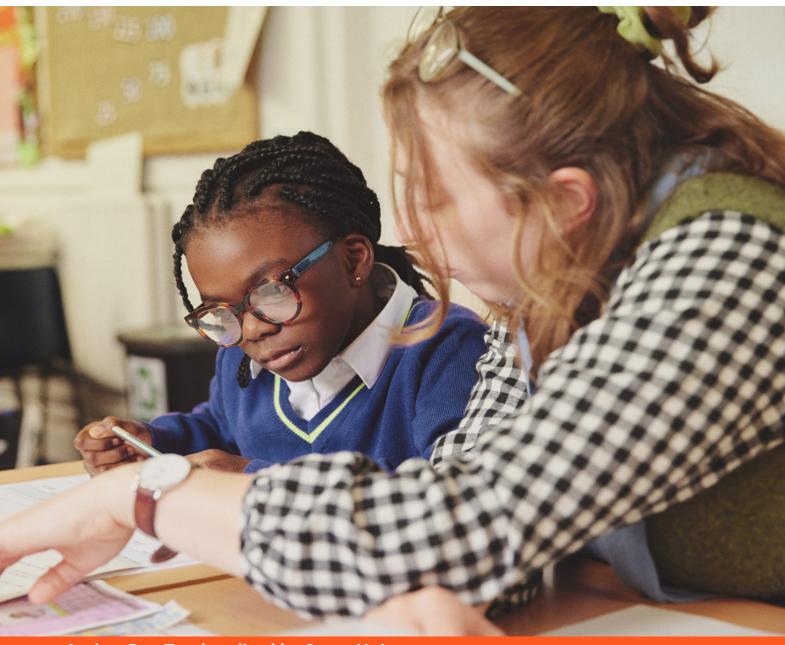# Applying an impact led theory of change to access and participation

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Cover photo: Into University, Impetus charity partner

FOUNDATIONS

Applying an impact led theory of change to access and participation

# Introduction

Higher education providers are now in the process of developing their new access and participation plans, to meet regulatory requirements. We worked with one of the universities that took part in the first wave of this work, the University of Bath, to explore how a clearer understanding of their Theory of Change can lead to better programmes and better outcomes for people facing disadvantage. This paper sets out our lessons, both for universities preparing their plans and for policymakers in the higher education sector.



University of Bath

# Definitions

Definitions used in this document include:

**Access and participation work**
Activity to support disadvantaged and underrepresented groups to access and participate in higher education. This may include: sustained and progressive programmes of targeted outreach with schools, colleges and job centres; and broader collaborative activities with employers, third sector organisations and other education providers. This covers the whole student life cycle: access, continuation, completion, attainment and progression.

**Access and participation team/s**
The team within an HE institution who are responsible for developing and drafting Access and Participation Plans (APPs). This includes conducting, commissioning and monitoring access and participation work.

**Young people from disadvantaged / under-represented backgrounds**
Young people who are being targeted by access and participation work due to barriers to equality of opportunity at one of the stages of the student lifecycle.

**Higher Education providers**
HE provider is the current collective terminology for universities and other institutions that provide forms of higher education in England, used by the Office for Students (OfS). To get on the Register, a provider must:
1. Apply.
2. Demonstrate that it meets a set of requirements ('initial conditions of registration') relating to teaching quality, student protection, student support, financial sustainability, sound governance and management, and more.]

Any institution offering HE and required to submit an APP to the Office for Students (OfS).

# Partners and acknowledgements

This project would not have been possible without the following people (in chronological order):

**Rajbir Hazelwood,** then of King's College London, who planted a seed early in March 2020 which became this project.

**Helena Vine,** now at QAA but previously Impetus policy officer, who took this from an idea into a planned project ready for others to pick up the baton.

**Jonathan Simons** of Public First and **Mary Curnock Cook,** formerly chair of Impetus' charity partner The Access Project, who helped us shape the project and shortlist potential partners.

**Andrew Ross** and **Jenny Boyle** from the University of Bath, who opened up about the reality of life in a university access and participation team and trusted us with their biggest hopes and their biggest challenges.

The views in this report are not the views of those acknowledged above, but solely those of the authors.

# About

## About Impetus

Impetus transforms the lives of young people from disadvantaged backgrounds by ensuring they get the right support to succeed in school, in work and in life. We find, fund and build the most promising charities working with these young people, providing core funding and working shoulder-to-shoulder with their leaders to help them become stronger organisations.

In partnership with other funders and through sector coalitions, we take what we learn and influence decision makers to change entrenched systems and barriers, so that many more young people can benefit from policy change.

Our work in higher education includes supporting charities like IntoUniversity and The Access Project; establishing the Fair Access Coalition of major charities working in access and participation; and convening a termly forum between the Office for Students and third sector access and participation practitioners.

