

**Office for
Students**



Access and participation plans

Guidance on student submissions

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What are access and participation plans?

Introduction

The Office for Students (OfS) regulates universities and colleges in England. As part of our work, we aim to make sure that higher education is as fair and equal as it can be for all students and potential applicants. One of our main objectives is to ensure that all students, from all backgrounds, with the ability and desire to undertake higher education, are supported to access, succeed in, and progress from higher education.¹

We seek to achieve this objective because it remains that some groups of students don't have the same opportunities as others or are underrepresented in higher education.

Access and participation plans set out what your university or college believes are the most significant risks to equality of opportunity for its current and prospective students, and how it intends to address these risks for underrepresented groups of students. The OfS approves and monitors these plans.

If you want to learn more about access and participation plans, or how universities and colleges are assessed, there is more information on our website² which also includes links to the separate guidance produced for your university or college.³ You may also find the online 'Students' union guide to the Office for Students' useful in understanding the wider role of the OfS.⁴ The guide includes a section on equality of opportunity.

What is the role of students in access and participation plans?

While developing their access and participation plans, universities and colleges should involve and listen to their students. As part of this, the plan put together by your university or college must demonstrate how students have had the opportunity to express their views about the content of the plan before it was submitted for approval, and what steps were taken as a result.

In addition, students or a student body can write a commentary and submit it to the OfS, alongside the plan from your university or college.

¹ See OfS strategy for 2022-25, at www.officeforstudents.org.uk/about/our-strategy/.

² Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plans/.

³ Available at www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

⁴ Available at www.officeforstudents.org.uk/for-students/ofs-and-students/students-union-guide-to-the-office-for-students/equality-of-opportunity/.

Student submissions

What are student submissions?

A student submission is an additional commentary made by the student body on the access and participation plan produced by your university or college. To help you with this, a recommended template for the submission is available alongside this guidance.⁵

What should you tell us about?

We are particularly interested in students' perspectives 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
- whether the university or college has identified the greatest risks to equality of opportunity (see the section on [risks to equality of opportunity](#))
- the credibility of the intervention strategies outlined by the university or college to address the risks to equality of opportunity (see the section on [intervention strategies](#)).

The student submission is optional, although we encourage students to make a submission if possible.

Why are student submissions important?

Along with your university or college's access and participation plan and relevant data, the student submission will contribute to the decision made by the OfS about whether or not to approve a plan.

The submission should provide additional insights on the access and participation plan from the students' perspective in a way that is:

- more direct
- separate from the access and participation plan
- more current than the OfS data which is based on retrospective figures.

We consider that the creation of these submissions will increase opportunities for students to influence how universities and colleges address risks to equality of opportunity, and ultimately how well all students access, succeed in, and progress from higher education.

⁵ You can download the template from www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

What happens if you don't produce a student submission?

If you choose not to produce a student submission:

- The OfS will still complete its analysis, using data and the university or college's access and participation plan
- Your university or college is still required to demonstrate how students have had the opportunity to express their views about the content of the access and participation plan before it is submitted for approval and what steps were taken as a result. Therefore, you could just take part in this way
- If you are not able to create a student submission this time, consider what would make it possible for students in the future to produce one. This might include agreeing with your university or college relevant committee membership for student representatives and setting up student representative structures.

How do you put together a student submission?

Nominating a student contact

The first step is to nominate someone to act as the student contact. Depending on your situation, this could be done by the student body, for example through the students' union, or by your university or college if that is easier. Ideally, the student contact should be a person with a relevant role in representing students, such as an elected sabbatical officer.

The student contact will be responsible for coordinating, producing and submitting a single student submission on behalf of the university or college's students. However, they should not work on their own but rather with the student body to canvass opinions and produce the student submission.

Once the student contact has been nominated, either the nominated individual or the university or college should email app@officeforstudents.org.uk to tell us who the student contact is and their institutional email address.

Evidence gathering

Before you produce your submission, we recommend that you gather some information. There are a variety of ways to gather information from other students to inform your submission and you should use the methods that best suits your situation.

