

Consultation question		Choice	Comments (if applicable)
<b>Proposal 1: Access and participation plan approval and timescales</b>			
1	To what extent do you agree or disagree with the proposal that plans should normally remain in place for a period of at least three years, rather than annually as at present?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	<p>Please provide a brief explanation for your response (max 300 words):</p> <p><b>Overall, we welcome the proposal that plans remain in place for a longer period based on risk, which aligns with the OfS' overall approach to risk regulation. We agree that this will allow providers to focus more on design, implementation and evaluation of their access and participation activities. It will also allow providers to develop access and participation plans that align with the trajectories of their students and the timescales of their overall institutional plans. Along with the need for providers to submit new plans where there is an increased risk of a future breach of condition A1, we are pleased that the proposal allows providers to submit new plans earlier should they wish to do so.</b></p>

Proposal 2: Annual monitoring and planning			
2a	How effective, if at all, would the proposed approach of annual impact reports and action plans be for...		
	i. Assessing a provider's progress compared to the sector as a whole?	Not at all effective <b>Not very effective</b> Fairly effective Very effective Don't know/prefer not to say	N/A
	ii. Assessing a provider's progress compared to other institutions?	Not at all effective <b>Not very effective</b> Fairly effective Very effective Don't know/prefer not to say	N/A
	iii. Improving a provider's strategy to improve access and participation?	Not at all effective Not very effective <b>Fairly effective</b> Very effective Don't know/prefer not to say	N/A
	iv. Engaging students in the monitoring of access and participation?	Not at all effective Not very effective <b>Fairly effective</b> Very effective Don't know/prefer not to say	N/A
	v. Capturing good practice and findings from evaluation?	Not at all effective Not very effective Fairly effective <b>Very effective</b> Don't know/prefer not to say	N/A

2b	To what extent do you agree or disagree with the submission of an action plan that would make providers more accountable to their students, the OfS, and the public for their performance in access and participation?	<p>Strongly disagree Tend to disagree <b>Tend to agree</b> Strongly agree Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>Action plans have the potential to be a helpful tool for providers in communicating how they intend to drive improvements in their access and participation activity to internal and external audiences. Action plans will be most effective in achieving accountability if they are able to present information in ways that are easily understood by the wide range of audiences that might consult them. Like the short contextual introduction that is part of the proposed impact report, it may be helpful to allow providers to include further details on the context in which they operate in their action plans.</p>
2c	To what extent do you agree or disagree that the approach of a longer-cycle plan with annual impact reporting, and ongoing OfS monitoring, will reduce the level of burden for low risk providers and apply greater scrutiny for providers at increased risk of a future breach of one or more conditions?	<p>Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>Based on the information provided in the consultation document, we agree that the approach proposed by the OfS is reasonable and aligns with its overall approach to risk regulation. We look forward to seeing further detail on how the OfS will oversee annual monitoring processes (e.g. format of the impact report, whether any guidance will be developed for student</p>

		<p>bodies commenting on provider progress as part of the impact report, etc).</p> <p>We understand that some providers may be worried about the potential burden associated with annual impact reports and action plans. However, the level of burden may well depend on how the provider operates. Overall, we believe that the approach proposed by the OfS will ensure greater scrutiny is appropriately directed to higher risk providers.</p> <p>We welcome the reference in the consultation document that the OfS will “aim to align the data collection format [with other sector organisations] to avoid duplication”.</p>
--	--	---

Proposal 3: Access and participation plan targets			
3a	To what extent do you agree or disagree that...		
	i. The stated OfS specified-aims are the national priority areas for access and participation?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	N/A
	ii. The OfS should specify measures that we should encourage providers to use when setting targets related to OfS-specified aims?	Strongly disagree Tend to disagree <b>Tend to agree</b> Strongly agree Don't know/prefer not to say	N/A
	iii. Providers should also be able to set additional targets relative to their context?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	N/A
	iv. The proposal allows for comparability of performance in access and participation across the sector?	Strongly disagree Tend to disagree <b>Tend to agree</b> Strongly agree Don't know/prefer not to say	N/A
	v. The proposal allows for progress to improve access and participation to be measured?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	N/A

Proposal 4: Reporting on access and participation spend			
4a	To what extent do you agree or disagree with the proposal to collect and publish, in a transparent way, access investment?	<p>Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>The approach outlined in the consultation document is sensible. It achieves a balance between ensuring providers submit appropriate information, and ensuring data already submitted by providers as part of their compliance with the OfS' registration conditions is incorporated in these processes.</p> <p>It will be important to ensure that this information is published in a way that students and the public can easily interpret and understand it. In publishing this data, the OfS will also need to ensure students and the public are able to link a provider's access investment with relevant outcomes and performance.</p>
4b	To what extent do you agree or disagree with the proposal to disaggregate access spend by post-16, pre-16 and work with adults and communities?	<p>Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>The disaggregation of access spend by pre-16, post-16 and adults/communities will help provide further information on what is being spent in these areas, and the effectiveness of these investments. As different providers may prioritise different groups based on</p>

			their missions, this information will also help providers obtain a clearer picture of the links between their access spend and outcomes.
4c	To what extent do you agree or disagree that a strong focus on targets and outcomes alone, creates enough pressure to secure sufficient funding in access and participation to achieve change, without an expectation of spend?	<p>Strongly disagree</p> <p>Tend to disagree</p> <p><b>Tend to agree</b></p> <p>Strongly agree</p> <p>Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>We agree that a focus on targets and outcomes, rather than minimum spend, will drive providers to focus on achieving meaningful change, rather than inputs. This approach should allow providers to set appropriate expenditure forecasts based on their targets and ambition, and the tools at the OfS' disposal will allow it to take appropriate action where concerns may arise. Alongside the focus on targets and outcomes to drive improvements, providers and the OfS will need to work together to ensure the new regime continues to support strong outcomes in areas where providers demonstrate success and/or where providers conduct work that aligns with overall access and participation aims, but that may not align with specific targets. The details contained in the consultation document on the proposed flexibility in setting targets and evaluating activity should allow for the growth of provider access and</p>

