

**Office for
Students**



Regulatory advice 6: How to prepare an access and participation plan

**Supplementary access and participation plan
guidance**

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Enquiries to app@officeforstudents.org.uk

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Introduction

1. This regulatory advice sets out practical guidance for a higher education provider in England on how to prepare its access and participation plan. It replaces the version published on 28 February 2019 (OfS 2019.06).
2. An English higher education provider is required to have an approved access and participation plan if it is registered in the Approved (fee cap) category of the OfS Register and wishes to charge above the basic tuition fee limit for 'qualifying persons' on 'qualifying courses'. This requirement stems from the Higher Education and Research Act 2017 (HERA) and is reflected in ongoing condition of registration A1.
3. The aim of this regulatory advice is to support a provider in creating a clear and effective access and participation plan. This advice sets out further information about the ways in which a provider can meet the requirements and expectations set out in Regulatory notice 1.¹ As such, it is important that a provider reads this advice alongside Regulatory notice 1 to ensure that it fully understands the OfS requirements and expectations.
4. This advice follows the expected structure of an access and participation plan, as set out in Regulatory notice 1. It provides advice on the information a provider may wish to include in each section of its plan and includes a number of illustrative examples. The examples provide an indication of how the guidance set out in Regulatory notice 1 may be applied but are non-exhaustive. When preparing its plan a provider should refer to the expectations set out in Regulatory notice 1 and carefully consider its own context.
5. The advice is issued by the Office for Students (OfS), under section 29 of HERA which relates to the approval of access and participation plans, and section 35 of HERA which relates to the identification of good practice and giving advice about such practice to registered providers.
6. We will update this advice as new evidence emerges, as appropriate. A provider can refer to this advice during the design, implementation and evaluation stages of the plan. Plans will be assessed against expectations set out in Regulatory notice 1. However, during the assessment process and monitoring we may draw providers' attention to particular aspects of this advice in order to support continuous improvement in relation to the promotion of equality of opportunity.
7. The following annexes are published separately and are available on the OfS website²:
 - Annex C: Access and participation plan template
 - Annex D: Guidance on completing the Fees, investments and targets (FIT) document
 - Annex E: Template fees, investments and targets (FIT) document
 - Annex F: Student submission guidance

¹ Available at www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/.

² Available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

- Annex G: Student submission template
- Annex H: Guidance for completing a summary of approved access and participation plan
- Annex I: Plan summary template

8. If there are any inconsistencies between Regulatory notice 1 and this document, then the Regulatory notice will prevail.

Related information

- Regulatory notice 1: Access and participation plan guidance
- Equality of Opportunity Risk Register (EORR)

General expectations

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Part B: Contents of an access and participation plan	18-118

Further advice

9. A plan should be publicly available and written for non-expert audiences, including prospective and current students, schools, parents, carers and guardians, and other interested members of the public. As such, we expect plans will be:
 - **Clear:** Plans should be readable, written in plain English, and avoid unnecessary jargon. Plans should be publicly available for the OfS, the provider's governing body, prospective and current students, schools, parents, carers and guardians, and other interested members of the public.
 - **Accessible:** We expect all plans to be accessible for readers with different impairments, and therefore to comply with the standards in the Web Content Accessibility Guidelines.³
10. A provider is expected to use the template available on the OfS website to structure its access and participation plan.⁴ The OfS expects a plan to be a single document that should not normally exceed 30 pages of A4. There is no minimum length expectation.
11. A plan may include the following annexes, which are exempt from the 30-page limit:
 - Annex A: Analysis relating to the identification and prioritisation of key risks to equality of opportunity – including that which relates to a provider's assessment of performance and consideration of the Equality of Opportunity Risk Register (EORR).
 - Annex B: Further information that sets out the rationale and evidence base for each intervention strategy that is included in an access and participation plan.
12. These documents should be submitted using the OfS provider portal. Submissions via email will not be accepted.
13. A plan may include a separate student submission in relation to the provider's plan. This should be sent directly to app@officeforstudents.org.uk in advance of, or at the same time as, the

³ See <https://www.w3.org/TR/WCAG21/>.

⁴ Available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

provider's submission of its plan. Further information about the student submission can be found at Annex F.⁵

14. Alongside the access and participation plan, a provider is expected to submit the Fees, investments and targets (FIT) document. For further information about completing this document, see Annex D.⁶

The access and participation plan and associated documents to submit include:

- Access and participation plan (*not more than 30 pages*)
- Annex A: Analysis relating to key risks to equality of opportunity (*optional*)
- Annex B: Rationale and evidence base for each intervention strategy (*optional*)
- Student submission (*optional*)
- Fees, investments and targets (FIT) document

⁵ Annex F is available at: www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

⁶ Annex D is available at: www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

Introduction and strategic aim

The introduction and strategic aim provide the reader with a clear statement about the mission and aims of a provider in order to contextualise the content of the plan.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Overview of an access and participation plan	38a
Introduction and strategic aim	56

Further advice

15. A provider is expected to use the introduction to set out its context, mission, and overarching strategic aim, as they relate to the delivery of equality of opportunity for students.
16. This account will be significant in our consideration of whether a provider has identified appropriate risks to equality of opportunity.
17. A provider may use this section of its plan to highlight its areas of success as well as those in which it seeks to improve its approach to equality of opportunity. However, the introduction should be brief and normally be limited to one side of A4.
18. When setting out the introduction to a plan, a provider may want to include:
 - a brief description of the mission of the provider
 - overarching strategic aim in relation to equality of opportunity for all students
 - any additional context that a provider wants readers to know about.

Identifying risks to equality of opportunity

We want to understand how a provider has identified the key risks to equality of opportunity that will be the focus of the plan, and the rationale for this.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Risks to equality of opportunity	38b 57-60
Assessment of performance	43-55

Further advice

Assessment of performance

19. A provider is expected to undertake an assessment of its performance to identify the risks to equality of opportunity its plan will address. We expect the elements of the assessment of performance that were used by a provider to identify the risks to equality of opportunity that will be addressed by its plan to be included as an annex to the plan.
20. The assessment of performance is intended to identify the greatest risks to equality of opportunity that certain student groups may face. This is done by identifying the indications of risk, and their underlying risks to equality of opportunity. By undertaking this analysis, a provider demonstrates that it understands the greatest risks to equality of opportunity to its students in its own context.
21. This assessment can then be used to inform the intervention strategies that a provider undertakes to address or mitigate the risks to equality of opportunity.
22. To undertake a credible assessment of performance, a provider is expected to consider:
 - a. All stages of the student lifecycle and student groups where there are known risks to equality of opportunity, or indications of these risks, across the lifecycle stages in the OfS access and participation data dashboard.⁷
 - b. Any particular student groups highlighted by the EORR.⁸

⁷ See www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/data-dashboard/.

⁸ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/equality-of-opportunity-risk-register/.

23. As such, a provider may wish to:

- a. Use the OfS access and participation dataset⁹ and other published data sources to analyse data from across the whole student lifecycle for a wide range of groups, particularly those where there are known risks to equality of opportunity as highlighted in the EORR (further information can be found in the section on using the EORR to identify risks to equality of opportunity).
- b. Analyse gaps between target groups and their comparator group, as well as performance over time.
- c. Disaggregate data where possible and consider intersections of characteristics.

24. Following this analysis, a provider is expected to use the EORR and other sources of evidence to identify which risks to equality of opportunity may be contributing towards the indications of risks seen in the data.

25. A provider is expected to give an explanation in its plan where the data suggests there are risks to equality of opportunity present that are not being targeted in the provider's plan.

26. Where a provider does not have sufficient data to undertake a credible assessment of performance, it can use the national groups identified in the EORR to identify potential risks to equality of opportunity that its students may be facing. For more information on this, see section on using the EORR to identify risks to equality of opportunity.

27. We would expect a credible plan to also do the following:

- a. State in the plan or annex setting out a provider's assessment of performance where data has been suppressed or not included due to small numbers.
- b. Describe the confidence it has in the performance data, and whether or how it considers statistical uncertainty to have had an impact on its assessment of performance.
- c. Comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 in relation to using and publishing information which may identify individuals.¹⁰
- d. Have consideration to the EORR, internal data, and any other national, regional and local data and evidence (including qualitative).
- e. Include timebound written commitments for collecting and reporting on data that is currently suppressed.

This will be particularly important where a provider has a small number of students (for both a particular group or whole student population).

⁹ Available at www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/.

¹⁰ See <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>.

Considering lifecycle stages and student groups

28. A provider can use the access and participation data dashboard, the EORR and its own knowledge to identify key risks to equality of opportunity for student groups across the student lifecycle, including:
- **Access** to higher education
 - **Continuation** in the study of higher education qualifications
 - **Completion** of the study of higher education qualifications
 - **Attainment:** achievement and the awards made to higher education students at the end of their studies
 - **Progression:** into the labour market, further study and other destinations after leaving higher education.
29. There are a number of groups that are more likely to experience risks to equality of opportunity across the lifecycle (including but not limited to):
- a. Students in receipt of free school meals.
 - b. Students with certain characteristics, including care experienced students, students who are estranged from their families, and students from Roma, Gypsy and Traveller communities.
 - c. Students with a protected characteristic identified by the Equality Act 2010 who do not experience equality of opportunity because of that protected characteristic.
 - d. Students who experience multiple barriers to higher education or who are identified when looking at intersections of characteristics, such as male students who are in receipt of free school meals.
30. The EORR identifies groups that are more likely to experience certain risks to equality of opportunity on a national level, and encourages providers to consider which student groups are at risk at a provider level. The EORR also provides further information on different student characteristics, including personal, area-based and school-based, that a provider can consider.
31. It is important to consider multiple aspects of students' backgrounds that may affect the risk to equality of opportunity to ensure a well-rounded assessment of performance. This may include:
- a. Measures based on individual circumstances or personal characteristics: for example eligibility for free school meals.
 - b. Area-based measures: for example TUNDRA or indices of deprivation. Such measures may be suitable for use by a provider where there are geographical gaps in access to higher education (we would not expect use of the area-based measures in isolation where a provider is addressing a risk to equality of opportunity that is related to individual student circumstances).

- c. Intersections of characteristics: for example the Associations Between Characteristics of Students (ABCS) measure or specific combinations of characteristics.¹¹ A provider should be aware that reporting data in more intersectional terms can lead to increased statistical uncertainty due to their often small population sizes (use of ABCS may mitigate this issue due to the way it groups multiple combinations of characteristics with similar outcomes in quintiles).

32. When presenting the assessment of performance, a provider may use charts and graphs to aid communication of its assessment of performance.

33. We expect providers to comply with GDPR and a provider must not submit data to the OfS through the access and participation plan process where individual students can be identified.

Analyse performance at a granular level

34. A granular assessment of performance can provide a greater understanding of performance across the lifecycle and for particular groups. This could include analysing the gaps between a specific group and their comparator group as well as analysing performance over time in relation to gaps.

35. By disaggregating data to a level that examines sub-groups and acknowledging that groups with a particular characteristic are not a homogenous group, a provider can demonstrate a strong understanding of the characteristics of students and its performance for these groups. This would normally include:

- a. Disaggregation of black, Asian and minority ethnic students into individual groups.
- b. Disaggregation of disabled students (including those who are or are not in receipt of Disabled Students' Allowances), including: those with declared mental health conditions; cognitive or learning difficulties; sensory, medial or physical impairment(s); social or communication impairment(s) and multiple health condition(s).

36. Other disaggregation may be possible using the OfS individualised data underpinning the OfS access and participation data dashboard or using other data sources. Care should be taken when analysing disaggregated data and intersections as analysis may involve small numbers and statistical uncertainty. For further information on analysing small numbers, please see the section on [analysing small numbers](#).

37. Considering intersections of characteristics can identify more accurately gaps in access, success and progression for particular groups of students (for example where examination by a single characteristic may mask or underestimate the extent of a gap that needs addressing for a particular group). This may include intersections between personal characteristics, area-based characteristics and school-based characteristics, including the full range of protected characteristics.

¹¹ See www.officeforstudents.org.uk/data-and-analysis/associations-between-characteristics-of-students/.

Use available data sources

38. To support a provider in assessing its performance, we have made available an access and participation data dashboard. This shows both sector- and provider-specific data on provider performance in equality of opportunity. As this dashboard is publicly available, using it in a provider's assessment of performance allows those reading a provider's plan to verify this and monitor performance.
39. The access and participation dashboard shows gaps in access and student outcomes for student groups compared with their peers, broken down by various student characteristics. Exploring the data in conjunction with consideration of the EORR can identify risks to equality of opportunity for particular groups of students at national and provider level. The OfS access and participation dataset will be updated regularly to account for the latest student and outcomes data available. User guides on accessing the datasets can be found on the OfS website.¹² Similarly, documentation describing the construction of OfS data indicators (including how to disaggregate for certain groups and how the concept of statistical uncertainty can be understood and applied) can also be found on the OfS website.¹³ We acknowledge that not all providers will have data for each group and lifecycle stage due to small numbers of students with certain characteristics, or small datasets overall, and instead we encourage providers to use other published or internal data to support their assessment.
40. Other possible data sources published by the OfS, Jisc, Department for Education (DfE), UCAS, Office for National Statistics (ONS), and similar sector-wide organisations include (but are not limited to):
- the OfS's student characteristics data: outcomes data¹⁴
 - the OfS's student outcomes data dashboard (in relation to registration condition B3)¹⁵ and the Teaching Excellence Framework (TEF) data dashboard¹⁶
 - National Student Survey¹⁷
 - Graduate Outcomes survey data¹⁸

¹² Available at www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/about-the-data-dashboard/get-the-dashboard-data/.

¹³ See the 2023 algorithms to support OfS regulation, including the 'Description and definition of student outcome and experience measures' and 'Rebuild instructions for 2023 data resources' documents at www.officeforstudents.org.uk/data-and-analysis/student-outcome-and-experience-measures/documentation/.

