

# INDEPENDENT HIGHER EDUCATION

IHE response to the OfS call for evidence on  
regional access partnerships

July 2025

## Introduction

IHE welcomes the OfS's consideration of the model for collaborative access work and the regulator's continued engagement with the sector on this. We agree that providers working in partnership to address local needs has potential to be an impactful and efficient way to address risks to equality of opportunity in accessing higher education provision. We also support the proposed regional approach and positioning of partnerships to engage locally to target access activity to meet industry needs and create pathways for those from all backgrounds into higher level jobs. We welcome the recognition that the Uni Connect programme is not delivering what is needed and are enthused by the opportunity for a model that will enable more institutions across the sector to engage and realise their potential in this area.

We support a regional model but feel this needs to be adapted to make clearer provision and process for providers with multiple sites, national and online providers, and those who teach a specialism which is not identified as a regional priority. Institutions with multiple campuses are often driven by their mission to partner with industry to meet skills needs, and to create opportunities for specialist provision to learners who would otherwise not access it. These providers represent a small proportion of the sector, but they are critical players in widening student choice and addressing risk to equality of opportunity in accessing higher education. We feel that the model should enable them to choose a 'lead' region to engage in collaborative access work, in line with their priorities, which would be reflected in their Access and Participation Plan (APP) and upon which their contribution would be evaluated. There should be flexibility for them, and national online providers, to engage in other regions where there is an alignment with their strengths and expertise should they wish to do so.

A new programme of regional collaborative access must be driven by two needs: those of industry, and those of learners. Without this, it will be impossible for large, diverse regions with institutions with different student demographics, institutional missions, and specialisms to identify shared priorities and targets – and the impact of the programme will be limited.

The OfS should align how this is achieved with the evolving work of Skills England and the local structures that emerge. Although Local Skills Improvement Plans (LSIPs) are currently the main vehicle for this, concerns about their effectiveness suggest the OfS should not assume they will remain so. There will need to be a clear strategy focused on local and national skills needs to enable diverse regional groups to identify and deliver shared priorities. The mechanisms for this may need to evolve to ensure that it remains deliverable.

We see a clear need too for regional collaborations to be based on an understanding of all learner needs, moving beyond a narrow focus on young people leaving Level 3 education to consider all those in a region who experience barriers in accessing higher education. This should explore what activity is delivered, and how success is measured.

For a regional approach to be a success, we advocate for a model whereby there are regional strategies, plans and targets – driven by the industry and learner needs described above – which are developed and overseen by a governance structure comprised of individuals with the expertise needed to meet strategic aims and drawn from providers, industry and other local partners. This Board would oversee a project-based structure, with strands of activity developed to meet these priorities and funding centrally managed and allocated accordingly.

Providers would contribute to activity and be accountable for specific targets according to their strengths and expertise, and reflect this in their APPs alongside their other individual targets and intervention strategies.

This model would be effectively supported by an impartial regional coordinator, who we feel should be reflective of the sector and have a clear remit and guidance on supporting all institutions in a partnership to engage effectively. We also feel this should be supported by central resource in each region for evaluation and coordination activity, mitigating the risk that providers have to divert funding away from the delivery of outreach to students to meet these needs. This would not be in the interest of students or the aims of the programme.

We support the proposal for an impartial regional coordinator and think they will play a pivotal role in ensuring all institutions in the partnership can contribute. This role should be reflective of the diversity of the sector and have a clear remit and guidance on supporting all institutions to collaborate effectively.

This model will best enable all institutions to engage in regional collaboration. IHE Members are uniquely placed to make a significant contribution to the new approach through their dual expertise in reaching students from underrepresented groups and developing partnerships with industry to address skills needs. We urge the OfS to consider how the design, structures and support embedded within a regional approach to access will realise this potential.

## Question 1

### ***What do effective regions for collaboration on equality of opportunity look like?***

Effective regions for collaboration on equality bring together all providers to meet local skills needs in a way that match learner aspirations. Both skills needs and learner aspirations must be prioritised for success. Regional collaboration needs to be driven by a clear understanding of skills needs in industry, linked into and evolving with the work of Skills England to bring together regional plans to address these. Collaborations need to be organised and governed in such a way that enables institutions of all sizes and specialisms to contribute and realise their potential in raising aspiration and creating pathways to higher education for those who would otherwise not access it.

IHE Members have significant potential to contribute to regional collaborations, with a number having a track record of local collaboration with different structures including local and combined authorities, as well secondary and further education providers, enabled by their specialist provision and strong links with industry. Examples of this include working with local authorities to deliver training and skills programmes to local mature learners, contributing to regional local authority funded music and arts provision, and developing student projects in partnership to address local priorities such as sustainability and housing.