			<p>participation activity across underrepresented groups.</p> <p>The metrics used to establish targets and evaluate provider outcomes will need to appropriately reflect the diverse contexts in which providers operate, and the diverse student bodies that comprise them. For example, some of our members have expressed concerns that the use of POLAR may not be helpful due to the composition of their student body (e.g. high number of mature students).</p>
4d	To what extent do you agree or disagree with the principles in paragraph 140 which we propose should underpin our approach to funding and investment in access participation?	<p>Strongly disagree</p> <p>Tend to disagree</p> <p>Tend to agree</p> <p><b>Strongly agree</b></p> <p>Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>These principles appear to be aligned with the OfS' overall approach to regulation, all while aiming to drive improvement in areas where transformations could not take place without additional funding. No matter the outcomes of the post-18 review, we hope that these principles remain at the core of the OfS' approach to access and participation funding and investment.</p>



Proposal 5: Provider self-assessment of evaluation activities			
5a	To what extent do you agree or disagree that an evaluation self-assessment tool will contribute to improvements in evaluation practice?	<p>Strongly disagree</p> <p>Tend to disagree</p> <p><b>Tend to agree</b></p> <p>Strongly agree</p> <p>Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>An evaluation self-assessment tool has the potential to drive institutional improvements. The OfS will need to keep the sector informed of the outcomes of the piloting of the tool to ensure potential issues related to its practical implementation have been fully considered (e.g. challenges smaller and newer providers may face in completing the tool, ensuring the tool is fit for purpose for diverse types of providers with varying student demographics and different modes of study, understanding of the amount of institutional resource required to complete the tool, etc.).</p>
5b	What support do you think the OfS could provide to enable more effective use of tracking services?	N/A	<p>Please respond (max 300 words)</p> <p>Most Alliance universities are members of a tracking service and recognise the value of an external service in providing this type of data. The OfS could act as a central information point to provide further details on these services. The OfS could also work with relevant partners (e.g. government departments, schools, colleges) to support the collection of/access to data required for these services.</p>

			<p>The research the OfS plans to undertake on tracking services will also be valuable in ensuring their value, assessing where additional data may need to be included in these services to make them more effective for providers, and that opportunities for collaboration between providers in this area are maximised.</p>
--	--	--	--

Proposal 6: Transparency information condition			
6a	To what extent do you agree or disagree that the OfS should undertake further work to explore whether data split by age could be included within the transparency information condition?	<p>Strongly disagree</p> <p>Tend to disagree</p> <p>Tend to agree</p> <p><b>Strongly agree</b></p> <p>Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>We agree that it would be good to explore if this data split could be included within the transparency information condition, as it could provide useful information on the impact/effectiveness of targeted access and participation activity across different age ranges. As part of its work, the OfS will need to consider aspects that could pose challenges with this type of data split (e.g. small data issues, issues where different data systems are used by different providers, etc.).</p>
6b	To what extent do you agree or disagree that the OfS should undertake further work to explore whether data split by disability status should be included within the transparency information condition?	<p>Strongly disagree</p> <p>Tend to disagree</p> <p>Tend to agree</p> <p><b>Strongly agree</b></p> <p>Don't know/prefer not to say</p>	<p>Please provide a brief explanation for your response (max 300 words):</p> <p>We agree that it would be good to explore if this data split could be included within the transparency information condition, as it could provide useful information on the impact of access and participation activity on disabled students. As part of its work, the OfS will need to consider aspects that could pose challenges with this type of data split (e.g. small data issues, issues where different data systems are used by different providers, etc.). It may also be useful to</p>

			explore if the data could be further nuanced to reflect different types of disability, all while remaining aligned with equality and diversity objectives.
--	--	--	--

Proposal 7: Access and participation dataset			
7a	To what extent do you agree or disagree that OfS should create and maintain an access and participation dataset?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): A dataset will assemble relevant data in one tool, allowing providers, students and the public to better understand relevant access and participation data. In theory, this should reduce burden and provide greater transparency. However, the OfS will need to ensure that certain technical issues are appropriately addressed to ensure that the dataset functions as intended (e.g. compatibility between different systems different types of providers use to submit data; ensuring the definition of 'student' is clear - for example, whether this term includes apprentices; whether the non-aggregation/non-benchmarking of data may not appropriately represent provider performance in relation to targets due to the context in which they operate, etc.).
7b	To what extent do you agree or disagree that the proposed datasets would support you to hold providers to account on their performance against targets?	Strongly disagree Tend to disagree Tend to agree <b>Strongly agree</b> Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): The dataset will help provide a clear picture of performance against targets over time by using consistent data. It will be appropriate, alongside the data, to provide further information on institutional context as the

			non-aggregated, non-benchmarked data may provide incomplete information on why a provider has performed in a certain manner vis-à-vis a particular target.
7c	Are there any measures you feel are missing from the dataset?	N/A	<p>Please respond (max 300 words)</p> <p>It would be helpful for providers if the dataset provided, if possible and where appropriate, further breakdowns on data points related to ethnicity and disability, as well as further data on entry qualifications and modes of study, to help them address relevant gaps. It may also be helpful for the OfS to confirm/clarify that it is using definitions accepted across the sector and aligned with other bodies such as HESA for terms such as 'mature student'.</p>