Don't forget to make use of any existing information that is relevant to the access and participation plan as you do not necessarily need to gather new information. It could already be available in the form of previous feedback collected from students at school or faculty level via course representatives, students' unions or student committees, or included in annual reports produced by your university or college.

Your university or college should be making commitments in its plan to work with its students on the design and delivery of the plan, so there should be information there about any student consultation and involvement. This may include activities such as committing to creating a student advisory panel, or forming focus groups for underrepresented groups.

If there aren't many student representatives, or existing information is limited, consider what the best options would be for gathering evidence. Additional information gathering could be targeted to fill any gaps that you identify, for example through focus groups, short surveys, and/or informal conversations with students or their representatives. Participation could be encouraged via mentions in lectures or relevant social media channels to do with your university or college. If necessary, you could also ask the person responsible for your university or college's access and participation plan to put you in touch with other students.

In the first section of your submission, you should describe how you have gathered your evidence, so the OfS can understand where the evidence has come from and how representative it is of different groups of students. The evidence can be qualitative, quantitative, or both. It should be factual and verifiable, rather than based on assertions that could not be verified. Whether evidence is quantitative or qualitative, you should aim to include information about:

- when and how the evidence was collected
- the range of students who took part or responded (for example, students from different backgrounds), to indicate how representative the evidence is.

Working with your university or college

We expect universities and colleges to consider a range of ways in which they can offer support to their student contacts.

As the student submission will be commenting on the access and participation plan, we would expect collaboration between those working on the respective documents. For example, in order to comment in the submission, you will need to be aware of the risks to equality of opportunity being highlighted by the university or college and the intervention strategies being put forward to address them.

When your university or college is writing its access and participation plan, it should consult with its student body. We would encourage you to have a conversation with your university or college while you are developing your submission. To organise the conversation(s), you should get in touch with the person responsible for your university or college's plan. The university or college should discuss the relevant information, and, where appropriate, should support you in writing the submission.

Specific arrangements should be discussed and agreed between students and their university or college, and might include, for example:

- ensuring student contacts know who their university or college's contact is for the access and participation plan
- making sure student contacts have access to any data that the university or college has that would be useful for their submission. This could also include consideration of your university or college's data available through the access and participation data dashboard on the OfS website.⁶

⁶ The data dashboard, and a guide on how to use it, are available at www.officeforstudents.org.uk/data-and-analysis/access-and-participation-data-dashboard/.

- sharing any training on or analysis of the access and participation data that is being made available to people writing the university or college's plan
- mutual sharing of drafts, where this has been agreed by both parties
- coordination of content on key areas such as the risks to equality of opportunity identified by the university or college and how they plan to address them.

It will be for the university or college and students to agree what arrangements are appropriate and whether this includes financial compensation. It is not the OfS's role to incentivise student involvement through financial compensation.

When discussing how you would like to work with your university or college and what support could be offered, you should also agree boundaries to maintain the independence of the student submission. Independence means that the university or college does not try to influence the content of the student submission, and the student contact has the final say over its content. We ask that you confirm that the university or college did not unduly influence the content of the submission.

What should the student submission cover?

The recommended template sets out the headings that we would like you to cover in the student submission.

At the heart of what we're asking you to tell us about in the student submission is whether your university or college has, in the opinion of students, identified the greatest risks to equality of opportunity and whether students think the intervention strategies to address the risks are credible.

What is a risk to equality of opportunity?

Some student groups have historically experienced inequality in higher education. For example, disabled students have been less likely to progress to highly skilled employment or further education than their peers. Further, there may be other barriers to higher education which mean certain student groups do not experience equality of opportunity. One example might be students with fewer financial resources potentially being more affected by increases in the cost of living. The OfS classes such examples as a 'risk to equality of opportunity'.

The OfS has published what is known as an Equality of Opportunity Risk Register (EORR).⁷ The EORR is part of our new regulatory approach to improving equality of opportunity in higher education.

The EORR identifies 12 key risks that may affect a student's opportunity to access and succeed in higher education. Each risk covers an area in which the evidence shows that certain student groups are less likely to experience equality of opportunity.