## About Inclusion Revolution

Inclusion Revolution was established by Rae Tooth in 2022 to support HE providers and third sector organisations to deliver outstanding social inclusion and belonging.

Rae brings experience in higher education policy in particular around improving access, progression, and success for socially disadvantaged and underrepresented groups. She is an expert in effective evaluation of practice and outcomes, and in bringing together practice, policy and academic discourse in relation to social justice.

Rae has been the CEO of a national social mobility charity, supporting children from disadvantaged backgrounds into higher education, and worked in the Civil Service for two decades leading work on higher education and equality. She advised successive Cabinet Ministers on developing evidence-led policy aimed at improving outcomes for disadvantaged and historically excluded students.

## About the University of Bath

The University of Bath was established in 1966 to advance learning and knowledge through teaching and research, particularly in science and technology, and in close association with industry and commerce. In the intervening years, the University has grown in both size, with 15,000 first-degree students and reputation, being highly ranked in national and international league tables.

The University has an excellent track record in student experience and employability and attracts some of the best and brightest students in the world. Engagement with employers is fundamental to ensuring that Bath's students are particularly well prepared for future careers. The University values both teaching and research as core strengths and a commitment to quality is central to the institution.

The University was one of 40 volunteers that submitted an APP to the OfS in 2023 following a new set of regulation and guidance. The approved plan covers September 2024 to July 2028.

Having an approved APP is a condition of registration with the OfS and allows the University to continue to charge the higher rate tuition fee. The plan sets out how the University supports a diverse cohort of UK undergraduate students into, through and out of the institution.

SUMMARY

# The process

This report represents the outcome of a co-creation process designed and facilitated by Impetus and Inclusion Revolution working with the Access and Participation team at the University of Bath.

We ran five workshops in January and February 2023 that brought together some of the people responsible for the development and approval of the University's APP. This included:
- The Head of Widening Access and Participation
- The Access and Participation Impact Manager
- Senior staff: Vice-President (Community & Inclusion), Director of Education and Student Services; Director of Student Recruitment and Admissions
- Chair of Council, Lay Member of Council.

The key principles behind the workshop approaches were:
- **Co-design:** Mix of senior leadership and front-line staff to ensure everyone office was aligned towards a common vision and goal
- **Layered approach:** Each session built on the previous one, with stakeholders aligning in-between workshops
- **Empathetic challenge:** Facilitators brought incisive questions, and answers came from participants.

The content of the workshops focused on the high-level mission, and then drilled down to focus on the 'access' elements of the APP, considering programme design and performance management.

Between the sessions, working groups on target population, programme design and evaluation were convened by the Head of Widening Access and Participation and the Access and Participation Impact Manager of the University of Bath, to deep dive into the issues and support informed decision making. The same workshop model was used internally across the University to build more granular intervention strategies set out in their new APP.

All elements of the proposed interventions are subject to continual improvement following approval by the OfS, and as the University moves into implementation.

# The background

Young people from disadvantaged backgrounds are 40% less likely to go on to higher education than their better-off peers. This access gap has persisted for over a decade.

Government policy has attempted to widen participation since at least the Robbins Report (1963) which set out the principle that university places "should be available to all who were qualified for them by ability and attainment", although explicit programmatic focus on access and participation work has only really developed since the late 1990s.

What started as a small funding stream has grown significantly as tuition fees have been introduced and increased over the last 20 years, driven by political concerns that tuition fees would be detrimental to the access and participation of disadvantaged young people in higher education.

The mid-2000s saw fees rise to £3,000 per annum, and the introduction of an independent regulator, the Office for Fair Access (OFFA) focused on ensuring fair access to higher education. In 2012 an increased fee of £9,000 was introduced and in January 2018 a new regulator responsible for the entire higher education sector – the Office for Students (OfS) – was created.

In February 2018, the then-Prime Minister announced a wide-ranging review of post-18 education and funding led by Sir Philip Augar. The review was published in May 2019, but it wasn't until April 2022 that the government responded. The review's recommendations included freezing tuition fees at £9,250 per annum for a further two years, and the introduction of a new Lifelong Learning Entitlement from 2025.

In 2019 the OfS established a What Works centre, Transforming Access and Student Outcomes in Higher Education, (TASO), to grow the quality and quantity of evidence and research available to improve the effectiveness of widening access interventions.

In Autumn 2022, the Director for Fair Access and Participation (DFAP) at the OfS announced a new approach to access and participation. This moved away from a set of national targets on equality, to a system in which providers themselves undertake serious and sustained analysis of their own context and mission, identify the most serious risks to equality of opportunity they face, and outline measures to mitigate these, supported by the OfS Equality of Opportunity Risk Register (EORR).

