Effectiveness in implementation of access and participation plan reform: Part 2

11 March 2021

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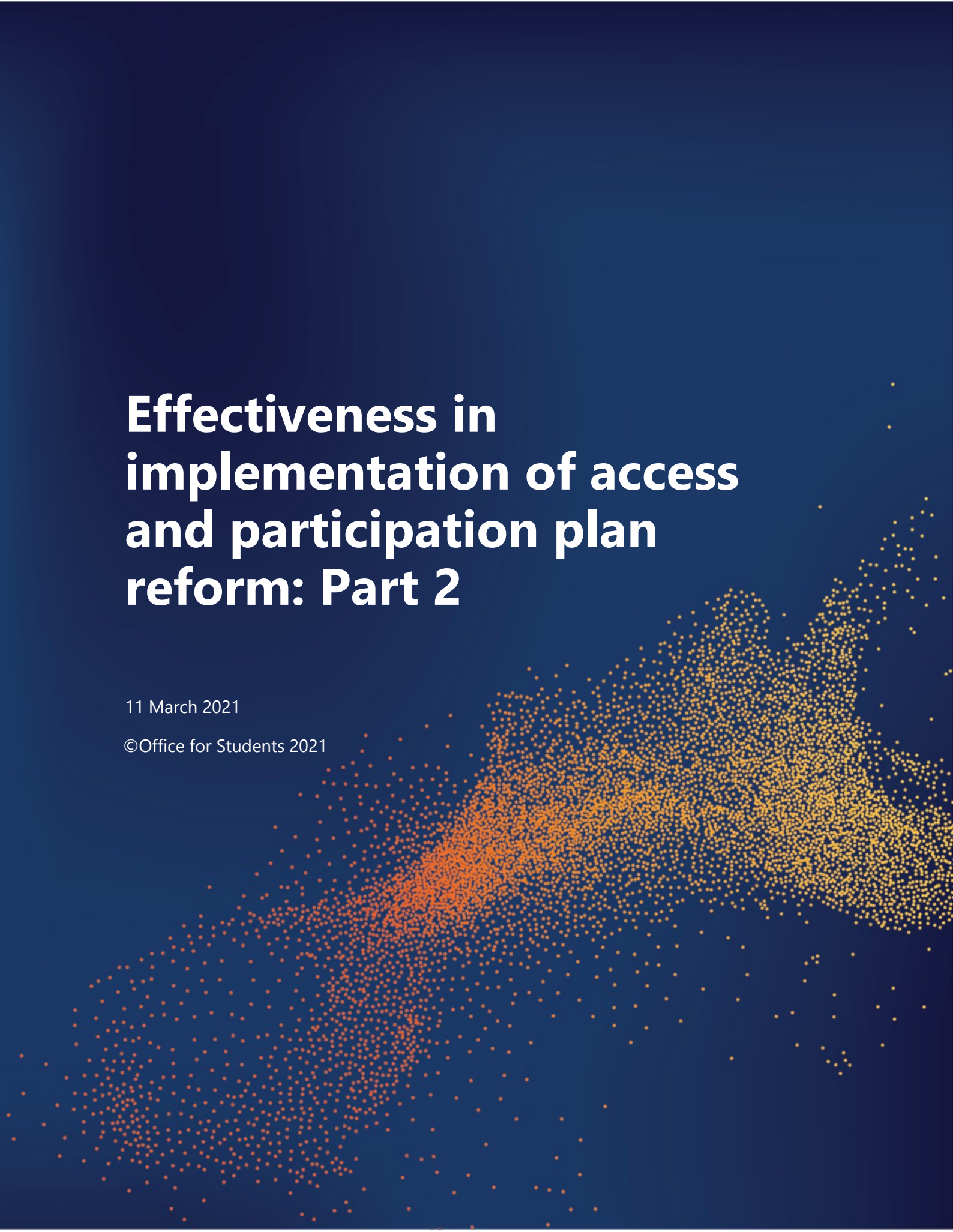

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Abbreviations and glossary

Term	Meaning
APP	Access and Participation Plan
BAME	Black, Asian and minority ethnic groups (usually with reference to students)
DfE	Department for Education
DFAP	Director for Fair Access and Participation
FECs	Further Education Colleges
FSM	Free School Meals data
HE	Higher Education
HEFCE	Higher Education Funding Council for England
HEIs	Higher Education Institutions
HERA 2017	Higher Education and Research Act 2017
IMD	Index of Multiple Deprivation (England) is calculated from a basket of measures which classifies areas by level of deprivation. It is presented as five quintiles, where quintile 1 contains the most deprived 20 per cent of the English population, and quintile 5 the least deprived 20 per cent.
KLEs	Key Lines of Enquiry relating to the review of access and participation reform
KPM	Key Performance Measure
NCOP	National Collaborative Outreach Programme. In January 2020 it was officially relaunched as Uni Connect. The programme brings together 29 partnerships of universities, colleges and other local partners to offer activities, advice and information on the benefits and realities of going to university or college.
OFFA	Office for Fair Access
OfS	Office for Students

Term	Meaning
POLAR4	Participation of Local Areas is a classification of geographical areas, based on rates of participation in higher education by young people. It is calculated using data on students who began their studies between 2009-10 and 2013-14. Areas are ranked by a measure of young participation and then divided into five equal-sized groups – quintiles.
RA6	Regulatory advice 6: How to prepare your access and participation plan - effective practice advice (OfS 2019.06)
RN1 2020-21	Regulatory notice 1: Access and participation plan guidance (OfS 2019.05) for 2020-21 to 2024-25 plans

1 Executive summary

Introduction

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

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

The Nous review has been completed in two parts:

- **Part 1:** Analysis of changes in the content of the 2018-19 Office for Fair Access (OFFA) access agreements to the OfS 2019-20 access and participation plans (APPs) and the five-year 2020-21 to 2024-25 access and participation plans.
- **Part 2:** A comprehensive stakeholder review, involving provider staff (senior leaders and operational), students (elected students' union officers, students' union staff and student representatives), and sector representative bodies, to understand whether regulatory changes and the OfS guidance and actions have resulted in changes in behaviour that reflect a greater ambition and commitment to access and participation.

This two-part review contributes to a broader evidence base relating to the impact of the OfS's access and participation reforms. Another element is the OfS report 'Transforming Opportunity in Higher Education'[1], which sought to understand the scale of ambition in relation to the outcomes targets set by providers for access and participation. We explore some of those findings in this report.

1.1 Key findings

Nous' Part 1 report found that providers' plans showed increasing commitment to the access and participation agenda through more strategic and whole-provider approaches.[2] The feedback from this review of provider staff, student and representative body stakeholders supported the positive findings from our content analysis, reflecting the changing level of commitment observed in the plans. The sector also broadly agreed that the OfS's aims for driving ambition in access and participation were supporting these shifts in behaviour. The various approaches employed by the OfS to communicate and implement the reforms had proved effective, with provider staff and representative body stakeholders reporting a good understanding of the aims and satisfaction with the resources and guidance provided. However, these stakeholders raised some challenges with the reforms, particularly relating to resource implications of the new APPs and the process of agreeing targets.

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

[2] See Effectiveness in implementation of access and participation plan reform: Part 1, available at https://www.officeforstudents.org.uk/publications/effectiveness-in-implementation-of-ap-plan-reform/

Nous identified eight key outcomes:

1. **The reforms have accelerated shifting culture at the sector level**

   The OfS's reforms appear to have accelerated momentum in access and participation that had been building for several years. This was evident in the positive response to the staff and student stakeholder surveys and supported by feedback in staff consultations that the regulatory changes had created new opportunities to push the agenda internally. The changes observed across the sector were not solely the result of reforms. Staff stakeholders cited several other influential factors, including sector-wide efforts to address the Black, Asian and minority ethnic (BAME) awarding gap, the Black Lives Matter movement, and innovative responses to COVID-19.

2. **Governing body engagement has been a driver for change**

   There appears to be an increasing priority for the access and participation agenda at the highest levels of providers, driven by changing regulation. The level of engagement required by the governing body in the development and implementation of the plans has made a significant impact. In many cases, it has served to increase the relative priority of the access and participation agenda and has led to additional resources to ensure compliance with the provisions set out in the plan, as a condition of ongoing registration.

3. **Stretching and broad-ranging targets have focused minds**

   Most staff and representative body consultees noted that the targets set to reduce gaps in access and participation had been stretching. Often, governing bodies had to engage in, and sign-off, multiple iterations of plans as the OfS pushed for increasing ambition in the targets set. The OfS's data dashboard supported the requirement to explore inequalities across a wide range of student groups at different stages of the lifecycle and provided greater insights into providers' access and participation issues.

4. **The five-year plans provided a framework for a more ambitious and strategic approach**

   Staff survey respondents reported (92 per cent) that their access and participation plan was more ambitious than in previous years. Many stressed that the level of ambition was already high, but that the new plan had provided a 'framework' to deliver a more strategic and ambitious approach. The increasing prioritisation of the agenda, supported by comprehensive guidance and five-year outcomes targets, enabled increasingly strategic, joined-up whole-provider approaches which drew in stakeholders from across the provider, including students. The changes facilitated investment in infrastructure and more evidence-informed long-term initiatives, which could be tested and adapted over time. The requirement to develop a theory of change received mixed reviews, but many agreed that it had been positive for underpinning this framework. Providers saw the previous one-year cycle as a hindrance to infrastructure development in comparison. Examples of changes included new dedicated senior roles, recruitment of evaluation specialists, changes to governance structures to oversee the plans and greater time taken to plan and implement long-term initiatives.

5. **Student engagement has been challenging**

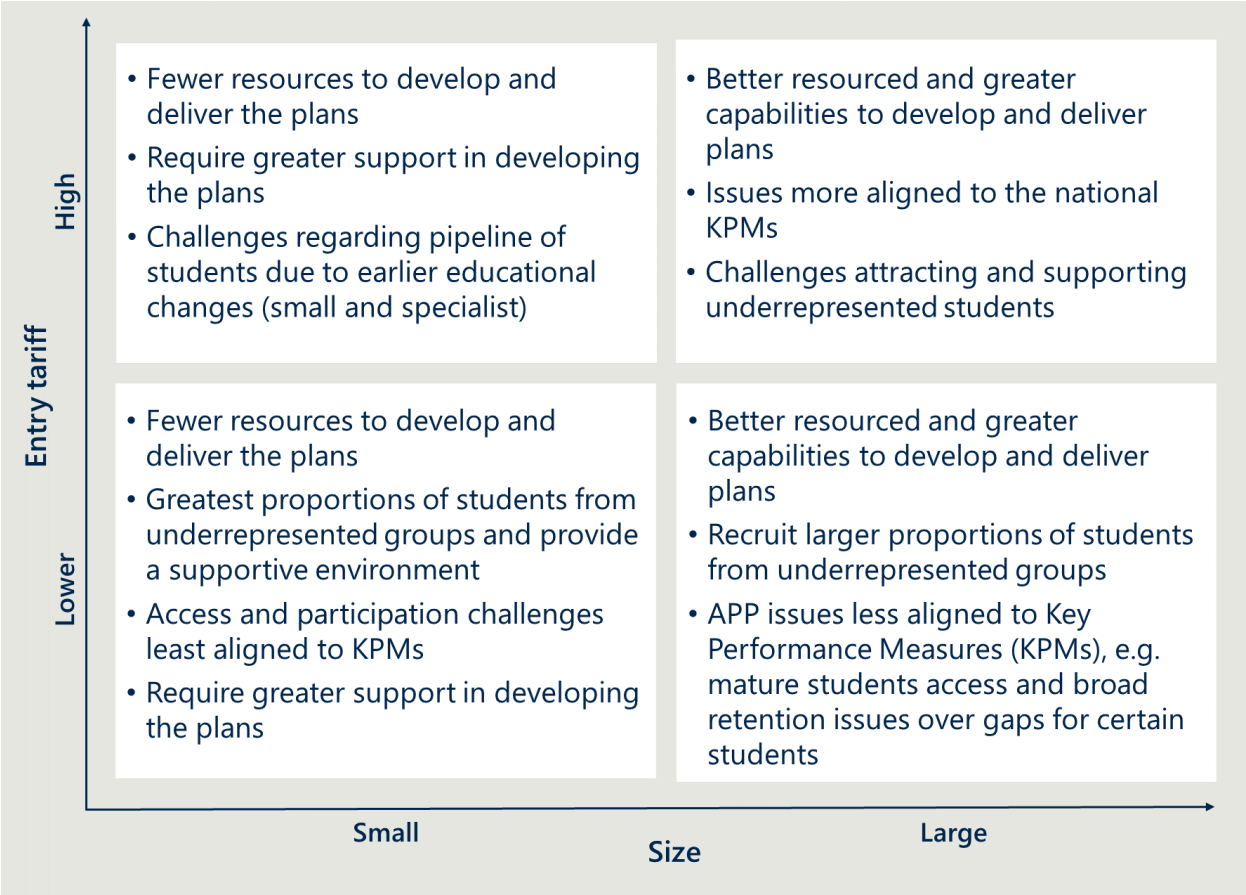
   Where comparison was possible, most provider staff and student stakeholders acknowledged that greater efforts had been made to engage students with the 2020-21 plans than previously. The mechanism for student engagement was usually through

student representative roles in relevant governance groups. However, in smaller providers without students' unions or elected officers, this had been more challenging. Students' unions and student representatives expressed concerns that opportunities to input had been rushed. Many providers reflected that the timescales to effectively engage students in the plan development had been tight. The tight timescales may explain why not all the plans described the ways in which providers had responded to student feedback on the plans, as found in our Part 1 report.

6. **The approach has disproportionately affected smaller providers**

   A consistent message emerged that the one-size-fits-all approach had differing impacts on providers depending on their size and available resources. Figure 1 illustrates key issues based on the size and entry tariff requirements of providers.

Figure 1 | Key issues with developing and implementing access and participation plans by provider tariff and size



Smaller providers frequently raised concerns regarding the OfS's resources and approaches which they felt created challenges for plan development and implementation in the following ways:

- The plan development process required significant resources and was often the responsibility of one or two individuals;
- OfS's resources were less compatible with smaller student populations. For example, the data dashboard suppressed data for smaller providers as the numbers were below publication thresholds. Staff in smaller providers often had to recreate the OfS dataset

internally, placing a further strain on resource, particularly where they lacked capabilities;

- There were concerns regarding student engagement due to the lack of formal student representative structures and the fact that mature student populations were often less likely to engage;
- The infrastructure required to implement the plan would take longer to develop for smaller providers, and they frequently cited concerns regarding evaluation capability and capacity to allow for continuous improvement.

These challenges meant that smaller providers tended to require greater support in the plan development process and found the OfS briefing events more useful than larger providers.

7. **The level of expectation from the OfS for stretching targets created concerns**

Staff and representative body stakeholders consistently raised concerns regarding the OfS's approach to negotiating and approving targets. In many cases, they characterised the approach as inflexible and overly challenging. They felt this had contributed to a number of difficulties:

- The challenging negotiation process from the OfS resulted in providers setting targets which were difficult to achieve. This was particularly true in situations where providers were local recruiters, or the pipeline of students had been reduced, and there were concerns regarding the unknown repercussions of missing targets;
- The targets were sometimes aligned to the OfS's national Key Performance Measures (KPMs) and not always the student groups that were a priority for the provider, which had been a focus in previous plans. This may have been due to concerns that proposed targets were not outcomes-based, measurable, or did not relate to an equality gap at a provider;
- The metrics available to set targets were too narrow. Providers commonly called for the introduction of free school meals (FSM) data and expressed concerns over the validity of the Participation of Local Areas (POLAR4) dataset;
- The stretching of access targets had created competition between providers for recruitment of target students;
- The requirement to meet stretching access targets led to some providers tightening the focus of outreach approaches, prioritising efforts at secondary level to allow them to evidence change in the five-year timescale and reduce efforts for collaborative outreach.