A small number have also engaged in access initiatives through existing Uni Connect partnerships, but these are in the minority as for most their ability to do this has been limited. As the Independent Review of the programme highlighted, the current programme has mostly been dominated by larger institutions and favoured the promotion of traditional three-year undergraduate programmes. Where IHE Members have been able to engage, this has been dependent on pre-existing relationships and networks and an already established local profile (developed through some of the activities described above), requiring effort and resource over a sustained period of time. The extent of activity has largely been determined by the lead provider, and not the result of or leading to a full and equal role in the regional partnership. The new model must take the opportunity to remove these barriers and expand and develop the successful examples of local collaboration that there have been from smaller institutions. See our response to Question 5 for how it can do this.

Effective regional collaboration on equality of opportunity must be grounded in a shared understanding of local skills needs. We agree that they should be positioned to engage in cross-sector activity but urge the OfS to define with this should like in line with the evolving work of Skills England and the local structures that emerge. Although LSIPs are currently the main tool, concerns about their effectiveness suggest the OfS should not assume they will remain so. There will need to be a clear strategy focused on local and national skills needs to enable diverse regional groups to identify and deliver shared priorities. The vehicle for this may need to evolve beyond the LSIP model to ensure it can be deliverable.

Effective regions must also recognise that whilst place-based learning opportunities are important for learners who wish to study locally, their needs and the needs of industry may not always be met by the providers that are geographically located there. In some cases, these are best matched with provision outside of the region or national (including online). There are also many reasons why regional collaborations may choose to include a national skills target, in areas which are not identified as a local skills need. This could be in areas where the workforce is not

centralised, such as Technology, sport or education. The model must allow for national as well regional strategic aims in order to avoid an unhelpful restriction of access activity to specific institutions with a physical presence in the area. This will not support student choice or enable partnerships to address local skills needs. Please see our response to Question 2 for a proposed approach for national providers.

Effective regions will also be people-based, recognising and responding to the needs of cohorts of learners in different regions. This necessitates moving away from the current narrow understanding of widening access focusing mostly on 16–18-year-olds progressing from Level 3 education and considering the needs of other groups such as mature learners, or those not currently in secondary education. Regional collaborations need to recognise and facilitate the expertise of different providers in working with and catering for the needs of these different groups, providing access to funding and the structures for them to do so. This is critical if the programme is truly going to widen access to all who experience barriers in getting into higher education, and vital to link to individual Access Plans where providers have more nuanced targets.

## **Question 2**

### ***What are your thoughts on the proposed regions, as set out in Annex A and B of this document?***

IHE's primary concern with the current proposed model is that it does not consider providers operating in multiple regions, online, or as a national centre for a specialist qualification. This is most often the case for small and specialist providers and driven by an institutional mission to partner with industry to meet skills needs, and to create opportunities for specialist provision to learners who would otherwise not access it. These providers represent a small proportion of the sector, but they are critical players in widening student choice and addressing risk to equality of opportunity in accessing higher education.

We propose that these providers are able to choose a lead region for collaboration, as opposed to this being allocated according to their registered address, so that they can direct their efforts in line with their institutional priorities and where they can make the most significant contribution. They should only be required to contribute to the governance and coordination of this one region and be evaluated on their collaboration there.

Providers should then have opportunity to engage in outreach activity in other regions if they choose to do so, facilitated by the regional coordinator, resourced by them in line with their APP priorities. Restricting this would otherwise have a negative impact on student choice and equality of opportunity and create potential disadvantage for institutions whose APP targets require activity in more than their chosen lead region. A project-based structure, as we have described in later answers, would facilitate this, bringing in institutions with the right strengths and expertise to contribute to the delivery of specific priorities in that region.

Engagement across regions should also recognise the role that online provision can play in meeting industry and learner needs, with a mechanism for these providers to contribute. Again,

this should be driven by the alignment between provider strengths and expertise and the needs of industry and learners in that region. It should also consider emerging data on industries with high owner-operator models or with high volumes of home-workers such as technology, tourism, sport and culture, or allied health. These courses often appeal to mature learners who can learn and then work from home.

The model should allow for growth and change, which is more likely in smaller institutions, giving flexibility where possible for providers to change their lead region as priorities develop, or in cases where a new campus is established in response to an industry need. Providers would need to justify and accept any additional burden in this process.