In early 2023, the OfS identified 40 'first wave' higher HE providers to pilot this new approach. Guidance was published in March 2023 and the first wave providers made their submissions to the OfS in July 2023.

# The project

Considering the changes to the regulatory landscape of the higher education sector, Impetus was interested in working with a team responsible for access and participation at an HE provider.

We proposed running a series of Theory of Change workshops facilitated by Impetus and Inclusion Revolution to trial a co-creation approach that could be used to:

- Improve the quality of outcomes for young people from disadvantaged / under-represented backgrounds who receive targeted interventions delivered by or on behalf of a specific HE provider
- Improve the quality of outcomes across England for young people from disadvantaged / under-represented backgrounds, by sharing meaningful approaches to developing and delivering APPs that can be adopted more widely
- Capture reflections on the regulatory process and make recommendations to policy-makers that could drive faster progress towards closing gaps in equality of opportunity for young people from disadvantaged / under-represented backgrounds, as the OfS continue to roll out the new regulatory requirements.
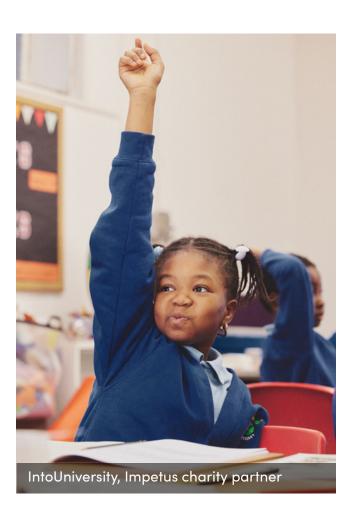
To create the best possible potential for learning, Impetus sought an HE provider that was not an outlier in its size, structure and student population, and where the data suggested there were differences in outcomes between young people from disadvantaged /under-represented backgrounds and their better off peers.

For the project to be a success, it also needed supportive senior internal stakeholders, a good track record of evaluating its practice, and a reflective team leader willing to commit time to engage openly in the process and share their experience.

After a thoughtful and careful selection process, the University of Bath agreed to take part in this project.

This document summarises the results of these workshops and the co-creation process. It focuses on broader key lessons we identified that could be of use to HE providers, policy makers, and third sector organisations working on access and participation.

It is not possible to take the experience of a single university and assume that it will be the same in all other providers. However, it is hoped that the lessons from this work can be used to add value in the delivery of access and participation work of other HE providers.



IntoUniversity, Impetus charity partner

# Key lessons for policy makers and higher education providers

## 1. Leadership

While partnership is a vital principle of APP activities, clear leadership is required to bring partners together, build strong relationships, drive implementation forward, make difficult decisions and ultimately hold people accountable.

## 2. Delivery through partnership

Partnerships between HE providers, the third sector and other organisations can provide expert advice, specialist interventions, greater reach and economies of scale that are backed by evidence. By outsourcing activity, HE providers are able to free up resources and play to institutional strengths, where they can have the greatest impact.

## 3. Mixed seniority

Having a mix of voices involved in developing the Theory of Change – from members of the governing body and the HE provider's Senior Management Team (SMT) to delivery staff – ensures that it is grounded in both high-level institutional policy and the reality on the ground.

## 4. Contextualise

Developing the APP within the broader strategic priorities of the HE provider means that the plan can directly contribute to whole institution success while meeting regulatory requirements.

## 5. Performance culture

Teams responsible for access and participation can play an important role as a 'quality manager'. Understanding how internal and external delivery partners – including third sector partners – are performing and having honest, respectful accountability conversations, drives continuous improvements, leading to better outcomes.

## 6. Exit strategies

Each intervention needs a process of review and an exit strategy. This is so HE providers are better able to stop activity where there is insufficient evidence that it delivers the desired outcomes, offers value for money, or meets the strategic needs of the provider. Exit strategies protect participants, stakeholder relationships, and organisational reputations.

# Executive summary of University of Bath APP Theory of Change

OfS Regulatory Notices 1 and 6 state that an APP should be an accessible document for non-expert audiences, clearly setting out what a provider will do to address the risks to equality of opportunity it has identified, using a prescribed structure.

An effective Theory of Change is something that must be worked on deliberately. Impact does not happen simply by hard work or good intentions. It requires systematic focus.

Ultimately, that is what the Theory of Change process is about – it creates time and space for the team and stakeholders to think about and answer the essential and existential questions: What are we trying to do here?

How are we going to do it? How will we know if we are succeeding?

Every APP is context and provider specific. The value in sharing the University of Bath's example is to understand the process more than the content. A more detailed understanding of the content can be found in the University of Bath's published APP .