8. **Providers raised concerns with the OfS's communication**

Staff and representative body stakeholders raised concerns over the tone, consistency, frequency, and quality of the OfS's communications. Many highlighted concerns that the tone taken by the OfS did not facilitate a collaborative and open approach to tackling the challenges. Other concerns related to inconsistency in feedback and messaging during the plan development. The formal guidance and messaging from the Director for Fair Access and Participation (DFAP) made it clear that providers were encouraged to set targets relating to the KPMs, but only where they made sense in their contexts. Some providers felt

that there was a lack of clarity and inconsistent guidance in relation to this issue during the assessment process. They felt they had been encouraged to set targets aligned to national target groups even when not appropriate and that they had received differing advice to other providers.

Challenges and opportunities for implementation

While staff stakeholders were positive that their providers were making significant efforts to meet targets, they highlighted several risks to the work, including COVID-19, and the political and policy environments.

COVID-19 was the highest on the list, with negative impacts cited in over half of the staff survey qualitative responses. These included:

- the disruption of secondary education;
- limited opportunities for providers to conduct face-to-face outreach activities in schools;
- digital poverty creating disproportionate challenges for students from underrepresented groups;
- and constraints on progression to gainful employment in a shrinking economy.

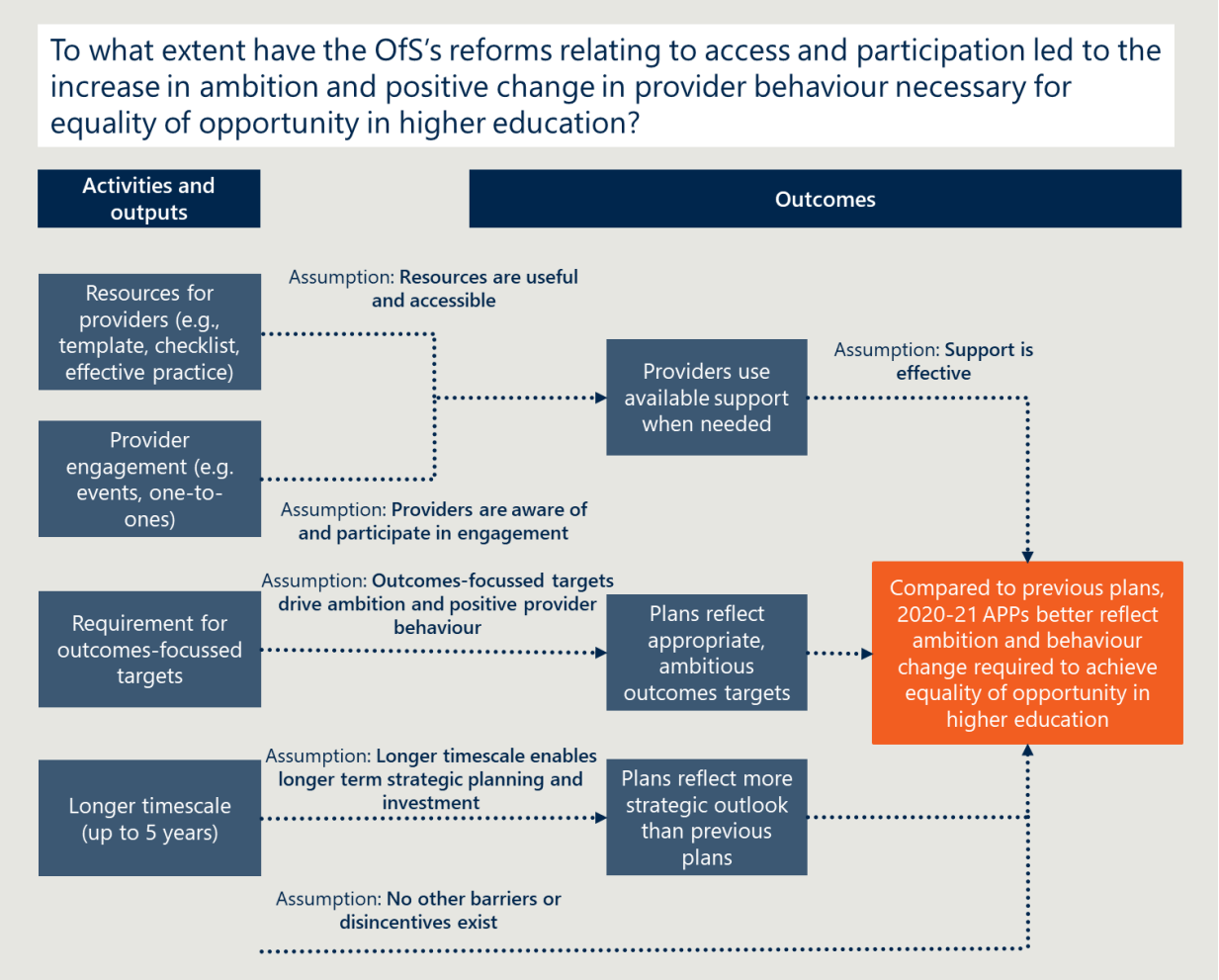
Staff and representative body stakeholders highlighted issues in the political and policy environment as barriers to and opportunities for implementation of plans and called for greater collaboration across the broad education sector to support progress.

The remainder of this report investigates these key findings in more detail. It follows a theory of change to explore the reception of the OfS's reforms and guidance, changes to provider ambition and the drivers (OfS or otherwise), before looking at resulting changes to provider behaviour to date. It explores unintended consequences of the OfS's reforms and looks ahead to opportunities and challenges which will affect the ability of the sector to meet the commitments set out in the 2020-21 plans.

1.2 Theory of change

Nous employed a theory of change (Figure 2) to underpin the analysis conducted.

Figure 2 | Theory of change



We tested the assumptions in the model through an engagement process with provider staff, student, and representative body stakeholders to analyse the effectiveness of the OfS's reforms and activities aimed to support their implementation, as well as the achievement of outcomes.

Table 1 provides the key lines of enquiry (KLEs), which address the overarching research question, detailing how the three reports contribute to the evidence base.

Table 1 | Key lines of enquiry (KLEs)

KLEs	Report	Contribution to evidence base
To what extent do the 2020-21 plans reflect the ambition and provider behaviour change required to achieve equality of opportunity in higher education?	OfS 'Transforming opportunity in higher education'	Scale of ambition reflected in providers' outcomes targets
	Nous review Part 1	Changes in access and participation commitments in the plans over three years
	Nous review Part 2	**Staff, student, and representative body stakeholder views on ambition and changing behaviour**
To what extent is changing ambition and behaviour in access and participation a consequence of the OfS's reforms?	Nous review Part 1	Relationship between changing guidance and corresponding commitments in the access agreements and plans over three years
	Nous review Part 2	**Staff, student, and representative body stakeholder views on factors influencing changing ambition and behaviour, including the range of OfS activities**
How has OfS guidance, engagement and assessment processes influenced behaviour in relation to the development of access and participation plans?	**Nous review Part 2**	**Staff, student, and representative body stakeholder views on the influence of the OfS's guidance and support**

1.3 About this report

This report presents Part 2 of the two-part Nous review of access and participation plan reforms. The findings are based on a synthesis of insights from the Nous Part 1 report, with stakeholder review findings from engagement with students' unions and student representatives, senior leaders and access and participation practitioners.

Part 2 stakeholder engagement consisted of a mixture of surveys, interviews and focus groups. The questions focused on three themes:

- Views on guidance, resources, and engagement as part of the OfS's reforms
- Changes to providers' ambition and the impact of the OfS's reforms on this
- Changes to providers' behaviour which the OfS was aiming to incentivise through the reforms. These included whole-provider and evidence-informed approaches, student engagement and wider understanding of access and participation issues.

2 Background

2.1 Introduction

The Office for Students (OfS) engaged Nous Group to conduct a review of the effectiveness of its regulatory reform to access and participation. The review seeks to understand whether changes in regulation, from access agreements to access and participation plans (APPs), have led to increased ambition and changes in the behaviour required for better outcomes for underrepresented groups in higher education. The Nous review is formed of two parts:

- Part 1: An analysis of changes in the content of the 2018-19 Office for Fair Access (OFFA) access agreements to the 2019-20 OfS access and participation plans and the five-year 2020-21 to 2024-25 access and participation plans;
- Part 2: A review of staff, student and representative body stakeholders to understand whether regulatory changes and the OfS guidance and actions have resulted in changes in behaviour that reflect a greater ambition and commitment to access and participation.

The findings from Part 1 of this review were published in October 2020. This report considers these findings in light of new insights from our stakeholder review.

The Nous review is part of a broader evaluation conducted by the OfS. The OfS report, Transforming Opportunity in Higher Education[3], reported quantitative analysis of the sector's targets to 2024-25 in relation to the OfS's key performance measures (KPMs) 2-5. The KPMs aim to ensure that access, success, and progression are not limited by background and identity, and that gaps are significantly reduced in the following areas:

- KPM1: participation between the most and least represented groups[4]
- KPM2: participation at higher tariff providers between the most and least represented groups
- KPM3: non-continuation between the most and least represented groups
- KPM4: degree outcomes (1sts or 2:1s) between white students and black students
- KPM5: degree outcomes (1sts or 2:1s) between disabled students and non-disabled students[5].

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

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

[4] Progress on KPM1 was not included in OfS 2020.06 because the OfS committed to setting the level of ambition once the government had responded to the post-18 review of education and funding.

[5] See Participation Performance Measures available at https://www.officeforstudents.org.uk/about/measures-of-our-success/participation-performance-measures/

2.1.1 Access and participation regulation has evolved

Reforms to access and participation regulation were part of broader changes to higher education regulation following the new Higher Education and Research Act 2017 (HERA 2017)[6]. The Act established the OfS as the new regulatory body under the new legislation which was formed following the dissolution of the Higher Education Funding Council for England (HEFCE) and OFFA. One of the seven general duties under the Act was that 'the OfS must have regard to the need to promote equality of opportunity in connection with access to and participation in higher education provided by English higher education providers.'

> 'The need to promote equality of opportunity in connection with access to and participation in higher education'
>
> OfS general duty, HERA 2017

Access and participation plans were introduced in the OfS regulatory framework[7] in 2018 as the first ongoing condition of registration for providers wishing to charge fees above the basic amount to qualifying persons on qualifying courses. The plans require providers to outline their approach to improving equality of opportunity for underrepresented groups to access, succeed in and progress from higher education. The plans replaced access agreements which were required under OFFA regulations up to the academic year 2018-19.

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

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

2.1.2 The 2020-21 plans represented an overhaul of the regulatory approach

The 2020-21 plans reflected a step-change in the evolution towards more strategic and proactive access and participation for the sector. The 2019-20 plans were intended as a one-year interim approach while the OfS developed and consulted on reforms to its approach to access and participation, which were agreed by the OfS Board in December 2018. Key to the reforms was placing access and participation plans on a more strategic footing. Changes in 2020-21 included:

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[6] See Higher Education and Research Act 2017, c29, available at https://www.legislation.gov.uk/ukpga/2017/29/introduction/enacted

[7] See Securing student success: Regulatory framework for higher education in England, (OfS 2018.01) available at https://www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/

- A move from one to five-year timescales
- A shift to five-year stretching outcomes-based targets
- The introduction of the OfS's KPMs to work towards narrowing gaps in access and outcomes for students from underrepresented groups.

2.2 Methodology

The methodology for this report involved conducting surveys and consultations with provider staff (senior leaders and operational staff), student stakeholders (students' union officers, staff, and student representatives), and representative bodies. These consultations supplemented the analytical work performed in the report for Part 1. The overall approach was guided by a theory of change, which Nous used to structure and direct our methods and analysis for stakeholder engagement. The theory of change is outlined in Figure 2, found in Section 1.

2.2.1 Stakeholder engagement and analysis

Nous engaged staff, student and representative body stakeholders spanning a variety of provider types via a mixture of surveys and consultations (interviews and focus groups). These methods are outlined in Table 2.

Table 2 | Stakeholder engagement activities

Online survey of student stakeholders (students' union officers, staff, and student representatives)	• 171 quantitative responses from 84 providers • Qualitative insights from 54 different providers
Online surveys of provider staff (senior leaders and other staff members)	• 167 quantitative responses from 143 providers • 137 qualitative responses from 133 providers
24 Virtual interviews	• 7 students' union officers and staff members • Executive staff members from 10 providers • Senior staff from 8 representative bodies
4 Virtual focus groups	• Operational staff from 21 different providers

Nous selected a broadly representative sample of provider stakeholders for engagement, based on size (small, medium, or large), tariff (high tariff or lower tariff) and education type (further education colleges (FECs) or other higher education (HE) providers). A detailed breakdown of engagement representation in these categories is described in Appendix A: Survey and consultee responses.

To understand trends emerging from stakeholder engagement activities, Nous employed two methods of analysis. These were:

1. **Quantitative analysis of survey data from staff and student stakeholders**. The quantitative responses from staff and student stakeholder survey responses were analysed numerically

and graphically to identify overall trends. Responses were then broken down further by provider size, tariff, and education type to analyse variations between these categories.

2. **Qualitative coding of consultation and qualitative survey responses.** This was designed to draw out common themes. The response categories used were refined through an iterative process. The occurrence of each of these response categories was then analysed quantitatively by provider size, tariff, and education type.

2.2.2 Methodological limitations

Nous' approach to analysis and stakeholder engagement has provided key insights into providers' views and behaviours relating to the OfS's reforms. Potential limitations of the methods used were:

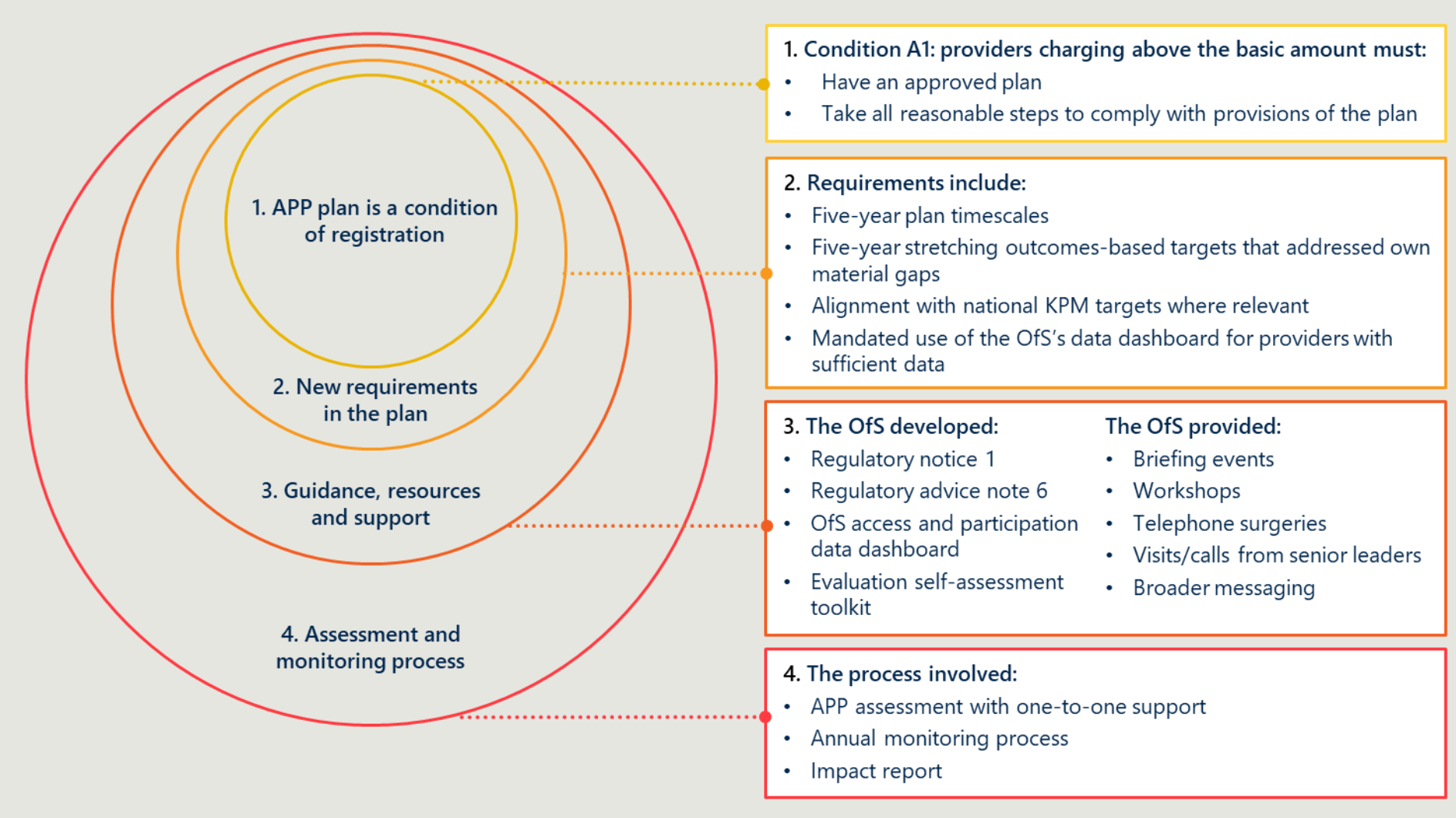
- **Influence of reporting bias on surveys.** Survey questionnaires could have been influenced by providers' desire to be seen as responding effectively to the reforms, or an unwillingness to express negative views about the OfS. This was mitigated by assuring providers of anonymity and by conducting virtual interviews and focus groups alongside the survey. From these, Nous interviewers were confident that responses in both the survey and consultations were a genuine reflection of providers' views.
- **Varying staff survey respondent types.** The survey was undertaken by staff in varying positions within the provider. Although this was captured in the survey, in some cases providers used collective opinions of senior leaders to complete the survey and for others one staff member shared their opinions. This influenced the consistency of the survey responses across providers.
- **Varying interpretations of provider ambition.** Ambition in access and participation was interpreted in different ways by different providers, for example, relating to either the individual or community. This may have partially influenced responses to survey questions on ambition but was actively addressed during interviews and focus groups to understand the nuances in interpretation.
- **Opinions from staff consultations may not have been representative.** Nous conducted interviews and focus groups with staff from 24 different providers. To obtain a range of opinions, it selected providers of varying size, tariff, and educational offering to take part in consultations. However, Nous noted that since only a sample of providers have been consulted in this way, the views extracted may not be representative of those of the sector.