Further barriers to providers working in defined regions could arise in cases where providers are not offering courses which directly align to the skills needs for that region. For these instances we feel the OfS has a series of options. Firstly, to explore an exemption model – allowing providers to choose not to collaborate regionally if there is no clear match between their provision and regional needs. Secondly, allowing flexibility and choice for them to engage in another region where they can contribute. Thirdly, clear and specific guidance for how providers can participate for example through contribution on ambition-raising activity including through awareness of non-traditional models of higher education provision. There are examples within the IHE membership for whom these options will be needed, such as specialist provider Matrix College whose students commute to the institution for flexible weekend teaching but return to their home region and complete clinical practice to meet skills needs there.

We also feel further consideration should be given to the number and balance of institutions in the different regions. We agree that the partnerships should be positioned to engage in local activity through LSIPs, or what they evolve to be, and that relationships with combined authorities will be critical in this. However, this needs to be balanced with ensuring that the regional groups are not so large that this prohibits effective collaboration.

This could in particular be a risk for the Greater London region and would support this being broken down further. The OfS should also consider the funding model for different regions, and explore variation in this depending on size, institutional profiles and learner demographic. This should reflect the varying costs of collaborative activity, and how this might be organised differently across regions, and include consideration of the balance of public funding with proportionate financial contributions from providers.

### **Question 3**

#### ***How could a region best collaborate to improve equality of opportunity in access to higher education?***

A region will best collaborate to improve equality of opportunity in access to higher education if it is driven by a clear set of strategic priorities and targets which bring together the needs of industry with the needs of learners. This is essential for a large and diverse group of institutions, each with their own institutional mission and priorities, to be able to collaborate effectively; and to ensure that efforts and funding leads to impact. Regional partnerships should be organised around an established strategy, agreed by all stakeholders. Governance can be adapted to

specific strategic models, for example Greater London could have a governance structure which creates sub-regions, or providers could take on strategic leadership in areas of expertise.

It is critical that the governance and organisation of partnerships enables all institutions have the opportunity to participate. In particular, the unique value and contribution of smaller institutions in this space needs to be recognised. Small institutions, like those in the IHE membership, are ideally placed to contribute to addressing the dual needs of industry and learners. For many, doing so is at the heart of their institutional mission. For this reason, we encourage a governing board for regions that reflects the expertise needed to meet strategic aims – a ‘skills-based’ Board model. Providers should be represented through their expertise, rather than simply as representatives of the provider or provider ‘type’.

Many IHE Members could bring expertise in specific student groups, alongside size and subject. Students at IHE member institutions are more representative of the population that of the population that don’t progress to higher education than those at traditional universities, giving them unique experience and expertise that will be critical for the partnerships to reach learners of all backgrounds. 2023/24 data shows that 39% of undergraduate students at IHE Members are from IMD Quintiles 1 and 2, compared to 27% for the sector as a whole. They also have a significantly higher proportion of mature students (66% at undergraduate level) who are underrepresented (34%) in the sector as a whole. 22% of undergraduates enter IHE courses with no formal qualification at Level 3 (compared to 5% for the sector). Therefore, these institutions play a crucial role in offering alternative higher education provision that removes some of the barriers that learners from these groups experience in the traditional sector. For example, offering flexible, blended and online learning which could key to raising ambition and creating pathways for the high numbers of young people currently struggling to attend mainstream secondary education. Industry based curricula, and project-based learning, also appeal to those who have disengaged from traditional learning and teaching models experienced in schools, as well as to increasing numbers of young people who are neurodiverse or have a mental health need.

IHE member institutions combine this expertise with established industry links, with many having partnered with industry to develop provision in response to a particular skills need, with a target underrepresented cohort in mind. For example, the Collective Acting Studio is one such institution which was established by industry in direct response to a need to address the lack of diversity in film and television.

The Board should also include includes industry professionals, as well as experts in working with the learners that we most want to reach, and student representation.

The Board would then be well placed to oversee the setting of targets, matching the strategic priorities of the region, and organisation of regional activity to meet these. These KPIs should reflect the contribution of all institutions, not being based purely on numbers entering higher education but also include measures of success to do with raised aspiration or ambitions amongst key learner groups; numbers going into non-traditional higher education provision, and progress in addressing identified local skills needs.

The organisation structure should then facilitate institutions to participate where they can make the most significant impact. It should not be the case that every institution in the partnership is engaged in every area of collaboration, instead efforts should be targeted where they will have the most impact according to expertise, industry links, and capacity. This could be facilitated through a project-based structure, with small teams established to work on different areas. This needs to be coordinated by a strong regional coordinator (as proposed in Question 4) with central resource for coordination and evaluation to enable providers to focus on the delivery of collaborative activity.

