
A report for the Higher Education Funding Council for Wales (HEFCW)

Pauline Hanesworth and Freya Douglas Oloyede
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1. Introduction

1.1 Review background

In September 2018, Advance HE was commissioned by HEFCW to conduct a review on institutional Fee and Access Plans ("plans"). This report outlines the findings of the review.

In line with the Higher Education (Wales) Act 2015 ("the 2015 Act"), any institution in Wales that wishes for its full-time undergraduate higher education courses to be automatically designated for student support is required to submit an annual Fee and Access Plan to HEFCW. On approval of the plan, institutions are permitted to charge up to the maximum fee limit (currently £9,000 per year), and students studying courses at that institution can receive student fee support up to that amount as well as other student support. The Welsh Government intends for the plans to make a significant and lasting contribution to widening access to higher education in Wales.

Fee and Access Plan applications must include:

1. Information regarding an institution’s financial viability, the arrangements for the organisation and management of its financial affairs, and the quality of education it provides or is provided on its behalf.

2. Information regarding how an institution will address equality of opportunity and the promotion of higher education.

Part two of the plan should be accessible and informative for all audiences and be published on an institution’s website following HEFCW’s approval. The published sections of the plan should include:

+ an executive summary;

+ clear articulation of the full extent of the institution’s engagement with their student bodies, including students’ involvement in developing, assessing and monitoring plans;

+ a case for the focus and contents of the plan, including a critical reflection on the lessons learned from previous plan implementations and evaluations;

+ evidence of a strategic approach to fee and access planning, including how the plan aligns with the institution’s other strategic documents;

+ an evidence-based assessment and definition of the underrepresented groups the plan will target;

+ an outline of the institution’s objectives, provision and investment planned to support equality of opportunity and the promotion of higher education;

+ SMART institutional targets that contribute directly to demonstrating the institution’s commitment to equality of opportunity and the promotion of higher education, aligned to plan objectives and investment.

Plans are submitted to HEFCW for approval. HEFCW’s role in the Fee and Access Plan process is to ensure that:

1 Meaning specific, measurable, achievable, realistic and time-bound.
the measures to which institutions commit in their plans are sufficiently ambitious to improve access to higher education in light of the significant public subsidy derived from statutory student support;

individual institutions’ performance against the measures in their plans and progress made across the regulated higher education sector as a whole is sufficiently evaluated; and

good practice is identified and communicated to institutions so that the effectiveness of fee and access plan measures and investments increases over time.

Since the Higher Education (Wales) Act 2015, there have been three Fee and Access Plan cycles: 2017/18 (with plans published in August 2016), 2018/19 (with plans published August 2017) and 2019/20 (with plans published August 2018). Ten institutions have completed and published plans for each of the three years.

1.2 Review aims and objectives

The purpose of the review was to further inform HEFCW’s understanding of Fee and Access Plans to enable it to respond fully to the Welsh Government’s expectations and to meet a Welsh Government remit on HEFCW to strengthen the plans.

It aimed to:

1. Consider the contribution of the plans to supporting equality of opportunity (widening access) and promoting higher education.

2. Comment on the plans’ development over the three-year period.

3. Identify areas for improvement of the plans, within the context of the Higher Education (Wales) Act 2015.

4. Identify any effective practice.

The review focused only on the published elements of the 30 plans. It took into account the distinct higher education policy context in Wales, the Welsh Government’s expectations in relation to widening access, the sector priority of Welsh-medium higher education, and the priorities enshrined in the Well-being of Future Generations (Wales) Act 2015.

The review particularly concentrated on the extent to which there is coherence between a plan’s definition of underrepresented groups, objectives, investment against categories of activities, and proposed targets to measure progress and demonstrate ambition.

It also considered the extent to which:

+ plans reference, are aligned with, and articulate appropriately institutions’ corporate documents, including institutional strategies and strategic equality plan objectives and actions;

+ the student voice is taken into account, including how HE in FE students are engaged / involved in plan developments;

+ the critical review sections in each plan appear to inform the plan’s development;

+ plans are accessible as public documents.
Finally, the review considered whether HEFCW’s guidance could be improved to strengthen plans, and, if so, how.

1.3 Review limits
In order to be available to influence HEFCW’s guidance on the next set of plans, the review had to be conducted in a short time frame. As such, it was desk-based and focused solely on the contents of the published documents and not the process of developing and monitoring them. The section in this report that concentrates on the Fee and Access Plan process is focused only on the elements articulated within the documents themselves.

The report, therefore, does not comment on the annual process of negotiation that takes place between HEFCW and institutions during the development of the plans, nor any changes potentially made to the plans as a result of this.