3 Reception of the OfS's reforms and activities

This section explores the reforms and activities implemented by the OfS to support greater ambition in access and participation across the higher education sector. It seeks to understand the extent to which the sector understood the reforms and what they meant for providers, as well as the uptake and usability of the various OfS resources and support when developing the plans.

Figure 3 illustrates the reforms and the supporting activities and resources that the OfS put in place to implement them.

Figure 3 | OfS reforms and supporting activities



3.1 The sector reported a good understanding of the reforms

Conversations with students' union staff, student officers and senior and operational staff across the sector suggested that the OfS's reforms were well understood and that engagement with the OfS's requirements had generally increased across providers. There were several reasons for this, including:

- Strong messaging from senior OfS leaders regarding the strategic importance of the reforms;
- Opportunities to attend briefings and engage with guidance and resources which supported understanding;
- Increasing accountability for the plan development and delivery at senior and governing body levels which led to a greater level of engagement with the OfS's requirements than had been seen previously;
- Engagement of students' union staff and student officers in the plan development and implementation through governance groups and student feedback.

Staff stakeholders felt that the academic community was not always as familiar with the details of the reforms as those at senior levels or those working in access and participation.

Similarly, a small number of staff and student stakeholder consultees highlighted a general lack of awareness of the plans amongst the student body. This was reflected in survey responses from student representatives, 41 per cent of whom were not aware that their provider had an access and participation plan. Approximately one-quarter of the qualitative responses from the student stakeholder survey highlighted the need to better educate students on the plans.

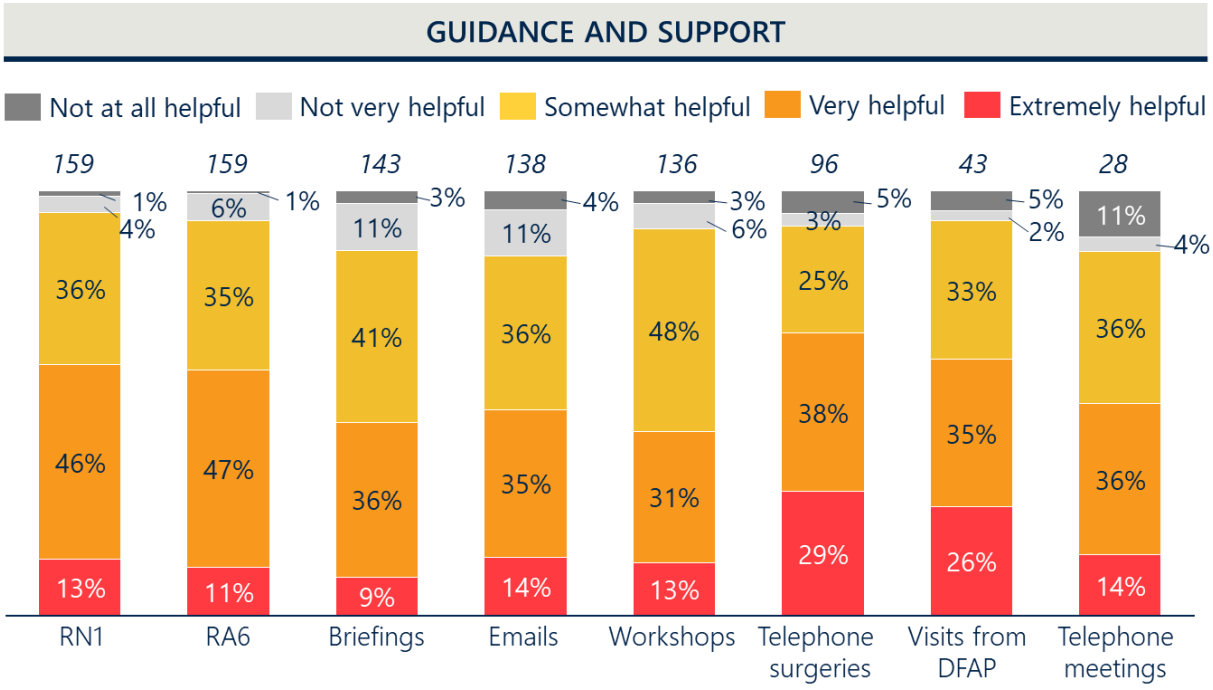
> 'In terms of the plan it would be useful to promote that a bit more and put it in a digestible format, so the students are a bit more aware of it. Students don't know it's a problem – seeing the university take account of that would be really useful – explaining the gaps with initiatives and explaining what they are there for.'
>
> Students' union vice president (education), high tariff, medium HE provider

3.2 The formal guidance and opportunities to speak one-on-one to OfS staff were most valued

Survey respondents were positive that the guidance, resources and support had been helpful in communicating OfS expectations for the 2020-21 plans. Figure 4 demonstrates that the formal guidance documents (Regulatory notice 1: Access and participation plan guidance[8] (RN1 2020-21) and Regulatory advice 6: How to prepare your access and participation plan[9] (RA6)) and telephone surgeries were the most useful methods for communicating OfS expectations. Staff stakeholders generally agreed that the guidance provided a comprehensive framework to produce the plans which, in turn, provided a workable framework for their access and participation activity. However, there were concerns that the two guidance documents were duplicative, lacked real-world examples, and did not effectively articulate requirements for a theory of change.

> 'The personal support via telephone surgeries…was extremely helpful. The Regulatory Publications 1 and 6 were useful, and it would have been even more useful if the information was combined'
>
> Head of APP, lower tariff, medium HE provider

Figure 4 | Helpfulness of guidance and support in communicating expectations



[8] See Regulatory notice 1: Access and participation plan guidance (OfS 2019.05), available at https://www.officeforstudents.org.uk/publications/regulatory-notice-1-access-and-participation-plan-guidance/

[9] See Regulatory advice 6: How to prepare your access and participation plan (2019.06), available at https://www.officeforstudents.org.uk/publications/regulatory-advice-6-how-to-prepare-your-access-and-participation-plan-effective-practice-advice/

Survey respondents were most positive about the telephone surgeries run by the OfS, with visits from the Director for Fair Access and Participation (DFAP) a close second (67 per cent and 61 per cent respectively stated that they were very or extremely helpful). These findings were reflected in qualitative survey responses and consultations with the sector. Many staff stakeholders lamented the limited opportunities to engage with staff directly following the move to the OfS from HEFCE, not just in relation to access and participation activity but more broadly. The sector appreciated the opportunities to discuss and contextualise their issues with a member of staff and often praised individuals that they had dealt with. Those that received visits from the DFAP appreciated the level of understanding displayed regarding providers' circumstances as well as an explanation for the rationale for the way the reforms had been designed.

'Policy Advisors remain the most useful resource available to us when preparing APPs. It is unfortunate that they are not as accessible to HE providers.'

APP Manager, medium, lower tariff HE provider

Staff stakeholders were least satisfied with email communication, which they felt had been impersonal and slow at times.

'OfS staff were very helpful in discussing specific queries and I appreciated their support. It used to be very helpful to have a specific named contact to discuss issues with, who knew about our university. I would welcome a return to named contacts in the future.'

Senior leader, lower tariff, large HE provider

'We had difficulty contacting OfS – there was no named contact and so it was impossible to get any quick answer to queries.'

Senior leader, lower tariff, small HE provider

3.3 Providers' experience and needs differed when developing plans

All smaller providers consulted expressed concerns over the proportionality of the OfS's approach and around 15 per cent of qualitative survey responses from smaller providers referenced this directly. They felt that the level of resource required to develop and implement the plans was disproportionate to their size, especially when they were already recruiting and supporting very high proportions of students from underrepresented groups. This was often exacerbated by resources which they saw as being tailored to larger providers.

'In a small institution…the demands of the APP preparation were severe. We concentrated resources on delivery…but the documentation and data analysis have to be accommodated within remits of posts (or in some cases a single post) that are already very full.'

Senior leader, lower tariff, small HE provider

'You have to jump over the bar whether you are a big or small organisation – interesting because if we set that against the students we are trying to support, it wouldn't work.'

Principal, small FEC

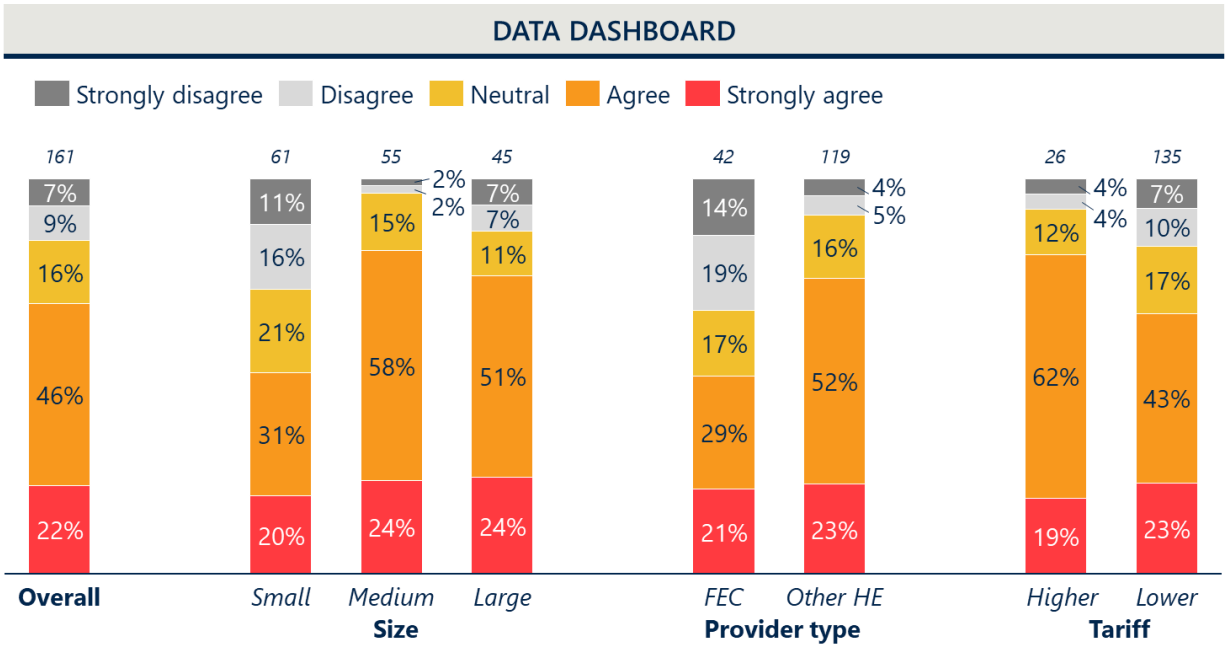
3.3.1 The data dashboard was valued but not usable for all

Overall, staff stakeholders felt that the OfS's access and participation dataset had supported a more in-depth understanding of access and participation issues than previously existed, as shown in Figure 5. It had allowed comparisons with other providers and provided useful sector context on national issues such as the awarding gap. However, respondents from medium (82 per cent), large (75 per cent) and other higher education (75 per cent) providers were much more likely to agree than those from small (51 per cent) and FEC (50 per cent) providers. Notably, there was disagreement that the dataset had supported understanding from respondents at small (27 per cent) and FEC providers (33 per cent). Consultations and qualitative survey responses supported findings from Nous' Part 1 report that this was due largely to the suppression of data for small numbers of students, in some cases rendering the dataset unusable. This often meant that staff in small providers had to recreate the datasets, costing significant resources and made more challenging by limited data capabilities.

> 'The data dashboard is a very useful tool for HE providers that are new to APP. It provides a rich source of data which helps in setting specific targets which are evidence-based where a provider does not have its previous data.'
>
> Member of access and participation team, lower tariff, small HE provider

> 'We don't have a data person in post as a small and specialist; because we have small numbers, a lot of the data we would like is not available on the dashboard.'
>
> Access and participation lead, lower tariff, small and specialist HE provider

Figure 5 | The OfS's data dashboard supported understanding of issues



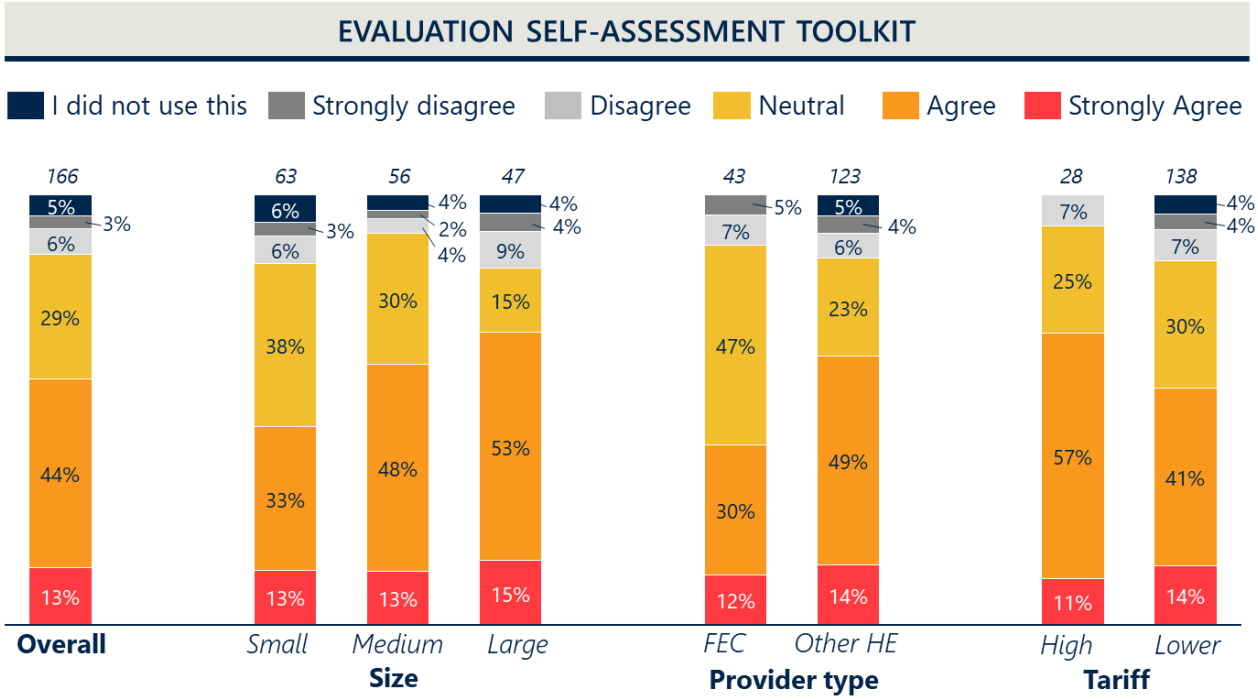
3.3.2 The evaluation self-assessment toolkit was less useful for smaller providers

'The resource that is required to deliver access and participation is large and evaluation is really the difficult part – there is a gap in the sector around the expertise available.'