¹⁴ Available at www.officeforstudents.org.uk/data-and-analysis/student-characteristics-data/outcomes-data-dashboard/.

¹⁵ Available at www.officeforstudents.org.uk/data-and-analysis/student-outcomes-data-dashboard/.

¹⁶ Available at www.officeforstudents.org.uk/data-and-analysis/tef-data-dashboard/.

¹⁷ Available at www.officeforstudents.org.uk/advice-and-guidance/student-information-and-data/national-student-survey-nss/.

¹⁸ Graduate outcomes data is available at www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/ and www.officeforstudents.org.uk/data-and-analysis/student-characteristics-data/.

- the OfS's ABCS data¹⁹
- DfE's destination measures, including longitudinal education outcomes (LEO) data, and data on schools performance, and apprenticeships
- ONS data on population, labour force and other statistics
- other national- and provider-level data from the OfS and other sector-wide organisations including those used in the EORR.²⁰

41. When considering these different sources of data, we recommend a provider remains alert to issues of consistency in the coverage and definitions of the populations or outcomes being reported, for example whether the dataset used includes students who are not 'qualifying students' on 'qualifying courses' or whether the dataset uses benchmarks as well as absolute performance.²¹ Care should be taken when considering benchmarked data as this data adjusts for differences in outcomes for particular groups. We recommend that a provider also remains alert to issues of statistical uncertainty, which may be particularly relevant for data based on small student populations.

42. Other data sources that are not publicly available may also help show a fuller picture of a provider's performance, where this is supplementary to other published data and can be transparently monitored by stakeholders (if possible). These could include (but are not limited to):

- internal data, for example on student access to provider-delivered services such as wellbeing, careers or academic support
- individualised student data files released to providers by the OfS, to ensure transparency in our approach to regulation of student outcomes and equality of opportunity, which can be used to consider alternative groupings than those constructed by the OfS if data is not reportable in the access and participation data dashboard
- tracking data, including data provided by tracking services such as the Higher Education Access Tracker (HEAT), Aim Higher West Midlands, East Midlands Widening Participation Research and Evaluation Partnership (EMWPREP), and UCAS Outreach Evaluator
- UCAS provider data
- Student Loans Company (SLC) data

¹⁹ Available at www.officeforstudents.org.uk/data-and-analysis/associations-between-characteristics-of-students/completing-full-time-higher-education/.

²⁰ Such as relevant publications available at www.officeforstudents.org.uk/data-and-analysis/official-statistics/published-statistics/.

²¹ For the condition of registration and other purposes, 'qualifying persons' on 'qualifying courses' are prescribed by regulations made under HERA. These are available online and are amended from time to time.

- local authorities' data, for example to supplement provider data in relation to care experienced students and disabled students
- data and evidence about local and regional economies, including from Local Enterprise Partnerships (LEPs) and Local Skills Improvement Plans
- national, regional and subject-level data, qualitative evidence, research and evaluation evidence, and academic evidence to highlight groups where risks to equality of opportunity may be present to a provider's performance in context.

Analysing small numbers

43. A provider may find that intersectional or disaggregated analysis is limited by small student numbers or high levels of statistical uncertainty. The latter is often a consequence of small student numbers. For characteristics included in the OfS access and participation data dashboards, users are encouraged to consider the statistical uncertainty associated with each indicator value we have calculated – whether based on large or small student numbers – through the information included in the dashboard. A provider may want to consider whether information on statistical uncertainty is available in respect of any other datasets they may be using to understand its performance.
44. Consideration of statistical uncertainty is important to ensure that users can have confidence in their use and interpretation of statistics. As the actual students in a provider's observed population are just one possible realisation of many other populations of students who could have attended that provider, or may do so in the future, statistical uncertainty exists because of the potential for random variation in student behaviours and outcomes. A provider is encouraged to consider this potential for random variation when assessing undertaking its assessment of performance.
45. Where analysis is limited by small student numbers or high levels of statistical uncertainty, a provider may use the EORR to give general consideration to whether students are likely to experience risks to equality of opportunity. A provider may also consider gathering information and data in different ways, for example through focus groups or other qualitative analysis. A provider may wish to consider using this information in place of, or in conjunction with, analysis of quantitative data.
46. Access and participation plans must not include information which makes individuals identifiable: onward publication of the plans must remain compliant with the UK GDPR. Where the numbers of students with particular characteristics are too small to inform their assessment, a provider may choose to use an aggregate of two or four years of data to ensure that data is more robust and that individuals cannot be identified. However, where this is not possible or appropriate, providers should summarise where this is the case. A provider can use qualitative analysis, regional or national statistics, or academic evidence, to assess the gaps and barriers in its context.

Using the EORR to identify risks to equality of opportunity

47. The EORR identifies 12 sector-wide risks to equality of opportunity. Once a provider has identified indications of risks through its analysis of the data, it can use the EORR to consider which risks to equality of opportunity may be experienced by its students.

48. The EORR links the indication of risks identified through a provider's data analysis to potential risks to equality of opportunity that may be causing the indications of risk. However, the risks are not exhaustive and the indications of risk that a provider has identified may also relate to risks that are not covered by the EORR.
49. The online EORR pages provide detailed guidance on how a provider can explore the relationship between different indications of risk and different risks to the equality of opportunity.
50. By identifying the indications of risk and linking these to risks to equality of opportunity, a provider can achieve a greater understanding of the risks that its prospective or current students may face – including how one risk may exacerbate another. This can subsequently be used to inform the design of intervention strategies.
51. Where a provider has small numbers of students with certain characteristics, or small datasets overall, it can use nationally identified at-risk student groups in the EORR to inform the development of intervention strategies.
52. Through examining the EORR, a provider can identify gaps in its data or knowledge. In these instances a provider may wish to consider whether a lack of information and data is contributing to a risk, and if so whether it can put in place any data collection systems to mitigate against this, or seek to develop better understanding through evaluation.
53. The EORR is not an exhaustive list of risks, and we intend to update it regularly as the evidence base for access and participation grows. If a provider feels that the EORR does not capture the main risks to equality of opportunity, it can provide feedback²² to help us build on the EORR in the future.

Example

The University of Edgestow is a large, highly-selective provider with over 12,000 students. This provider has responded to the assessment of performance requirements set out in Regulatory notice 1 in the following ways:

- It has used a number of datasets to identify the potential indications of risks. It has disaggregated student groups as much as possible, and has also explored intersectionalities across student characteristics.
- Through this exercise it has identified a number of indications of risks, including a very low proportion of applications from white students eligible for free school meals (FSM) and an on-course attainment gap between black and all other full-time undergraduate students.
- It has very low numbers of care experienced students and so has also used the EORR to note that these students may be at risk of not experiencing equality of opportunity.
- The provider has complied with the UK GDPR in the presentation of its data.

²² Feedback on the EORR should be sent to app@officeforstudents.org.uk.

- It has used the EORR to link the indications of risks that are visible in its datasets to potential risk(s) to equality of opportunity. From this it has seen that a very low proportion of applications from white, FSM-eligible students may be related to three potential risks in the EORR: prior knowledge and skills; information and guidance, and perception of higher education. It has also seen that an on-course attainment gap between black and non-black full-time undergraduate students may be related to six potential risks in the EORR.
- The provider has also identified a risk that is specific to its context and is not covered by the EORR – care experienced students may be exposed to nine different risks to equality of opportunity across the lifecycle.
- It has considered the extent to which these risks may be contributing to the indications of risks, and will use this information to inform its intervention strategies.
- The provider has summarised its assessment of performance and included it as an annex of its plan.

Objectives

Objectives set out a provider’s ambitions for addressing the indications of risks to equality of opportunity that it has identified through its assessment of performance.

It is important that objectives are timebound and measurable so that any reader of a plan will be able to see the progress a provider intends to make and can hold it accountable for them.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Objectives	38c 61-62

Further advice

54. A credible example of an objective would be one that addresses an indication of risk that a provider sees in its data and/or in the EORR.

55. We expect that each objective will relate to an indication of risk that is likely to be caused by risks to equality of opportunity. A provider’s intervention strategy can address the underlying risks to equality of opportunity through different activities. Where relevant this may intersect across the student lifecycle.

56. A credible plan would consider the following when setting objectives to address the risks to equality of opportunity:

- objectives relate to the indications of risks and risks to equality of opportunity identified in a provider’s context from the assessment of performance and/or the EORR
- objectives are ambitious, realistic and lead to change
- objectives are timebound and measurable (where possible)
- whether the objective needs to be set over a longer timeframe than the plan.

57. Small providers might be expected to have capacity and capability to address fewer objectives, targets, and intervention strategies in the plan than a larger provider.

Putting it into practice

58. We expect objectives to be set for the most significant indications of risks identified at a provider or at a national level. When setting objectives, a provider can consider the lead-in time

for new activities being designed and delivered and whether there are any other factors that may impact on its progress, such as anticipated changes in the nature or volume of its provision of higher education.

59. We acknowledge that some risks will take longer to reduce and, as such, the related objectives may be set over a longer timeframe than the duration of the plan.
60. A provider's objectives may be directly informed by the data used to identify the associated indications of risk in the assessment of performance. For example, if a provider has identified an attainment gap between those under the age of 21 and those aged over 21, it may wish to set an objective to eliminate the attainment gap between those two groups within six years of the plan start date. This could then be translated into a numerical target with measurable annual milestones for the maximum duration of the plan which work towards this (for further information see the [targets section](#)).
61. Where data is limited or unavailable from the access and participation data dashboard or other sources, but a risk has been identified through the EORR, the objective may be framed in a way that would demonstrate the progress that a provide expects to make in mitigating the risk to equality of opportunity. These should clearly relate to estimates of annual milestones and numerical targets. We expect the evidence and activities listed in the intervention strategy for this objective to be evaluated to be able to present progress being made on the objective within the timeframe of the plan.

Examples

Through its assessment of performance, the University of Edgestow identified a number of indications of risks. It will address nine of these across the student lifecycle. The objectives that it set for two of these indications of risk are:

Indication of risk: Very low proportion of applications from white, FSM-eligible students (relative to the national benchmark).

Objective: To increase the proportion of successful applications from white, FSM-eligible students such that it aligns with the national benchmark for the end-year of the plan duration.

Indication of risk: An on-course attainment gap between black and all other full-time undergraduate students.

Objective: To eliminate the attainment gap between black and all other students by 2029-30.

Intervention strategies and expected outcomes

We want to understand how a provider intends to address its risks to equality of opportunity, and the evidence base it has used to support the use of activities.

Some activities undertaken by a provider as part of its intervention strategy may extend beyond the time period of a provider's plan. A provider should set out the short, medium and the longer term outcomes it intends to achieve in these instances.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Intervention strategies	63-71

Further advice

62. An intervention strategy is a coherent group of activities or measures, such as new policies, that a provider will undertake or put in place to achieve its objectives. The intended outcome(s) of an intervention strategy should relate directly to an objective identified through the assessment of performance, but may also contribute to other objectives. Individual activities within the intervention strategy may also have their own outcomes.

63. To design a credible intervention strategy, a provider may:

- develop a theory of change underpinning each intervention strategy. The theory of change should aim to address the risks to equality of opportunity that may be resulting in the indications of risk that a provider has identified through its assessment of performance
- use the best available evidence to design the intervention strategies, and indicate the strength of this evidence, referencing this where possible
- collaborate to maximise impact, where possible (further information can be found in the collaboration section)
- align the intervention strategy with its whole provider approach (further information can be found in the whole provider approach section) and involve student consultation (further information can be found in the student consultation section).
- have mechanisms in place to understand if the intervention strategy is making progress against the objective(s)
- use the intervention strategy template in the [intervention strategy example section](#), and included within the access and participation plan template at Annex C, to summarise

information on the activities and outcomes of its plan.²³ An evaluation plan template can also be found in the access and participation plan template.

- consider how the impact of its interventions in mitigating the risks it has identified will be properly evaluated using the OfS standards of evidence as a guide.²⁴ A provider is expected to prioritise evaluation of activities for which the existing sector evidence is weak and/or for which high impact and/or high investment is expected. In these instances we would encourage a provider to aim to generate empirical evidence (Type 2) at a minimum and where appropriate (see Table 1 at paragraph 202 for further information about this). This may be done at an activity or intervention strategy level.

Putting it into practice

64. A provider is expected to have an appropriate and realistic number of intervention strategies based on the risks that it has identified through its assessment of performance, its objectives and its context.
65. For each indication of risk that is identified for action through the assessment of performance, a provider is expected to develop an intervention strategy that addresses the underlying risks to equality of opportunity, and that contains information on the activities that it will undertake to mitigate these risks and achieve the objectives it has set.
66. The OfS and the Centre for Transforming Access and Student Outcomes in Higher Education (TASO) have produced effective practice resources covering specific groups and evidence related to common activities undertaken by providers.²⁵ These resources provide non-exhaustive examples of the types of activities that may be included within a provider's intervention strategies. This advice will not include guidance on supporting specific target student groups.

Develop a theory of change

67. A theory of change process should support a provider to articulate the changes it wants to make, that will contribute towards the overall objective(s). It should give information on what a provider plans to do to achieve the outcomes and objective (e.g. the activities it will deliver), along with a description of how and why (the causal links) the activities should lead to change. Developing a theory of change can help a provider improve its strategy and the quality of evaluation.
68. For providers that are new to developing a theory of change, TASO has developed resources to support providers using this approach, including a simple template based on a logic model

²³ Annex C is available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

²⁴ Available at www.officeforstudents.org.uk/publications/standards-of-evidence-and-evaluating-impact-of-outreach/.