University of Bath

PILLARS

# Our mission

## What is "mission"?

Mission is what you're trying to achieve overall. Every decision should ultimately be to help deliver the mission – if it's not helping you achieve your mission, why are you doing it? Bringing your mission into discussions is grounding when you're considering how to spend time or money – and it's also motivating.

## OfS guidance states:

Introduction and strategic aim: A provider is expected to use the introduction to set out its context, mission, and overarching strategic aim, as they relate to the delivery of equality of opportunity for students.

Whole provider approach: A description of how staff from departments and services across the provider are led and engaged to ensure that its students are supported to access, succeed in and progress from their time at the provider.

## University of Bath's mission:

Our Mission endures: to deliver world-class research and teaching, educating our students to become future leaders and innovators, and benefiting the wider population through our research, enterprise and influence.

Working with stakeholders from across the University shed light on areas of alignment between the University's mission and mission of the Access and Participation team:

- World class teaching and research should be accessible to anyone with the capability and capacity
- There is an expectation that future leaders are representative of society
- Innovation is achieved through different

ways of viewing a problem, an opportunity and a context
- Bringing together diverse and inclusive cohorts directly improves diverse ways of thinking within the University community
- To benefit the wider population through research, enterprise and influence, the University needs an inclusive culture where diverse lived experiences, skills and knowledge shine light on emerging or hidden areas for exploration.

## Access and Participation team mission:

Our focus is to ensure our diverse student body is **inclusive** and **representative** [1], we expect all our students to be **successful** [4] and we **support** [2] them to be able to reach their **academic and social** [6] **potential** [3]. The University is driven to ensure that we provide a **diverse, well taught, well qualified, well-prepared** cohort of graduates that can successfully enter the **workforce** [5].

1. We know that capability and capacity is not determined by socioeconomic status, or protected characteristics. We want a student body who bring with them diverse prior experiences and knowledge.

2. We recognise that there are barriers to equity of opportunity for some people. We aim to reduce or remove these where we can, enabling people to overcome them. We do this through masterful relationship building. We share pertinent factual information alongside sharing our diverse lived experiences.

3. As a result, we develop each individual's informed agency over life choices so they can fulfil their aspirations and potential, through a University of Bath education.

4. We set up our students to succeed through the range of programmes to support them

at every step of their journey with us, from pre-application through to graduation, further study or meaningful employment. The University is best placed to work through schools with young people who are motivated but may have some skills or knowledge gaps to overcome. We recognise that different partners will be better at addressing different barriers.

5. The outcome of this mission is for everyone. APP activity is only for those who face barriers to access and participation. Our programmes may only support a person to travel part of the journey into higher education, studying at the University of Bath, but we always keep this endpoint in sight.

6. Students need to be successful both academically and socially to fully reap the benefits of their time with us. We recognise that we are in a unique position to support both.

It was clear from the mission that the Access and Participation team have a strong understanding of what they do, for whom and to what end. This clarity drives everything they do and helps them to stop activity that doesn't serve their purpose.

Where there was alignment with the University Mission, the drive to action was increased. However, there were elements of the University Mission where the role that the APP played in achieving these outcomes was less clear.

Having open conversations with staff at all levels of the University helped explore tensions and potential conflicts. Making decisions on what outcomes the whole institution wanted to achieve, and tailoring APP activity to align with this, led to higher levels of support, a strong business case for spending, and better value for money of interventions.



IntoUniversity, Impetus charity partner

# Our target population

## What is "target population"?

Target population is about who you want to help. Every decision should ultimately be to help these people – if it's not helping these people, why are you doing it? This is not to say these are the only people you help – there are others who you will help because you can, as part of your service population. But it's the target population who are always in focus.

## OfS guidance states:

Risks to equality of opportunity: The key risks to equality of opportunity identified by a provider's assessment of its own performance and consideration of the EORR which will be addressed in the plan.
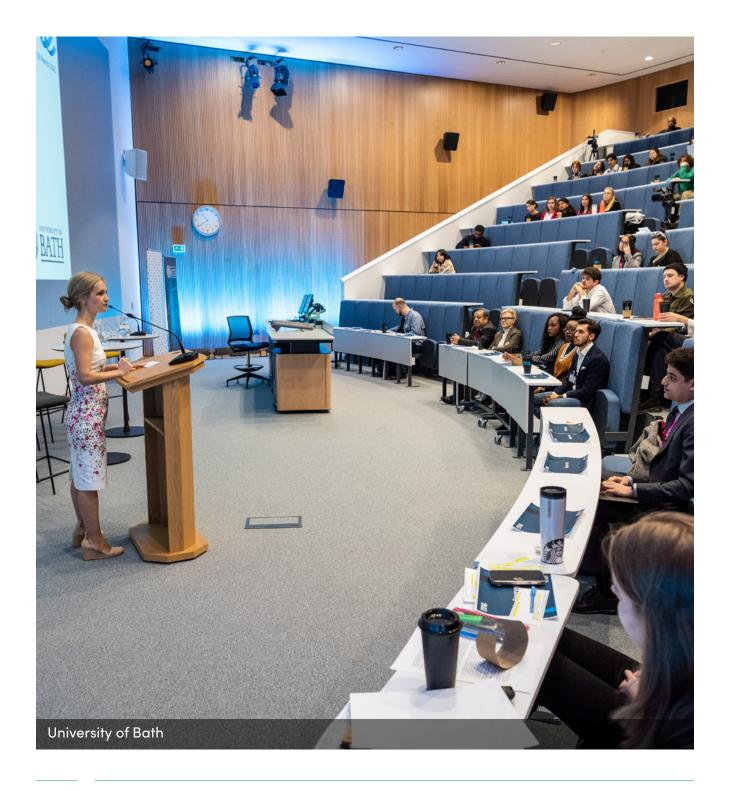
## University of Bath target population