Member of access and participation team, lower tariff, small HE provider

The evaluation self-assessment toolkit was similarly less popular with smaller providers and FECs. Staff stakeholders from smaller providers reflected in consultations that the evaluation self-assessment had been 'set up with large providers in mind' and that the process had been challenging. This was echoed in the quantitative responses shown in Figure 6, where small and FEC providers (46 per cent and 42 per cent respectively) were much less likely to agree that the toolkit had supported the development of a more robust evaluation strategy compared to large and other HE providers (68 per cent and 63 per cent respectively).

Figure 6 | The OfS's evaluation self-assessment toolkit supported the development of a more robust evaluation strategy than previous years



Note: 'I did not use this' or 'Did not experience' reflect responses from those who did not have personal experience of resources or processes.

3.3.3 Smaller providers and FECs required more support

Smaller providers and FECs were more positive that the support received through telephone surgeries and briefings effectively communicated the OfS's expectations. Consultations with larger providers suggested that the briefings and workshops did not provide a lot of new information, whereas smaller providers were less familiar with the requirements.

'Verbal briefing events were very well received, to sit alongside the written guidance…the visit from the Director was very useful and also very reassuring, it helped to cement the level of ambition in the institution.'

Access and participation manager, lower tariff, small HE provider

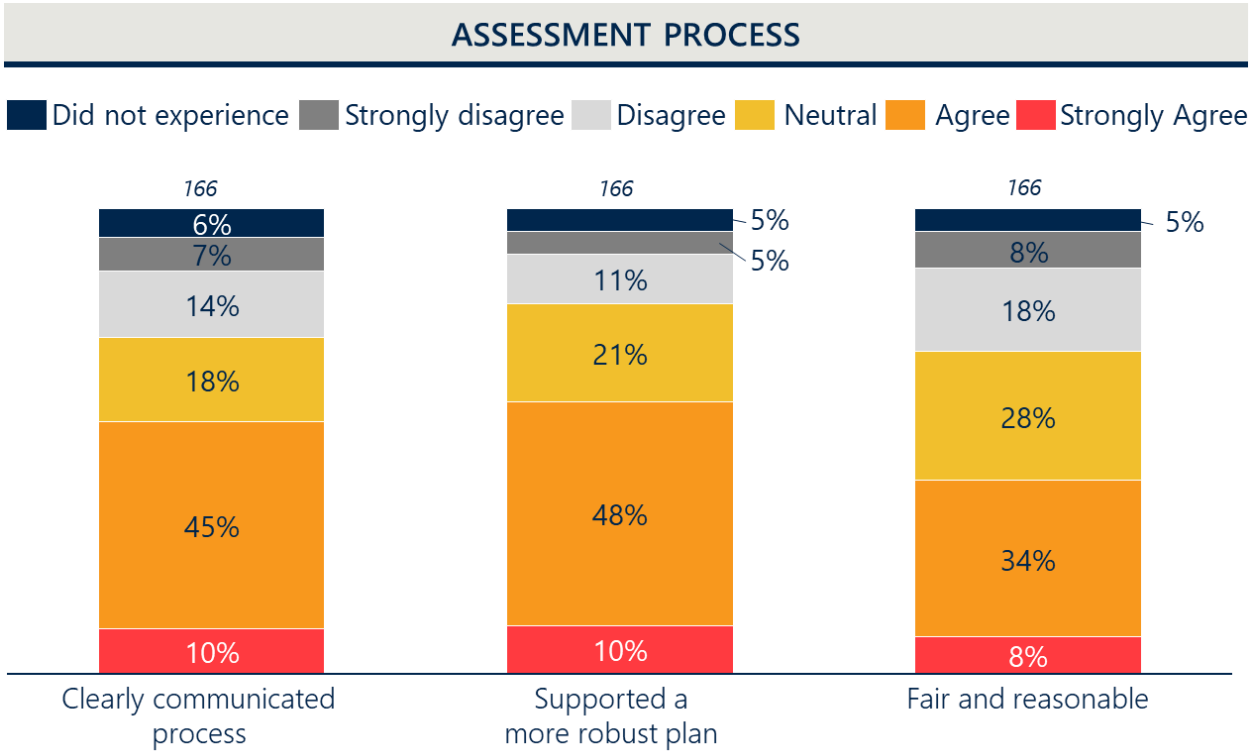
'The launch events were not quite a waste of time but had a real mixed bag of people and it was hard to find something in common. Generic sessions were also not helpful.'

Member of the executive, high tariff, large HE provider

3.4 The assessment process was challenging

Survey respondents were less positive overall about the assessment process, with 55 per cent agreeing that the process was clearly communicated, 58 per cent agreeing that the process supported a more robust plan than previous years, and 42 per cent agreeing that the process was fair and reasonable for their provider, as shown in Figure 7.

Figure 7 | Questions relating to the assessment process



Note: 'I did not use this' or 'Did not experience' reflect responses from those who did not have personal experience of resources or processes.

Smaller providers, including FECs, were more likely to agree that the assessment process had supported the development of a more robust plan than previous years (76 per cent small providers and FECs, compared to 49 per cent large and 57 per cent other higher education providers). This most likely reflected the fact that smaller providers, particularly independent providers who had not been through the access agreement process, would have required greater levels of support when developing their plans. The assessment process provided a point of contact to discuss challenges relating to provider context that was not available elsewhere.

Target setting was challenging and inconsistent

A common theme from the staff stakeholders was that the sector felt the OfS's rigorous negotiation process had encouraged providers to set overly ambitious access targets aligned to the OfS's KPMs, which were insufficiently context specific. Of the 137 staff members who provided qualitative survey responses, 15 per cent noted these concerns and all but one of the 28 consultations revealed this theme. The result was that the assessment process was often time-consuming and created challenges obtaining sign-off from governing bodies in already tight timeframes. The concern was most prevalent among small and medium-sized providers.

The reasons for this included:

- Providers were competing for a finite pool of target students. Students from low participation neighbourhoods (quintile 1 students in the POLAR4 classification) were often provided as an example where competition was strong.
- Providers recruiting in their local communities, mainly lower tariff providers and FECs, were more limited in their access to students from broad-ranging target groups. For example, students from Black, Asian and minority ethnic (BAME) backgrounds were unlikely to travel to rural areas to study at an FEC.

> '…Get institutions which are good at recruiting and supporting certain groups of students to work on getting more of them rather than expecting all institutions to chase the same groups of students out of context. KPMs should also be contextualised to the region each institution is in, [our area] has four HEIs, and all have worked collaboratively for a number of years to reduce P4Q1 neighbourhoods with success…this target should be disaggregated.'
>
> Senior leader, high tariff, medium HE provider

> 'Our targets had to be focused on national KPMs rather than using our own access profile. As we are a small provider who has moved away from franchised to validated provision, our data trends were not always stable. We would have preferred to have been able to set less ambitious and more realistic targets in some areas.'
>
> Senior leader, lower tariff, small FEC provider

3.5 Providers raised concern with communication

Staff and representative body stakeholders raised concerns over the consistency, frequency, and tone of the OfS's communications.

3.5.1 There were reported inconsistencies in communications

Inconsistency of messaging in relation to the assessment process came up in half the consultations and 14 per cent of the qualitative staff survey responses. Where this was raised, staff stakeholders felt they received inconsistent advice on their own plans as well and, in some cases, conflicting advice compared to other providers. The main area of confusion related to the alignment of targets with the national KPMs. The RN1 2020-21 guidance and messaging from the DFAP made it clear that providers should set targets relating to the KPMs only where they made sense in their contexts. However, the majority of providers, consulted through interviews and focus groups, reported that they had been encouraged to set targets aligned to

the national target groups. This created more significant concerns for smaller and lower tariff providers where their target groups were less likely to align with the national KPMs.

> 'Points from the Director's initial briefing were not always reflected in the assessment process (particularly the Director's emphasis on each provider identifying its own strategic priorities and focus).'
>
> Head of access and participation team, lower tariff, large HE provider

> 'The messages seemed mixed in terms of 'targets meaningful to your organisation' and national targets we had to engage in even if they weren't demonstrably a necessary priority for the University. It felt that in the end there were some 'must do' things, irrespective of the evidence of data priorities.'
>
> Head of access and participation team, lower tariff, medium HE provider

3.5.2 The tone inhibited an open dialogue with the sector

Approximately half the consultations with staff stakeholders and representative bodies raised concerns that the OfS took an adversarial rather than a collegiate approach to enforce access and participation regulation. Some raised concerns that the tone and methods of communication prevented an honest and open dialogue about the challenges they faced, which could present a risk for the OfS in understanding upcoming problems. Despite this, there was acknowledgement that the OfS needed to take a different stance to HEFCE and OFFA and that a more forceful tone was likely to lead to greater compliance. Staff and representative body stakeholders also acknowledged a recent shift towards a more supportive and collegiate tone from the OfS as a whole.

> 'HE is a human interaction and the OfS lost the human element. The tone towards the whole sector was not helpful... the whole experience could be so much more effective – we're scared about reporting events and picking up the phone and asking.'
>
> HE manager, FEC provider

> 'Though it has improved during 2020, the tone of communications was slightly adversarial in the beginning. It could have done with being more supportive and collaborative.'
>
> Access and participation manager, lower tariff, medium HE provider

> '...all providers are part of a movement to affect positive change, but it felt at the start that it was an authoritative approach. On reflection, this has led to bigger institutional buy-in and greater weight on APP than before.'
>
> Access and participation manager, high tariff, large HE provider

4 Changing ambition

This section explores the extent to which the reforms and activities implemented by the OfS have led to increasing ambition in access and participation across the sector. The analysis draws on data from student and staff stakeholder surveys and consultations as well as insights from the OfS's Transforming Opportunity in Higher Education[10] report.

4.1 The 2020-21 access and participation plans represented greater ambition than previous years

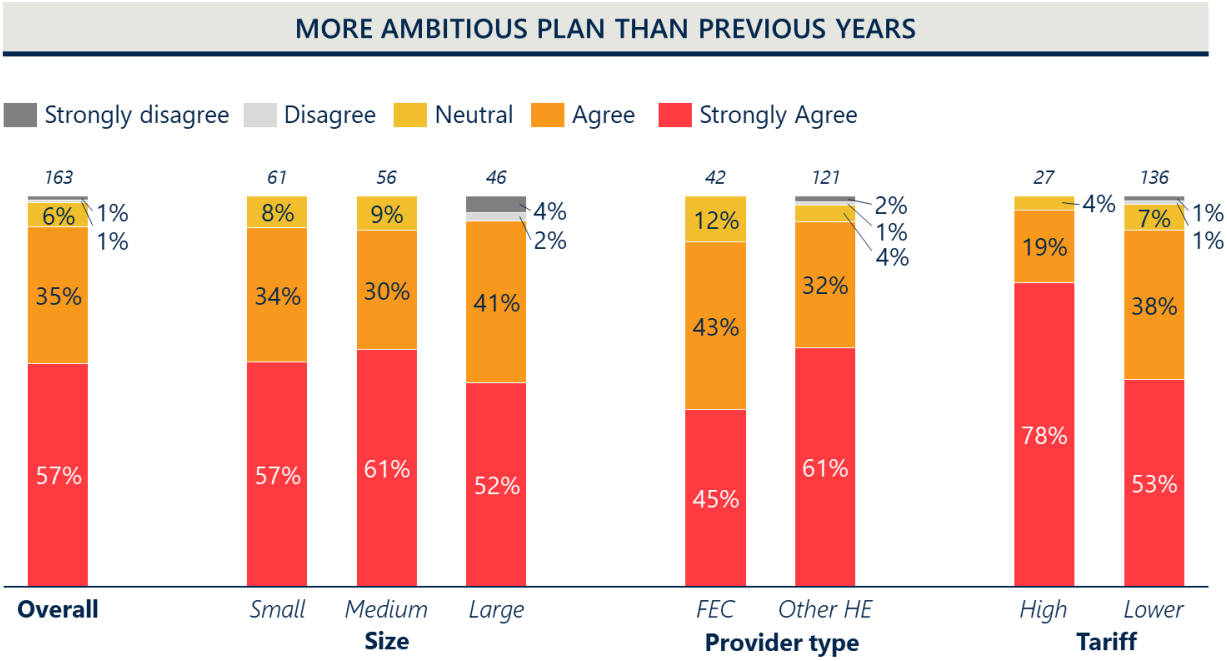
The OfS's 'Transforming Opportunity in Higher Education' report identified a step-change in ambition in the access and participation plans, 'not only in the outcomes providers are striving for, but also in their commitment to continuously improving the ways they work towards those outcomes'. The report also found that providers' commitments set out in the targets 'should bring about significant progress towards reducing inequalities in access and participation' if implemented successfully.

'I think it has created a new level of ambition…it has driven the APP agenda up in terms of senior leadership.'

Representative body

The findings from the staff stakeholder review have added weight to the OfS's previous report. Almost all (92 per cent) respondents agreed that their provider's access and participation plan showed greater ambition than in previous years. Figure 8 illustrates overall responses to this question as well as a breakdown by provider type.

Figure 8 | The 2020-21 plan is more ambitious than previous years



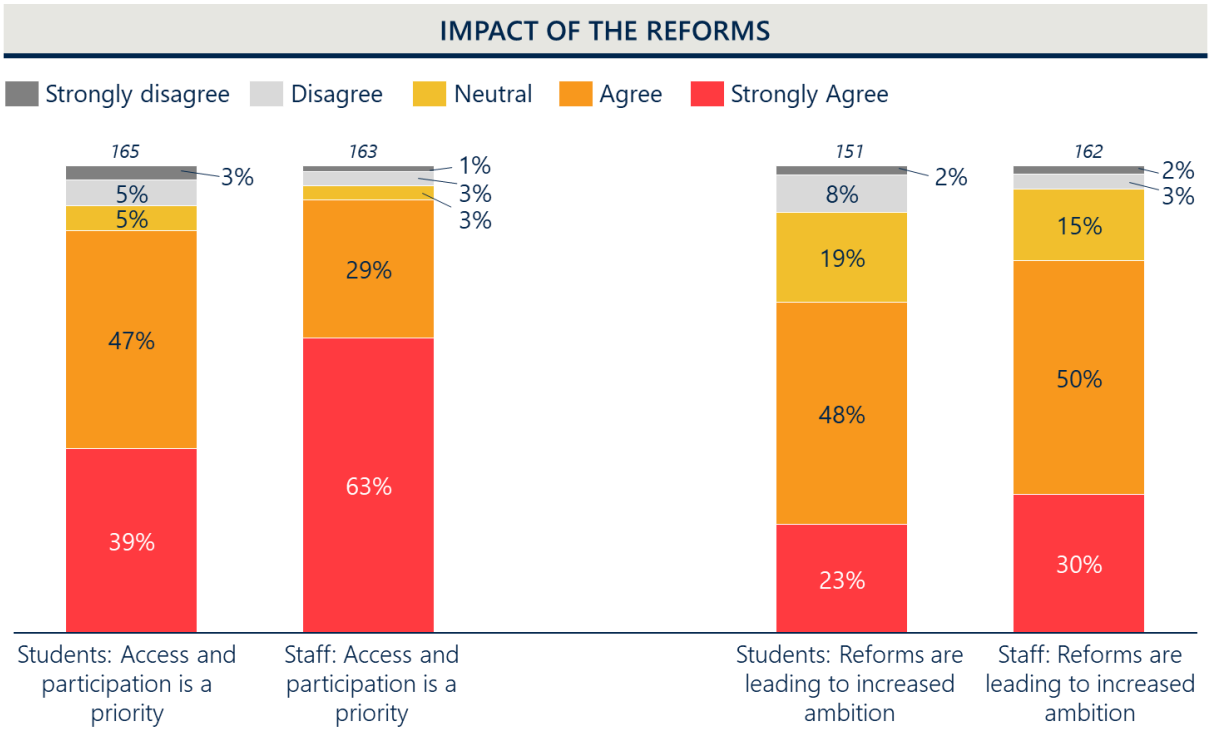
[10] See Transforming Opportunity in Higher Education, (OfS 2020.06) available at https://www.officeforstudents.org.uk/publications/transforming-opportunity-in-higher-education/

Figure 8 illustrates that there was little variation in plan ambition by provider size. Similar proportions of respondents at small, medium and large providers, strongly agreed or agreed that their plan showed increased ambition (all over 90 per cent). However, respondents from FECs were less positive, with 45 per cent in strong agreement compared to 61 per cent from other HE providers. Respondents from high tariff providers were more likely to agree strongly that their plans represented greater ambition (78 per cent compared to 53 per cent for lower tariff providers).