²⁵ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/. Also see <https://taso.org.uk/evidence/toolkit/> and <https://taso.org.uk/research/publications/>.

that providers can use for each intervention strategy, workshop slides and examples of pre-populated theories of change related to different TASO evaluations.²⁶

69. Issues related to equality of opportunity often sit within complex and changing contexts. In these more complex contexts, a provider may want to invest time in an appropriate theory of change process which facilitates deeper strategic thinking and challenge to its intervention strategies; for example, by using the Defra theory of change tool,²⁷ NPC step-by-step guide to a theory of change,²⁸ TASO's enhanced theory of change resources,²⁹ and Advance HE's ChangeBusters resources.³⁰
70. TASO has produced reports on common outcome measures (including short, medium and long term) used for different activities across the student lifecycle which can support a provider in determining the expected outcomes.³¹

Use evidence to inform activities

71. It is important that a provider researches the available evidence bases when designing measures or activities within an intervention strategy to gain a better understanding of how impactful it is likely to be, for whom and in what contexts. Where a provider is designing innovative interventions with a limited evidence base, a clear plan for evaluating impact will be particularly important.
72. Evidence informing a provider's interventions may be from published or internal research and evaluations, or evidence published from other providers or organisations, including evidence obtained from formative and summative evaluation.

Useful sources of evidence

73. Providers have access to a number of useful sources of evidence that can be used to inform the intervention strategies as well as the individual activities that sit within. These could include:
- TASO's evidence toolkit and publications^{32 33}
 - evidence from previous or ongoing OfS challenge competitions, OfS funding competitions or HEFCE catalyst fund projects

²⁶ Available at <https://taso.org.uk/evidence/evaluation-guidance-resources/toc/>.

²⁷ Available at <https://www.technopolis-group.com/report/defra-theory-of-change-toc-tool/>.

²⁸ Available at <https://www.thinknpc.org/resource-hub/ten-steps/>.

²⁹ Available at <https://taso.org.uk/evidence/evaluation-guidance-resources/toc/enhanced-theory-of-change-templates/>.

³⁰ Available at <https://www.advance-he.ac.uk/knowledge-hub/changebusters>.

³¹ Available at <https://taso.org.uk/evidence/evaluation-guidance-resources/toc/theory-of-change-leader-pack/> and <https://taso.org.uk/evidence/evaluation-guidance-resources/survey-design-and-validation/validated-widening-participation-questionnaire>.

³² See <https://taso.org.uk/evidence/toolkit/>.

³³ Available at <https://taso.org.uk/research/publications/>.

- OfS effective practice resources, case studies³⁴ and insight briefs³⁵
- Uni Connect evidence bank³⁶
- a provider's own evaluation and research findings
- evidence shared from other providers, and from partnerships and networks that providers engage with.

74. This is not intended as an exhaustive list, but rather a starting point to explore further evidence relevant to the activities a provider plans to deliver. Further sources of evidence can be found in the topic areas below.

75. Where a provider is developing new and innovative activity, it can use relevant data and evidence (even where this may be limited), co-design the activity with the groups being targeted for the activity, and set out a more detailed evaluation plan to show credibility. This will be key in ensuring the activity is not having a negative impact on the target groups.

Collaboration

76. There are benefits to working collaboratively across all aspects of access, success and progression. Collaborative approaches can ensure that expertise is pooled to enhance the quality of provision, activity can be strategically aligned to reduce duplication, overlap and burden, effective practice can be shared, and shared goals ensure that all partners are working towards the same ends.³⁷ Collaboration is likely to include relationships with other higher education providers, with employers, third sector bodies, community groups, schools or colleges.

77. In relation to collaboration and alignment with other work and funding sources, a plan may describe:

- a credible strategic approach to collaborative working, with a clear purpose and rationale, including any timebound commitments
- the collaborative activities that are in place or are in development, including the organisations and networks involved, what the collaborative partnerships are seeking to achieve and the shared goals that have been agreed
- a provider's work with schools, colleges, other educational organisations, health providers and community groups
- clear information on a provider's engagement with OfS-funded programmes, such as Uni Connect, and projects to improve outcomes for local graduates

³⁴ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/.

³⁵ See www.officeforstudents.org.uk/data-and-analysis/insight-briefs/.

³⁶ See www.officeforstudents.org.uk/publications/fourth-independent-review-of-impact-evaluation-evidence-submitted-by-uni-connect-partnerships/.

³⁷ See www.officeforstudents.org.uk/publications/benefits-of-and-barriers-to-collaborative-access-activity/.

- how a provider might wish to collaborate with its student body, including student unions and guilds, to design and deliver activity related to achieving the objectives of its plan.

78. Collaborative targets can be an effective way of securing commitment from partners in a collaborative arrangement, and help you demonstrate the progress being made towards shared goals. Further advice can be found in the [collaborative targets section](#).

Collaborating for access

79. Targeting the right learners, with the appropriate activity, in the right areas and at the right time is crucial for activity to have an impact on equality of opportunity.

80. It can be highly effective for a provider to collaborate for particular activities or intervention strategies with third sector organisations and community groups that have the relevant expertise. A provider is expected to make clear in its plan what role it plays in these collaborations.

81. Examples of effective collaboration are often at the strategic level. Partnerships based on agreed long-term objectives are likely to be sustainable and resilient even when key staff move on or activity programmes end.

82. A research report on the benefits and barriers to collaborative access activity suggests a number of considerations that may be helpful for any provider seeking to work collaboratively in relation to access activities:³⁸

- approach collaborative access activity impartially and ensure it does not focus on student recruitment
- be transparent when working with other providers to minimise competition
- utilise existing collaborative networks to draw on expertise, systems and processes
- engage with senior leaders, industry partners, school leaders, school governance, and community groups early on to ensure that expertise is utilised and that access activities are fit for purpose in the local context
- if applicable, ensure activities are relevant to the school curriculum, needs and priorities
- aim to provide a sustained multi-intervention offer rather than one-off interventions
- work with partners to provide relevant training to the outreach delivery team, if needed (e.g. if students are delivering activities, they need relevant training to ensure it is effective)
- make evaluation a key component of the collaborative approach.

³⁸ See www.officeforstudents.org.uk/publications/benefits-of-and-barriers-to-collaborative-access-activity/.

Uni Connect

83. The OfS-funded programme, Uni Connect, involves 29 partnerships in England helping to direct and identify what is being delivered to who and when in regards to higher education access activity.³⁹ Uni Connect has worked with over 1 million learners in England and over half of all schools and colleges in England were involved with a Uni Connect partnership in 2020-21. The OfS has also developed the national outreach coverage map to help providers with geographical targeting, identifying cold spots and areas of oversupply.⁴⁰
84. A provider is welcome to make use of its local Uni Connect partnership to build effective collaboration into its plans for improving equality of opportunity for access. The Uni Connect programme has an existing collaborative network and is well placed to facilitate collaborative activity to address risks to equality of opportunity in access across England. If a provider operates within a Uni Connect partnership, the activity planned and delivered through the partnership can form part of its plan. Uni Connect work is likely to complement and run alongside planned activity or interventions that relate to a provider's specific context.
85. As an OfS-funded project, Uni Connect has a specific remit and a specified approach detailed in terms and conditions of funding. When setting its own objectives for its plan it is likely that a provider's Uni Connect activity will be applicable and relevant to parts of its plan.

Collaborate with employers

86. A provider's collaborative activity may include working with employers (including those involved in local skills improvement plans, local enterprise partnerships (LEPs), and other education providers to identify skills gaps and develop flexible and responsive provision for those already in the workplace who may be looking to upskill or reskill. For example, delivering apprenticeships can provide opportunities for collaboration and the development of multiple strategic relationships beyond schools. There is some evidence showing that social mobility was a significant motivation for providers in diversifying their provision into apprenticeships with participants involved in two clear streams of activities:⁴¹
- awareness raising in schools and colleges that these apprenticeships offer another pathway for students to achieve a higher education qualification, without debt, that leads to excellent outcomes
 - establishing partnerships with employers looking to upskill and reskill their existing workforce, thereby raising adult attainment levels.
87. Some projects related to this programme worked with local Uni Connect teams to set up and promote degree apprenticeships. Another project saw providers collaborating to deliver Level 2 English and maths provision so that prior qualifications were not a barrier to existing employees looking to upskill.

³⁹ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/uni-connect/.

⁴⁰ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/national-outreach-coverage-project-targeting-tool/.

⁴¹ See www.officeforstudents.org.uk/publications/degree-apprenticeships-a-viable-alternative/.

88. More information on degree apprenticeships and flexible pathways can be found in the [delivering diverse pathways and flexible provision section](#).

Collaborating for success and progression

89. Our Addressing Barriers to Student Success (ABSS) programme demonstrates how collaborative approaches between providers can help to address issues at the success stage of the student lifecycle.⁴² For example, one collaborative project between four providers focused on tackling differential achievement by developing practical activities and resources that supports students at risk of leaving or not achieving their potential.⁴³

90. A provider may find it useful to collaborate with specialist organisations, to support delivery of effective mental health support to further support students to succeed. A provider may also find it useful to engage with local authorities to support its provision for students who have experienced care. We strongly encourage collaboration with organisations such as the NHS and other local agencies and authorities in addressing issues of safeguarding and welfare of students. More information on mental health can be found in the [supporting students with a mental health condition section](#).

91. Collaborating with employers should span the full student lifecycle – from encouraging prospective students (who may already be in work) to consider higher education; supporting students to succeed in their studies; to helping them to achieve the best possible outcomes when they enter the jobs market or embark upon further study. Working with employers throughout the lifecycle helps to improve a student's employability with the aim of optimising their employment outcomes. Employer links can open up opportunities for students to gain invaluable work experience. They can also include engaging employers to run taster days, mentoring programmes, employer-led competitions, as well as supporting student enterprise and entrepreneurial activity, and cohabiting innovation spaces and hubs. Further information on effective practice in employability and work experience is included in our effective practice resources.⁴⁴

92. Engagement with employers can also lead to the development of diverse pathways into and through higher education, for example technical and vocational education that may be delivered as on and off the job learning.

93. Our local graduate challenge competition involves 16 collaborate projects and demonstrates how providers, employers, councils, LEPs and other organisations can work together to support the transition to highly skilled employment and improve outcomes for graduates who seek employment in their home region.⁴⁵ A provider may draw on the case studies from this

⁴² See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/addressing-barriers-to-student-success-programme/.

⁴³ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/addressing-barriers-to-student-success-programme/.

⁴⁴ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/.

⁴⁵ See www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/improving-outcomes-for-local-graduates/.

programme when designing intervention strategies and seek to evaluate these in its own context.

94. A provider may want to collaborate with professional, statutory and regulatory bodies (PSRBs) in its work. A review has highlighted the importance of providers working closely with PSRBs on activities from access to progression, to promote and highlight pathways into the professions and particular industries.⁴⁶

Collaborating for evaluation

95. As a provider further develops its evaluation strategies we expect it to consider how it intends recording, publishing and sharing its evaluation activity and findings, working with TASO and others, to maximise understanding of what works (and what does not) across the sector.
96. We encourage providers to consider sharing evaluation expertise or resources with one another to maximise their expertise and capacity. A provider may also wish to consider whether collaboration with other higher education providers could strengthen its evaluation strategies by, for example, increasing sample sizes or creating comparator groups to better understand the potential impact of particular interventions.

Further general advice on creating intervention strategies

Support the successful participation of students, including continuation, completion and attainment

97. Where a provider has identified risks in the success stage of the lifecycle (continuation, completion and attainment), measures or activities may aim to support students both pastorally and academically, alongside improving students' sense of belonging. A provider may wish to co-design teaching and learning activities with students, as evidence has shown that students report an increased sense of belonging to their provider when engaged in such activities.⁴⁷
98. There are many sources of evidence related to student success that a provider can draw on in its activity design. Below are some examples of volumes of evidence related to supporting student success:
- OfS's ABSS programme, including case studies⁴⁸
 - TASO's evidence toolkit and publications related to success⁴⁹
 - Advance HE's effective practice resources for retention and student success⁵⁰

⁴⁶ See <https://www.gov.uk/government/collections/graduate-employment-and-accreditation-in-stem-independent-reviews>.

⁴⁷ See www.officeforstudents.org.uk/publications/final-evaluation-of-programme-for-innovation-projects/.

⁴⁸ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/addressing-barriers-to-student-success-programme/.

⁴⁹ Available at <https://taso.org.uk/>.

⁵⁰ Available at <https://www.advance-he.ac.uk/knowledge-hub/compendium-effective-practice-higher-education-retention-and-success>.

- findings from the OfS-commissioned evaluation of a programme for pedagogic innovation projects⁵¹
- Advance HE’s literature review and searchable dataset on student success.⁵²

99. We recognise that providers may still be considering their approach to blended learning as part of long-term learning and teaching strategies. Where this is being implemented, a credible approach is expected to consider the following:

- students must be able to expect high quality teaching, and that blended learning is not used as a replacement for face-to-face education
- inclusion for different student groups should be embedded from the outset⁵³
- how to embed the findings from the OfS’s blended learning review, including work with students to understand their learning needs, particularly with disabled students.⁵⁴

100. Where a provider chooses or needs to deliver blended learning, it can refer to TASO’s findings on teaching and learning during the coronavirus pandemic when designing the delivery of this.⁵⁵

Cost of living

101. Recent rises in the cost of living are affecting many in the UK, and higher education students and providers are reporting a significant impact. The OfS has published a brief which outlines the results of our information gathering on the effect on students of these price increases, including a commissioned poll and roundtable discussions, as well as summarising other recent research in this area.⁵⁶ It also explains some of the actions by universities and colleges to mitigate the effects of the situation on their students.

The EORR sets out ‘Cost pressures’ as one of the national risks to equality of opportunity.

Provide financial support

102. Financial support is typically given by higher education providers to help their students in the form of:

- bursaries and scholarships
- fee waivers (a discount on the tuition fee charged)

⁵¹ See www.officeforstudents.org.uk/publications/final-evaluation-of-programme-for-innovation-projects/.

⁵² This resource is available for Advance HE members. Available at <https://www.advance-he.ac.uk/knowledge-hub/access-retention-attainment-and-progression-review-literature-2016-2021>.

⁵³ Available at www.officeforstudents.org.uk/publications/gravity-assist-propelling-higher-education-towards-a-brighter-future/.

