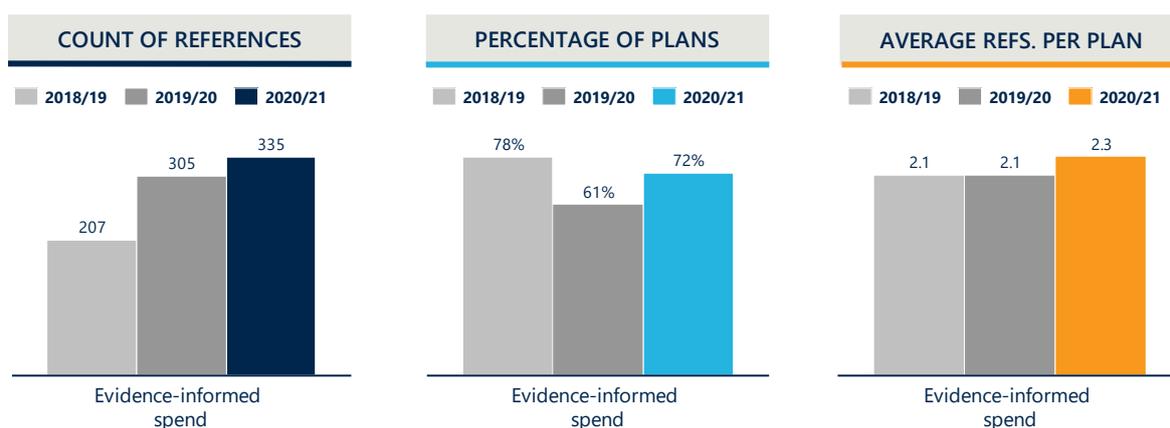
COUNT OF REFERENCES	PERCENTAGE OF PLANS	AVERAGE REFS. PER PLAN
2018/19 2019/20 2020/21	2018/19 2019/20 2020/21	2018/19 2019/20 2020/21

Count of references: 207 (2018/19), 305 (2019/20), 335 (2020/21)
Percentage of plans: 78% (2018/19), 61% (2019/20), 72% (2020/21)
Average refs. per plan: 2.1 (2018/19), 2.1 (2019/20), 2.3 (2020/21)

All for: Evidence-informed spend

Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

A qualitative review of the code content demonstrated that plans increasingly described evidence-informed spend across the lifecycle as the years progressed. A common feature in 2018-19 was the shifting of funding from financial support to outreach activities, resulting from a policy push by OFFA to move spend to areas where there was evidence of impact. Access and participation plans evolved to demonstrate a shift towards evidence-informed spend on inclusive support, attainment and continuation approaches away from the focus on financial support and outreach. Some examples are provided in Figure 11.

Figure 11 | Examples of evidence-informed spend over the years

Birkbeck, University of London (2018-19)

'We conducted a review of the impact of our financial support to analyse whether students in receipt of bursaries had improved retention rates... This finding has given us the confidence to reduce the overall financial support expenditure and to allocate the expenditure to areas that will achieve a greater impact on student success.'

University of Wolverhampton (2019-20)

'The strategic measures being undertaken in order to address our gaps in non-continuation and attainment are part of a wider strategy to embed "inclusive teaching and learning" across the university. Our measures have been developed based on evidence gathered in part through a number of national projects we have participated in that have investigated reasons for the gap in award attainment between groups of students with different characteristics.'

De Montfort University (2020-21)

'Focusing on BAME progression, we have recently secured the OfS funding in the Challenge Competition – Industrial Strategy and Skills – to carry out an ambitious project, Leicester's Future Leaders, which will support BAME students and graduates to rise to leadership positions within Leicester's business community, addressing ethnic imbalance in business leader role models. The three-year project will commence during the first half of the lifespan of our APP and has several stages of innovation.'

5.3 There were identifiable trends in the strategic initiatives delivered

Providers consistently referenced strategic initiatives across the lifecycle, including financial support over each of the three years of access agreements and plans. A qualitative review of initiatives over the years highlighted trends in activities delivered. Figure 12 provides notable examples.

Figure 12 | Trends strategic initiatives delivered

Use of contextual admissions increased year-on-year and nearly all high-tariff providers mentioned this in 2020/21

Use of learner analytics to support at-risk students increased slightly since 2018/19

Curriculum review and inclusive curriculum increased year-on-year, particularly for large and high-tariff providers

Co-curricular and extra-curricular activities were increasingly mentioned

Mentions of sponsorship arrangements with schools declined steeply since 2018/19

Foundation years and access routes declined in 2020/21 after an increase in 2019/20

Financial support was still a prominent feature of strategic measures but declined in 2020/21

Work placements and internships declined in 2020/21 after an increase in 2019/20

The changes reflect broader trends in the higher education sector. For example, there have been nationwide campaigns, largely driven by students, to decolonise the curriculum in response to gaps in the awarding of good degrees, particularly between White and Black students.[18] This has led to widespread review of curricula across the sector to increase inclusivity. Learner analytics and the use of data to identify and support at-risk students has been gaining traction across the sector for several years, as has the use of contextual admissions to widen access.

On the other hand, the focus on higher education providers sponsoring free schools and academies has waned in recent years, as has the emphasis on providing financial support to attract people into higher education. Other changes such as increased co- and extra-curricular activities, decreased mentions of foundation and access routes, and work placements and internships will be useful to explore further with the sector to understand the extent to which they are genuinely reducing, as opposed to less frequently highlighted

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[18] Universities UK and NUS, *Black, Asian and minority ethnic student attainment at UK universities: #closingthegap*, 2019, https://www.universitiesuk.ac.uk/news/Pages/Universities-acting-to-close-BAME-student-attainment-gap.aspx

in the plans. Part 2 of this review will provide a mechanism for this, including understanding the extent to which changes to activities have been made deliberately based on evidence of what is working.

Figure 13 provides some examples of increasingly popular activities from different types of providers.

Figure 13 | Examples of strategic initiatives

Contextual admissions

- **London Interdisciplinary School Ltd** is using contextual admissions as the main lever to achieve institutional access objectives for lower HE participation, household income and socio-economic groups, BAME students, and disabled students.
- **University of Bristol** has seen a positive impact from recent changes to its contextualised admissions policy, increasing from a one to two grade drop in standard entry requirements in 2017-18 extending the policy to include broader applicants from 2018-19.