4.2 Student and staff stakeholders were positive that the reforms were leading to increasing ambition

Student stakeholders (including students' union officers, staff members and student representatives) and provider staff responding to the surveys were both positive that access and participation was a current strategic priority and that the OfS's reforms had led to increasing ambition (see Figure 9). Greater proportions of staff stakeholders strongly agreed that access and participation was a priority (63 per cent compared to 39 per cent for student stakeholders). However, student stakeholders were almost as positive as staff that the changes to access and participation regulation were leading to increased ambition (71 per cent compared to 80 per cent). Many staff stakeholders disagreed that they themselves, or their provider, were more ambitious or passionate about access and participation as a result of the reforms, but largely acknowledged that they had supported more ambitious approaches.

Figure 9 | Views on current prioritisation of the agenda and the impact of the reforms



4.3 The OfS's reforms and activities had varying impact

The survey asked staff stakeholders to select three of the OfS's reforms or activities which had the greatest influence on access and participation ambition. The frequency of responses is presented in Figure 10, with the key reforms highlighted in dark blue.

Figure 10 | Reforms with greatest impact on ambition

4.3.1 Five-year timescales have had the greatest effect

The move to five-year planning timescales and targets had the greatest impact on ambition according to the provider survey responses. Consultations found that whilst the targets were challenging, they had provided a springboard for more focused and ambitious access and participation work.

> 'The five-year view is much better than taking it in 12-month sections. I think it has made us think more openly about what we can achieve – we have been thinking outside the box about ways in which we could enable change.'
>
> Member of the executive, FEC provider

> 'The five-year time frame was a welcome progression. Annual plans have long been recognised as extremely limited in creating a cultural shift within universities, schools and communities. This is the most beneficial change.'
>
> Senior leader, lower tariff, large other HE provider

> 'The move to five-year plans has undeniably had a positive impact…allowing us to be far more strategic and implement long-term plans, rather than reactive, short-term measures that show instant results over a one-year period.'
>
> HE manager, FEC provider

4.3.2 Other key drivers supported ambition

Alongside five-year timescales, providers felt that the data dashboard (selected by 40 per cent of respondents) had a strong impact on ambition by guiding a more evidence-based approach. Monitoring ongoing conditions of registration was selected as the third most impactful change (35 per cent) having increased buy-in, especially among senior leaders. Both national KPMs and RN1 2020-21 (29 per cent) were also selected as having heavily impacted ambition.

'...the data provided by OfS has narrowed our approach to focus on specific areas where the most progress is most needed.'

Head of access and participation, large, lower tariff HE provider

'APP becoming a condition of registration has had a positive effect on the priority given to access and participation.'

Member of the executive, FEC provider

'The launch of the OfS KPMs was particularly useful. It enabled benchmarking of institutional challenges against the national picture, and thus highlighted the contribution the institution could make towards the achievement of sector-wide priorities.'

Head of access and participation, large, lower tariff HE provider

4.3.3 Other influences

Further to this, staff and student stakeholders felt that other external factors, both positive and negative, had combined with the OfS's reforms to have an impact on their access and participation work. Examples of positive influences included external movements such as Black Lives Matter, the collaboration between partners, changes to senior leadership and innovation in access and participation initiated by COVID-19. Conversely, the COVID-19 pandemic and changes to early education provision, particularly in the arts, had a negative effect on access and participation work.

The following section explores how these various drivers have led to changing behaviour in the sector that the OfS aimed to incentivise and the varying impact of these drivers on different provider types. Section 6 then considers potential unintended consequences of the OfS's reforms.

5 Changing behaviour

This section explores changing provider behaviour across the sector. This considers both the positive changes taking place, particularly relating to the opportunities created by the reforms, as well as the challenges faced by providers of differing types.

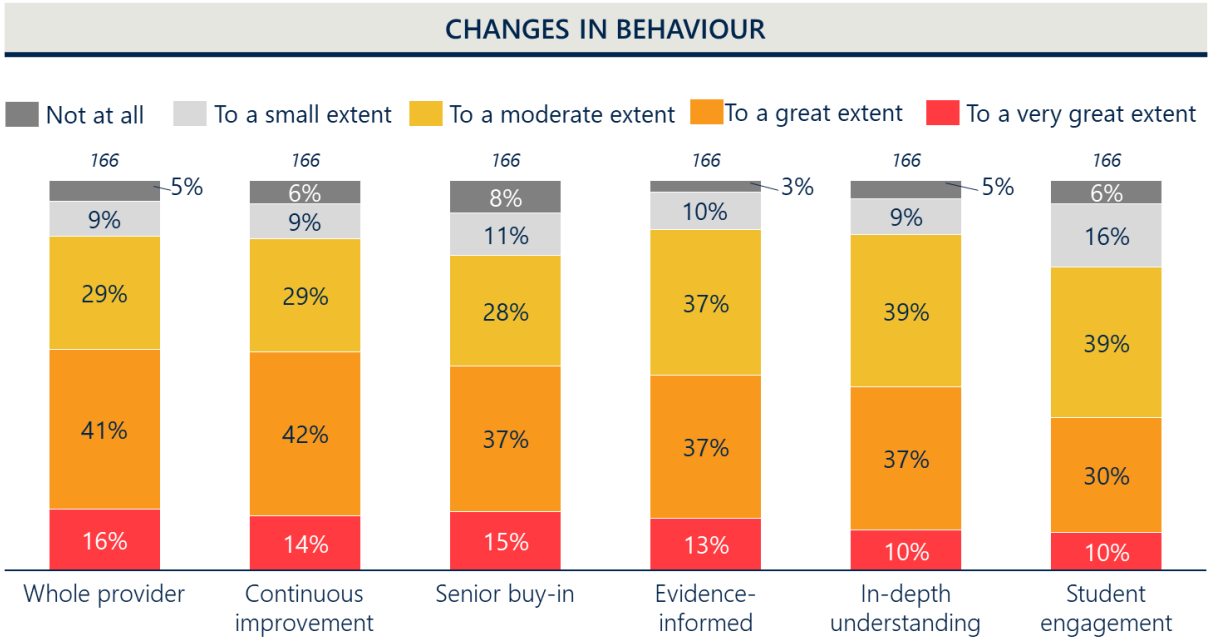
5.1 The OfS reforms have accelerated a shift in culture to varying extents

'The plan has enabled thinking about bigger, more ambitious programmes and building in the evaluative process from the beginning. It's changed governance and is building student engagement.'

APP manager, large, high tariff provider

Nous' Part 1 report and consultations with staff and student stakeholders during Part 2 indicate a culture shift in access and participation. The OfS's reforms appear to have been a driver, accelerating changes that were already taking place across the sector. Figure 11 demonstrates positive shifts in behaviour that the OfS aimed to incentivise since the sector began responding to regulation changes in early 2019. Shifts to whole-provider approaches, a greater commitment to continuous improvement and increasing senior buy-in were the most positive.

Figure 11 | Changes in provider behaviour over the previous 18 months



5.1.1 Changes to regulation have increased senior accountability

Consultations with staff stakeholders and representative bodies across the sector suggested that the ongoing condition of registration and increased expectations for governing bodies to engage with the plans had increased accountability at senior levels. Fifty-two per cent of staff

survey respondents had observed increasing senior-buy into a great, or very great, extent since the introduction of the new plans, as shown in Figure 11.

Approximately half of staff stakeholder consultations reported that the ongoing condition of registration had a positive influence on senior buy-in. Furthermore, governing bodies were frequently required to review targets and associated data, particularly where providers had gone through multiple rounds of assessment to increase or change targets. This increased scrutiny represented a step-change in the examples provided by the sector and served to increase the relative priority of the agenda in leadership teams.

> 'The Chair of our APP committee is our VC, that was a strategic decision on their part to ensure that APP was getting the focus it should. That was three years ago, well in advance of submitting the first plan. It was partly to prepare for submission of the first APP – but also broader than that.'
>
> Academic registrar, medium, lower tariff, independent HE provider

> 'The Chair of Council is pushing the drive for greater ambition – she is trying to push for them to be more ambitious than the targets set internally. The fact she is trying to be more ambitious might mean they actually make progress.'
>
> Student officer vice president (education), high tariff, medium HE provider

> 'The registration requirement…has enabled us to prioritise access and participation at the strategic level within the institution and engage our Board and leadership team in a way that was not possible previously as an 'alternative provider'.'
>
> Senior leader, lower tariff, medium, independent HE provider

> 'The move to a five-year timeframe, and with added scrutiny on targets and activities within the APP, has made the process more engaging for senior leadership.'
>
> Senior leader, lower tariff, large HE provider

5.1.2 Increasing use of data represented a step-change

Part 1 of Nous' review demonstrated that providers referenced increasingly broad student groups in their assessment. They also drilled into more detail for disaggregated groups and intersections of disadvantage.

Consultation with the sector revealed that increasing data use and maturity driven by the requirements in the OfS's RN1 2020-21 guidance, supported by the data dashboard, enabled a greater understanding of access and participation issues across the sector. Figure 11 demonstrates that 47 per cent of surveyed staff stakeholders agreed that understanding of key access and participation issues had increased over the past 18 months to a great or very great extent.

However, challenges concerning the emphasis on data use came up as often as comments regarding the positive impact of data in staff and representative body consultations. Both experiences were discussed in more than half the consultations and approximately 20 per cent of staff qualitative survey responses. Challenges were often due to the suppression of data for smaller providers and limited metrics available in the dataset. The relatively small cohort sizes

in smaller providers made target-setting challenging due to large percentage changes in outcomes year-on-year.

> 'Access to data was a huge one for us – we have been able to articulate [issues] in that way, and that has got senior leader buy-in; I'm constantly banging on about HE, but now whenever I go in a senior meeting people ask how are we going against the targets; We had struggled in a big way previously.'
>
> Higher education manager, small, FEC provider

> 'The launch of the OfS APP data dashboard has allowed the data team to pinpoint the most significant institutional challenges which have supported focused investment in these areas.'
>
> Head of access and participation, lower tariff, large HE provider

> 'The data dashboard and OfS dataset has proved very useful and has given us insight into the issue of intersectionality that we had not previously been able to analyse as fully. However, the amount of data within the dashboard is extensive and this makes it time-consuming to fully analyse and assess.'
>
> Senior leader, lower tariff, large HE provider

> 'As a small provider of HE, the internal skills and resources to analyse data in a meaningful way are limited. Available data on the OfS dashboard is also limited, due to small numbers of students. These limitations have made it necessary to draw conclusions and set targets based on internal data, the accuracy of which is sometimes difficult to assure.'
>
> Principal, small FEC provider

5.1.3 Providers have made progress towards more evidence-informed whole-provider approaches

The stakeholder review supported findings from Nous' Part 1 report that the plans demonstrated increasingly evidence-informed and whole-provider approaches. Half of the staff survey respondents stated that evidence-informed approaches had increased to a great or very great extent over the last 18 months. The proportion was 57 per cent for increasing the whole-provider approaches (Figure 11).

Qualitative survey responses and consultations supported these findings. Increasing the whole-provider approach was one of the most common themes arising from consultations, with 22 per cent of staff qualitative survey responses referencing this change and 85 per cent of provider consultations. Strategic and evidence-based approaches were also widely reported, with references appearing in 18 per cent of qualitative responses and 75 per cent of consultations. Providers cited a range of drivers for this which are outlined in Table 3.

Table 3 | Drivers of whole-provider approaches

Outcomes-focused targets 'Having clear outcome-based targets has meant that these are being embedded into institutional strategic planning.' Head of widening participation, high tariff, large HE provider	**Five-year plan and whole lifecycle** 'The five-year plan and whole student lifecycle approach have been beneficial in enabling us to align our APP with our education strategy. In doing so, the plan has gained greater profile, and the targets within it are monitored at a high level within the institution. It has also increased the focus on monitoring the impact of the activities we undertake to meet our APP targets.' Head of access and participation, large, lower tariff, HE provider
Data 'The thorough analysis of data during development of the new plan allowed us to have a more evidenced-informed approach to our targets and planned activities. We have used this evidence-informed approach to focus on the under-represented groups when we have particular gaps…the new data dashboard released by the OfS…has led to more effective sharing of the data across the college.' Manager in access and participation team, high tariff, medium HE provider	**RN1 2020-21 guidance** 'The whole institution approach in the guidance has been helpful – now the WP department has to be integral to the university…[it] has enabled [us] to get each department and school to write a mini APP plan and spread the responsibility across the university.' Head of access and participation team, large, lower tariff, HE provider

Staff stakeholders provided examples whereby they had implemented long-term strategies and governance structures in their access and participation work. Table 4 provides some examples.

Table 4 | Examples of changing governance structures and long-term initiatives

There were examples of new governance structures, new appointments and changes within current structures.
'[Our new institutional] strategy, alongside the requirement to meet the ongoing OfS conditions of registration related to access and participation, has seen the appointment of a Student Outreach Manager, as well as the establishment of a Widening Participation Working Group that is tasked with preparing and implementing [our] Widening Participation Strategy.' Senior leader, lower tariff, medium HE provider
'There is now additional resource…to have stakeholder/impact managers to embed [changes] in the curriculum and also, within faculties, there are dedicated colleagues to get APP rolled back within faculties and to report back centrally.' Member of senior leadership, low tariff, large HE provider

'I am responsible for APP and all WP work and have my own team now, in part due to the way these reforms have gone through…it has given me much more access to human resource and we have grown year on year off the back of the things we want to do in the APP.'

Member of the executive, FEC provider

'…[a positive change has been the] appointment of a new PVC with relevant expertise particularly to lead on this work. Changes to membership of the board to make it more diverse [have also] increased the level of challenge on participation metrics.'

Senior leader, lower tariff, medium HE provider

There were also examples of long-term strategies and initiatives being implemented across providers.

'We do welcome the renewed focus the OfS has brought to widening participation in HE nationally…raised societal awareness of the access and participation agenda has made projects like The Employ Autism Higher Education Network possible…During the 18-month programme, careers and employability professionals at [our provider] will receive specialist training and support from Ambitious about Autism to work specifically with autistic students, helping to guide them into sustainable employment.'

Member of staff, low tariff, large HE provider

'…Mind skills programme is the biggest one… it's about resilience and psychological flexibility, a holistic and long-term approach. It's given us space to really see what we can do on that agenda and it speaks to our agenda, a lot of mature, part-time students who are financially independent and have kids at home.'

Member of the executive, FEC provider

'One provider developed a race equality strategy, which is a really good example where students and staff have worked collaboratively…another co-developed a mental health strategy with students.'

Representative body

5.1.4 The introduction of a theory of change has had mixed reviews

Analysis of the plans in Part 1 of Nous' review highlighted the variation in the ways in which providers were representing the theory of change, suggesting that the OfS produce further guidance or examples of good practice. The staff stakeholder review reflected varying degrees of comfort and confusion regarding the requirement for a theory of change in the plans. Thirty-five per cent of staff and representative body consultations were positive about the requirement, but 50 per cent expressed the view that it had been challenging.