We expect your university or college to consider the EORR when writing its access and participation plans. The EORR asks universities and colleges to consider which, if any, of their

⁷ Available at www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/equality-of-opportunity-risk-register/.

prospective or current students are likely to be affected by the risks, and how they can contribute to reducing these risks.

To develop its access and participation plan, your university or college should firstly assess its performance. Risks to equality of opportunity are likely to contribute to the issues a provider identifies through its assessment of performance. We call these 'indications of risk'. For example, lower continuation rates from year one to year two for a specific student group is an indication of risk. The underlying risks to equality of opportunity may be insufficient academic support and cost pressures.

Your university or college should also consider the EORR when it makes this assessment as a way of not only identifying risks but also the relevant student groups. Groups that may be targeted by access and participation plan intervention strategies include, but are not limited to:

- Students in receipt of free school meals.
- Students with certain characteristics, including care experienced students, students who are estranged from their families, and students from Roma, Gypsy and Traveller communities.
- Students with a protected characteristic identified by the Equality Act 2010 who do not experience equality of opportunity because of that protected characteristic. The characteristics include: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 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.

Your university or college should consider how different groups of students are affected by the risks in the EORR.

The EORR does not cover all risks to equality of opportunity. Therefore, if your university or college considers that something not covered by the EORR may be causing a risk to occur, it may also wish to address this issue.

What is an intervention strategy?

Your university or college is expected to set out intervention strategies to address the identified risks and meet each of its objectives.

In the student submission, we would like you to state whether the student body agrees that your university or college has:

- identified its greatest risks to equality of opportunity
- set out credible intervention strategies to address these risks.

Producing the student submission

To help you with this, a recommended template for the submission is available alongside this guidance.⁸ It is up to you whether you use this template; however we suggest that this structure will make it easier for the OfS to consider your submission. If you choose to structure your submission in a different way, you could still use the suggested headings.

If you find it easier, you could create your submission in a non-written format such as a video, podcast, or presentation. We encourage students taking this approach to use the prompts in the template we have provided so that you cover the relevant content. Where possible, audio or video submissions should be accompanied by a written transcript, which should be submitted as a PDF.

Sharing the student submission with the OfS

Process for providing a student submission

The submission should be sent to app@officeforstudents.org.uk as a Word document before or at the same time that the university or college submits its plan. If you wish to send us your submission in a non-written format, please contact us at app@officeforstudents.org.uk to discuss how best to upload it.

If you have any questions while you are producing your student submission or require any accessibility adjustments to enable you to access or complete the submission, please contact us at app@officeforstudents.org.uk.

Including sensitive information

You should consider data protection issues and should not include personally identifying information that is not already in the public domain, or where an individual has not given consent. For example, you should not normally include names of individual students or staff, or details about them which would allow someone to identify them.

Please discuss with your university or college or contact app@officeforstudents.org.uk if you are unsure about whether you can include something in your submission.

You should also avoid making statements that could be considered defamatory, taking particular care to ensure statements are factually true, rather than assumptions or opinions presented as facts, and consider the potential for statements to cause financial or reputational harm.

How will student submissions be used?

The OfS will consider your submission alongside your university or college's access and participation plan and the relevant data. This will inform the OfS assessor's recommendation about whether or not your university or college's access and participation plan should be approved.

⁸ Download the template from www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/.

Student perspectives may differ from their university or college's. If this is the case, it would be an area for the OfS assessor to consider, weighing up the available evidence. In exceptional cases, the OfS assessor may get in touch with you if they think that there may be inaccuracies in the student submission or require further information. An example could be if information appears to contradict the access and participation plan or the data. We will only get in touch if the information concerned is likely to have a significant impact on the recommendation whether or not to approve the access and participation plan. If we get in touch, we may ask you to explain what evidence the relevant information is based on.

We will publish the university or college's access and participation plan on the OfS website, alongside the relevant data. We would not normally publish a copy of the student submission.

Will the university or college be able to respond to what students have said in the student submission?

The university or college will be able to make 'representations' to the OfS. Representations are a form of appeal against a decision made by the OfS about a university or college. If the university or college makes representations, it could comment on or provide its own information about the content of the student submission. This is why we encourage both students and universities and colleges to be open about what they have said in their reports.



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