| Out of scope Delivered by recruitment team | Service population Delivered with or by recruitment team | Target population Delivered by APP team and strategic partners | Service population Delivered by strategic partners with support from the APP team | Out of scope Needs met by organisations likely to be outside the higher education sector |
|---|---|---|---|---|
| • Is not facing barriers to access<br>• Is intending to go into higher education, possibly to this institution | • Facing barriers to access<br>• Potential to succeed<br>• Pupil within an identified partner school<br>• Intending to go into higher education, possibly to this institution | • Facing barriers to access<br>• Potential to succeed<br>• Pupil within an identified partner school<br>• Currently unlikely to continue into post 18 education<br>• Interested in subjects taught at the University | • Facing barriers to access<br>• Potential to succeed<br>• Small number of pupils meet this criteria within identified partner school<br>• Individuals with this specific criteria are diffuse across the UK (e.g. care experienced)<br>• In need of specialist or niche support<br>• Currently unlikely to continue into post–18 education | • Facing barriers to access<br>• Lower levels of capability and capacity<br>• Higher education inappropriate option |

The APP provided a guidance framework for identifying which students HE providers should target.

Historically, access and participation work has been closely tied to attracting students to individual institutions. This has led to an expectation that APP funding would be spent on recruitment activities, reaching people from disadvantaged / under-represented backgrounds who have likely already decided to pursue higher education, but not which institution to go to.

This means is that there is less funding available to spend on those who are undecided on whether to study further, and setting out the options available to them. The University of Bath was keen to ensure its target population fell into the second category.



University of Bath

# Our outcomes

## What are "outcomes"?

Outcomes are about what you want to achieve with the people you support. Every decision the Access and Participation team makes should ultimately be to help achieve these outcomes. You don't have to get people there all in one go, there may well be steps along the way; short-term outcomes that move you in the right direction.

## OfS guidance states:

**Objectives:** A provider is expected to set objectives to address the risk manifestations identified through the assessment of performance, and in doing so address risks to equality of opportunity. The objectives set should be time bound and measurable. One objective may address multiple risks to equality of opportunity.

## University of Bath outcomes

OfS guidance sets out the parameters of outcomes that must be presented in APPs. Providers engage in negotiation with the DFAP to agree what these will be. HE providers have some, but not complete, control over the outcomes they set.

APPs should set out steps that lead to the intended outcomes. When doing this, a strong case must be made to demonstrate that these steps are credible and will lead to the intended outcome.

This project focused on **access** related outcomes, though the full APP sets out outcomes across the student lifecycle:

- **Apply:** More individuals from the target group submit credible applications to attend the University of Bath.

- **Agency:** We want our target population to have informed agency over their life choices so they can make the best choices in order to fulfil their aspirations and potential. Applying to the University of Bath will be the right choice for only some of the target group. We want applicants to have a good knowledge of what we have to offer, the subjects available to them here and at other institutions, and what pathways will be open to them at the end of a course.

- **Sense of Self:** We want the individuals we work with to have a strong sense of self and belonging so that they are confident in navigating their route into higher education and the many transitions they will face on their journey. While we can remove unnecessary barriers, we recognise that securing a place and succeeding in higher education is competitive, and everyone is faced with disappointments and challenges. We want to develop potential applicants who are able to manage this well.

- **Knowledge and understanding:** Individuals have knowledge and skills they need to compete for a place at the University of Bath. This means making good subject choices, understanding what a credible candidate offers and how to demonstrate this, organisational skills to manage their engagement with the process, understanding how to prepare for interviews and knowing what they need to have in place to succeed.