⁵⁴ See www.officeforstudents.org.uk/publications/blended-learning-and-ofs-regulation/.

⁵⁵ Available at <https://taso.org.uk/research/current-projects/teaching-and-learning-in-the-time-of-covid/>.

⁵⁶ Available at www.officeforstudents.org.uk/publications/studying-during-rises-in-the-cost-of-living/.

- hardship funds
- 'in-kind' support (a non-cash contribution of goods or a service).

103. As with all interventions, the use of financial support within an intervention strategy is expected to include a clear rationale for how any financial support will support the target group(s). For example, we would likely query the evidence and rationale for providing financial support where the target group does not directly relate to financial need, or where students who are likely to need financial support are excluded, e.g. those from TUNDRA quintile 1.
104. A provider may be able to work with the SLC to receive information about its students, for example their household income and if they are care experienced or estranged, so that the provider can automatically award financial support to those students without the need for them to apply.⁵⁷ However, some students belonging to these groups may not wish to share this information with the SLC, for example their low income or their care experienced or estranged status, and a provider should continue to identify these students to ensure they get the support they are eligible for. Please see our effective practice resources on how to support these students beyond offering financial support.⁵⁸
105. Most providers invest large sums of funding towards offering financial support for students. Therefore, it is important that this is robustly evaluated and monitored to ensure effective use of funding. The OfS financial support toolkit is one way to evaluate bursaries and includes three tools to triangulate the findings: statistical tool, survey tool, and interview tool.⁵⁹ Providers should note that the statistical tool is only suitable where there are more than 300 financial support recipients per year, but the tool can be used collaboratively with other providers and years can be combined to increase the sample size.
106. Unlike financial support such as bursaries, we do not consider general hardship funding as an activity that supports the aims of the plan as it should be available to any students facing hardship. Furthermore, we would encourage providers to ensure appropriate promotion of hardship funds to reach the full student body.

Support students into successful employment and further study

107. Where a provider has identified risks to equality of opportunity for student groups in relation to progression, it may wish to consider what further activities it can undertake to support these students to achieve good graduate outcomes, whether this be through appropriate employment or further study.
108. There are various approaches a provider may want to take and resources it can draw on when designing an approach or activities, such as:

⁵⁷ Available at <https://www.practitioners.slc.co.uk/>.

⁵⁸ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/.

⁵⁹ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/financial-support-evaluation-toolkit/.

- tailoring careers advice and services to understand and meet the needs of target groups at an early stage, working with teams across a provider who can support targeting of students and of programmes
- monitoring uptake of services to ensure student groups that are least likely to have equality of opportunity in relation to progression are engaging with opportunities and additional support offered
- working with employers and PSRBs to provide work placements and experience
- working with employers and PSRBs on curriculum design to ensure students are sufficiently prepared for entering and succeeding in relevant industries
- providing mentoring programmes, including professional mentoring with industry specialists, including in partnership with other organisations
- if, following graduation, a provider's students often live locally, it can focus on local employer engagement and boosting local vacancies, and draw on OfS case studies on local graduates⁶⁰
- using evidence from OfS reports and case studies on employability⁶¹
- drawing on TASO's evidence and resources when designing and evaluating activities⁶²
- drawing on the OfS's ABSS programme findings, including case studies
- promoting and providing transitional support for students progressing to further higher study.

Align with other work and OfS funding

109. Approaches to designing and delivering high quality courses and addressing risks to equality of opportunity should complement each other. A provider's plan can make reference to this, if this is appropriate based on its performance and risks, and part of a relevant intervention strategy rather than a separate one.

110. Similarly to above, where a provider is in receipt of OfS funding or other public funding, such as Uni Connect or the artificial intelligence and data science postgraduate conversation course programme, it may help the reader of the plan to describe the relationship between this funding and the access and participation plan activity. There is however no expectation that these will form separate intervention strategies for most providers.⁶³

⁶⁰ Available at www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/improving-outcomes-for-local-graduates/.

⁶¹ Available at www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/graduate-employability-case-studies/.

⁶² Available at <https://taso.org.uk/research/current-projects/what-works-for-employment-employability/>.

⁶³ See www.officeforstudents.org.uk/advice-and-guidance/funding-for-providers/funding-competitions/.

Further advice on specific strategic priorities for access and participation

111. Regulatory notice 1 sets out that there are some impactful, sector-wide risks laid out in the Equality of Opportunity Risk Register (EORR) that we would expect to see reflected appropriately in a provider's access and participation plan. In particular, we expect most providers to consider:
- a. How it can address the risk posed to fair access and successful participation by knowledge, skill and attainment gaps emerging across childhood by making meaningful and effective contributions to supporting schools to raise pre-16 attainment.
 - b. How it can expand and promote diverse and flexible pathways and provision.
 - c. How it can improve the mental health of its students.

Building partnerships to support raising prior attainment

112. Higher education providers have a direct interest in enhancing the levels of knowledge and skills acquired by potential higher education students during earlier stages of their formal education. This can be achieved through sustainable, collaborative and reciprocal partnerships with schools. It may also be achieved through collaborations with third-party organisations and community groups, that may already be able to demonstrate scalable models for effective interventions, or that may be better placed to reach certain groups of students such as those who frequently move schools.
113. Activity should aim to drive increased attainment at pre-16 for students in schools, but we will not prescribe which activities a provider should deliver or the particular groups targeted, as long as it relates to the context of the provider and the focus of its plan. However, we expect that activities will be targeted to relevant groups of students that are at risk of low attainment. Providers' activity in this area should not relate directly to marketing their own higher education provision to students engaged in these interventions, and providers should seek to ensure that their evaluation of these activities demonstrates positive impact on students attending higher education other than that offered by the provider, where relevant.
114. Activities may be directly or indirectly related to raising attainment, and a provider can use its associated theory of change to demonstrate how the activity is expected to contribute towards raising attainment, and in turn how such attainment raising can be expected to contribute to improved access to and successful participation in higher education.
115. For those with existing raising attainment activities, where appropriate plans could demonstrate how those relationships will be expanded and enhanced so that activity is delivered at greater scale and with greater impact.
116. While the longer term outcome for a provider's raising attainment activity may not be realised until after the duration of a plan, understanding whether its activities have met the short or medium term outcomes will be important. For example, if a provider is delivering an activity focused on improving metacognition with the aim to improve grades, it may want to evaluate this and share the findings.

117. While a provider can decide which approaches to take in building partnerships to support raising attainment, and we wish to see a greater sector effort to support raising attainment by all provider types, we are mindful that:
- a. Providers with a greater emphasis on the recruitment of young students, and who choose to be highly selective in terms of academic grades or specialist skills of their entrants, might invest greater resource in strategic relationships with schools to improve prior attainment and support fair access to higher education at their provider as well as nationally.
 - b. Providers with large populations of mature students may have a greater emphasis on developing strategic relationships with further education colleges, other education providers, employers and employer groups, professional bodies, community groups, and parents.
 - c. Specialist providers might focus their activity on raising attainment in the skills required for entry, such as in the arts or agriculture. Providers of this nature may need to collaborate to overcome issues of limited resource, addressing grass-roots issues and national coverage.
 - d. Colleges with higher education provision might draw further on their collaborative networks, such as Uni Connect, and focus raising attainment efforts for their further education provision..
 - e. Providers that are submitting an access and participation plan for the first time might set out how they intend to develop collaborative relationships with schools or colleges in a way that is appropriate to the provider's subject mix and student cohort.
118. Evidence shows that GCSE attainment is a strong indicator of whether a learner will attend higher education and providers should be focusing on activities to support attainment for learners younger than 16.⁶⁴ This can include work with learners from early years through to key stage 4 and with learners with different levels of attainment.
119. There are several credible sources of advice and evidence to support the development of intervention strategies focused on raising prior attainment (this list is not exhaustive):
- The OfS's effective practice advice and insight brief, including information on setting up new partnerships with schools,⁶⁵ and examples and case studies of providers delivering raising attainment activities⁶⁶
 - TASO's typology of raising attainment activities, including the evidence ratings for each type of activity⁶⁷

⁶⁴ Available at <https://www.gov.uk/government/publications/higher-education-participation-socio-economic-ethnic-and-gender-differences>.

⁶⁵ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/strategic-relationships-with-schools/.

⁶⁶ Available at www.officeforstudents.org.uk/publications/schools-attainment-and-the-role-of-higher-education/.

⁶⁷ Available at <https://taso.org.uk/news-item/taso-launches-report-on-attainment-raising/>.

- TASSO's theories of change for common raising attainment activities⁶⁸
- TASSO's review of intermediate outcomes for access and success⁶⁹
- The Education Endowment Foundation (EEF) evidence toolkit and resources focused on improving teaching and learning in schools, particularly for disadvantaged pupils⁷⁰
- Causeway Education's raising attainment toolkit⁷¹
- The OfS's evaluation tools designed to help providers when evaluating activity with pupils, such as a tool for evaluating outreach with under-16s and the impact of outreach resource.⁷²

Delivering diverse pathways and flexible provision

120. The EORR sets out 'Limited choice of course type and delivery mode' as a national risk. The OfS strategy 2022-25 seeks to ensure that prospective students can choose from a diverse range of courses and providers at any stage of their life, with a wide range of flexible and innovative opportunities.⁷³
121. While many young people will access higher education to study traditional three-year, full-time degree programmes, this model of higher education will not always meet the needs of all prospective students or employers. As part of a strategic approach, a provider can offer students a diverse range of courses by considering either developing new or expanding existing pathways. Providers can support the expansion of diverse pathways to improve access to their provider and to meet employer needs. This includes offering higher and degree apprenticeships, Level 4 and 5 courses, including Higher Technical Qualifications (HTQs), and offering modular, part-time and flexible provision.
122. A provider can set ambitious plans to grow the number of students pursuing flexible and diverse provision, including Level 4 and 5 courses and degree apprenticeships, and evaluate how this is impacting on equality of opportunity for underrepresented groups. As part of this approach, a provider may choose to include the development and delivery of diverse and flexible provision as an activity within an intervention strategy, where this is appropriate.
123. While flexible and diverse provision can offer significant benefits to students from underrepresented groups, we recognise that the development of this type of provision is not something that should be directed predominantly at these groups, nor is it currently appropriate for all types of providers within their overall mission and context. For example, some providers

⁶⁸ Available at <https://taso.org.uk/evidence/evaluation-guidance-resources/toc/theories-of-change-attainment-raising/>.

⁶⁹ See https://s33320.pcdn.co/wp-content/uploads/TASSO-Report-%E2%80%93-Intermediate-outcomes-for-higher-education-access-and-success_stg4.pdf.

⁷⁰ See <https://educationendowmentfoundation.org.uk/education-evidence/teaching-learning-toolkit>.

⁷¹ This toolkit was designed for Uni Connect partnerships but will be of benefit for providers not involved in Uni Connect. Available at www.officeforstudents.org.uk/publications/attainment-raising-a-toolkit/.

⁷² See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/evaluation-of-outreach-interventions-for-under-16s/.

⁷³ See www.officeforstudents.org.uk/about/our-strategy/.

might feel that this type of provision is currently unsuitable for development due to their subject mix and student cohort. Rather, providers that can offer flexible provision could consider how its development could contribute to their access and participation aims while continuing to offer pathways for students from all backgrounds and at any stage in their lifetime.

124. In our recent exercise which invited providers to make variations to their plans for 2023-24, we found that over half of providers with existing access and participation plans were already delivering, expanding or developing diverse provision.⁷⁴ This includes apprenticeships (at all levels), and approved HTQs such as Foundation Degrees, Higher National Diplomas, and Higher National Certificates. However, fewer providers demonstrated how they had considered how to improve flexibility of provision, such as offering opportunities for flexible study, modular courses, microcredentials, or evening or part-time lessons. There also appeared to be limited consideration of how existing or planned expansion of such provision could promote equality of opportunity for particular groups. As such, where a provider intends to offer or extend diverse and flexible forms of provision it should clearly state how this supports the aims and objectives of its plan.

125. A provider may find it helpful to monitor participation across its flexible and diverse provision to better understand and improve equality of opportunity. Although research suggests that there has been a rise in the number and share of apprenticeships at higher and degree level since 2017, only five per cent of those starting a degree apprenticeship in 2020-21 were from lower income areas, compared with 6.7 per cent of those going to university. In addition, young apprentices from deprived areas made up just six per cent of degree-level apprentices in 2018-19.⁷⁵

126. There are several sources of advice and effective practice that a provider can draw on when designing intervention strategies related to diverse provision:

- The OfS's advice on how to design and deliver degree apprenticeships as well as examples of effective practice⁷⁶
- The Institute for Apprenticeships and Technical Education (IfATE) guidance on apprenticeships and technical qualifications, and information on quality, occupational standards and the qualifications themselves⁷⁷
- DfE's guidance and checklist for both new and existing training providers delivering apprenticeships at any level, focusing on the essential steps required to prepare and deliver high quality apprenticeships⁷⁸

⁷⁴ Available at www.officeforstudents.org.uk/publications/outcomes-report-variations-to-access-and-participation-plans-for-2023-24/.

⁷⁵ Available at <https://www.suttontrust.com/our-research/the-recent-evolution-of-apprenticeships/>.

⁷⁶ Available at www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/degree-apprenticeships/.

⁷⁷ Available at <https://www.instituteforapprenticeships.org/>.

⁷⁸ Available at <https://www.gov.uk/government/publications/provider-guide-to-delivering-high-quality-apprenticeships>.

- DfE's programme 'Apprenticeship Support and Knowledge for Schools and Colleges' (ASK) which offers advice and to raise awareness of apprenticeships, traineeships and T Levels among young people⁷⁹
- DfE's guidance, provider delivery toolkit, and case studies for designing and delivering HTQs⁸⁰
- IfATE's criteria, guidance, support and resources for the approval of HTQs.⁸¹

127. Part-time and flexible provision provides a pathway into higher education for students who may need to fit study around work, family and personal commitments. This enables individuals to reskill or upskill throughout their lifetime. Examples of delivering effective part-time and flexible provision include: ⁸²

- evening classes
- intensive weekend modules
- summer schools in partnership with further education colleges
- credit accruing work placements
- block learning
- online and distance learning
- delivering provision in the community.