The review did not explore other institutional documents, such as strategies or equality plans, to clarify or check alignment between these and the plans. Nor did it explore the effectiveness of the plans in advancing equality of opportunity and promoting higher education, since this is not discernible from the documents.

Importantly, the review did not comment on the general effectiveness of the activities / provision chosen, focusing instead on the alignment between objective, underrepresented groups and provision and on the provision’s appropriateness in light of its corollary objective.

Effective practice examples are presented throughout the report. They were chosen as illustrations of innovative, interesting or robust approaches in specific elements of Fee and Access Plans. They should not be considered as indicative of an overall exemplary plan: there were strengths and weaknesses in every document.

Although the review brings in knowledge and understanding of similar documents in England and Scotland where it is felt to be appropriate, it does not offer a comparison between the three sectors’ approaches to equality of opportunity or promotion of higher education. Nor does it offer a comparison of the plans with England’s Access and Participation Plans, Northern Ireland’s Widening Access and Participation Plans, Scotland’s Outcome Agreements or other similar documents. The nations have particular approaches to equality of opportunity and the promotion of higher education that are tailored to national needs and contexts, which influence the content of such documents, and thus which render such a comparison impractical for the purposes of this review of the first three years of Fee and Access Plans post the 2015 Act.

1.4 Review methodology
To conduct the review, Advance HE developed an analysis framework that articulated the enquiry parameters on which the research was based (see appendix). The framework was developed based on the review aims and objectives (section 1.2), with reference to the 2015 Act and HEFCW’s Fee

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2 This information would instead be found in Fee and Access Plan annual monitoring reports, which are submitted to HEFCW normally in December following the period for which the plan was in effect.

3 That is not to say that Wales cannot learn from the approaches of other nations and/or countries, and vice versa. Rather, it is to say that this type of research is outwith the scope of this review.
and Access Plan guidance (with a focus on the guidance for 2019/20). It was refined following comments from project critical friends, the HEFCW project manager and other HEFCW colleagues. The project team utilised the framework to conduct a desk-based analysis of the 30 plans. The review was conducted in three stages:

1. In-depth review of each institution’s 2019/20 plan according to the analysis framework to consider the contribution of plans to supporting equality of opportunity and promoting higher education, to identify areas for improvement, and to identify effective practice.

2. Retrospective review of each institution’s 2017/18 and 2018/19 plans to consider the plans’ development over the three-year period and to supplement the findings from the 2019/20 plans, if, and as, appropriate.

3. Overarching review of all institutions according to each framework stage to elicit common patterns that informed review findings and recommendations.

The project team compared findings after reviewing one institution each to ensure they were applying the analysis framework consistently and to iron out any discrepancies. They pooled and refined findings following analysis and confirmed recommendations.

A copy of initial findings was made available to project critical friends and HEFCW, comments on which informed the content of this report.

1.5 Review report

This report outlines the results of the review. It is structured differently to the analysis framework. This is because certain sections of the Fee and Access Plans aim to the same purpose, have certain commonalities, and are most coherent when considered collectively. This is also because the reviewers do not want to encourage the assumption that current plan structures are set in stone. It is clear that institutions are still trying to find the most effective structure for their plans and the reviewers are keen to ensure the report does not preclude further experimentation and refinement.

Following this introduction, there is a summary of key themes section, which provides a brief overview of cross-cutting themes. The report then contains four main sections. The alignment between these and the analysis framework is articulated in table 1.

Table 1: Report structure and analysis framework alignment

<table>
<thead>
<tr>
<th>Report section</th>
<th>Content</th>
<th>Analysis framework sections</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presenting the Fee and Access Plan</td>
<td>Consideration of the overall presentation and structure of the plans</td>
<td>Accessibility, executive summary</td>
</tr>
<tr>
<td>The Fee and Access Plan Process</td>
<td>Consideration of the Fee and Access Plan processes as described in the plans</td>
<td>Student voice, strategic alignment (subsection under rationale)</td>
</tr>
</tbody>
</table>

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4 Taking into account that previous plans were developed according to earlier guidance.

5 Project critical friends were chosen owing to their extensive experience and knowledge of widening access and/or the Welsh higher education and political context.

6 Plans were allocated evenly across the team with the two team members reviewing five institutions each. Allocation of institutions took into account potential conflicts of interest.

7 Thanks are due to the project critical friends and HEFCW project manager and colleagues for their thoughts and comments on a draft version of this report, which have been incorporated into this final version.
Report section | Content | Analysis framework sections
--- | --- | ---
The Fee and Access Plan Rationale | Consideration of how institutions justify their plans | Critical review (subsection under rationale), underrepresented groups
Implementing the Fee and Access Plan | Consideration of what institutions are committing to do within their plans | Objectives and provision, investment and targets

Each section incorporates recommendations that are brought together at the end of the report by way of a conclusion. The report is followed by an appendix, which houses the analysis framework.