Positively, providers described ways in which the theory of change allowed them to better align previously disparate activities to understand linkages and aggregate outcomes. It also allowed for more effective initiatives and programme planning. However, others considered that the requirement was a distraction, inaccessible to a lay audience or had been over-complicated in the guidance documents.

'Even with a lot of background knowledge on theory of change, it was over-complicated. But once we had cut through the complex guidance that was provided, it was a good tool to have sensible conversations.'

Medium, lower tariff, other HE provider

'I'm finding the theory of change a useful addition – we could utilise a lot of the work undertaken from NCOP [Uni Connect] with our theory of change.'

HE Manager, FEC provider

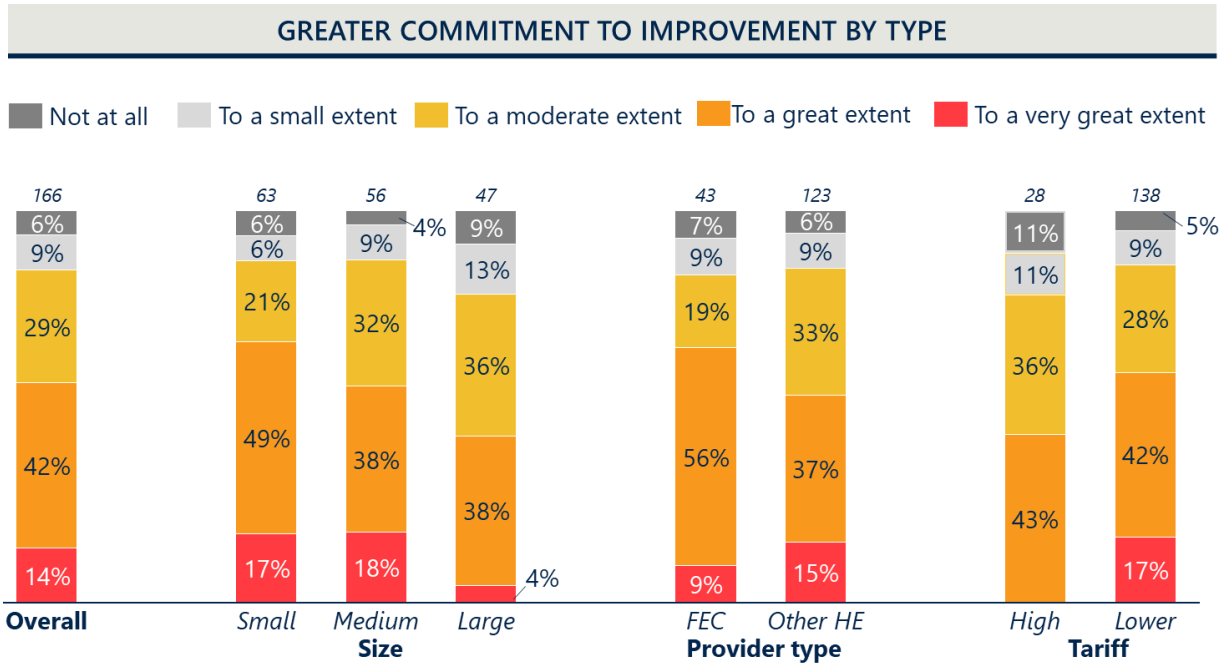
'The theory of change models…helped us to broaden the scope of our ideas and encouraged us to embrace new possibilities'

Member of senior leadership, low tariff, medium HE provider

5.1.5 More robust evaluation and monitoring underpinned providers' strategic work

Over half (56 per cent) of staff who responded to the survey had observed increasing commitment to continuous improvement to a great, or very great extent over the last 18 months. This increased to 66 per cent for small providers and 65 per cent for FECs. High tariff providers had observed these changes to a lesser degree (43 per cent to a great extent and none to a very great extent). Figure 12 illustrates the variations in responses by provider type.

Figure 12 | Greater commitment to continuous improvement by provider type



Consultations revealed that changes to evaluation approaches represented a significant step-change in maturity, with 70 per cent of interviews with staff stakeholders reporting more robust evaluation and monitoring processes.

'Evaluation is one of the most exciting parts of the APP.'

Head of access and participation, large, high tariff, HE provider

'We have really improved in terms of evaluation – people delivering activities are saying: "What are we trying to do, how will this be measured and when will this be reported?". When it's not working, we stop it. It has focused our minds on evaluation in a helpful way.'

Access and participation manager, medium, high tariff, HE provider

'Evaluation is a longer-term change – something that larger universities will have been doing for a number of years – but small and specialist where you are it [the only dedicated resource] – it will take time to be embedded as a cultural change – it's a positive outcome of the shift to APPs.'

Representative body

'Evaluation has been the biggest step-change. We're very hopeful about what the evaluation and impact will lead us to find out.'

Student development manager, FEC provider

5.1.6 Smaller providers were limited by evaluation capacity

Although survey responses suggested that smaller providers and FECs had made the greatest strides in evaluation capacity, it was clear from consultations that they were starting from a lower base in terms of capabilities and that capacity constrained their efforts. This was discussed in 30 per cent of staff stakeholder consultations.

However, the emphasis on evaluation had sometimes encouraged productive collaborations between small and large providers to support capability-building, including through existing Uni Connect partnerships. Providers of varying types called for the OfS to further encourage collaboration with other providers to drive best practice and achieve a common goal of widening access and participation in the sector.

'For small institutions, it makes it very difficult to measure the impact of changes…We need to do more shared evaluation across smaller institutions doing similar initiatives – then we would get data that is worthwhile and not statistically insignificant.'

Head of access and participation, small, lower tariff, other HE provider

'Engagement with the NCOP/Uni Connect partnership has helped to build awareness and appetite for outreach activity, allowing greater awareness of what the larger universities typically do, as well as capacity building in evaluation as our local consortium ran training events on the development of things like theory of change.'

Manager, small, lower tariff, HE provider

5.2 Student engagement has been a challenge for many

The findings from Nous' Part 1 and Part 2 reviews suggest that student engagement in access and participation work has increased. However, providers reported difficulties in engaging students with plans, particularly due to the timings and lack of necessary infrastructure.

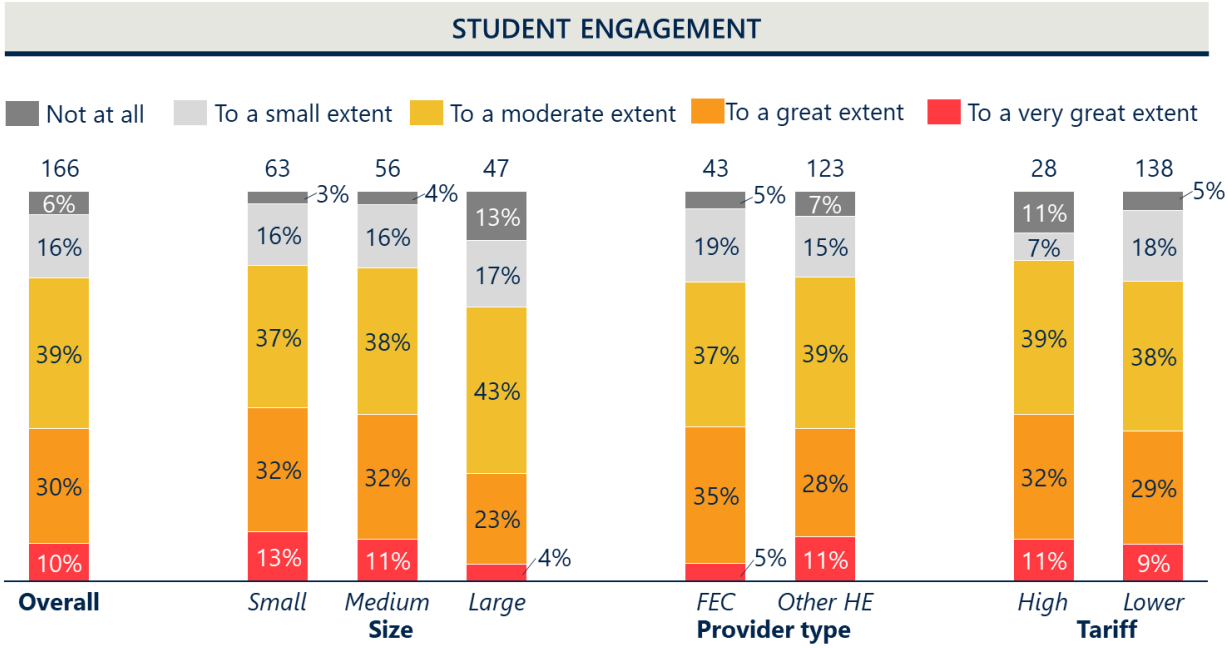
5.2.1 Plans described mechanisms for student engagement

In Part 1 of this review, Nous analysed providers' updated access and participation plans in relation to previous years. Plans revealed a positive trend in student engagement across the sector. The plans demonstrated that mechanisms were largely in place to engage and consult with diverse student groups and that student-led activities were increasingly diverse.

5.2.2 Providers agreed that students were more meaningfully engaged than previous years

Responses from the provider survey in Part 2 supported analysis from Part 1. Over three quarters (79 per cent) of respondents to the staff stakeholder survey had observed more meaningful engagement with students in the development and delivery of the plans to at least a moderate extent. However, only 40 per cent believed student engagement had increased to a great or very great extent (Figure 13), which was lower than other changes observed such as senior staff buy-in or whole-provider approaches (Figure 11).

Figure 13 | Staff stakeholder views on student engagement by provider type



Staff stakeholders at small (82 per cent) and medium (81 per cent) providers more strongly believed student engagement had increased than those from larger providers (70 per cent). Smaller other HE providers saw greater improvements, compared to FECs. Consultations with small and specialist provider staff and students typically reported closer relationships between the staff and student population due to smaller cohort and class sizes.

> 'Wider engagement across the university has been a huge positive, including with more students.'
>
> Senior leader, lower tariff, medium HE provider

> 'Over the last 18 months, consultation with the student body has also significantly helped to develop our access and participation work. Most notably, our Vice-President Student

> Voice conducted some excellent research with her peers on the experience of our black students and has published a series of recommendations.'
>
> Head of access and participation team, high tariff, medium HE provider

However, there were challenges in engaging students. Staff stakeholders from smaller providers reported challenges with student engagement where they lacked students' unions, and, therefore, the governance processes commonly found in larger providers. Those with students' unions struggled with the annual turnover of representatives, which challenged the continuity in student engagement. Providers with substantial distance learning and mature student populations also cited challenges engaging students due to their other commitments.

> 'We have struggled to get our students who are studying at a distance to be involved, especially within the access and participation plan, in a way that does not impose additional pressures on their time – for example, we do struggle to get them together for co-creation approaches.'
>
> Senior leader, lower tariff, large HE provider

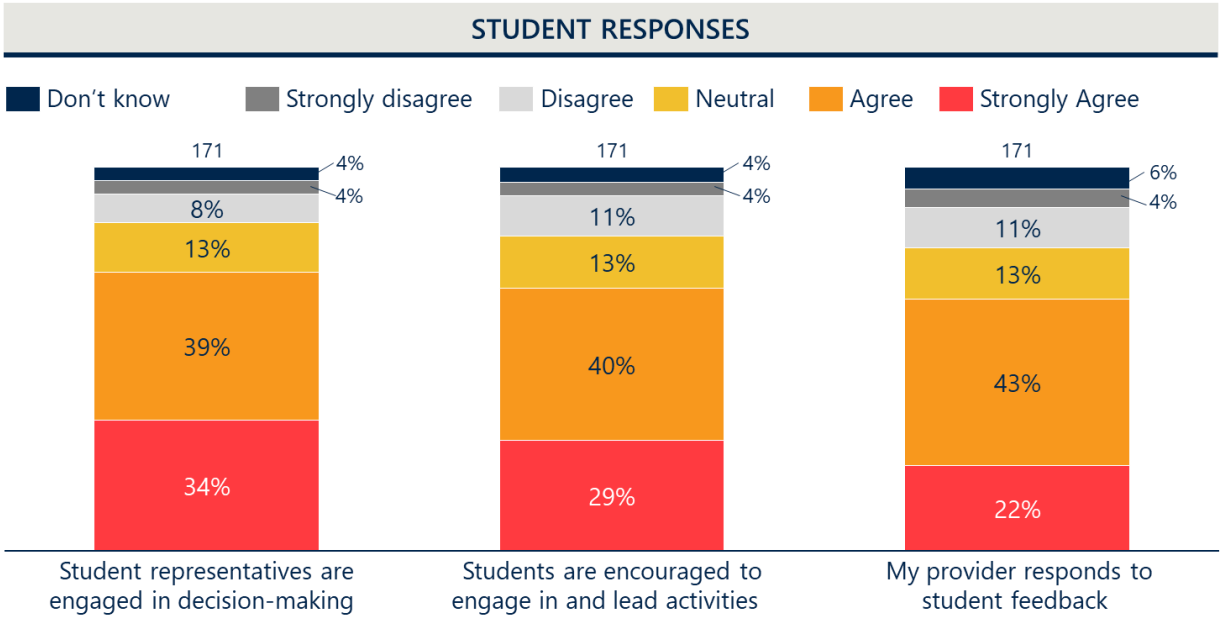
> 'The annual cycle of inducting a new cohort of SU officers into the world of APP is challenging, and each year's engagement can depend on the people voted into the officer roles.'
>
> Head of access and participation team, high tariff, large HE provider

5.2.3 Student stakeholders described engagement challenges

Students' union officers and staff, and student representatives, generally agreed that students had opportunities to engage with access and participation, as shown in Figure 14. This included engagement in decision-making (73 per cent) and in activities relating to access and participation (69 per cent). These responses supported the broadly positive findings from Part 1 of this review.

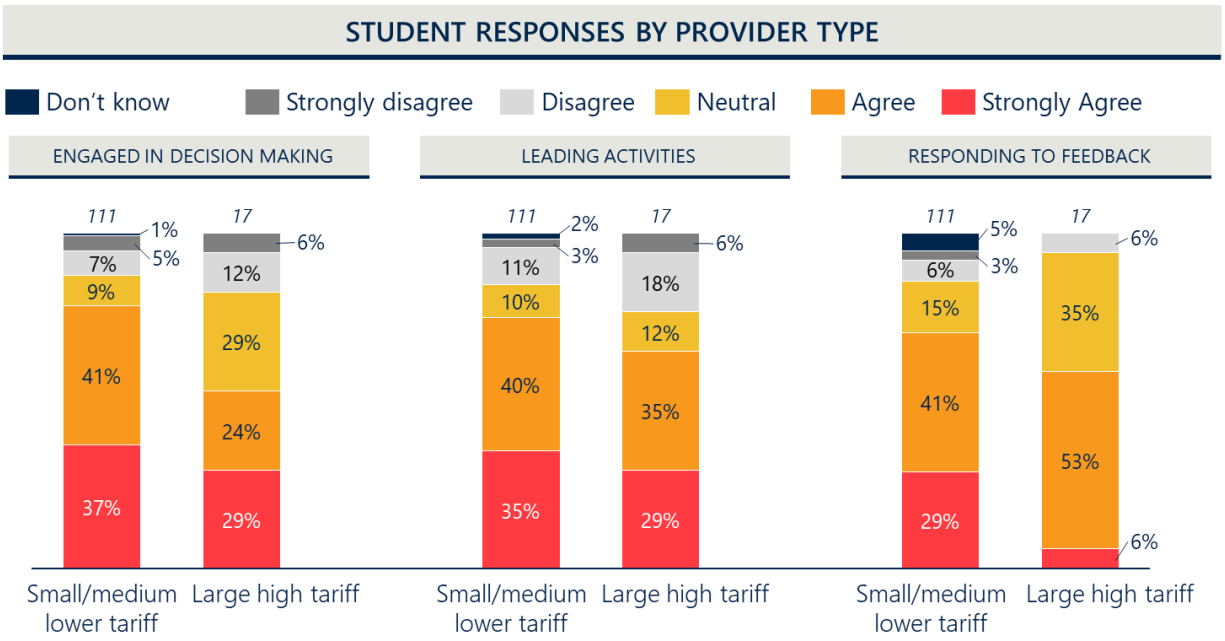
However, there were some concerns that student engagement was tokenistic and student stakeholders were less positive that their provider responded to student feedback, with only 65 per cent agreeing that this was the case. Part 1 similarly found that descriptions of steps taken as a result of student consultation varied in detail, with not all clearly outlining these.