128. In September 2020, the Government announced the introduction of a Lifelong Loan Entitlement (LLE) from 2025.⁸³ The LLE is a loan entitlement equivalent to four years of post-18 education funding at Levels 4-6 for students to use up to the age of 60 and is designed to enable access to student finance for eligible individuals to study full and modular courses across universities and colleges.⁸⁴

129. In March 2023, the Government published its response to a consultation on the implementation of the LLE. In that response, the Government sets out how it intends to introduce the LLE from the start of academic year 2025-26. There will be a phased approach with new modular funding being provided only for certain Level 4 and 5 courses on launch. These will include all HTQs and some technical qualifications at Levels 4 and 5. New modular

⁷⁹ Available at <https://www.apprenticeships.gov.uk/influencers/ask-programme-resources><https://www.apprenticeships.gov.uk/influencers/ask-programme-resources>.

⁸⁰ Available at <https://www.gov.uk/government/publications/higher-technical-qualification-overview>.

⁸¹ Available at <https://www.instituteforapprenticeships.org/qualifications/higher-technical-qualifications/>.

⁸² See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/mature-students/.

⁸³ See <https://www.gov.uk/government/speeches/pms-skills-speech-29-september-2020>.

⁸⁴ Available at <https://www.gov.uk/government/consultations/lifelong-loan-entitlement>.

funding will be expanded to broader provision at Levels 4 to 6 in 2027-28 dependent on the level of confidence in positive outcomes for learners.

130. The OfS, in collaboration with the DfE, funded 22 providers to develop short course provision as part of the higher education short course trial.⁸⁵ Where applicable, a provider can explain in the access and participation plan how it intends to deliver modular and part-time provision and, in particular, how this will benefit its students.

Supporting students with a mental health condition

131. While poor mental health can impact any individual studying at a provider, there are likely going to be students with mental health conditions that need specific support that can be targeted through the plan and/or complement other intervention strategies a provider may set.
132. Data shows that more students are declaring mental health conditions to their higher education provider, and numbers reporting a condition have doubled since 2016-17.⁸⁶ Continuation and progression rates are also lower for this group. In addition, research shows some stark intersectional trends. For example, in the last analysis published by the OfS, the degree attainment gap between black and white students with a mental health condition is higher than the attainment gap between black and white students who do not report a mental health condition.⁸⁷
133. There are several credible resources and approaches that a provider can use and consider to inform the design of activities to support students with a mental health condition. We would encourage a provider to:
- a. work with students to declare mental health conditions, at any stage of their student journey. UCAS has published some reports giving advice on the benefits of disclosure and also the barriers.⁸⁸
 - b. seek to understand the student population, including exploring barriers and challenges faced by groups of students who may be more at risk of poor mental health.⁸⁹
 - c. take a whole provider approach to considering how students' mental health can be supported. A provider may wish to use the Stepchange: mentally healthy universities

⁸⁵ See www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/higher-education-short-course-trial/.

⁸⁶ Available at www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/.

⁸⁷ Available at www.officeforstudents.org.uk/publications/mental-health-are-all-students-being-properly-supported/.

⁸⁸ See <https://www.ucas.com/connect/blogs/benefits-disclosing-mental-health-difficulty> and <https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-reports#starting-the-conversation-ucas-report-on-student-mental-health%E2%80%93june-2021>.

⁸⁹ See www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/student-mental-health/mental-health-funding-competition-using-innovation-and-intersectional-approaches/.

strategic framework⁹⁰ and the University Mental Health Charter, which provide information and principles on how to do this.⁹¹

- d. co-create activities and strategies with students.⁹²
- e. embed inclusive practice, such as the Education for Mental Health Toolkit which provides evidence informed information on the ways in which curriculum can support both wellbeing and learning.⁹³
- f. use evidence from OfS reports and resources from OfS-funded programmes,⁹⁴ TASO's evidence review on what works to tackle mental health inequalities,⁹⁵ and What Works Wellbeing evidence reviews and practice examples.⁹⁶
- g. collaborate with other providers and organisations, in particular with NHS organisations and local authorities. The OfS has published a suite of resources to support providers to develop partnership working, including a commissioned learning and evaluation programme bringing together providers, NHS providers and Integrated Care Systems to consider solutions and share effective practices to joint working.⁹⁷
- h. evaluate its own work and learn from others to make sure it is working in the most effective ways and to ensure that policies and procedures are robust, evidence informed and appropriate to its own context.

134. TASO, alongside collaboration partners, is developing a central hub of online resources of what works in relation to student mental health, which providers will be able to draw on when designing future activities related to mental health.⁹⁸

Evaluate intervention strategies

135. We expect providers to refer to the evaluation design section for information when choosing methods for evaluation. It is important to choose methods that are appropriate for the activity being delivered. When identifying which activities should be evaluated as part of intervention

⁹⁰ Available at <https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/stepchange-mentally-healthy-universities#:~:text=Stepchange%3A%20mentally%20healthy%20universities%20is,all%20students%20and%20all%20staff>.

⁹¹ Available at <https://universitymentalhealthcharter.org.uk/>.

⁹² See www.officeforstudents.org.uk/publications/evaluation-of-the-mental-health-funding-competition-co-creation/.

⁹³ Available at <https://www.advance-he.ac.uk/teaching-and-learning/curricula-development/education-mental-health-toolkit>.

⁹⁴ Available at www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/student-mental-health/.

⁹⁵ Available at <https://taso.org.uk/research/current-projects/mental-health-in-higher-education-he/>.

⁹⁶ Available at <https://whatworkswellbeing.org/category/education-and-learning/>.

⁹⁷ Available at www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/joint-working-between-providers-and-the-nhs-to-support-student-mental-health/.

⁹⁸ We expect this to be published in autumn 2023.

strategies, a provider may want to consider which of these activities have a weaker evidence base of impact and focus on generating evidence for these.

136. We expect a provider to consider whether it is able to evaluate the outcomes of individual activities within an intervention strategy and the outcomes of the whole intervention strategy.

Example

Collaborating for access: Providing impartial information to promote student choice (collaborating for access – Uni Connect)⁹⁹

Collaborative subject taster days are part of Go Higher West Yorkshire's (GHWY's) access offer and are designed to provide students with impartial careers information across a range of industry sectors and highlight the different study pathway options to careers in the sector. Different providers, along with local employers and other industry partners, collaborate to provide subject specialism introductions and an insight into the different education options in the area.

GHWY is a partnership of 13 providers, including further education colleges, small and specialist providers, and universities. GHWY's Uni Connect partnership coordinates regional access activities with a range of providers and local employers for students in years 9-13.

Collaborative subject taster days are organised to showcase the options available in the area. For example, local higher education providers have come together with West Yorkshire Police to offer a taster day about policing and criminology.

Collaborations involving specialist providers are also part of GHWY's offer, designed to introduce students to the variety of courses and career pathways available in the locally-important creative sector.

A suite of events offered to students – both in-person and online – allow students to experience what the breadth of higher education life will involve while focusing on specific subjects. Additional online sessions provide information about other aspects of higher education, such as student finance, that students can watch at a time convenient to them.

Collaborative partnerships enable partners to pool their resources to provide an impartial access offer for students. This is particularly beneficial for smaller, specialist providers and further education colleges with locally responsive higher education offers, that have less resource to host such events. Multi-partner subject taster days help to break down barriers to higher education for young people by broadening their horizons and showing them the range of careers on offer. A focus on specific industry sectors and subject areas also enables the taster days to contribute to addressing regional skills shortages.

⁹⁹ See www.officeforstudents.org.uk/publications/benefits-of-and-barriers-to-collaborative-access-activity/.

Intervention strategy example

137. An example of an intervention strategy is set out below. This example is for an unspecified number of students, and as such the financial inputs for similar interventions are likely to vary depending on the number of students and the specific context of the provider.

Intervention strategy 8

Objectives and targets: Principal objective: PTS_3 To ensure there is no continuation rate gap between care experienced students and non-care experienced students by 2027-28. Secondary objective(s): PTP_1 (IS4); PTA_1 (IS1); PTP_2(IS5)

Risks to equality of opportunity: **Information and guidance; insufficient academic support; insufficient personal support; mental health; cost pressures**

Activity	Inputs	Outcomes	Cross intervention?
Accommodation promise: 365-day accommodation guarantee for care experienced students, plus accommodation bursary to cover vacation residence. Guarantee of accommodation if student suspends status for one year. Accommodation guarantor scheme for Y2,3 and graduating students. New activity.	Accommodation budget per eligible student. Administrative costs and deposit loss fund.	Decreased financial concerns for students; increased sense of security; increased sense of belonging	IS1, IS4
£250 Start-up bursary for all care experienced students (paid after offer acceptance) to cover travel to university costs and purchase of home essentials (e.g. duvet, suitcase, cutlery), and accommodation welcome pack. Existing.	Bursary for students; 30 hours staff administrative costs per year	Increased financial security; decreased financial concerns for students	IS1, IS4
Named and trained staff contact for all care experienced students, whose role is to support students to access personalised academic and pastoral support services. Existing.	Staff training and 1FTE, plus administrative costs	Increase in % of students finding support helpful for personal or academic reasons; increase in engagement with services	IS1, IS4
Training for teaching, admissions and support staff on delivering educational services for care experienced students. New activity.	Staff training and 0.3FTE, plus administrative costs	Improved knowledge of the needs of care experienced students; increased confidence in supporting care experienced students in HE.	IS4
Access to fast-track mental health support for care experienced students, with counsellors trained in additional CPD in meeting the needs	Staff training and 1x additional counselling staff for four year duration.	Increase in student wellbeing (using Warwick-Edinburgh Mental Wellbeing scale); decrease in the	IS4

Activity	Inputs	Outcomes	Cross intervention?
of care experienced students. New activity.		number of mitigating circumstances forms submitted	
Bespoke mentoring programme through careers service. New activity.	Mentor training and expenses, plus administrative cost	Increase in continuation Increase in completion	IS5
For activity addressing information and guidance risk, see Intervention strategy 2	-	-	-
Total cost of activities per year	£190,000		

Evidence base and rationale: We have conducted a literature review, alongside targeted, anonymous surveys and a focus group with our current care experienced students. See Annex B, page 34 for further information.

Evaluation: We intend to evaluate each activity within this intervention strategy to generate OfS Type 2 standards to establish whether or not they lead to the intended outcomes. We will also examine the extent to which each activity contributes towards meeting the overall objective. We will start the strategy in the 2023-24 academic year, and we intend to disseminate interim findings every year. We will share our findings at conferences and through networks such as NERUPI, and after 4 years we intend to publish our findings on our website. More detailed information on how we will be evaluating each activity can be found below in Table 1.

[You can also include the following table here which sets out your evaluation plan for activities covered by this intervention strategy in further detail]:

Table 1:

Activity	Outcomes	Method(s) of evaluation Include type of evidence you intend to generate e.g. Type 2.	Summary of publication plan (When evaluation findings will be shared and the format that they will take)

Targets

Ambitious, clearly defined, outcomes-based targets enable a provider to demonstrate its level of ambition in addressing risks to equality of opportunity, and support others to understand progress and hold it to account.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Targets	72-76

Further advice

138. A provider is expected to set ambitious, clearly-defined, outcomes-based targets that directly relate to its risks to equality of opportunity and associated objectives. A provider is expected to set out its targets in the fees, investments and targets (FIT) document that it submits to the OfS alongside its plan.
139. We expect the objectives, intervention strategies and targets identified to secure continuous improvement in outcomes for students by addressing the risks a provider has identified in its assessment of performance.
140. We expect a provider's targets to be stretching and would not expect to approve access and participation plans that are insufficiently ambitious; however targets should remain credible. We encourage providers to be ambitious with their targets and to put in place reasonable steps to achieve these, rather than proposing low targets in the first instance.
141. If we are not clear on the progress a provider is making in relation to targets we would normally seek further information from the provider to understand the reasonable steps it has taken to deliver the plan.
142. A provider may set targets in relation to its objectives and intervention strategies, and these should normally be framed at a level similar to objectives.
143. So that targets are measurable and can be easily monitored by the OfS and by a provider's stakeholders, targets should, where possible, be based on the access and participation data dashboard or other publicly available data sources. Where this is not possible, a provider should include in its plan the data source it has used to set targets in the FIT document.
144. A provider can include milestones for targets that are informed by forecasts and estimates.
145. Where data is not available and a numerical figure is used as a proxy target, a credible plan may reference evidence to demonstrate the effectiveness of activities in meeting the objective. This may be necessary to set measurable milestones for activities relating to school

collaboration and raising attainment, given that related data is not held on the access and participation data dashboard.

146. Providers should include yearly milestones for the targets set out in its plan. This will support the OfS and other interested stakeholders to understand the progress a provider is making towards achieving each objective. Factors we will take into consideration when assessing the credibility of targets may include:
- a. The nature of a provider's plan and whether they are likely to generate improvement for the risks to equality of opportunity identified.
 - b. A provider's size and turnover, mission, level of higher fee income from qualifying students, and the plan considered as a whole.
 - c. A provider's track record of taking all reasonable steps to comply with the provisions of its plan, and whether the provider was previously able to make expected progress against targets.
 - d. Whether or not levels of forecasted investment demonstrate that it will invest sufficient additional resource to deliver the provisions of its plan.