Learner analytics

- **Nottingham Trent University**'s learning analytics dashboard identifies students most of risk of withdrawing from their undergraduate course. This data is already shared with students and their personal tutors to enable targeted support but will also be used by departments at an aggregated level to support evidence-based action and evaluation.
- **Coventry University** will be using learner analytics to address the gaps identified through its performance analysis, including disparity in attainment between Black students and White students.

Inclusive curricula

- **Liverpool John Moores University** runs the 'Whiteness and the curriculum' project, aiming to better understand BAME student experience of the curriculum from the perspective of both curriculum content and learning opportunities created for promoting dialogue, mutual understanding and sense of belonging.
- **Imperial College London** completed a review and redesign of 102 undergraduate programmes in partnership with students from a broad range of backgrounds. Inclusive curricula a key element of the review and supported by a new teaching toolkit on inclusive learning and teaching.

Extra and co-curricular activities

- **Middlesex University** is expanding extra-curricular opportunities for its target group students through networks and internship and mentoring programmes, aiming to provide role modelling and increase confidence and leadership capabilities.
- **University of Law** is developing a *Life module* embedded in the curriculum which encapsulates 'employability for life'. It includes employability skills, volunteering and pro bono extra-curricular support.

5.4 Avenues for further research

The findings from the analysis highlight areas to test through consultation with stakeholders in Part 2 of the review.

Areas for exploration:

5. How did the OfS's guidance support the development of a more coherent narrative in the plans?

6. How helpful was the OfS's guidance in supporting a more evidence-informed approach to planning?

6 Whole provider approach

This section seeks to understand the extent to which the strategic, evidence-informed approaches outlined in Section 5 are supported by a joined up whole provider approach. The OfS sets out that ambitions in the access and participation plans should be underpinned by joined-up approaches to addressing issues across the student lifecycle. Providers should demonstrate how departments and services work collaboratively through joint strategy and operations to deliver seamless and inclusive support to all students. To deliver this requires significant commitment from senior leaders to create the necessary culture and structures.

Regulatory guidance relating to whole provider approaches has evolved over time. The 2018 access agreement guidance encouraged providers to adopt a 'whole-institution approach' to the development of plans. In 2019-20, there was no specific reference to a whole institution or provider approach in the RN1 (2018.03) although this was a feature of the template. In 2020-21, the guidance (OfS 2019.05) set out a clear expectation to outline a whole provider approach including: links to other strategies (including equality and diversity, and teaching, assessment and feedback); a whole lifecycle approach; cross-departmental working; leadership commitment and culture change. The guidance has consistently featured a consideration of the interplay between access and participation, and equality and diversity in terms of the impact on students with protected characteristics.

The quantitative analysis of codes relating to whole provider approaches was complemented by a qualitative review of the relevant code references and detailed sampling of reports to understand any identified trends over the period. Key findings from the analysis were:

- Descriptions of whole provider approaches have increased since 2018-19
- Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.
- Alignment of strategies has been a key feature
- Dedicated roles have supported the embedding of whole provider approaches
- Approaches to culture change were not always clearly articulated.

Each is discussed in turn below.

6.1 Descriptions of whole provider approaches have increased since 2018-19

References to whole provider approaches have increased since 2018-19 from 67 per cent of plans, to 98 per cent in 2019-20 and 95 per cent in 2020-21. References to whole provider approaches were particularly high in 2019-20 despite there being no explicit reference to this in the RN1 2019-20 guidance (OfS 2018.03); however, a whole provider approach was included in the access and participation plan template for 2019-20. The sections below highlight some of the themes emerging from the codes relating to this. Figure 14 illustrates

changing code frequency relating to whole provider approaches over the three years of access agreements and plans.

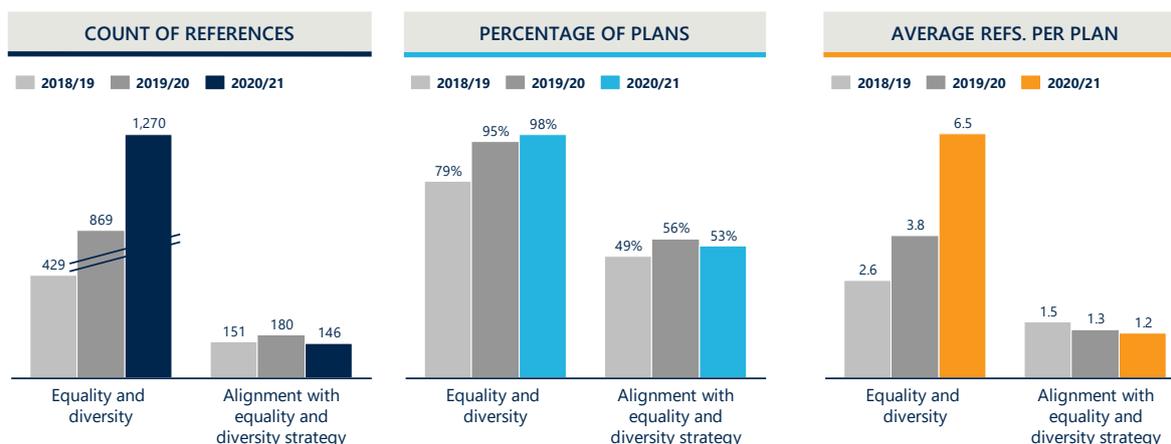**Figure 14 | References to whole provider approach**
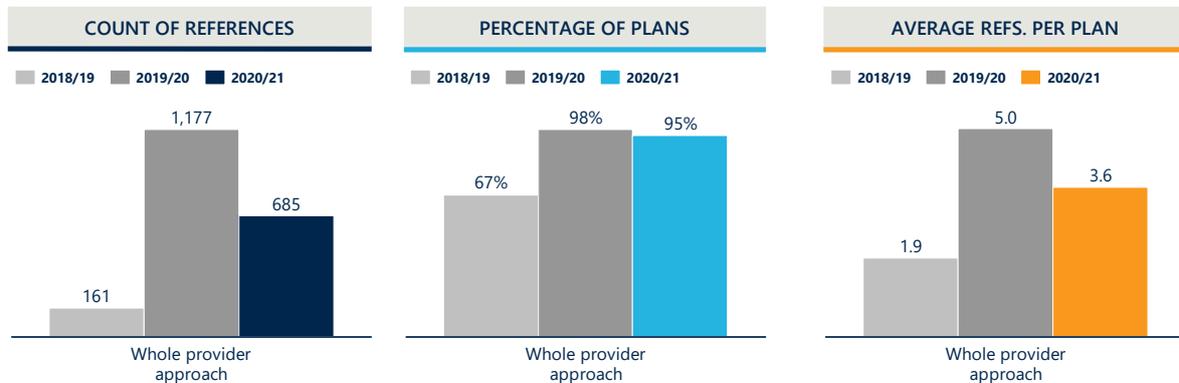
Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