# Our programme design

## What is programme design?

Programme design is about what you do to support your target population. Your programme design helps you achieve your mission, by supporting your target population to achieve your outcomes. If an element of your programme isn't doing that, why is it part of your programme? While mission, target population and outcomes are mostly fixed points of reference, your programme design should be refined regularly, especially as circumstances change or data sheds new light on what's working – and what isn't.

## OfS guidance states:

Intervention strategies and expected outcomes: An outline of the evidence-informed intervention strategies a provider will deliver to meet each of its objectives. Each intervention strategy may address multiple risks to equality of opportunity. The intervention strategy should relate to a specific objective(s) and include details of the individual activities that underpin it, the theory of change, including expected outcomes, how it will be evaluated, the resources required to deliver the intervention strategy and details of how each outcome will be monitored and evaluated. This should also include a timetable for when associated evaluation outcomes will be shared and the expected format this will take.

**Targets:**
Where appropriate, objectives should be translated into numerical targets with measurable outcomes-based milestones as part of the fees, investments and targets document.

**Investment:**
Investment information alongside each intervention. Information about a provider's investment in financial support for students and research and evaluation in the fees, investments and targets document.



University of Bath

## An example of programme design at the University of Bath

| | |
|---|---|
| **Find and engage** | • Identify schools with high target population cohorts using available data<br>• Outreach with schools, engaging ambassadors, building relationships with school staff<br>• Marketing through direct mail, social media, website |
| **Assess needs** | • Identify pupils within the school who fit the target population<br>• Sessions to identify gaps in knowledge and understanding<br>• Sessions to identify aspirations and ambitions |
| **Provision delivered to pupil influencers** | • Activities and information for parents/carers<br>• Teacher networks<br>• Support and information for teachers |
| **Provision delivered to pupils** | • In school activity<br>• On campus activity<br>• Sustained programmes including residentials<br>• Targeted activity for marginalised groups |
| **Monitoring and evaluation** | • Track outcomes: Participants journey to higher education in shared system, understand success rate of partners vs. benchmarks<br>• Long term indicators: Retention, progression and success compared to wider student population including employment outcomes<br>• Understand data split by characteristics of young people<br>• Feedback loop: identify trends to enable programme improvement |

# Our programme delivery and impact management

## What is programme delivery and impact management?

Programme delivery is how you deliver your programme, impact management is about ensuring that the support you give your target population actually benefits them – managing quality. With mission, target population and outcomes are mostly fixed points of reference, impact management informs the refinements you need to make to your programme delivery. If an element of your programme isn't actually having an impact, why are you doing it? And how can you know to stop doing something that's a waste of time, without knowing that it has no impact? Over time, impact management enables you to move towards more effective provision, improving the system and delivering better outcomes.

## OfS guidance states:

Evaluation of the plan: An outline of how a provider will strengthen and undertake evaluation of the activities delivered through its plan, including plans for publication of that evaluation.

**Annex A:** Assessment of performance: A provider is expected to set out the elements of its assessment of performance that were used to identify the risks to equality of opportunity the plan will address. Only those elements that directly relate to the identified risks need to be included: the OfS does not require the inclusion in the plan of all the analysis a provider has undertaken. However, we may request additional information where that is considered appropriate.

## The University of Bath approach to programme delivery and impact management

**Governance:**
All HE providers have their own systems and structures of governance. For the University of Bath the process is as follows:
- Council is the owner of the APP and approves the Plan, receiving regular updates on progress
- Delivery is managed through the Pro-Vice Chancellor for Education and their Advisory Board
- To ensure detailed oversight of delivery towards the targets and action plans, the university has created an Oversight Group. The Oversight Group is comprised of senior managers from across the university, who use the intervention strategies laid out in the APP as a framework to monitor delivery, ensure outcomes are delivered and monitor progress made on the targets.

**Supporting delivery:**
Templates and training are provided to staff across the university on how to:
- apply a theory of change
- map their activities to the risks in the APP
- identify outcomes
- develop an evaluation plan.

Partnerships with several third sector organisations support targeted activity and a higher level of focus.

**Approach to evaluation:**
A set of dedicated projects listed in the APP cover detailed and challenging questions, and ongoing evaluation of activities and interventions.

The Access and Participation team ensure that partners are delivering the desired outcomes and evaluating their work to a high standard, by:

The Access Project, Impetus charity partner

- Agreeing clear Key Performance Indicators (KPIs) and expectations so that partners are aligned with the APP
- Setting minimum goals and sharing regular progress updates
- Setting appropriate expectations for smaller partner organisations
- Offering to support organisations in other ways if they can, once targets are on track
- Feeding reports and updates into the overall monitoring of the access and participation work of the University
- Taking decisions about continuing or stopping work as part of the portfolio of activity.

The University has developed a network of researchers working on access and participation. This network crosses the barrier between professional services and academic staff and is designed to ensure that practice is informed by research and vice versa.