#### **Question 4**

***One option for leadership and coordination would be working with an independent regional coordinator identified by the OfS to facilitate collaboration in each region. What are your thoughts on this approach?***

IHE supports the proposal of an independent regional coordinator to facilitate collaboration. We believe this model would best deliver the strategic aims agreed by the governing Board of the region and ensure that all institutions have the opportunity to engage in activity according to their strengths and expertise. We support the move away from the leadership of partnerships by institutions (as was under Uni Connect) as this has led to unequal opportunities to participate in collaboration and, in some cases, the exclusion of smaller institutions from partnerships as the design of the model fit the leadership of the time.

The regional coordinator should have responsibility for agreeing KPIs and coordinating a project-based structure (as we have described in Question 3) whereby institutions will have an agreed contribution and intended outcomes. They will need clear guidance from the OfS on their responsibility for ensuring that all providers in the region can engage in a way that can be effectively evaluated.

As we have expanded upon in response to Question 5, this role should also have responsibility for the delivery of evaluation activity, with sufficient central resource allocated to this, and for supporting regional governance. This is important to ensure that provider efforts and funding can be focused on the delivery of access activity with learners. Collaboration here would bring significant cost savings within the wider access and participation funding model.

Regional coordinators should also have responsibility for facilitating sharing of expertise and best practice across regions. IHE Members have already established the potential benefits of a collaborative model through SEER, which enables learning to be shared between institutions, in particular in challenging areas such as effective evaluation practice. The regional coordinator will be well placed to facilitate this and drive forwards some of the 'What works' activity in this area that was formerly under the remit of TASO.

For this role to achieve impact, the individuals appointed to it should be reflective of and understand the diversity of the sector. Lessons can be learnt from the experiences of small and specialist institutions in TEF, whereby some of the assessors did not have an appropriate level of understanding to make an accurate judgement on the quality of provision where established data wasn't available. There is a risk of a repeat of this, with regional coordinators not understanding the strengths and expertise of small institutions given their lack of participation in previous

models and through this not engaging the right providers in the delivery of activity to meet priorities and targets.

To achieve this, it must be a centrally funded and co-managed post. Each role should be held to account for the strategic aims and KPIs of the partnership but managed centrally to promote consistency and establish support structures across regions. Clear targets, stemming from the overall aims of the funding should also be managed by the role, including to ensure participation by all providers. The anticipated link between regional partnerships and access plans means it is essential for this role to be independent so it can best remove blockers to provider participation.

## **Question 5**

### ***What support would be required for your organisation to work collaboratively across a defined region to improve equality of opportunity in access to higher education?***

Small institutions like those in the IHE membership are uniquely placed to contribute to this new model, but to enable this there needs to be specific support in place.

Evaluation models should include more than the typical measures of transition to higher education or volume of students attending a programme. Attention should be paid to the types of students engaging and on more qualitative evaluation in areas such as aspiration raising, awareness of key skills needs for the region, or awareness of non-traditional provision. Some of our members found that awareness of ways to acquire skills outside of traditional three-year degrees had a profound impact on raising aspirations in students in specific target groups like those with caring responsibilities, families of military personnel, and neurodivergent students. Setting strategies and evaluating impact on a more granular level would mean that smaller providers who excel in these areas would have data to reflect in their own APP, which they have lacked in the larger enrolment driven data which dominates the sector.

The funding model more broadly can ensure that all institutions are supported to engage. Regional funding should be managed by the regional coordinator, overseen by an effective governance structure (as we have described in Question 3) to make sure that this reflects regional priorities and targets, the costs of the collaborative activities identified to address these, and the size and resource of the institutions engaged in delivering them.

Regional collaborations should have a standard sliding scale for any financial contributions from providers based on size of eligible student population, with none required from small and micro providers. Smaller institutions already spend a higher proportion of tuition fee income on APP activity, due to fewer economies of scale and a disproportionate administrative cost in meeting regulatory requirements in this area. The OfS must ensure that the burden of collaboration does not fall to the smallest institutions. Larger institutions will inevitably recruit more students from outreach activity, and so their level of financial contribution should reflect this.

There should also be central resource in each region for coordination and evaluation, with the latter being a particular area of need for small institutions. This is critical to ensure that they do not have to divert already limited resource away from the delivery of outreach activity with students. Funding for providers should be targeted to action, not administration. This is the best way to meet the needs of potential learners and the aims of regional collaboration.

The OfS should also use central coordination to support the development of shared services and tools across the regional collaboration. This would reduce costs overall and again support a higher proportion of funding to be spent directly on learners. This could include shared access to central datasets (such as access to the HEAT tracker which is currently prohibitively expensive for smaller institutions), and shared survey models.