6.2 Alignment of strategies has been a key feature

Links with equality and diversity have been consistent throughout

The proportion of plans describing the alignment with equality and diversity has been high and increasing year on year, with 98 per cent of plans describing this in 2020-21. Alignment with equality, diversity and inclusion has been a feature of the guidance for several years because of the need to consider the interplay between impacts on students from underrepresented groups and those with protected characteristics. Requirements in the guidance to specifically align access and participation plans with equality and diversity strategies was a feature of all three years of guidance. As such the proportion of providers describing these links is relatively stable across the years, at around 50 per cent. Figure 15 illustrates changing code frequency relating to alignment with equality and diversity generally, and with equality and diversity strategy specifically, over the three years of access agreements and plans.

Figure 15 | References to alignment with equality and diversity

| COUNT OF REFERENCES | PERCENTAGE OF PLANS | AVERAGE REFS. PER PLAN |

Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference. // = break in scale

Providers increasingly aligned equality and diversity measures

Although the description of strategic alignment with equality and diversity has been a stable feature of the plans, qualitative review of codes shows greater consideration in the 2020-21 plans. Providers increasingly described the way in which targets and measures mutually supported one another across their access and participation plans, and equality and diversity strategies. Links with Athena SWAN and race equality charters have also been a feature. Within these codes there was also a slight uplift in direct references to some protected characteristics including sexuality and gender. Figure 16 provides examples from the sector of aligning equality and diversity with access and participation measures.

Figure 16 | Providers described equality and diversity measures (2020-21)

Amity Global Education Ltd

'There are three particular sets of measures in our approach to equality, diversity and inclusion which are "co-owned" by the [equality, diversity and inclusion] strategy and the access and participation plan:

- annual equality and diversity audit
- equality and diversity training standard
- inclusive curriculum working group objectives.'

British Academy of Jewellery

'Academy will undertake an intersectional analysis of its first higher education students, in order to continue evaluating and developing strategic measures that meet both our equality objectives and access and participation outcomes.'

Buckinghamshire New University

'Annual EDI objectives are approved by Council and cover a range of initiatives in relation to both students and staff. To ensure a consistent and "one university" approach from 2019, the APP strategic measures and the OfS [access and participation data dashboard] will form part of student [equality, diversity and inclusion] reporting into Council.'

Coventry University

'The equality objectives focus on equity of attainment for BAME students; equality of satisfaction in the [National Student Survey] both by students who have, and those who do not have, a protected characteristic; diversity at senior staff grades and within the professoriate; and increasing staff disclosure of a disability.'

Inclusive pedagogical strategies have supported the agenda

For the first time, the RN1 2020-21 guidance (OfS 2019.05) called for a description of the alignment with broader provider strategies including teaching, learning and assessment. As a result, approximately half of plans included codes relating to alignment with teaching, learning and assessment. This represents an increase from previous years where references appear to be lower.[19] A review of the relevant code content in the 2020-21 plans suggests that developing inclusive curricula and pedagogy has been fundamental to support successful participation for target groups. Offering alternative routes to higher education to widen access to broader groups of students and transitions such as induction and progression to second year were also commonly referenced. Some examples are provided in Figure 17.

'Describes how the plan links to and draws from other provider strategies, particularly equality, diversity and inclusion, and learning, teaching and assessment strategies'
RN1 2020-21

Figure 17 | Alignment with teaching, learning and assessment strategies (2020-21)

Amity Global Education Limited

'The key measures in the LTA strategy which are co-owned with access and participation are: ... individualised induction and transition; personalisation of student support; academic, pastoral and employability support programmes; graduate loyalty scheme and internship programme.'

Aston University

'We plan to increase the number of students on degree apprenticeships, which will lead to better outcomes for our students and further diversify our student demographic. We also plan to prioritise active collaborative learning in order to enhance learning and reflect real workplace situations, leading to better progression and better continuation for students.'

Bournemouth University

'We are reviewing our curriculum design principles and policy in 2019 to align with BU2025, to ensure that our strategic aims in our access and participation plan are appropriately embedded into curriculum design and delivery, and to further the evolution of the "Fusion Learning" approach.'

Derby College

'We plan that it (new teaching, learning and assessment strategy) will cover the requirements for inclusive approaches to teaching, equality and diversity, expectations for teachers and

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[19] Teaching, learning and assessment strategy was first coded in the plans in 2020-21 but a review of the plans suggests references to this have increased.

> students, physical and virtual learning space, academic study support, student voice, engagement with external employers or stakeholders, professionalism and academic sustainability.'

Joined-up governance structures have provided oversight

Providers have consistently described joined-up governance processes as providing provider-wide oversight of the access and participation agenda. References to access and participation steering or working groups with diverse membership were common. Institutional committees or boards sharing strategic goals to deliver mutually supportive strategies was also a feature. Some examples are provided in Figure 18.

Figure 18 | Providers described joined-up governance processes (2020-21)

Nottingham Trent University

'The main committee for directing this work across the university is the "Success for All" steering group which now has an access and participation group reporting specifically on the APP. The group is chaired by the vice-chancellor, with membership comprising the deputy vice-chancellor (academic and student affairs), most heads of professional services, all academic schools' deputy deans and student representation.'

SAE Education Ltd

'We have an access and participation implementation group which consists of staff from student services, access and participation mechanism for strategic overview specifically of the evaluation strategy and from July 2019 this will also include faculty nominees.'

6.3 Dedicated roles have supported the embedding of whole provider approaches

Some providers have employed dedicated staff members to embed whole provider approaches. Professional service roles committed to supporting academic departments in delivering student support, embedding inclusive pedagogy and supporting evaluation appear to be increasing. Effective sharing of data across the provider, for example, through learner analytics systems, often underpins this activity. Examples of these roles from the 2020-21 plans are provided in Figure 19.