Putting it into practice

Collaborative targets

147. Collaborative targets can be an effective way of securing commitment from partners in a collaborative arrangement, and help a provider to demonstrate the progress being made towards shared goals.
148. Providers are welcome to include collaborative activity and targets in their plan, particularly where this maximises impact, such as by increasing the population size of target groups across a number of providers.
149. We encourage collaborative targets being set in partnership with other higher education providers to address national, regional and local priorities. For example, this may be a target across particular types of providers (such as high tariff or specialist providers), or a regional or geographical target.
150. We encourage providers to consider how their collaborative targets could align with and support activity generated by other agencies, third sector entities, and including, where appropriate, Uni Connect partnership activity in their locality.
151. Where targets are set in collaboration with other providers that are also submitting an access and participation plan, we encourage providers to feature those targets in both plans, and use consistent wording so they can be identified.
152. We will take collaborative efforts that contribute to national priorities into account when monitoring a provider's progress in achieving the collaborative targets it has set itself as necessary.

Whole provider approach

The successful participation and attainment of students depends on a wide range of factors and experiences, so we consider it is important that a provider takes a holistic approach to supporting its students' success.

It is important that a provider has due regard to the Equality Act 2010 when designing its plan.¹⁰⁰ As many of the groups often targeted in plans have multiple protected characteristics, access and participation plans should align with a provider's wider equality, diversity and inclusion work.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Whole provider approach	77-79

Further advice

153. How a provider is embedding a whole provider approach and having due regard to equality, diversity and inclusion should be clear throughout its plan, although a provider should also include a brief section to summarise how it has sought to do this. Therefore, a credible approach to embedding this may consider:

- how work to address risks to equality of opportunity for students is coherently embedded across the whole provider and all stages of the lifecycle
- how a provider has paid due regard to the Equality Act 2010 when creating its plan
- how a provider has aligned equality, diversity and inclusion strategies with the intervention strategies set out in its plan
- the mechanisms in place to ensure target groups are not adversely impacted by any inclusive approaches
- how a provider's evaluation activity might draw on skills, capabilities and expertise from across its organisation.

¹⁰⁰ See <https://www.legislation.gov.uk/ukpga/2010/15/contents>.

Putting it into practice

Take a whole provider approach

154. A whole provider approach can be considered even if a plan is highly targeted: intervention strategies are likely to include activities that are embedded across the provider. A provider may wish to use the published research and implementation and evaluation tools for support in embedding a whole provider approach.¹⁰¹ Embedding a whole provider approach can demonstrate the commitment a provider is taking to addressing the risks to equality of opportunity in its own context.
155. The key features of the whole provider approach in the context of access and participation include the following:
- a. Staff from across the provider are actively involved and engaged, with access and participation valued as integral to their roles.
 - b. Students representing the breadth of the student population, particularly those from hard-to-reach groups, are engaged in formulating, supporting and evaluating access and participation across the provider.
 - c. A full student lifecycle approach is adopted, where support is extended from pre-entry, to on-course success and through to post-graduation progression. In many cases this starts with supporting potential learners from primary age upwards, and includes pre-entry outreach, including with those looking to upskill or reskill, admissions, transition, learning and teaching, student engagement and support and access to postgraduate study and/or employment.
 - d. A clear organisational-wide commitment, including leadership from senior management and governing bodies, to access and participation. This commitment is backed up with clearly defined target groups and expected outcomes that are shaped by evidence and aligned with other strategies, for example those relating to equality, diversity and inclusion; learning and teaching; and business and community engagement.
 - e. Consideration of how the plan aligns with any learning, teaching and assessment approaches, in order to develop more inclusive curricula and practice to ensure that students from all backgrounds are engaged and supported to succeed.

Have regard to equality, diversity and inclusion

156. Under the Equality Act 2010, all publicly funded education providers must comply with the general duties under the public sector equality duty. This means that a provider must have due regard to the need to:
- a. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.

¹⁰¹ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/whole-provider-approach/.

- b. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c. Foster good relations between people who share a protected characteristic and those who do not.
157. This will also include taking equality issues into account when designing policies (including internal policies) and services, and to review such issues regularly. A credible plan should demonstrate how a provider is meeting its relevant obligation with regards to the Equality Act 2010.
158. A credible plan would demonstrate how a provider's access and participation strategies align with its equality, diversity and inclusion strategies. This could include explaining how access and participation activities help to advance equality of opportunity and foster good relations between people who share a protected characteristic under the Equality Act 2010 and those who do not, and explaining how the equality objectives relate to the access and participation plan objectives and intervention strategies.

Example

The University of Wrotesley is a large provider with 28,000 qualifying students. Its Head of Access and Participation sits within the Academic Administration Division, and inputs to admissions, on-course and progression work across the provider. This positioning of the role recognises that access and participation is needed in equal measure across the whole student lifecycle rather than just admissions, where the role previously sat.

For its 2023-24 access and participation plan, the provider has seven intervention strategies that address multiple risks to access, participation and progression. In developing its plan and the constituent activities, the provider has sought equal representation from all divisions and departments as well as from students. The provider also expects all departments and divisions to participate in the relevant activities. Some are led by a specific department (e.g. activities relating to pre-16 attainment are led by the admissions department; its on-course academic support is led by its Education Support department), whilst others are led jointly by academic divisions. All activities are overseen by the Head of Access and Participation and their team.

The provider also recognises that the activities that are required to meet intervention strategies may change every few years, but the conceptual basis for access and participation will not. As a result, it has developed training sessions on equality, diversity, access and participation that all staff members are required to take (both academic and administrative). It has also set out to review all curricula and internal practices that may impact access and participation.

Student consultation

Student consultation is an important requirement set out in the Higher Education (Access and Participations Plans) (England) Regulations 2018 (section 3, paragraph 1).

Student engagement can support a provider to better understand both the experiences of specific groups at different stages in the student lifecycle, and how it can address risks to equality of opportunity that these students may face.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Student consultation	80-83

Further advice

159. A credible plan on student consultation and engagement could include:
- Consulting and engaging with students from different backgrounds to ensure that views are representative of a provider's student population and are reflected in the plan.
 - Collaborating with student representatives, which can include students' unions, guilds or associations, to ensure there are meaningful mechanisms for engaging with students about the plan.¹⁰²
 - Providing a variety of opportunities and channels for student input and feedback, as well as clear processes for recognising and disseminating feedback about where student contributions have impacted on the content of the plan. Where student feedback has not been or cannot be implemented, a provider may communicate this to the OfS in its plan and to the students they engaged with.
 - Co-designing activities with students, where appropriate.
 - Including student representatives on decision-making panels and actively collaborating with them in the preparation of papers and meeting content.
 - Ensuring student wellbeing, particularly related to mental health, are at the forefront of discussions with students, and that any approaches to these issues are reflective of the whole provider strategic approach.

¹⁰² The term 'students' unions' is used throughout for brevity to refer to students' unions, associations, guilds, and student representatives at providers without a formal student representative structure.

- g. Regular engagement with students at different stages of the lifecycle, including through delivery, monitoring and evaluation, so that the plan remains relevant.
160. For a new provider with no current students, or for a provider with no or few current students in groups that are included as a focus for its plan, a credible approach to student consultation and engagement regarding the plan could include:
- setting out a clear plan to engage with its first cohort at the earliest reasonable time, and including a timebound written commitment to request a variation to the plan if the plan needs to change as a result of this consultation with students
 - undertaking market research or engaging with prospective students about the content of the plan
 - giving a clear description of how the provider will ensure ongoing engagement with students regarding the plan, including through the delivery, monitoring and evaluation stages, and building in early engagement points about the plan when the first cohort of students starts.

Putting it into practice

Involve students

161. Students make a significant personal and financial investment in their studies and are the subject of access and participation plans. Furthermore, the voices of underrepresented students can go unheard. Therefore, a provider is expected to involve students, and in particular, those students who are the focus of plans, as active partners and co-creators in developing, implementing and evaluating activities that are seeking to address the risks they may experience to equality of opportunity.
162. When implementing student engagement strategies, it is important to ensure that engagement in access and participation activities is meaningful and collaborative. Part of this is taking action to help students understand the context of access and participation so they are able to make informed contributions. This can be done by:
- providing student representatives with appropriate training and support for their roles, so they are able to make informed and meaningful contributions. This could also include specific training, for example, on how to interpret data.
 - providing materials for meetings in a format that is accessible to students.
 - communicating throughout the implementation, monitoring and evaluation processes by providing feedback at each stage about what changes have been made as a result of student feedback.
163. It is also important to consider how to include students from a diverse range of backgrounds in the design, implementation and evaluation of a provider's plan. This can be challenging due to issues such as 'self-selection' or 'highly engaged' students being more likely to participate in consultation activities. We know, for example, that in some providers mature students can experience isolation and disconnection from other students and that participating in ambassadorial roles can help to encourage a greater sense of belonging, in line with a whole

provider strategic approach. A credible approach will put mechanisms in place to allow all students to express their views. Where the provider population is demonstrably diverse, a provider can actively seek a representative view from different sections of the student body. The plan can demonstrate how a provider is ensuring the student voice of any targeted groups in its strategy are being captured in the access and participation plan engagement processes.

164. The report 'Breaking down the barriers to student opportunities and youth social action', published by Universities UK and the NUS, examines reasons why students do not participate in volunteering opportunities and provides suggestions on how to encourage students to engage with these activities.¹⁰³ The barriers to engaging students identified in this report can be applied more widely to increase engagement in access and participation activities.
165. A provider may wish to draw on findings from the ABSS programme which funded a project to support student ambassadors from certain student groups with the intention of improving students' sense of belonging engagement (amongst other outcomes).¹⁰⁴

Support students to develop a student submission

166. Students' unions and representatives are welcome to submit a single student submission to comment on their provider's plan and how they have been consulted with and involved in their provider's access and participation work. This should be submitted alongside the provider's plan, and a provider is expected to provide assistance and advice to the students' union and representatives on how to submit information through the access and participation plan process. The OfS has designed a template for students which is available as Annex G; further information is available in Annex F to support students in completing a student submission.¹⁰⁵
167. We are particularly interested in students' perspective on:
- how effectively students (including students' unions or other representative bodies) have been engaged in the design of the access and participation plan
 - how confident students are (including students' unions or other representative bodies) that they will be appropriately involved in the delivery and evaluation of the access and participation plan
 - their higher education provider's analysis and identification of the greatest risks to equality of opportunity
 - the credibility of the intervention strategies outlined by their higher education provider to address the risks to equality of opportunity.

168. If provided, the OfS will use this information to understand whether the plan has met the student consultation expectations set out in Regulatory notice 1. A provider is expected to make it clear to its students, students' unions, associations and representative bodies that they

¹⁰³ Available at <https://thelinkingnetwork.org.uk/wp-content/uploads/2019/06/Breaking-down-the-barriers-to-Student-Opportunities-and-Youth-Social-Action-2015.pdf> (link opens a PDF).

¹⁰⁴ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/addressing-barriers-to-student-success-programme/abss-project-university-of-manchester/.

¹⁰⁵ Annex F and G are available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

have the opportunity to create a student submission. It should indicate in the plan the opportunities that it has provided for student engagement and involvement.

169. We encourage student representatives to be critical friends to their provider in relation to access and participation. Further information about the student submission can be found in Annex F.¹⁰⁶

Examples

One small provider has mostly mature part-time students. The provider has consulted with its student governors and student representatives on its proposed plan and at the design stage of its new activities. The plan clearly states what action the provider has taken as a result of this consultation, for example the students felt that despite relatively good performance in progression outcomes for target groups, there could be additional careers support for some underrepresented groups who were the least likely to seek these services. This resulted in new more targeted activities to support progression for these student groups.

The provider describes how it tries to engage with student governors and representatives as well as a wider group of students in the delivery and monitoring of the plan, and involves students in its evaluation activity. The provider has also listed in its plan the different opportunities to seek feedback and opinions from students throughout the duration of the plan. This approach demonstrates how students have been consulted, the ongoing opportunities for feedback made available to them, the feedback provided by students, and how this has been acted upon.

One large provider has a diversity and inclusion student ambassador project that adopts a co-production model to bring staff and students together to take action to promote wellbeing and improve outcomes for black, Asian and ethnic minority students and those from low socioeconomic groups. Working in partnership with the provider's students' union, two further higher education providers and their students' union and guild, the approach aims to increase academic attainment, improve students' sense of belonging, engagement, wellbeing, interpersonal skills and the ability to confidently tackle discriminatory behaviour by creating supportive spaces and networks, and empowering students to safely challenge racism and other forms of discrimination. Student ambassadors receive training and support to undertake activities that promote inclusive learning environments.

In the plan, the provider makes reference to this co-production model and describes the ways in which it engages with these students and the opportunities it provides for them. This approach demonstrates working in partnership with students and other providers to co-produce activities that aim to support students as well as empower them to take action on areas that are important for their wellbeing and academic attainment.

¹⁰⁶ Annex F is available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

Key resources

OfS topic briefing – www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/student-engagement-and-consultation/

OfS student guide to help tackle inequality – www.officeforstudents.org.uk/for-students/equal-opportunities/help-tackle-inequality/

OfS Addressing Barriers to Student Success programme resources – www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/addressing-barriers-to-student-success-programme/

Evaluation of the plan

Evaluation is important because it helps a provider to understand whether the intervention strategies and the activities and measures contained within them are effectively addressing the risks to equality of opportunity identified through its assessment of performance.

Robust evaluation is also crucial for contributing to the development of sector-wide knowledge of what works, for whom, and in what contexts, to address risks to equality of opportunity.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Monitoring and evaluation of the plan	84-91
Monitoring progress of delivery of an access and participation plan	165-169

Further advice

170. A credible approach to developing an evaluation strategy, setting out how evaluation activity will be strengthened overall, and explaining the methodologies that will be used, may include:

- embedding a consideration of evaluation into the design of all individual activities that contribute to an intervention strategy
- undertaking a self-assessment of evaluation practice. The OfS has produced an evaluation self-assessment tool¹⁰⁷ which a provider may wish to use
- setting out a clear and timebound written commitment on the progress that a provider will make in building evaluation capabilities and capacity where appropriate.

171. A provider is expected to set out how and when it intends to share its evaluation evidence, and the methodologies it expects to use in analyses further to that detailed in individual intervention strategy evaluation sections where necessary.

¹⁰⁷ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/standards-of-evidence-and-evaluation-self-assessment-tool/.

