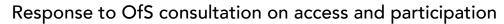


Cor	nsultation question	Choice	Comments (if applicable)	
Prop	Proposal 1: Access and participation plan approval and timescales			
1	To what extent do you agree or disagree with the proposal that plans should normally remain in place for a period of at least three years, rather than annually as at present?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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.	



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





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2b	To what extent do you agree or disagree with	Strongly disagree	Please provide a brief explanation for your
	the submission of an action plan that would	Tend to disagree	response (max 300 words):
	make providers more accountable to their	Tend to agree	Action plans have the potential to be a
	students, the OfS, and the public for their	Strongly agree	helpful tool for providers in communicating
	performance in access and participation?	Don't know/prefer not to say	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.
2c	To what extent do you agree or disagree that	Strongly disagree	Please provide a brief explanation for your
20	the approach of a longer-cycle plan with	Tend to disagree	response (max 300 words):
		_	· · · · · · · · · · · · · · · · · · ·
	annual impact reporting, and ongoing OfS	Tend to agree	Based on the information provided in the
	monitoring, will reduce the level of burden	Strongly agree	consultation document, we agree that the
	for low risk providers and apply greater	Don't know/prefer not to say	approach proposed by the OfS is
	scrutiny for providers at increased risk of a		reasonable and aligns with its overall
	future breach of one or more conditions?		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

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bodies commenting on provider progress as part of the impact report, etc). 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. 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".



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



Prop	posal 4: Reporting on access and participation sp	end	
4a	To what extent do you agree or disagree with the proposal to collect and publish, in a transparent way, access investment?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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. 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.
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?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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

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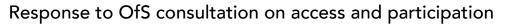
			their missions, this information will also help providers obtain a clearer picture of the links between their access spend and outcomes.
4c	To what extent do you agree or disagree that a strong focus on targets and outcomes alone, creates enough pressure to secure sufficient funding in access and participation to achieve change, without an expectation of spend?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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



			participation activity across underrepresented groups. 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).
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?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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.



Prop	oosal 5: Provider self-assessment of evaluation ac	tivities	
5a	To what extent do you agree or disagree that an evaluation self-assessment tool will contribute to improvements in evaluation practice?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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.).
5b	What support do you think the OfS could provide to enable more effective use of tracking services?	N/A	Please respond (max 300 words) 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.





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The research the OfS plans to use tracking services will also be value, assessing want additional data may need to be these services to make them may for providers, and that opportune collaboration between provider are maximised.



Prop	oosal 6: Transparency information condition		
ба	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?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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.).
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?	Strongly disagree Tend to disagree Tend to agree Strongly agree Don't know/prefer not to say	Please provide a brief explanation for your response (max 300 words): 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

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



Prop	oosal 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 Strongly agree 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 nonaggregation/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 Strongly agree 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

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			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	Please respond (max 300 words) 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'.