Figure 19 | Examples of staff employed to embed provider-wide practice (2020-21)

University of Leeds

'School academic leads for inclusive practice (SALIPs) will raise awareness of inclusivity, share good practice and evaluate the extent to which the baseline standards are currently being met in the school throughout 2019-20 and throughout 2020-22 [SALIPs] will lead on change initiatives to ensure the baselines are met.'

University of Cumbria

'Strategic Lead for Access and Participation whose remit will include developing and embedding the evaluation framework across the student lifecycle and supporting empirical evaluation of targeted interventions.'

School of Oriental and African Studies

'The Students' Union Engagement Officer post in the widening participation team will work closely with new central posts in attainment and student success, and the new Black Student Support Coordinator post will work with departments and programme leaders on approaches to improving student outcomes, such as developing pedagogic approaches to support inclusivity.'

Roehampton University

'Our learner analytics project has created a student engagement dashboard, which integrates attendance, library, VLE and submissions data to identify students at risk of non-continuation. To back this up, in 2018-19, we established a central student engagement team to contact at-risk students and to coordinate activity in academic departments.'

6.4 Approaches to culture change were not always clearly articulated

'A pragmatic approach to change developing a culture and structure that promotes and supports inclusivity and consistency'

RN1 2020-21

An uplift in mentions of culture change in the 2020-21 plans was evident following the new reference in the RN1 2020-21 guidance (OfS 2019.05) to a pragmatic approach to change. However, providers often did not articulate detailed approaches to implementation or evaluation, instead acknowledging the intention to address culture. Examples of tangible culture change initiatives are outlined in Figure 20.

Figure 20 | Examples of culture change initiatives (2020-21)

The Courtauld Institute of Art

'Reviewing our academic appointment strategy to ensure that our faculty is equipped to deliver the diversified curriculum that we are developing; along with a clear strategy for marketing this to groups who do not currently think that The Courtauld is for them.'

University of Gloucestershire

'We have aligned the access and participation plan to our People and Culture Strategy that focuses on developing our staff to be in a position to deliver our ambitious goals, this includes ensuring that staff are supported in key areas... so we ensure a culture of empowerment, engagement and accountability enabling staff to deliver on our APP targets.'

King's College London

'We have identified four key priorities (in relation to the Race Equality Charter): increasing the ethnic diversity of senior academics (in particular Black academics); continuing to close differences in attainment by ethnicity through systemic changes to our education; supporting staff and students to identify and report microaggressions and supporting the King's community in sensitively discussing race and racism.'

University College London (UCL)

'Earlier this year, every faculty dean at UCL made a pledge specific to his/her faculty around culture change and closing the attainment gap.'

Newman University

'Theory of change helped to identify the importance of NSS data on "learning community" as a key measure of the culture change we are intending to achieve.'

6.5 Avenues for further research

The findings from the analysis highlight areas to test through consultation with stakeholders in Part 2 of the review.

Areas for exploration:

7. How has the OfS's guidance improved efforts to implement whole provider approaches?

7 Student consultation

This section seeks to understand the extent to which providers are consulting with students and their representatives on the plan development and engaging them in activities relating to the plan.

Consulting students on the access and participation plan is a statutory requirement and a common feature of OFFA and the OfS guidance over the three years of access agreements and plans. Key changes over the years include: a shift away from a focus on student engagement with decisions around financial support in 2018-19 to activities across the lifecycle in 2019-20 and 2020-21; a requirement for providers to explain how they are responding to student feedback on the access and participation plans, with more 'musts' relating to this in the RN1 2019-20 guidance (OfS 2018.03); and a requirement for providers to detail how they will engage students in the design, implementation and evaluation of the access and participation plans from 2019-20.

The quantitative analysis of codes relating to student consultation and engagement was complemented by a qualitative review of the relevant code references and detailed sampling of reports to understand any identified trends over the period. Key findings from the analysis were:

- Mechanisms were in place to engage diverse student groups
- Descriptions of steps taken as a result of student consultation varied in detail
- Student-led activities are increasingly diverse.

Each is discussed in Sections 7.1, 7.2 and 7.3.

7.1 Mechanisms were in place to engage diverse student groups

Analysis of codes relating to student consultation suggest that providers are taking greater steps to engage a diverse range of students as part of the access and participation plan process. Plans included more detailed descriptions of the mechanisms for consulting students, including focus groups, surveys and others, alongside representative structures. Providers increasingly mentioned consulting specific target groups, for example BAME, mature and disabled students. Figure 21 provides examples from the access and participation plans.

Figure 21 | Examples of mechanisms for engaging a broad range of students

New governance arrangements

- **Plymouth University** has set up an **APP operational group** to both seek feedback and raise awareness of initiatives among target groups.
- **Liverpool Institute for Performing Arts** has set up a **new widening participation student steering group** to ensure student engagement in monitoring of APP commitments.

Student feedback panels

- **King's College London's** 100 panel brings together a diverse community of learners to share insights and will be an important mechanism for consultation on the APP.
- **University of Nottingham** established a widening participation advisory panel, consisting of 20 current undergraduate and postgraduate students, including representation from the main OfS underrepresented groups.

Educating and training students

- For the 2019-20 APP, **Yeovil College** engaged students in **conversations about access and participation regulation** to support their contribution to the plan.
- **University of Greenwich trained 21 student volunteers**, mainly mature students and BAME students, who participated in focus groups to support plan development.

New student representation structures

- **University of Bedfordshire** students' union redesigned its representation policy and strategy for 2019-20 to support the representation of target groups at all its campuses in the APP process.

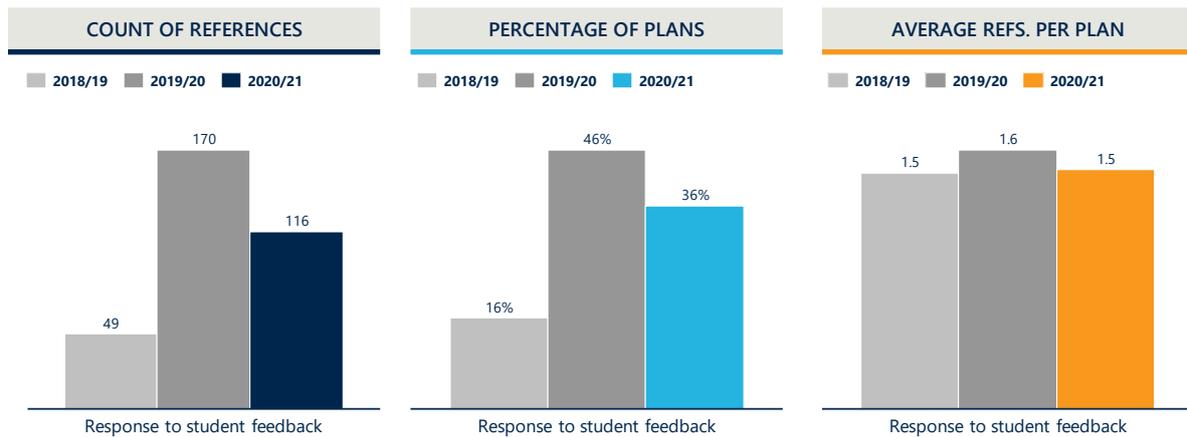## 7.2 Descriptions of steps taken as a result of student consultation varied in detail