Putting it into practice

Self-assessment

172. Undertaking an evaluation self-assessment helps a provider to identify its strengths and weaknesses in its evaluation, and plan for how it will improve the quality of its evaluation practice over the duration of the plan.

173. The OfS evaluation self-assessment tool was designed to help a provider understand whether its evaluation plans and methodologies go far enough to generate high quality evidence about the impact of activities in its plan. It is a five-point framework to support a provider to assess and develop its evaluation. It encourages a provider to reflect upon where it is now and identify improvements in the following areas:

- the **strategic context** for evaluation
- how evaluation and evidence shape current **programme design**
- the current quality and rigour of **evaluation design**
- the current quality and rigour of **evaluation implementation**
- how **learning** from evidence and insight from evaluation shape improvements.

174. If a provider has used the OfS evaluation self-assessment tool, it will be given a score of emerging, good or advanced, alongside numerical scores for each of the five dimensions of evaluation set out above. These scores can be shared in the plan to show the level a provider is currently working at and used to set a commitment to where it aims to be by a certain point in time.

175. A provider can download the tool, and information on how to complete it, from the OfS website.¹⁰⁸

Understand strategic context

176. Evaluation is an important aspect of a whole provider strategic approach to access and participation. Reviewing the strategic context in which a provider's evaluation takes place could include a description of how skills, capabilities and expertise are being drawn upon from across its organisation. This description may also reference planned participation in collaborative networks and engagement with students.

Design activities

177. Good programme design has an evaluation plan established at the start. Building effective evaluation into intervention strategies is best achieved by evaluating individual activities that contribute towards the overall objective of the intervention strategy. By doing this, a provider can build up an understanding of which activities are 'working' towards an objective, and which are not.

¹⁰⁸ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/standards-of-evidence-and-evaluation-self-assessment-tool/.

178. Developing a theory of change will help a provider to understand the change it wants to make through an intervention strategy and associated activities. More information on using evidence and developing a theory of change in relation to programme design can be found in the section [Develop a theory of change](#).

Design evaluation

179. Establishing how the outcomes of activities can be evaluated credibly is best done at the start of the development of any activity. Undertaking an evaluability assessment may be one way of determining what elements to focus on.¹⁰⁹

180. Once a provider has determined the focus of the evaluation for each activity that it is evaluating, it is important to ensure that the evaluation approach and methods of data collection and analysis are appropriate to evaluation questions and are aligned with the objectives of the evaluation. For further support a provider can review the OfS-commissioned review into the different data that supports planning, delivery and evaluation of access and participation interventions.¹¹⁰ It is important that a provider considers appropriate data collection and GDPR compliance arrangements at the design stage to avoid challenges later on.

181. Both qualitative and quantitative methods are welcome in plans, and the methods used will depend on what is being evaluated. Using different methods and then triangulating findings can be useful in understanding the effectiveness and impact of a provider's activities.¹¹¹ This can enable a provider to gain insights into how its activities are working and the impact they are having.

182. A provider may wish to consider the following when designing evaluations:

- potential barriers to preferred approach
- the availability of expertise needed to conduct this evaluation properly
- if collaboration is needed to make this evaluation work well
- exploring counterfactuals, i.e. what would happen to target groups if a provider did nothing
- the number of participants needed to help get the insights needed
- the number of years a provider wants to run the evaluation for
- whether comparison groups are appropriate and, if so, whether the selection method takes account of possible selection bias
- what happens if a provider is running a small programme

¹⁰⁹ See <https://www.betterevaluation.org/methods-approaches/themes/evaluability-assessment>.

¹¹⁰ Available at www.officeforstudents.org.uk/publications/data-use-for-access-and-participation/.

¹¹¹ See <https://www.betterevaluation.org/methods-approaches/approaches>.

- what kinds of data are needed for the chosen approach, what method will be used to collect data, when to collect it and how often (before, during and after), and how data can be stored securely
- which outcomes of intervention strategies will be evaluated
- how findings will be disseminated (for more information, see the section Learn from and disseminate findings).

183. There are several tools that can support a provider in choosing the most appropriate methods:

- TASO's evaluation guidance, including its guidance on impact evaluation with small cohorts¹¹²
- The OfS's evaluation toolkits, including the financial support toolkit, the evaluation of outreach interventions for under-16s development tool, and the whole provider approach evaluation tool¹¹³
- The OfS standards of evidence (see Use the OfS standards of evidence for more information), including further information and case studies related to each type of evidence.¹¹⁴

184. Other tools to help a provider identify appropriate evaluation methods are available, such as the Centre for the Evaluation of Complexity Across the Nexus (CECAN)'s Choosing Appropriate Evaluation Methods tool¹¹⁵ or the evaluation support tool by Mayor's Office for Policing and Crime (MOPAC).¹¹⁶ A provider should take care to ensure that approaches are in line with the OfS's expectations where tools are not specific to an education context.

185. Some providers may wish to apply to join TASO's evaluation trials related to specific interventions, and providers can include these intentions in the plan. Providers already participating in TASO's evaluation trials can inform us of this in the plan too.

Implement an evaluation plan

186. To enable a provider to implement its evaluation effectively, it will need to set up processes and arrangements to ensure the relevant data can be collected, stored and analysed

¹¹² Available at <https://taso.org.uk/evidence/evaluation-guidance-resources/>.

¹¹³ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/.

¹¹⁴ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/standards-of-evidence-and-evaluation-self-assessment-tool/.

¹¹⁵ Available at <https://www.cecan.ac.uk/news/choosing-appropriate-evaluation-methods-a-tool-for-assessment-and-selection-version-two/>.

¹¹⁶ Some of the questions in this tool are specific to MOPAC and the context in which they are evaluating. However, it may be a useful tool for providers to use. Available at <https://www.london.gov.uk/programmes-strategies/mayors-office-policing-and-crime/data-and-statistics/mopac-academic-research/mopac-evaluations?ac-53042=53041>.

appropriately and to include the necessary ethical, safeguarding, legal and risk considerations.¹¹⁷

187. There may be different expectations in individual providers about gaining formal ethical approval for evaluation (sometimes different to research activity). TASO has produced guidance and tools for providers to support getting the appropriate ethical approval.¹¹⁸ Regardless of whether ethical approval is sought, well established ethical principles should be considered.¹¹⁹

188. Working in partnership to deliver evaluation can be beneficial in terms of cost and knowledge sharing, and sharing analysis and reporting. For example:

- internally with other departments
- with other providers
- with partnership schools, colleges, and community groups
- where they have appropriate data sharing agreements in place, smaller providers can collaborate to use the statistical tool of the OfS financial support toolkit
- providers delivering similar activities can standardise the activities and outcomes to increase the sample size and evaluate
- providers with more developed evaluation capability and capacity can support smaller providers they work in partnership with
- with other members of a tracking service using any collaborative tools offered, for example HEAT has developed a tool where its members can share and peer review each other's evaluation plans, to ensure that members are setting the most appropriate and robust evaluation plans possible.

189. Tracking services are membership services that collect data about participants engaging in different outreach activities. Tracking in itself is not an evaluation method but can provide useful longitudinal data as part of an evaluation.

190. A provider can access other services to support its evaluations, for example UCAS's Outreach Evaluator¹²⁰ and from ImpactED.¹²¹

¹¹⁷ See the Information Commissioner's Office website for resources and support: <https://ico.org.uk/for-organisations/>.

¹¹⁸ Available at <https://taso.org.uk/evidence/research-ethics-guidance/>.

¹¹⁹ Available at <https://www.evaluation.org.uk/app/uploads/2019/04/UK-Evaluation-Society-Guidelines-for-Good-Practice-in-Evaluation.pdf> [opens as PDF].

¹²⁰ See <https://www.ucas.com/providers/services/our-products-and-services/understand-your-customers/outreach-evaluator-tracking-results>.

¹²¹ See <https://impacted.org.uk>.

191. Responding rapidly to interim findings or process evaluations can help keep a provider on track for its objectives and targets and improve its activities and practice.
192. For smaller providers or providers evaluating a small group of students, a credible plan in relation to evaluation could:
- refer to TASO guidance on best practice for evaluations with low student numbers¹²²
 - collaborate with other providers delivering a similar activity on the evaluation to increase the sample size and share skills and resources.

Learn from and disseminate findings

193. For evaluation to be effective, it needs to be translated into practice. There are a number of ways a provider can learn from and share its evaluation findings so that the sector can learn about what works and what can be improved.
194. We expect a provider to publish findings on short, medium and long-term outcomes, or other relevant findings, through a range of channels, both internally and externally.
195. A provider may publish its evaluation findings through a number of channels, including (but not limited to):
- Peer reviewed or non-peer reviewed reports or papers hosted on a provider's own webpages
 - REF submissions (where appropriate)
 - blogs and webpages
 - papers in academic journals
 - calls for evidence
 - at conferences (e.g. talks or poster presentations)
 - learning lunches, network meetings or network communication channels.
196. The manner in which a provider publishes the findings of evaluations may depend on the context of the provider, the audience, the evaluation undertaken, and the stage at which the evaluation is at (e.g. interim or final). Where possible it is good practice to ensure that findings are open access, so that they can be easily read by different audiences.
197. Sharing evaluation findings of what has worked, has not worked and for whom and in what contexts will help grow the evidence base for equality of opportunity in higher education.
198. The OfS intends to create a repository where providers can submit their evaluation findings over the duration of the plan. It is anticipated that providers will share their evaluation outputs

¹²² See <https://taso.org.uk/evidence/evaluation-guidance-resources/impact-evaluation-with-small-cohorts/what-is-small-n-evaluation/>.

to the repository which will assess the output and rate the type and strength of evidence generated. We will update this advice with more information in future.

199. Peer review and external validation of findings helps to add credibility to the findings when sharing and publishing. This could involve practitioners working with academics during the evaluation or when analysing the findings, informal peer review with other providers, participating as a research partner in an evaluation trial for TASO, or commissioning or partnering with appropriate organisations that provide evaluation support. Members of the UK Evaluation Society can take part in a voluntary peer review process.¹²³

Use the OfS standards of evidence

200. It is for a provider to judge what activities within an intervention strategy should be evaluated, what type of evaluation should be conducted, and what type of evidence will be generated, as the evaluation will be context specific. A credible intervention strategy will state what types of evidence will be generated or have been used to inform the activities.

201. The OfS standards of evidence categorise different types of knowledge to help providers understand which type of evidence is appropriate and most useful to inform their programme design.¹²⁴ The table below sets out the different types and the claims that can be made for each type:¹²⁵

¹²³ Available at <https://www.evaluation.org.uk/about-us/get-involved/>.

¹²⁴ See www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/standards-of-evidence-and-evaluation-self-assessment-tool/.

¹²⁵ Table 1 has been adapted from the Access and participation standards of evidence research. See www.officeforstudents.org.uk/media/6971cf8f-985b-4c67-8ee2-4c99e53c4ea2/access-and-participation-standards-of-evidence.pdf.

Table 1: Three types of evidence

Type of evidence	Description	Evidence	Claims that can be made
Type 1 – narrative	The impact evaluation provides a narrative or a coherent theory of change to motivate its selection of activities in the context of a coherent strategy.	Evidence of impact elsewhere and/or in the research literature on access and participation activity effectiveness or from existing evaluation results.	We have a coherent explanation of what we do and why our claims are research-based.
Type 2 – empirical enquiry	The impact evaluation collects data on impact and reports evidence that those receiving an intervention have better outcomes, though does not establish any direct causal effect.	Quantitative and/or qualitative evidence of a pre/post intervention change or a difference compared to what might otherwise have happened.	We can demonstrate that our interventions are associated with beneficial results.
Type 3 – causality	The impact evaluation methodology provides evidence of a causal effect of an intervention.	Quantitative and/or qualitative evidence of a pre/post treatment change on participants relative to an appropriate control or comparison group who did not take part in the intervention.	We believe our intervention causes improvement and can demonstrate the difference using a control or comparison group.

202. The standards of evidence are not intended as a hierarchy and, as such, there are circumstances in which generating one type of evidence is more appropriate than another. There is further information to support providers in making these judgements available on the OfS website.¹²⁶ For illustrative example only, it may not be possible or appropriate to generate causal (Type 3) evidence if:

- a provider is delivering a one-off light touch activity that is not part of a multi-intervention programme and is not fundamental to meeting its wider objectives
- it is not feasible to have a counterfactual or comparator group

¹²⁶ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/evaluation/standards-of-evidence-and-evaluation-self-assessment-tool/.

- a provider is evaluating a small sample (although it may be able to collaborate with other providers or organisations to increase the sample size)
- a provider does not have or cannot source the skills to conduct experimental or quasi-experimental evaluation
- a particular intervention already has a strong evidence base and a provider's evaluation will not add value to this.

Example

College of Education is a small provider with approximately 900 students, mostly studying undergraduate courses. The provider has set out an intervention strategy that seeks to increase on-course attainment for students in receipt of free school meals (FSM). Four activities will contribute towards this goal: a collaborative project with a third-party organisation to raise attainment at pre-16; financial support for FSM students on-course; additional academic support for FSM students on-course; and an activity designed to increase sense of belonging for FSM on-course students.

The provider has stated that it will not evaluate the overall intervention strategy, but it does intend to evaluate three out of the four activities. It will focus its evaluation on new activity that is it delivering which has a weaker evidence base. The provider has set out that:

- It intends to evaluate the increased sense-of-belonging and the additional academic support activities using both quantitative and qualitative methods. It will track attainment outcomes and participation in the different activities, and will also undertake focus groups with participants.
- It is working in collaboration with the third-party organisation to evaluate raising attainment at pre-16 activity, and will generate Type 2 evidence as it does not have a comparator group.

The provider states that each activity will be evaluated for full impact across the four years of the plan. However, it will produce interim evaluation reports at the end of each academic year. It states that all of its evaluation activity will be published on its website, and it will also seek to present it at conferences and will share through formal networks that it belongs to.