## Further considerations

The workshops did not generate the relevant information to address two of the objectives set out in OfS guidance. These were considered by the University separately. These were:

**Student consultation:**
A plan should demonstrate how students have had the opportunity to contribute to the development of the plan in a meaningful way before it was submitted for approval, and what steps were taken as a result.

**Provision of information to students:**
How prospective students will be provided with information about the fees they will be charged for the duration of their course. It must also set out how a provider will inform students about any financial support to which they are entitled and the level of financial support students will be offered in each year of study. We expect this information to include the eligibility criteria for this support.

Throughout the process of writing the APP the University had student input and is enhancing methods for ongoing student insight. The University is co-creating a space for students where a two-way dialogue can happen between practitioners, strategy writers and students.

CONCLUSIONS

# Lessons for access and participation work

## 1. Placing an APP in the broader provider context means you are able to deliver better results, engage more effectively with stakeholders and manage provider risks

The activity set out in the APP needs to be carried out within the broader context of provider strategy, culture and activity. If this context is conducive to social inclusion, then access and participation work is more likely to be successful.

Having a clearly articulated whole-provider ambition for what successful social inclusion looks like – and how APP targets and ways of working help to drive this – is essential for developing activities and targets that are likely to succeed, and ensure wider provider buy-in.

Using the APP as a single component of a wider 'social mobility strategy' that directly contributes to delivering institutional strategy can:
- Increase buy-in, protect resources and engage a greater number of stakeholders across and outside of the provider
- Demonstrate commitment to access and participation beyond regulatory requirements, helping to build partnerships with third sector and other external organisations, making the provider a more attractive partner to not only deliver on behalf of but to co-create new interventions and approaches
- Protect programmes and partner relationships from sudden changes in the APP that would redirect resources or terminate activity that supports wider provider aims
- Create a place to develop innovative interventions that may not be successful, or viable, and manage the risk of relying on untested activity to deliver outcomes against targets
- Maintain a programme of activity that meets a set of outcomes that are regulation agnostic. This means a provider can respond quickly to changes in policy focus and requirements to respond to the needs of different target groups or achieve different outcomes whilst not having to redesign programmes each time regulation guidance updates
- Support a more sustained approach, and have long term impact, including on institutional culture.

## 2. Involving members of the relevant governing body in the development of a Theory of Change contributes to a well-informed, engaged oversight function who act as champions for access and participation work

The OfS expects governing bodies to be involved in APP development and sign off. However, there are significant challenges to doing this meaningfully, in particular the short time scales between publication of guidance and submission of the APP to the OfS.

Engaging governing bodies in the development of a Theory of Change means that they are able to:
- Contribute at an appropriately high level to the development of the access and participation work
- Engage and influence the APP and have a much deeper understanding of the work set out within the plan, so they are approving it from an informed position
- Become champions of the work
- Set the APP within the broader provider strategy and consider the provider's role in the wider social justice agenda
- Create opportunities for the team delivering access and participation work to have ongoing engagement with the governing body
- Influence culture and direction of travel for the whole provider and demonstrate the contribution of the APP to these wider objectives.

**3. Make bold decisions about where to invest your resources – stop activity that doesn't achieve great results, outsource activity that is specialist or delivers economies of scale, identify what you are best placed to deliver, push back where work could be effectively achieved through another team or department**

It can be challenging to take decisions to stop work, or start new initiatives, in particular stopping legacy activities, even when evidence shows only limited impact. At times it can be unclear whether activities are targeted enough on fair access, or are supporting wider recruitment efforts.

There is limited understanding of what constitutes 'good value for investment', with low cost per capita often being used as a proxy, which can make lighter touch interventions more appealing than deeper engagement activities that may have a greater impact.

Focusing attention and resource where you can make the biggest possible difference will accelerate progress towards targets. To do this, teams leading access and participation work should:

- Use oversight as a lever for delivering high quality outcomes, setting clear accountability at all levels

- Ensure interventions have clear outcomes and are implemented on the basis of the contribution it makes to the APP
- Protect programmes that have a demonstrable and significant impact over the appeal of 'new' programmes
- Ensure interventions are delivered by those best able to deliver them, this often means working with delivery partners in the third sector who often have greater expertise, reach and can deliver economies of scale
- Put in place robust and proportionate theories of change, evaluation and reporting mechanisms. Where individual staff or departments run their own programmes there needs to be quality assurance and accountability to the team leading access and participation work
- Set out how and when a programme will be reviewed, with recommendations i.e. expansion, closure
- Have an exit strategy in place setting out how activity will be withdrawn in a way that is ethical and protects the recipients and institutional reputation. When activity is delivered through a partner organisation, at the point of commissioning agreement needs to be reached about how either party will exit from the programme, to ensure individual participants and stakeholder relationships aren't damaged in the process.