The RN 1 2020-21 guidance (OfS 2019.05) stated that all providers must demonstrate the steps they took as a result of student consultation on the plan. The types of response to this requirement varied. Some providers included broad statements, describing the partnership approaches or committee structures which built student contributions into the plan. Others offered more detailed examples where student feedback had led to reviews or changes to specific initiatives or programmes.

'A plan must demonstrate how students had had the opportunity to express their views about the content of the plan before it was submitted for approval and what steps you took as a result.'

RN1 2020-21

The coding picked up these more explicit examples of actions taken as a result of student feedback, which appeared throughout various sections of the plans. These more detailed references appeared in fewer than half of the 2019-20 and 2020-21 plans. They were most common in the 2019-20 plans, with 44 per cent of providers including examples, dropping to 36 per cent in 2018-19. Figure 22 illustrates changing code frequency relating to actions taken in response to student feedback over the three years of access agreements and plans.

Figure 22 | References to actions in response to student feedback

COUNT OF REFERENCES	PERCENTAGE OF PLANS	AVERAGE REFS. PER PLAN
2018/19 2019/20 2020/21	2018/19 2019/20 2020/21	2018/19 2019/20 2020/21

COUNT OF REFERENCES — Response to student feedback: 49, 170, 116

PERCENTAGE OF PLANS — Response to student feedback: 16%, 46%, 36%

AVERAGE REFS. PER PLAN — Response to student feedback: 1.5, 1.6, 1.5

Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.
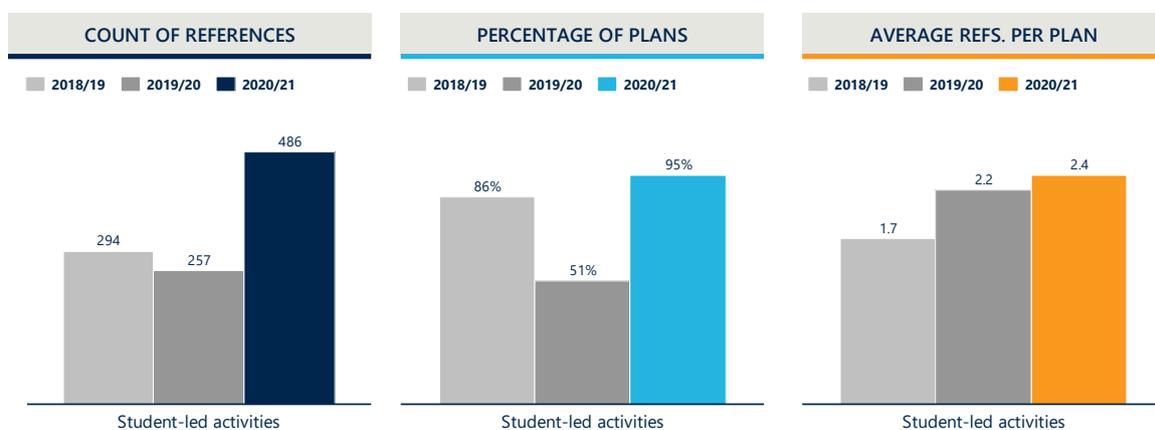
Actions taken in response to student feedback were increasingly broad

A qualitative review of the codes showed that the steps taken as a result of student feedback related to increasingly broad initiatives. In 2018-19, financial support was the focus, which is likely because this was the focus of the guidance. The 2019-20 plans demonstrated a diversification away from financial support to other activities such as student support (academic and non-academic) and the curriculum. In 2020-21, although there were fewer codes, there was a further shift in focus away from financial support to broader activities.

7.3 Student-led activities are increasingly diverse

The frequency of codes relating to student-led activities over the three years of access agreements and plans suggest that they were a much greater focus in the 2020-21 plans, with 95 per cent of providers describing these, up from 51 per cent in 2019-20. Figure 23 illustrates changing code frequency relating to student-led activities over the three years of access agreements and plans.

Figure 23 | References to student-led activities

COUNT OF REFERENCES	PERCENTAGE OF PLANS	AVERAGE REFS. PER PLAN
2018/19 2019/20 2020/21	2018/19 2019/20 2020/21	2018/19 2019/20 2020/21

COUNT OF REFERENCES — Student-led activities: 294, 257, 486

PERCENTAGE OF PLANS — Student-led activities: 86%, 51%, 95%

AVERAGE REFS. PER PLAN — Student-led activities: 1.7, 2.2, 2.4

Student engagement in governance processes is a key activity

Student representation in formal governance processes, including boards, committees and specifically designed working groups, was the focus in 2018-19, aligning with OFFA guidance. The decrease in student-led activity codes in 2019-20 (to 51 per cent of plans compared to 86 per cent in 2018) was partly owing to a decline in mentions of representation in governance and decision-making, which was omitted from the RN1 2019-20 guidance (OfS 2018.03). The increase in mentions of student-led activities in 2020-21 plans (up to 95 per cent of plans) is partly attributable to an increase in mentions of governance after this was reinstated in the RN1 2020-21 guidance (OfS 2019.05).

Students increasingly engaged in initiatives, campaigns and evaluation

Notable changes between access agreements and access and participation plans included increased examples of working in partnership between providers and their students' unions. Joint working often focused around the design and delivery of initiatives and campaigns. For example, collaborative work to address the BAME awarding gap was more prominent in the latest years' plans.

Student engagement in the evaluation of the plans was also more prominent in 2020-21 plans despite this being downgraded from a 'must' to 'expect' in the RN1 2020-21 guidance (OfS 2019.05). Approximately a quarter of the codes relating to student-led activities described evaluation and monitoring. Student representation on key advisory panels and steering groups relating to the plans was a key vehicle for this involvement. However, some providers also described programmes of student-led research, as shown in Figure 24.