Figure 14 | Student stakeholder views on student engagement



Analysis by provider type in Figure 15, shows that student stakeholders at small, lower tariff providers (including FECs) felt more engaged in decision-making (78 per cent agreement compared to 53 per cent at large high tariff providers) and in leading activities relating to access and participation (75 per cent compared to 64 per cent). They were also much more likely to feel their feedback was listened to (70 per cent compared to 59 per cent).

Figure 15 | Student engagement by provider type



Note: Figure 15 compares responses from providers which are both small/medium and lower tariff to those from providers which are both large and high tariff. Together, these groups make up 128 of the 171 total survey responses.

Isolated comments from student stakeholders in large providers suggested that their input was tokenistic.

'My provider seems to be using students in a tokenistic way and does not appear to be publicly addressing inequalities in access and participation.'

Students' union officer, large, high tariff, HE provider

'My provider does respond to student feedback on inequalities - but the responses are incredibly weak and seem like a PR stunt.'

Part-time students' union officer, large, high tariff, HE provider

Students provided mixed feedback regarding their capacity to lead on activities. Around a quarter of survey and interview respondents believed that students were listened to and taken seriously. However, others expressed concerns relating to this. Table 5 provides examples.

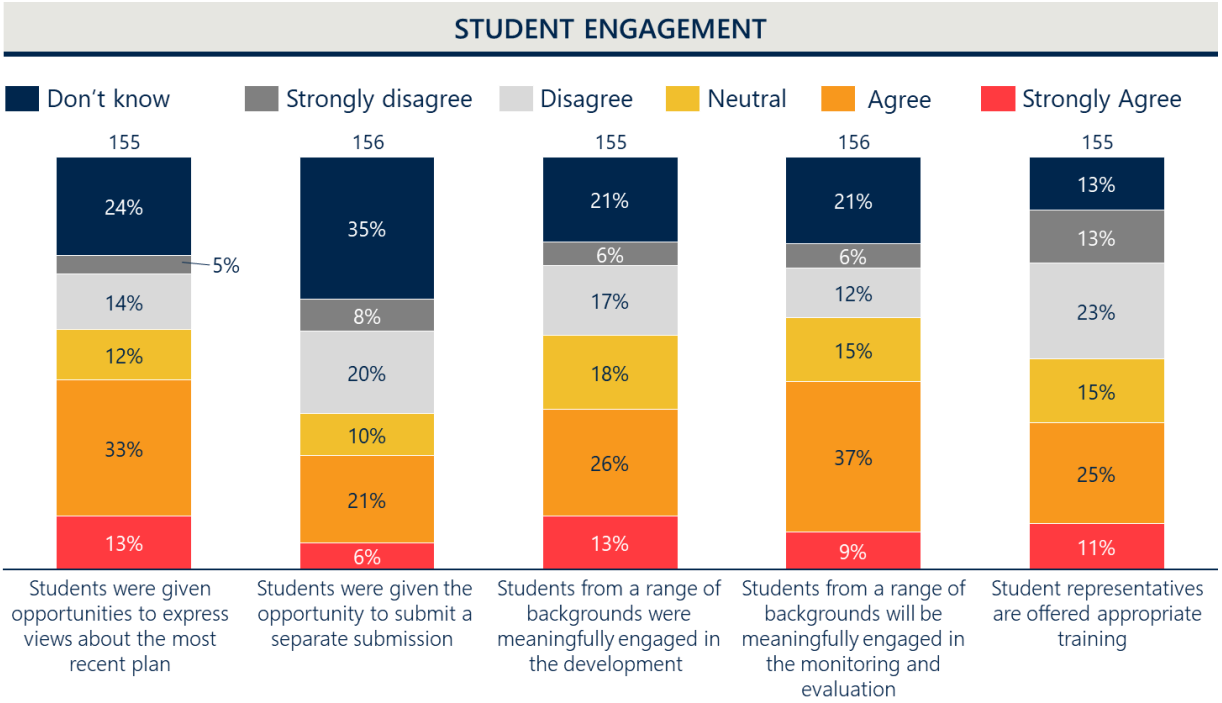
Table 5 | Examples of limitations on student engagement

Approximately a quarter of student stakeholders consulted noted that there was a concentration of engagement in decisions with elected students' union officers, but few efforts to expand this in a meaningful way. 'The SU top-level representatives were definitely engaged at a number of levels in development, but I can only recall limited hasty instances of engagement with students from relevant backgrounds from the university's side.' Students' union officer, high tariff, large HE provider
There were examples of siloed activities between the students' union and the provider to support the agenda. 'There are huge amounts of volunteer efforts, but there is no attempt to utilise this in a structured way to further an access and participation agenda.' Students' union officer, high tariff, medium provider
There were isolated cases of providers not responding to campaigns led by students 'Where there have been student-led campaigns on student voice and furloughing issues, we have been met with disregard and non-committal promises to improve the relationship and co-create solutions.' Vice principal (education), high tariff, large HE provider

5.2.4 Timings made engagement in plan development more difficult

Respondents to the student stakeholder survey were less positive about student engagement with plans than they had been about engagement with access and participation generally, as shown in Figure 16. Relatively few agreed that they were given opportunities to meaningfully engage with their providers' plan development (39 per cent) or provide a separate submission (27 per cent). By comparison, almost half (46 per cent in each case) agreed that students had opportunities to express views on the plan and engage in monitoring.

Figure 16 | Student engagement with plans



Note: The number of responses to the second section of the student stakeholder survey (Figure 16) was slightly lower than the first section (Figure 14) due to drop-offs. 'Not applicable' responses for each question in Figure 16 have been removed.

Staff and student stakeholders expressed the view that tight timescales had limited the scope for meaningful student engagement during plan development. Staff pointed to the timescales afforded by the OfS as a key concern, but student stakeholder responses alluded to longer-standing issues of rushed or 'tokenistic' student engagement.

> 'The timing made it particularly difficult to consult with students on the APP content, which was a requirement of the submission.'
>
> Head of access and participation, large, lower tariff, HE provider
>
> 'We were asked to pull together a student panel a week before it was submitted. It's not driving any of the outcomes.'
>
> Students' union executive officer, lower tariff, medium HE provider
>
> 'The university asks for engagement at the very last minute – usually the day before it is submitted – and will frequently write a response from the SU for us to 'sign off'. It is made quite clear that we need to be complimentary about the work as otherwise it can damage the institution.'
>
> Students' union staff member, high tariff, large HE provider

Student engagement across both plan development and execution was higher at small, lower tariff providers (including FECs). Respondents from these providers were more likely to agree that:

- Students had the opportunity to provide a separate submission (38 per cent at FECs compared to 24 per cent at other providers);

- Students were engaged meaningfully in plan development (42 per cent agreed at lower tariff providers compared to 22 per cent at high tariff providers);
- Students had been given opportunities to give feedback on the plan (48 per cent at lower tariff providers compared to 30 per cent at high tariff providers).

Consultations with staff and student stakeholders reflected the benefits of smaller cohort sizes for facilitating this engagement.

> 'The college always treat their students as a main priority and makes sure that their voices are heard.'
>
> Student representative, FEC provider
>
> 'There was a meeting where all students were invited to come along and…give feedback on how the plan looked. Students gave useful feedback on specific things the school could do to help students feel really included.'
>
> Student representative, FEC provider

5.2.5 Areas of effective practice in student engagement have developed

Providers have typically found student engagement challenging. However, there are examples of good practice in this area which have emerged from student and staff survey responses. Table 6 illustrates this.

Table 6 | Examples of effective student engagement

Creation of new working groups with students for decision-making 'A new APP monitoring group set up with students and staff across the institution is gathering momentum and beginning to get to grips with what is working and what is not.' Head of access and participation team, high tariff, large HE provider	**Incorporation of students into committees which develop and monitor plans** 'The university has made big strides this year in getting its [students' union] officers onto the relevant committee and the chair of the group carried out some specific training/meetings about the plan and why it was important.' Students' union executive officer, high tariff, medium HE provider
Seeking student feedback for continuous improvement 'In October 2020, a 'pulse survey' was launched. The survey is constantly 'live' with results being analysed each week- this ensures ongoing student feedback on both experience of [our] new, blended applied learning model and engagement with support opportunities. The survey helps us to better understand things that are working well for students and the challenges they may be facing.' Head of access and participation team, lower tariff, large HE provider	**Change in culture and attitudes towards student engagement** 'We are moving away from [a view that there is a] deficit in students to something wrong with university…[as a result, we are] including students in layers of co-creation (co-design, co-evaluation etc) and starting to set up governance advisor boards for pre-, current, post- students as a sounding board.' Head of access and participation, high tariff, large HE provider

6 Potential unintended consequences of the targets

This section explores the potential unintended consequences of the use of targets in the access and participation plans, relating to both their stretching nature and focus.

6.1 The stretching nature of the targets

The requirement to set stretching quantitative targets caused concern with providers regarding their capacity to meet them, as well as concern about their potential impact on collaboration.

6.1.1 There was concern that the targets won't be met

'Some targets are not going to be hit – OfS needs to think about what it does where that is the case.'

Head of APP, large, high tariff provider

The majority (19 out of 21) of staff and representative body interview and focus group consultees expressed concerns that the outcomes targets they had set were unattainable because they were too stretching or not relevant to their context. In total, 15 per cent of qualitative staff survey responses reflected on the issue of challenging and inflexible targets. Staff stakeholders expressed concerns about the uncertainty of sanctions relating to missing these targets, as well as the possible lack of sanctions, with calls for the OfS to consider and articulate its approach in this area.

6.1.2 Stretching targets threaten collaboration

Providers of differing types raised concerns that the highly stretching access targets created significant competition between providers, with approximately 30 per cent of staff consultations identifying this issue. Staff stakeholders believed that targets were sometimes undermining access work by encouraging providers to chase individual 'quick wins' over more collaborative, long-term initiatives. For example, some providers were scaling down outreach approaches, focusing efforts at secondary level to allow them to evidence-change in the five-year timescale and more closely target students that were likely to attend their provider rather than go elsewhere.

'Neighbouring universities have taken a lot of our students...uncapped student numbers have allowed them to take as many students as they want.'

Dean of HE, small FEC provider

'There are a finite number of students in Index of Multiple Deprivation (IMD) postcodes, and there are now many universities trying to recruit those students, so the line between competition and collaboration is now tighter, which may be to the detriment of students. Uni Connect can be helpful in this space, but the puzzle has not been put together yet.'

Head of access and participation, large, high tariff, HE provider

'The current regime does not recognise the success of a participant from a school with which we have a partnership taking up a place at another Russell Group university... This tends to mitigate against collaboration in outreach, in favour of competition for WP

students. Equally, the emphasis on meeting targets within a five-year timescale can lead to pressure to de-emphasise early-intervention outreach.'

Professional services staff, medium, high tariff HE provider

'We do all this outreach work but it only works if they come to us – those students will move away from home inevitably…We're faced with targets where it only matters if those students come to study with you, so we have to target a very small number of young people and we are not going to do primary outreach.'

Principal, small and specialist HE provider

6.2 The focus of the targets

Stakeholders also expressed concern regarding the focus of targets on certain groups as well as on outcomes over inputs.

6.2.1 The focus on the KPMs diverted attention from other student groups

Approximately 15 per cent of qualitative staff survey responses referenced that the focus on the OfS KPMs had diverted attention and resources from existing access and participation projects. This was a greater issue for small and lower tariff providers whose access and participation issues were less aligned to the OfS's KPM target groups. There were concerns that efforts to address inequalities for groups that had previously been included within plans had been dropped. In these cases, the OfS may have queried proposed targets because they were not outcomes-focused or measurable or because they did not address an equality gap at that provider, rather than because of the nature of the groups concerned.

In a small number of instances, larger providers expressed concern that the focus on addressing gaps had created too narrow-a-focus whereas their access and participation issues affected students across the board.

'The main focus is on achieving institutional targets in order to drive faster sector progress in support of the OfS KPMs. An unintended consequence could be that some internal momentum has been lost in working with faculties on their specific access and participation goals. This is something we are currently seeking to address.'

Head of access and participation, large, lower tariff, HE provider

'There are challenges around how some of the APP KPMs are focused on the participation of 18-19-year olds. Our members have a lot of mature students.'

Representative body

'We were forced into narrow fields of targets where we have gaps on the data, but we didn't have any gaps in many areas…Our challenge is retention across the piste – we'd be better to look at disciplines than demographics.'

Member of the executive, large, high tariff, HE provider

'Issues that we raise to the university that are having a disproportionate impact on groups covered by the APP…are not addressed as they do not manifest themselves in measurable, negative degree outcomes.'

Students' union officer, high tariff, large HE provider

6.2.2 The metrics available have created concerns

Providers of varying types called for the OfS to allow the use of a broader range of metrics that were better aligned to those used in colleges and schools. They provided free school meals (FSM) data as an example, which they also argued provided a more valid measure of deprivation than POLAR4. Such issues with metrics were raised in 40 per cent of staff stakeholder consultations. In some examples, providers and representative bodies called for better alignment of metrics to those used by colleges and the Department for Education (DfE) to allow for a more joined-up system from primary through to higher education.

'Unlike Free School Meals, POLAR4 is not a measure of individual deprivation. So there remains a question over whether the use of this factor advantages some students who are not necessarily disadvantaged and misses others who appear in a higher quintile who do, in fact, suffer some deprivation.'

Senior leader, large, high tariff, HE provider

'The insistence by the OfS that POLAR4 be used as a measure even when this is not appropriate due to the location and context of a particular institution has perhaps led to potentially unproductive outreach activities where time could have been better spent elsewhere.'

Access and participation manager, medium, high tariff, HE provider

6.2.3 The focus on outcomes could undermine progress

A less commonly raised risk was that the focus on targets could undermine continuous improvement. Five-year outcomes targets reduced requirements to regularly demonstrate which interventions were working, limiting opportunities for continuous improvement at a sector level.

'With a firm focus on outcomes, continuous improvement isn't going to be there; you can achieve a lot of the outcomes without improving anything, you just change who you recruit, it's possible that's how you succeed… There isn't a way now to see continuous improvement as a success – lots of changes can make a difference but unless OfS sees outcomes at the end of five years then it doesn't really matter.'

Representative body

> ‘I’m keen for OfS to include monitoring/progression of plans, not just metrics, and would like OfS to have proper discussions on monitoring etc. There will be some things that we got right and wrong. We would like to have emphasis on monitoring so there is good conversation about context and plans developing.’
>
> Head of access and participation, medium, lower tariff, provider
>
> ‘There is a danger that the metric targets become the sole focus of activity, leading to some gaming or distortion of activity to hit targets, rather than to deliver genuine improvement.’
>
> Senior leader, lower tariff, medium HE provider

7 Challenges and opportunities for future implementation

Despite concerns that not all targets would be reached, the sector was still positive about the progress they would be able to make under the new reforms. However, survey respondents and consultees highlighted external factors which could impact implementation in the future. Key issues were COVID-19 as well the political and policy environment.

7.1 COVID-19 has created challenges and opportunities

COVID-19 was the most common theme arising from the stakeholder engagement, with respondents highlighting both the challenges and opportunities that COVID-19 has created.

'We did a survey of our students – 25% don't have access to study space at home.'

Member of Executive, large, high tariff provider.

Over 40 per cent of staff qualitative survey responses described challenges associated with COVID-19, including the disruption of secondary education, resulting in gaps in knowledge for young people progressing to higher education. Limited opportunities for providers to conduct face-to-face outreach activities in schools also represented a risk to access targets. Digital poverty was a significant concern, having created disproportionate challenges for students from underrepresented groups in accessing online teaching and support. Progression was also a concern as students were facing uncertain job prospects in a shrinking economy. There was a call from the sector for the OfS to respond to this issue proactively as it was likely to impact on the implementation of the plans for years to come.