The provider has two other intervention strategies, and has also detailed the extent to which it will evaluate these. The provider has further stated that it will be expanding the evaluation team in 2026, and will subsequently increase evaluation and outputs.

Investment

We would like to know how much a provider will be investing in each of its intervention strategies, as well as total investment in access, financial support and in research and evaluation. We consider this will enable a provider to evaluate the effectiveness of its interventions and activities.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Investment	92-107

Further advice

203. A provider is expected to provide an estimate of the investment required to deliver its intervention strategies in the fees, investments and targets (FIT) document that it submits to the OfS alongside its plan. A provider is expected to consider whether the amount being invested is realistic and credible in addressing the objectives it sets in its plan.

Putting it into practice

204. For all areas of investment, the following may be included:

- **the direct costs of delivering activities, including:**
 - relevant staffing (payroll costs of staff time spent on planning and delivering activities)
 - remuneration costs of access and participation work undertaken by student ambassadors, student associations, unions or guilds or alumni that are funded by the institution
 - staff learning and development
 - travel and other logistic costs of access and participation project delivery
 - outsourced research and evaluation projects
 - subscription and membership costs
 - costs of gathering and analysing data
 - subscriptions to tracking services
 - funding PhDs, and other research projects

- subscriptions to appropriate journals and academic societies
- **the indirect/support costs of activity, including:**
 - payroll costs of academic staff time apportioned to access and participation work
 - infrastructure costs apportioned to strategic projects
 - the direct costs of delivering financial support.

205. For all financial data, figures should be in thousands of pounds (£'000s).

Intervention strategy investment

206. We expect a provider to set out the investment required to deliver each of the individual intervention strategies that it has described in its access and participation plan in the fees, investments and targets (FIT) document.

207. Estimated investment for an intervention strategy ought only to relate to the work undertaken to support delivery of the access and participation plan objectives. A provider is expected to include the cost associated with delivering the intervention strategy for students identified in the plan.

208. Further information regarding how to complete the FIT can be found in Annex D.¹²⁷

¹²⁷ Annex D is available at: www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

Provision of information to students

Provision of information to students about the fees that they will be charged for the duration of their course and about the financial support that they are entitled to is an important requirement set out in the Higher Education (Access and Participations Plans) (England) Regulations 2018 (section 2, paragraph 2).

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Provision of information to students	108

209. A provider should include details of the arrangements in place to ensure that prospective students are provided with information about the fees they will be charged for the duration of their course.

210. A provider should also set out how it will make available to students, information about the financial support that students are entitled to. This should include eligibility criteria and the level of financial support students from underrepresented groups will be offered in each year of their studies.

Access and participation plan summary

The access and participation plan summary is important as it shows students, parents and others a provider's commitment to support equality of opportunity.

Summaries should be accessible to non-expert readers. A provider may have more than one summary if this is appropriate to ensure accessibility.

Key references

For guidance on how to meet the expectations for this aspect of an access and participation plan, see:

Regulatory notice 1	Paragraph(s)
Access and participation plan summary	35-37
Publication of an approved plan by a provider	141-142

Further advice

211. There is no expectation about what a plan summary will look like if it meets the expectations set out in Regulatory notice 1, including the information a summary should contain. A provider may use the template provided as Annex I, but other formats will be accepted to ensure the summary is communicated in a clear and accessible way.
212. The plan summary may be produced after the access and participation plan has been approved by the Director for Fair Access and Participation. A provider is expected to publish the plan summary alongside its approved access and participation plan and submit a link to the OfS within 28 days of receiving confirmation that its plan has been approved. Information on where a provider should send a link to its accessible plan summary and access and participation plan will be provided when relevant.

Putting it into practice

213. For a plan summary to be considered, we would expect to see the following:
- a summary of what an access and participation plan is
 - where a provider's access and participation plan can be found
 - the key points of the plan
 - fees charged
 - financial help available
 - how a provider is informing students about the provisions of the plan

- what the provider is aiming to achieve
- what the provider is doing to achieve its aims
- how students can get involved in the planning, monitoring and evaluation of the plan
- how the plan is being evaluated
- contact details for further information.

214. We understand that a provider may wish to create more than one summary if this helps to ensure accessibility.

215. More information on what the OfS would expect to see in each section, and advice on how to write the summary, can be found in Annex H.

Annex A: Explanation of terms

Glossary

Association between characteristics of students (ABCS)

Association between characteristics of students (ABCS) is a set of analyses that seeks to better understand how outcomes vary for groups of students holding different sets of characteristics. We define groups of students by looking at a set of characteristics so that we can determine the effect of not just one characteristic on an outcome, but the effect of multiple characteristics.

Absolute performance

This is a term that we use in the context of our student outcomes indicators. It refers to the proportion of students that we observe to have achieved a certain outcome. As a calculated proportion (in technical terms, a point estimate), it provides a factual representation of the actual population of students present at a particular provider at a particular point in time, based on administrative student data. We refer to this as a measure of the provider's absolute performance.

Access

Access into higher education.

Access and participation dashboard

Our access and participation dashboard helps to compare different student groups and their peers across all stages of a student's involvement at English universities and colleges. The dashboard can be used by anyone with an interest in higher education and displays data across a time series to show how student access and participation has changed in recent years.

Access and participation dataset

This dataset contains the underlying data of the access and participation dashboard. It is published as data files alongside the dashboard on the OfS website.

Aim, objectives and targets

Aims are a provider's high-level aspirations. These may be general or more specific (where, for example, the provider has a particular remit for an underrepresented group, such as mature students or children from military families).

Objectives explain how these aims will be achieved and should be time bound. There may be a number of objectives that are related to meeting one strategic aim.

Targets show what progress the provider expects to make towards meeting its objectives over the duration of the plan.

Comparator group

A comparator group is defined relative to a target group and by student characteristics or combinations of characteristics that have better outcomes than the target group.

Degree apprenticeship

An apprenticeship is a full-time job where an employee also undertakes off-the-job training paid by the employer. A degree apprenticeship is an apprenticeship where the employee is studying towards an undergraduate degree as part of their apprenticeship.

Equality of opportunity

In the context of higher education, 'equality of opportunity' means that individuals are not hampered in accessing and succeeding in higher education as a result of their background or circumstances they cannot fairly influence.

Equality of Opportunity Risk Register (EORR)

This is the OfS risk register that sets out the greatest sector-wide risks to equality of opportunity in English higher education.

Free school meals (FSM) eligibility

Whether or not a student has been eligible to receive free school meals in the six years prior to the March census date in their final year of key stage four (year 11). This eligibility criteria can be used as an indication of students' disadvantage.

Higher education provider

An institution that delivers higher education, as defined in Schedule 6 of the Education Reform Act 1988. A provider can be a body with degree awarding powers or deliver higher education on behalf of another awarding body.

Identifiable information

Identifiable information is Information that relates to an individual who is identified or may be identifiable. An individual is 'identified' or 'identifiable' if they can be distinguished from other individuals.

Indications of risk

An indication of risk is the term used by the OfS to refer to a potential impact of a risk to equality of opportunity in relation to higher education. For example, lower continuation rates for a specific student group is a potential indications of risk of insufficient academic support (a risk to equality of opportunity).

Intervention strategy

An intervention strategy in an access and participation plan is an activity that the provider plans to deliver to meet a specific objective.

POLAR4

The participation of local areas (POLAR) classification looks at how likely young people are to participate in higher education across the UK and shows how this varies by area. POLAR4 uses data for young people who entered higher education between the academic years 2009-10 and

2014-15 (aged either 18 or 19). POLAR4 is used as an historical measure, which may be used with TUNDRA to lead to more insights about higher education participation than one measure alone.

Protected characteristics

Protected characteristics are the grounds on which it is illegal to discriminate against someone under the Equality Act 2010.¹²⁸ They are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

Risk to equality of opportunity

Risks to equality of opportunity occur when the actions or inactions of an individual, organisation or system may reduce another individual's choices about the nature and direction of their life.

Robust evaluation

A robust evaluation would withstand challenge and scrutiny, in terms of the quality of its design and implementation. This includes the quality of the individual methods (for example, adequate sampling strategies and sizes, well-tested tools for surveys or interviews, adherence to ethical principles, appropriate training for researchers) as well as the overall evaluation approach (the extent to which the evaluation provides evidence of a causal effect of an intervention). It might also include the independence of the evaluation and adequate peer review, to quality-assure the design and execution of the evaluation.

Statistical uncertainty

The indicators we calculate to inform our regulation of access and participation are the proportions of students that we observe to have achieved a certain outcome (in technical terms, point estimates), meaning that they provide a factual representation of the actual population of students present at a particular higher education provider at a particular time.

If our interest were solely the observation of past events, then it would be appropriate to rely solely on these values. However, we are seeking to use the indicator values as representations of the most likely underlying performance in respect of student outcomes and experiences, and in respect of equality of opportunity.

¹²⁸ See <https://www.gov.uk/guidance/equality-act-2010-guidance>.

As the actual students in a provider's observed population are just one possible realisation of many other populations of students who could have attended that provider, or may do so in the future, statistical uncertainty exists because of the potential for random variation in student behaviours and outcomes.

This means that the indicator values may not always be accurate or precise measures of the underlying performance that they aim to represent. Our regulatory approaches take account of this uncertainty by using a statistical approach that identifies the range within which each provider's underlying performance measure could confidently be said to lie. The full details of this approach are set out in our 'Description and definition of student outcome and experience measures' document.¹²⁹

Target group

A target group is defined by a student characteristic, or combination of characteristics, that is underrepresented in higher education or has poorer outcomes. It represents a group for which a provider may consider developing an intervention strategy in order to address a risk to equality of opportunity through the objectives of its plan.

TASO

The Centre for Transforming Access and Student Outcomes in Higher Education (TASO) is an independent organisation and affiliate What Works Centre that undertakes and uses research and evaluation to determine what works in eliminating equality gaps in higher education.

Teaching Excellence Framework (TEF)

The TEF is a scheme operated by the OfS that aims to incentivise excellence in teaching, learning and student outcomes. The scheme rates higher education providers for excellence above a set of minimum requirements for quality and standards that they must satisfy if they are registered with the OfS. The TEF aims to incentivise a higher education provider to improve and to deliver excellence above these minimum requirements, for its mix of students and courses.

Theory of change

For the purposes of explaining our expectations, we have adopted TASO's definition of a theory of change: A theory of change is 'a visual representation of a programme's inputs, activities, outputs, outcomes and underlying causal mechanisms'.¹³⁰

Tracking and trackers

A database used for monitoring and evaluation that longitudinally tracks participants who have taken part in access and participation activity.

¹²⁹ See www.officeforstudents.org.uk/publications/description-and-definition-of-student-outcome-and-experience-measures/.

¹³⁰ See <https://taso.org.uk/evidence/our-approach-to-evaluation/step-1-diagnose/>.

TUNDRA

Tracking underrepresentation by area (TUNDRA) is an area-based measure that uses tracking of state-funded mainstream school pupils in England to calculate young participation. TUNDRA is a supplement to POLAR4. Using both of these together can lead to more insights about higher education participation than one of the measures alone.

Uni Connect

Uni Connect is a programme with 29 partnerships of universities, colleges and other local partners, which supports young people to achieve their ambitions through helping remove academic, financial and cultural barriers to higher education. It does this by supporting impartial, collaborative outreach, attainment-raising and higher education providers to engage schools.

Abbreviations

Abbreviation	Meaning
ABSS	Addressing Barriers to Student Success
ABCS	Associations Between Characteristics of Students
CECAN	Centre for the Evaluation of Complexity Across the Nexus
DfE	Department for Education
DipHE	Diploma of Higher Education
EEF	Education Endowment Foundation
EMWPREP	East Midlands Widening Participation Research and Evaluation Partnership
EORR	Equality of Opportunity Risk Register
FIT	Fees, investments and target
FSM	Free School Meals
FTE	Full time equivalent
GDPR	UK General Data Protection Regulation
GO	Graduate Outcomes (survey)
HEAT	Higher Education Access Tracker
HEFCE	Higher Education Funding Council for England
HERA	Higher Education and Research Act (2017)
HESA	Higher Education Statistics Agency
HNC	Higher National Certification
HND	Higher National Diploma
HTQ	Higher Technical Qualification
IfATE	Institute for Apprenticeships and Technical Education
LEO	Longitudinal Education Outcomes (survey)
LEP	Local Enterprise Partnership
MOPAC	Mayor's Office for Policing and Crime
NUS	National Union of Students
OfS	Office for Students

Abbreviation	Meaning
ONS	Office for National Statistics
POLAR	Participation of Local Areas (classification)
PSRBs	Professional, Statutory and Regulatory Bodies
SLC	Student Loans Company
TEF	Teaching Excellence Framework
UCAS	Universities and Colleges Admissions Service
UKPRN	UK Provider Reference Number

Annex B: Access and participation plan submission checklist

By submitting your application via the OfS portal, you are confirming that:

- you have read Regulatory advice 6 and Regulatory notice 1
- you have uploaded all your documents, as set out below.

Documents

Have you uploaded the following documents to the OfS provide portal?

- Access and participation plan
 - Annex A: Assessment of performance
 - Annex B: Evidence base and rationale for intervention strategies (further detail)
- Fees, investment and targets document

Access and participation plans should:

- be in an accessible Word document format (see plan template for details)
- not exceed 30 pages of A4, excluding annexes
- exclude personal details or any data which makes individuals identifiable.

Student submission

Have you notified students that you are submitting your plan so that they can submit the optional student submission to app@officeforstudents.org.uk?

For queries please contact app@officeforstudents.org.uk.

Annexes C-H

The following annexes are published separately and are available at:

www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/:

- Annex C: Access and participation plan template
- Annex D: Guidance on completing the Fees, investments and targets (FIT) document
- Annex E: Template for fees, investments and targets (FIT) document
- Annex F: Student submission guidance
- Annex G: Student submission template
- Annex H: Guidance for completing a summary of approved access and participation plan
- Annex I: Plan summary template



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