Figure 24 | Examples of student-led research (2020-21)

Queen Mary, University of London

'The student as change agent is at the heart of the Going for Gold programme, with student-led research underpinning many of the work-strands and large-scale improvements to the pedagogic and pastoral student experience. Furthermore, students are integral to the monitoring and evaluation of all changes.'

University of Bath

'Across the Student Engagement Programme, which reached approximately 900 students, examples of impact include: 17 focus groups and workshops, training 30 student academic representatives, social media and in-person events in Skills and Employability Week, student-led research on inclusivity, citizenship and sustainability, employability and research-engaged learning.'

7.4 Avenues for further research into student consultation

The findings from the analysis highlight areas to test through consultation with students' union offers and staff as well as student representatives.

> **Areas for exploration:**
>
> 8. To what extent has the OfS's guidance led to more meaningful engagement of students from diverse backgrounds in the development, delivery and monitoring of the plans?
> 9. How effective was consultation and engagement from the student perspective in relation to the 2020-21 plans?

8 Evaluation strategy

This section seeks to understand the extent to which plans demonstrated increasingly mature approaches to evaluation and monitoring to support continuous improvement. Evaluation is an integral process to ensure the evidence-informed approaches outlined in Section 5 are effective. Figure 25 illustrates a cycle of continuous improvement.

Figure 25 | Evaluation to support continuous improvement
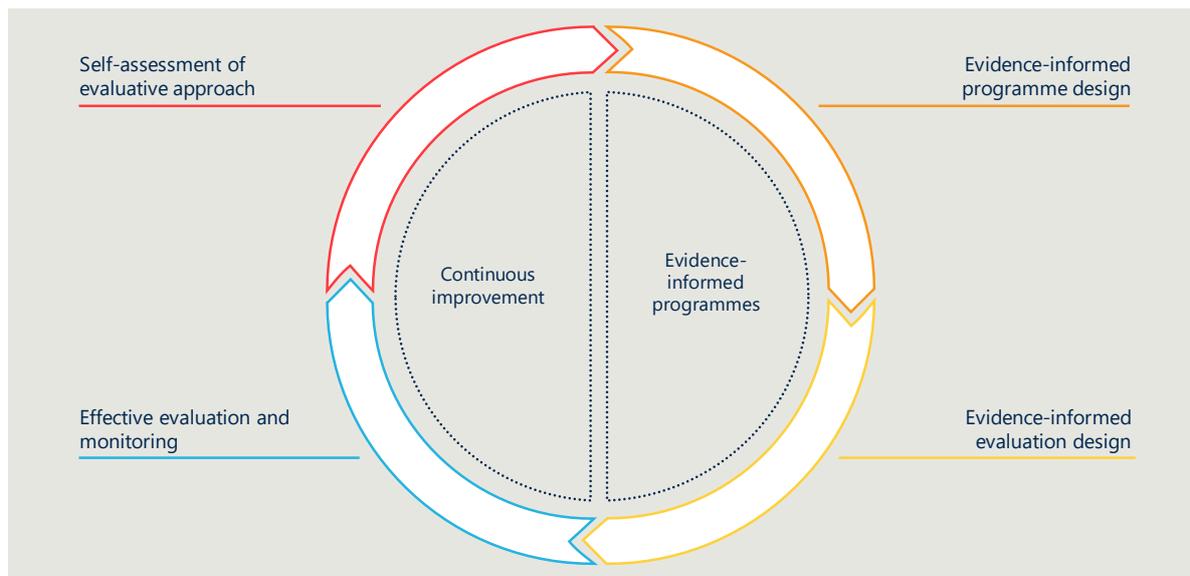
Regulatory guidance for all three years of access agreements and plans has repeatedly stressed the importance of effective evaluation and monitoring of any intervention activities. It has asked providers to demonstrate that they are seeking to continuously improve their evaluation strategy based on observed evidence and self-assessment of practices. The guidance has become more sophisticated in the clear division of evaluation and monitoring activities and the independent expectations for each of these processes. The RN1 2020-21 guidance (OfS 2019.05) delineated the two components of this section into 'evaluation strategy' and 'monitoring progress against delivery of the plan', each with its own list of compulsory and optional components.

The quantitative analysis of codes relating to evaluation and monitoring was complemented by a qualitative review of the relevant code references and detailed sampling of reports to understand any identified trends over the period. Key findings from the analysis were:

- Providers demonstrated continuous improvement of their evaluation strategy
- Self-assessment was referenced more often in the evaluation strategy
- More providers committed to using the OfS toolkits
- Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.
- Monitoring practices were covered in more detail

- Intervention actions were not clearly identified.

Each is discussed in Sections 8.1, 8.2, 8.3, 8.4 and 8.5.

8.1 Providers demonstrated continuous improvement of their evaluation strategy

In each of the last three years the OfS has mandated that all providers demonstrate a commitment to continuous improvement of their evaluation strategy. The OfS looks for evidence that providers have evolved and improved their evaluation approach as a principle indicator in the assessment process. Quantitative analysis found that references to continuous improvement in the plans has increased over the three years. In 2020-21, approximately 55 per cent of providers explicitly mention continuous improvement in their plan, up from 14 per cent in 2018-19. It is important to note that the concept of continuous improvement arises in some plans outside the evaluation strategy; however, the rise in mentions has been taken to indicate an increased focus by providers. Figure 26 illustrates changing code frequency relating to continuous improvement over the three years of access agreements and plans.