Finally, the role of the regional coordinator will be key in supporting the participation of smaller institutions. The OfS should ensure that have a good understanding of small and specialist institutions, provide clear guidance on how to engage them, and make it a clear part of their role to facilitate this.

## **Question 6**

### ***What are your views on addressing regional risks to equality of opportunity in your access and participation plan?***

IHE supports the principal that collaborative regional activity on access, where it is taking place, be reflected in provider APPs. This is the most logical and proportionate way to ensure that there is accountability for contributions and funding received and avoids duplication of effort, creating efficiencies for smaller providers. Targets will play an important role in this in providing a way to clearly and consistently measure contributions and impact.

Collaborative targets also have the potential to address some of the challenges providers currently experience with small numbers and limited data. A larger data set composed of multiple providers in a region could reduce some of the current burden of the requirement to have numerical outcomes-based targets in APPs and ensure that the data being captured was at a publishable level and could be meaningfully used to evaluate impact.

Collaborative targets are also essential for ambition-raising activity, where the final higher education destination for the student is not the end goal and therefore less easily tracked by individual providers. Collaborative evaluation activity could also provide opportunity to share expertise and good practice in an area in which IHE Members benefit from drawing on the experience of the wider sector. However, in order for shared targets to be effective they need to be strategically driven, proportionate and should not add further to unnecessary evaluation.

APP development is currently disproportionately burdensome for smaller institutions (for some, proving a primary disincentive for joining the Fee Cap category of registration). The new model requires significantly more detail than previously, and the expectations for evaluation based on numerical targets is not efficient for smaller providers, requiring them to find alternative data to that which is readily available to those with larger populations. In some cases, targets amount to less than a handful of students and therefore do not represent value for money in the effort spent to evaluate.

It is therefore important that the approach does not add to this for providers. Regional strategies should result in regional plans, with targets that are evaluated regionally. Individual providers should then be encouraged to include these in their APPs with an outline of the contribution they are making. It would be neither feasible nor desirable to attempt to identify the same collaborative targets for all providers in the region, so focus should be on breaking down plans and providers

identifying that to which they have contributed. We have described this model further in Question 3. The balance of regional contributions, and other individual targets and activity in APPs, should be proportionate to the size and strengths of the provider and it should be acceptable for them to determine this based on where their efforts and funding can have the greatest impact.

Targets should also reflect the impact and contribution that all institutions can make. As we have set out in Question 5, these should not be based solely on enrolment data or volumes of participants but instead include measures specifically relevant to the aim of the activity such as aspiration raising or awareness of particular regional skills opportunities. This would also allow for work in earlier school years or with adults not yet ready to enter the workforce.

The OfS should also consider the APP approach for providers with multiple campuses. We suggest that they choose a 'lead' region, for which collaborative activity would be reflected in their APP. This would be necessary to support the proposal that APPs are developed in waves according to region. The APPs for providers who do not deliver courses that meet a local skills need will also need to be considered. As we have outlined earlier, the OfS could explore exempting them from regional collaboration, and therefore the requirement to include this in their APP. Alternatively, they could have the choice to engage in another region where there is clear evidence of a potential contribution – and then their APP would be renewed in line with that regional wave. Or, there could be specific guidance for providers in these circumstances for what their participation, and therefore contribution to collaborative targets, should look like.

## **Question 7**

### ***What are your views on a regional coordinator identified by the OfS providing feedback to us on levels of collaboration reflected in APPs?***

IHE supports the provision of feedback to the OfS on levels of collaboration reflected in APPs and would agree that each regional coordinator would understand the context of the region and providers to be able to do this. Feedback will only be effective where there are clear expectations for institutions, detailed regional strategies and identified KPIs for regional partnerships and individual providers. Feedback to the OfS should be structured, transparent and include all providers in the region where possible. Feedback should also reflect the diversity of institutions in the sector – including their differing strengths, size and resource levels – as well as the strategic priorities of the region they are in and the opportunities for them to engage that result from this.

We also feel that even more important than the provision of individual provider feedback is the role of the coordinator in sharing a sector-wide view of what is working and what is not in collaboration across the regions. OfS can then be enabled to take a sector-level approach where there is commonality across regions, but also for different types of providers. There is not enough support for smaller providers in APPs and feedback to the OfS from coordinators could be an effective way to develop this. This will be essential and should be a priority in the early years of this new model for the OfS to effectively undertake its role in the regulation of this area across the sector.

## Contact IHE

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