University of Bath

# Lessons for policy makers

**1. Making fair access a fundamental tool to deliver wider ambitions for the higher education sector will improve outcomes both people from disadvantaged / under-represented backgrounds and more widely**

We are all best served by a higher education system that improves outcomes for individuals, communities and wider society. It is vital to a whole range of policy debates – from social mobility to growth to productivity – that we ensure that the opportunity to participate in higher education is available to as wide a group of people as possible, especially young people from disadvantaged backgrounds who are disproportionately less likely to benefit at present. Fair access sits at the heart of achieving this goal and yet it can often be seen as an isolated endeavour.

HE providers are subject to a range of other regulatory requirements, some of which have bigger implications for their wider work. The Teaching Excellence Framework (TEF) outcome, for example, is designed to be used by potential applicants in their decision making, and therefore has an implication for recruitment and income. The greatest success comes when institutions

understand how access and participation links to all their regulatory requirements.

Governing bodies of HE providers need to feel ownership of access and participation work and provide good challenge and feedback to an emerging plan. For this to happen, the regulatory process needs to run for long enough for the team responsible for access and participation work to draft a plan or key questions for input, circulate it in advance of a meeting, receive feedback, and act on it – before a submission deadline.

Identifying how fair access and participation contributes directly to the fundamental purpose of higher education and helps meet the breadth of regulatory requirements, could drive accelerated progress.

The OfS should ensure its wider regulatory framework dovetails and that access and participation is a consistent theme, not an isolated set of requirements. Furthermore, the OfS should develop a way of crediting providers for work that a) expected to pay off in the long term and/or b) increase the pool of credible higher education applicants, even if they do not go to the institution that funded the work.



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**2. Working with third sector partners, providers are better able to focus on developing and evaluating interventions that they are uniquely positioned to deliver, improving impact and value for money across all target groups**

The regulatory approach can discourage HE providers from building strategic partnerships, while focusing in-house activity on what the institution is best placed to do. This actively disincentivises contracting work to external providers and specialists.

Where target populations are very small (e.g. young people who are care experienced or care leavers) or have specialist support needs (e.g. neurodiverse and disabled students), interventions delivered through third sector partners are likely to have a greater impact and offer economies of scale.

HE providers should be expected to demonstrate that they have identified the most appropriate delivery body for interventions. Incentives should be in place to promote partnerships that deliver greater impact.

Regulatory processes should reflect that HE providers working with multiple partners may require flexibility in reporting arrangements, without compromising the robustness. Expectations should minimise the burden on delivery partners, recognising the limited capacity and capabilities of small organisations.

**3. There is a need for a co-ordinated, independent organisation to build partnerships for action and improve evidence led practice**

HE providers benefit significantly from knowledge sharing across sectors and evidence of what works. Creating a place where lessons learned from not only success, but failure, is essential if we are to significantly improve outcomes for people from disadvantaged / under-represented backgrounds.

The mandate and funding of TASO should be significantly increased to play this role, sharing learning across higher education, schools and the third sector, providing funding for promising interventions and creating partnerships to generate systemic change.

# Reflections and next steps

Ultimately, the process supported the University of Bath to produce a strong APP which has a coherent and clearly articulated narrative that is well understood internally and externally. This clear plan has created continuity and a shared language across the University, with a positive impact on culture and understanding of access and participation. Clarity about the links between activity within the APP and the breadth of activity across the University will help all stakeholders to work in greater alignment.

The workshops gave the team dedicated time to reflect on what interventions were delivering impact. Empathetic challenge from knowledgeable partners gave the team permission to think bigger and pushed them to question assumptions and the status quo.

The Theory of Change helped strengthen the framework that underpinned more detailed elements of planning, development and analysis, and a clearer monitoring process. This gave senior management greater clarity about what is working and how to monitor progress against outcomes, freeing up time for the team to develop and implement improvements or new strands of activity.

Understanding what the University is uniquely positioned to deliver, alongside clearly defined target groups and outputs, will also lead to more effective delivery through, and quality management of, third sector organisations delivering on behalf of the University.

The process also provided an opportunity for the University to consider both its APP and the broader social inclusion work they deliver to meet their strategic aims. The process helped the University to identify the need for a wider social mobility strategy, which is supported by senior leaders including members of Council.

More broadly, the work uncovered necessary changes to regulatory frameworks to drive progress on access and participation, including aligning timeframes, incentives and disincentives.

While we must continue to push for better outcomes now, we must also recognise the need to put in place long-term, sustained, effective interventions across all HE providers. Long-term change is possible and, to deliver this, consideration must be given to the best arrangements to deliver fair access in the short and long term.