Figure 26 | References to continuous improvement
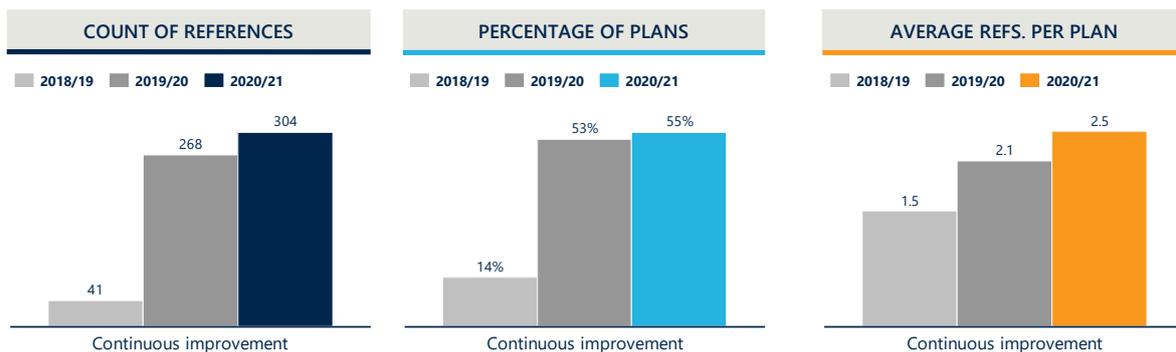
Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

It is possible to see an evolution of providers' evaluation strategy through a qualitative review of plans across the three years of access agreements and plans. Reports from the most recent year made commitments to focus on improved evaluation practices. These commonly included a commitment:

- To increase the regularity of evaluation activities
- To enhance data capabilities
- To further involve student and staff consultation and feedback into the evaluation process.

Additionally, there was evidence of historical improvement in the quality of providers' evaluation strategies. An indicative example of this is provided in Figure 27, which shows how two providers that are at different levels of evaluation maturity have both shown an evolution of their approach over time.

Figure 27 | Examples of providers that have evolved their evaluation strategy over time

	2018-19	2019-20	2020-21
UNIVERSITY OF BOLTON	Use of own evaluation and impact frameworks. Evaluation aligned with teaching strategy. Identified that evaluation was historically under resourced and established plan to increase activity.	Enhanced existing student experience evaluation and impact framework. Collected student experience data through a wide range of media to inform future strategies. Piloted automated 'Early Alerts' data system to identify at-risk students and evaluate intervention impacts.	Detailed evaluation strategy in full theory of change model. Identified opportunity to expand evaluation impact framework to support a whole-institution approach to evaluation. Commitment to introduce an Evaluation and Monitoring Officer position.
CITY COLLEGE NORWICH	No discussion of changes or improvements to APP practices resultant from previous evaluation. No cohesive evaluation strategy. Limited pool of data resources, often using indirect measures such as NSS scores.	Evaluation of APP is the responsibility of deputy principal and college governors. Use of 'live data' to inform new targets and actions based on previous actions. Identify that students are under involved in evaluation process; commit to great inclusion in the future.	Established brand new higher education evidence and evaluation group with cross-functional experts to deliver evaluation strategy. Recognise capability limitations; commit to working with partners where needed. In the process of developing individual theory of change models for each key target.

8.2 Self-assessment was referenced more often in the evaluation strategy

The RN1 2020-21 guidance (OfS 2019.05) states that the OfS expects the evaluation strategy to be informed by a provider's self-assessment of their approach to evaluation. This builds on the OfS's desire to see providers demonstrate a culture of continuous improvement derived from evidence. The clarity of instruction on self-assessment is greater in the RN1 2020-21 guidance (OfS 2019.05) than in previous years, where self-assessment was not directly stipulated in the evaluation section.

There was a notable rise in the use of the term self-assessment in the most recent submission of plans. The phrase was coded 436 times in 2020-21 up 370 per cent on the previous year and was identified in 68 per cent of plans. Most self-assessment references in the evaluation sections of reports related directly to the use of the OfS's standards of evidence and evaluation self-assessment tool (evaluation self-assessment toolkit). Further discussion of quantitative findings related to the use of this tool and the OfS's financial

support evaluation toolkit (financial evaluation toolkit) is provided in the next section. Figure 28 illustrates changing code frequency relating to self-assessment over the three years of access agreements and plans.

Figure 28 | References to self-assessment

Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

8.3 More providers committed to using the OfS toolkits

The OfS supports providers to undertake effective, evidence-informed evaluation through the provision of two online resources, the standards of evidence and evaluation self-assessment tool[20] and the Financial support evaluation toolkit.[21]

There was a measured increase in the number of providers referencing additional resources that were supplied by OFFA and then the OfS. The number of references to and percentage of providers that include acknowledgement of the OfS financial evaluation toolkit in their plans increased from 31 per cent in 2018-19 to 47 per cent in 2019-20 and up to 72 per cent in 2020-21 (see Figure 29). The financial evaluation toolkit was most popular with large providers. Approximately 85 per cent of the larger providers referenced the use of the OfS evaluation resource compared with just 70 per cent and 71 per cent for small and medium-sized providers respectively in 2020-21.

Approximately 52 per cent of providers referenced using, or committed to using, the OfS evaluation self-assessment toolkit in 2020-21. Again, large providers were more likely to reference the tool, with 57 per cent of large, 55 per cent of medium-sized and 46 per cent of small providers returning positive codes. However, disaggregating the use of the various toolkits from the data is difficult as providers often referred to them collectively or interchangeably.

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[20] OfS, *Standards of evidence and evaluation self-assessment tool*, https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/standards-of-evidence-and-evaluation-self-assessment-tool/evaluation-self-assessment-tool/

[21] OfS, *Financial support evaluation toolkit*, https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation-and-effective-practice/financial-support-evaluation-toolkit/

Future plan templates could include checkboxes to indicate clearly when evaluation design or financial support has been informed by some form of self-assessment toolkit. This could also include the opportunity to indicate how useful the tools have been on a Likert scale.

Figure 29 illustrates changing code frequency relating to the OfS evaluation support resources.

Figure 29 | Analysis of codes related to the OfS evaluation support resources
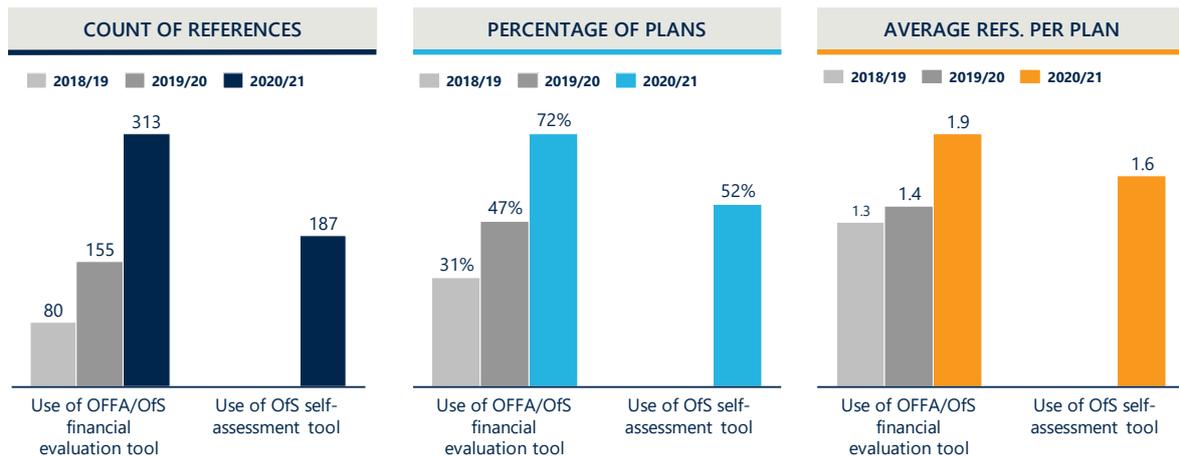
Note: 'Average refs. per plan' refers to the average number of instances per plan in the sample of plans identified that included at least one relevant reference.