Despite the significant disruption created by the pandemic, 16 per cent of staff qualitative responses highlighted the rapid innovation across the sector to deliver online teaching and support to students. These changes have created positive opportunities to improve the accessibility of resources for students, including those who would have traditionally struggled to access face-to-face teaching and support. The outcomes targets have afforded greater flexibility for providers to respond to, and adapt to, changes without needing to significantly adapt their plans and still aim to meet targets within the five-year timescales.

> 'Unsurprisingly, COVID-19 has been the single most significant factor in access and participation activity in the last seven months, as is has been in almost all areas. In-person activity has had to cease, and staff have had to adapt access and participation activity while also adapting to new ways of working, all in a time when the inequalities that young people in all levels of education face are as stark and urgent as they have ever been.'
>
> Access and participation manager, medium, lower tariff HE provider

> 'COVID-19 has had an impact on the work planned for access and participation. It has also given us time to think about issues for underrepresented students, and it has brought about enormous changes to our delivery models.'
>
> Head of access and participation, medium, lower tariff, HE provider

'The institution immediately recognised the potential for digital poverty to compound disadvantage and the provision of digital devices to those students without access was addressed. Whilst the pandemic did pause the provision of face-to-face widening access outreach in schools, the team swiftly moved to the provision of online materials and delivery where possible. Engagement in programmes which had commenced pre-COVID-19 remained high.'

Head of access and participation, large, lower tariff, HE provider

7.2 The changing political, policy and educational environment

Staff and representative body stakeholders highlighted changes in the political, policy and educational environment. Table 7 below provides examples highlighted by stakeholders.

Table 7 | Examples of changes in the political, policy and educational environment

Political interest had been increasing in the agenda but the rhetoric regarding the value of higher education from political leaders had changed in recent months. 'Heightened political interest also pushed the new strategy.' Member of the executive, large, high tariff, HE provider 'Pre-COVID-19 there has been significant political change in the way in which the role of APP has been spoken about.' Representative body
The pipeline of students entering higher education had begun to dry up in some cases. 'The OfS event[11] was very clear about the expectation that we would not reduce our ambition – but we're in a situation where the careers that students are going into have been obliterated – music education underneath has been obliterated – what happens if we do miss our targets?' Deputy Principal, small and specialist provider 'Reforms in the school system are resulting in a reduction in the number of arts-based qualifications that students are taking in the system – [this is] having an impact on the pipeline of qualified students being able to compete for those places.' Representative body
Attempts to increase flexible delivery in higher education was positive but created challenges for the OfS's targets. 'A more flexible approach where people opt in and out of modules will change how we measure continuation. The government wants to see changes by April – will APPs catch up with that?' Representative body

[11] See 'Getting access and participation plans back on track, 2 November 2020, available at https://www.officeforstudents.org.uk/news-blog-and-events/events/getting-access-and-participation-plans-back-on-track/

7.3 The sector called for greater collaboration going forward

A key message from the stakeholder review was that collaboration will be important if the equality of opportunity in higher education that the OfS is striving for is to be achieved. Staff and representative body stakeholders expressed the need for a whole system approach, with collaboration between the OfS, the higher education sector and the tertiary education sector more broadly. Figure 17**Error! Reference source not found.** illustrates the collaborative approaches proposed by these stakeholders.

Figure 17 | Whole system collaborative approaches

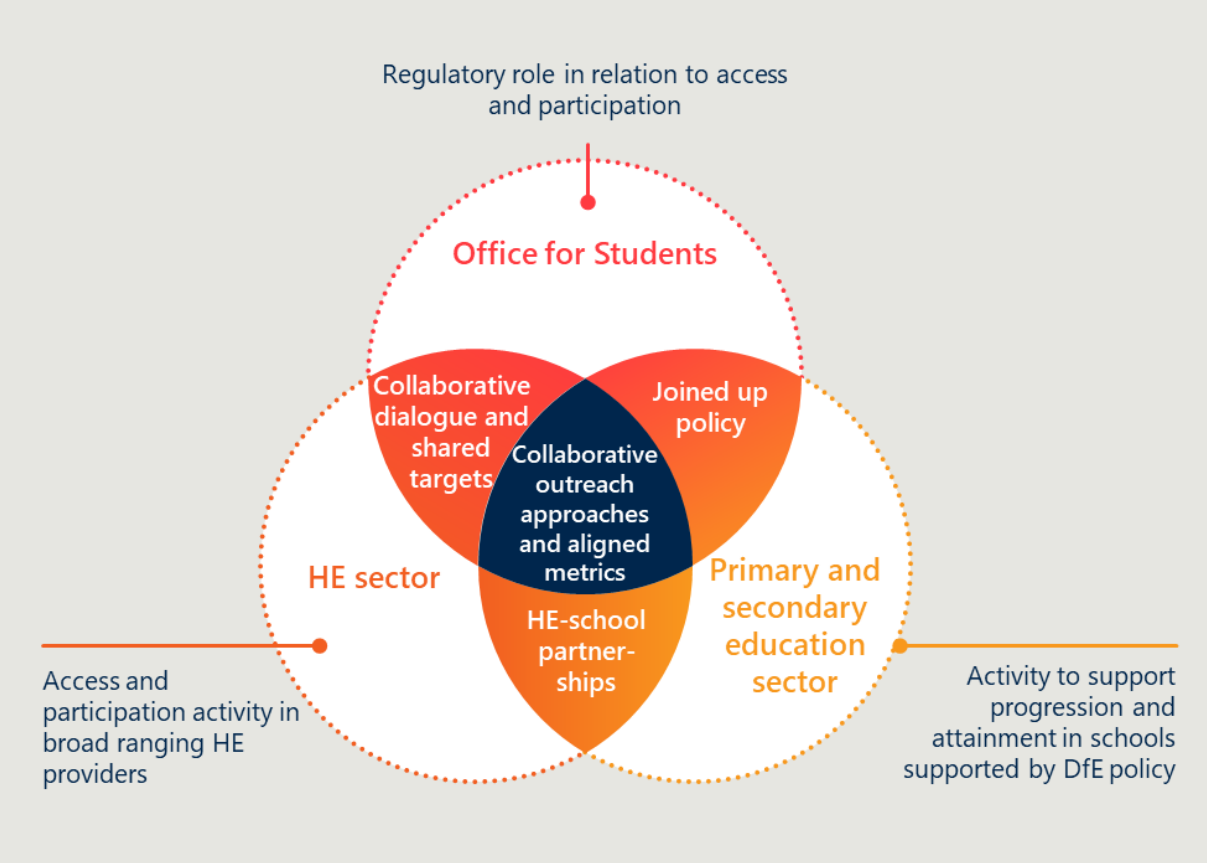


Table 8 provides further detail regarding the approaches outlined.

Table 8 | Examples of emphasis on collaboration

Collaboration between the OfS and the HE sector

'Continue to build a library of good practice and provide opportunities to develop a collaborative, supportive approach across the sector. [We would like to see] more opportunities for networking and 'buddying' of institutions for mutual support.'

Member of the executive, large, lower tariff HE provider

'We should begin thinking as a sector about how to renovate the approach – what are the next set of aspirations and goals and how do we go about doing that? How it's navigated could make the next round really constructive.'

Member of the executive, large, high tariff HE provider

'The OfS should encourage shared targets – locally and regionally – to think about the challenge that has come out of COVID-19 and how to ensure that the support is fit for purpose and facilitate deliverable regional collaboration.'

Representative body

Collaboration between HE providers and schools

'Now, more than at any point in the last 10 years, collaboration with schools is so important.'

Representative body

Collaboration across the whole school sector

'The main two things that need sorting out are competition versus collaboration and joining up the Department for Education (DfE) via common metrics so that we have a shared understanding of a DfE and university lifecycle.'

Head of access and participation, large, high tariff HE provider

'We need a joined-up approach between schools, universities and colleges. We need a 10-year strategy and central coordination of that.'

Representative body

Appendix A: Survey and consultee responses

Staff and representative body stakeholder consultation

Qualitative interviews and focus groups

Consultations with staff stakeholders and representative bodies were designed to capture information from a wide variety of provider types. Staff stakeholders from a total of 25 different providers were involved in staff stakeholder focus groups and consultations with senior managers:

1. Askham Bryan College, York
2. Bedford College
3. BIMM Limited
4. Blackpool and the Fylde College
5. Durham University
6. Guildhall School of Music and Drama, London
7. Keele University
8. Lincoln College
9. Liverpool Hope University
10. Loughborough College
11. Nottingham Trent University
12. Queen Mary University of London
13. Royal Holloway University of London
14. Solihull College and University Centre
15. South Devon College
16. South Essex College
17. The Open University
18. The Royal Central School of Speech and Drama, London
19. The Royal Northern College of Music, Manchester
20. University of Bolton
21. University of Chester
22. University of Law Limited
23. University of Northampton
24. University of Southampton
25. York St John University

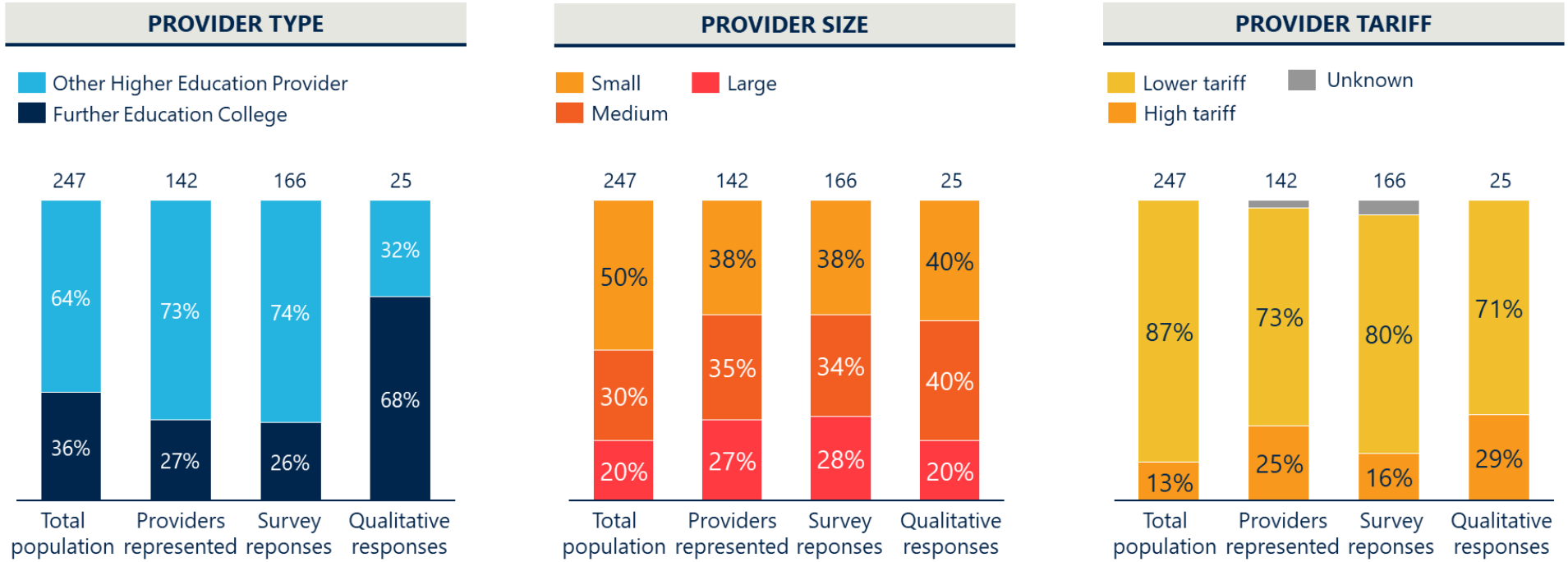
The following eight representative bodies were also involved in consultations:

1. Association of Colleges
2. Conservatoires UK
3. GuildHE
4. Independent HE (focus group with members and staff)
5. MillionPlus
6. Russell Group
7. Universities UK
8. University Alliance

Provider staff survey

Quantitative responses in the staff stakeholder survey were broadly representative when divided by provider category. The charts in Figure 18 show the total population of providers with a 2020-21 access and participation plan (broken down by type, size and tariff level). These figures are compared to the proportion of providers represented in the survey, along with the total responses (which differ due to multiple responses from some providers).

Figure 18 | Staff stakeholder survey responses were broadly representative



Student stakeholder consultation

Qualitative interviews and focus groups

Nous conducted either one-to-one interviews or focus groups with student stakeholders (including students' union officers, students' union staff and student representatives) from seven different provider types. The providers represented were:

1. Durham University
2. Guildhall School of Music and Drama, London
3. Liverpool Hope University
4. Royal Holloway University of London
5. South Essex College
6. The Open University
7. University College Birmingham

Student stakeholder survey

Quantitative responses in the student stakeholder survey were also broadly representative when divided by provider category. The charts in Figure 19 below show the total population of providers with a 2020-21 access and participation plan (broken down by type, size and tariff level), compared to the proportion of providers represented in the survey and the total responses (which differ due to multiple responses from some providers).

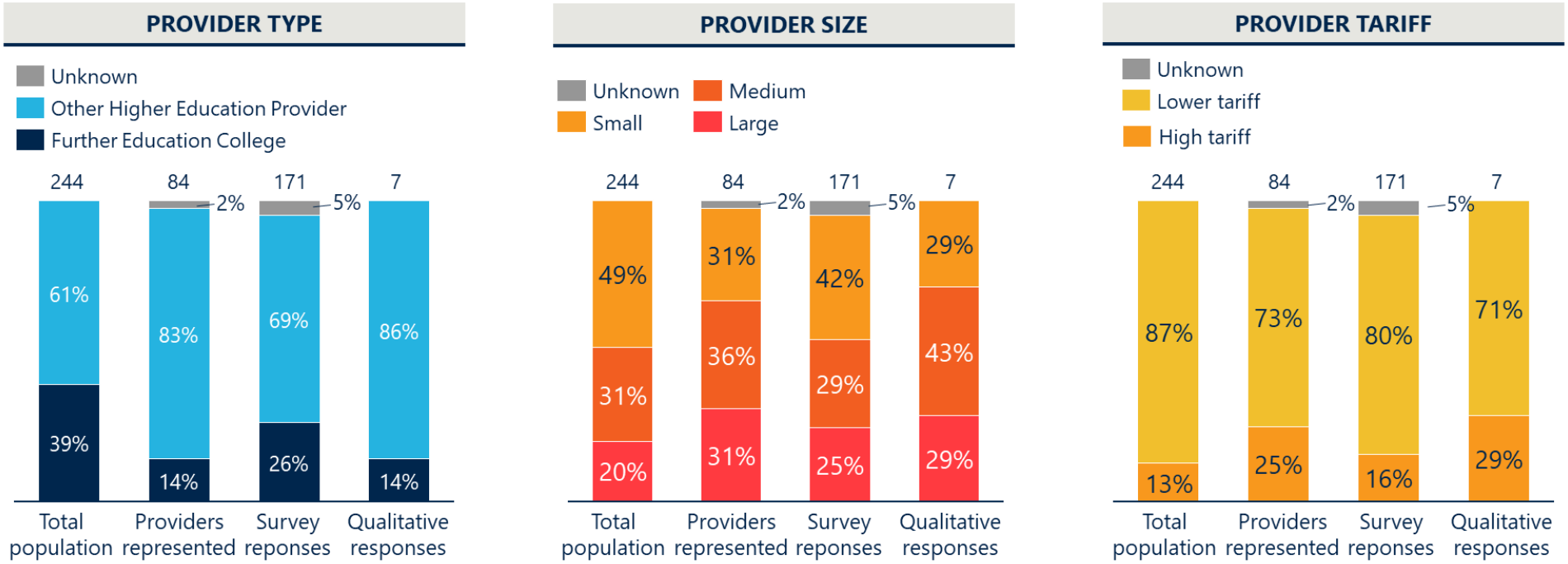



Figure 19 | Student stakeholder responses were broadly representative