8.4 Monitoring practices were covered in more detail

The RN1 2020-21 guidance (OfS 2019.05) provided more explicit detail on the difference between evaluation and monitoring expectations for providers. This led to a notable increase in both the volume of references and the percentage of providers that made specific reference to their monitoring processes.

The allocation by many providers of a specific sub-headed section to the monitoring practices has led to greater detail being included in the most recent plans. Providers have included more substantial explanations of which groups are undertaking monitoring, which executive is accountable for progression of the plan and how students have been consulted or included in the monitoring.

'Monitoring is distinct from evaluation in that monitoring is conducted on a routine basis often at leadership meetings and looks at progress against targets and other commitments made in a plan. Evaluation is a periodic activity looking at the impact of specific activities.'

RN1 2020-21

8.5 Intervention actions were not clearly identified

Throughout the responses few providers have provided detail on what processes are in place should monitoring identify underperformance. Many reports identified which leadership groups and executives are responsible; however, they did not articulate the powers available to intervene should targets be missed. There is further scope for providers to define underperformance in a monitoring context and establish formal processes for effective intervention. Figure 30 provides examples of where providers have provided detailed timeliness and responsibility for monitoring.

Figure 30 | Examples of providers that detail timeliness and responsibility for monitoring

University of Worcester 2019-20

'The Student Performance Monitoring Group will ensure that the plan is regularly monitored and evaluated. Chaired by the pro vice-chancellor (students) and with membership from key university academic departments and professional support services, the group will take lead responsibility for communicating, monitoring and evaluating the university access and participation plan.'

Bournemouth University 2020-21

'The Access, Excellence and Impact Committee is responsible for a comprehensive combination of regular and annual monitoring of the access and participation plan as a whole and its targets and milestones, linked to key performance indicator (KPI) monitoring. This approach allows us to closely track our progress through this monitoring and provide early opportunities to identify any potential for milestones and ultimately targets not to be met, and if planned actions need to be revised or if further targeted actions are required.'

Askham Bryan College 2020-21

'The EDI Committee reports to the senior/executive leadership team and to corporation/governing body via the Quality and Standards Committee (a sub-committee of corporation). Senior responsibility for monitoring of this APP will sit with the director of higher education, reporting to the chief executive officer... An annual report, including progress against targets, will be presented to the full corporation, normally in December each year.'

8.6 Avenues for further research into evaluation and monitoring

The findings from the analysis highlight areas to test through consultation with stakeholders.

Areas for exploration:

10. To what extent have changes in the OfS's guidance and resources incentivised improvements in monitoring/evaluation?

9 Looking ahead to Part 2

The review of changing access agreements and access and participation plans has provided insights into likely changing ambition and provider behaviour. It has highlighted areas which require further exploration with stakeholders to better understand the following overarching issues:

- The extent to which observed changes in ambition and shifting behaviour are a reality

- The extent to which changing behaviour can be attributed to changing regulation as opposed to other external or internal variables (for example, national or local student campaigns or changes in leadership)

- Which of the actions taken by the OfS have been most influential in driving behavioural change (for example, making access and participation a top priority in the regulatory framework, emphasis by the OfS leadership of the importance of the agenda, changing plan guidance).

The stakeholder review will also seek to understand the following key question relating to the OfS guidance and support:

11. How useful were the OfS's guidance, resources, workshops and briefing events in supporting the development of access and participation plans?

12. To what extent did the OfS's various reforms and resources support greater ambition in plan development and implementation?

10   Appendix A: Codes used in the analysis

Table 3 provides a list of codes used in the analysis for this report and a description.

Table 3 | Description of codes used in the analysis

Section	Code	Meaning
Scale of ambition	Ambition	Direct references to 'ambition' or 'ambitious' in the plans.
	Eliminate	Direct references to the word 'eliminate'.
Assessment of performance	BAME categories (group of codes)	References to student groups from Black, Asian and minority ethnic backgrounds, including mixed ethnicity, other ethnicity and unspecified.
	Socio-economic groups (group of codes)	References to students from low socio-economic backgrounds (or proxy) including low participation neighbourhoods, low socio-economic backgrounds and low income.
	Optional wider student groups	References to students included in the OfS's list of optional student groups in the guidance, including carers, estranged students, travellers, refugees and military.
Evidence-informed strategic approach	Theory of change	Direct references to theory of change in response to the OfS's request to describe how and why a desired change is expected to happen in a particular context.
	Evidence informed spend	References to a provider focusing/redirecting spend based on performance.
Whole provider approach	Whole provider approach	References to joined up approaches across the whole provider to support the agenda, including through governance, departments working together and aligning of strategies.
	Equality and diversity	General references to equality and diversity and the interplay with the activities in the plans.
	Alignment with equality and diversity strategy	More explicit reference to the alignment of equality and diversity strategies with the access agreements/access and participation plans.
Student consultation	Actions in response to student feedback	References to decisions that have been made and/or actions that have been implemented as a direct response to student consultation.

	Student-led activities	Activities run by students, including engagement in governance process, campaigns and involvement with plan design, delivery, evaluation and monitoring.
Evaluation strategy	**Continuous improvement**	Direct references to continuous improvement relating to effective evaluation to support evidence-informed practice.
	Self-assessment	Direct reference to self-assessment relating to the extent to which providers are reviewing their own practices.
	Use of OFFA/the OfS financial evaluation tool	References to the use of the OFFA/OfS's financial support evaluation toolkit.
	Use of the OfS self-assessment tool	Reference to the use of the OfS's evaluation self-assessment tool.