The report is aimed at HEFCW, Welsh Higher Education Providers and the Welsh Government, and is designed to be read both section by section and as a whole. It is hoped that the report will support institutions and HEFCW in the future development of plans and the Fee and Access Plan process.

In writing the report, the reviewers have highlighted instances of effective and/or interesting practice, either within the body of the text itself or in pull-out boxes. For these, institutions are named. In all other cases, examples are anonymised. It should be noted that not all effective or interesting practice is reflected in the report: there was much that could not be incorporated into a report of this length. We encourage institutions to explore each other’s plans since there is much that can be learned from each.
2. Summary of Key Themes

The review resulted in a wealth of findings and recommendations that are outlined in detail in the next four sections. Many of these are specific to the section under which they sit. Rather than summarising them, we instead present here eight interrelated but overarching themes that cut across the seven analysis framework sections.

These themes are less focused on plan content and more on overarching Fee and Access Plan development, attention to which could improve the plans themselves as documents as well as overall Fee and Access Plan development, implementation and evaluation.

The themes should be read as a high-level summary of the report’s key findings and should be considered in conjunction with the recommendations in section 7.

1. Individualising the Fee and Access Plan

The HEFCW template is, on the whole, helpful to institutions in the development of their plans. However, where institutions have followed the template very closely, it has caused problems. We outline this particularly in section 3. In summary, this has sometimes resulted in:

+ repetition within the plan;
+ publication of parts of the template that do not need to be published, increasing document length and/or making it more difficult to navigate;
+ a disjointed narrative (see also “creating a narrative”).

Where institutions adapted the template, using institutional branding, adopting their own structures or adapting the HEFCW structure to make it work for them, inserting sections not required by the template (e.g. narratives on investment in the critical review, tables illustrating alignment between objectives, investment and targets etc.) and other such actions, it read more clearly and more coherently. Further, it read less as an impersonal / HEFCW-owned document and seemed more likely to appeal to a range of audiences.

However, there were also instances where individualisation led to a loss or minimising of one or more required elements. As explored further in the report, care must be taken to ensure that when pursuing individualisation and coherency, the plans remain comprehensive.

2. Structuring the Fee and Access Plan

In addition to a separate section on structuring the plan (3.3), considerations of structure are interspersed throughout the report. While we do not want to be prescriptive regarding structure, and would encourage adaptation (see “individualising the Fee and Access Plan”), we did identify a few areas where the structure as outlined in the HEFCW guidance and template could be tightened, without losing any of the necessary elements of the plans. This includes:

+ separating student voice and communication of fees and financial support to students: the former being placed in a section on the Fee and Access Plan process, the latter coming into provision;
+ separating critical review and strategic alignment: the former staying within the Fee and Access Plan rationale, the latter moving to those areas considering the Fee and Access Plan process;
+ bringing the identification of underrepresented groups into the Fee and Access Plan rationale;
+ separating monitoring and evaluation from provision and placing it with explorations on the Fee and Access Plan process.
3. Focusing the Fee and Access Plan

Institutions included a lot of information within their plans, with each year seeing increasing amounts. Sometimes, this was useful, for example in evidencing underrepresented groups or in discussing the communication of fees and financial support. However, at other times, information included appeared extraneous and obscured the core of the document. For example:

+ increasing amounts of information on student engagement in institutional governance / policy and reflections on Wise Wales principles (though required by the guidance) tended – though did not always – to obscure the information on student involvement in the Fee and Access Plan process;
+ expanding descriptions on institutional strategies, policies and other documents tended – though did not always – to obscure the evidencing of alignment between them and the plan;
+ increasing amounts of information on current institutional contexts within the critical review could make it difficult to discern which elements were relevant to the plan and which were not;
+ extensive descriptions of provision created overlap and could make it difficult to discern where provision was specific to the objective to which it was aligned.

Throughout the report, we offer recommendations on improving the focus of the plans, which aim to strengthen each section, ease readability and consequently improve the overall argument for the plans’ focus and contents.

4. Being explicit

Institutions had a tendency within the plans to be implicit. For example:

+ presenting institutional data on student participation, experience and outcomes within their critical review without explicitly stating how this data fit within the Fee and Access Plan process (i.e. how it influenced objectives);
+ presenting strategies to which the plan aligned without being explicit as to how this alignment occurred;
+ adopting institutional objectives without being explicit as to how these aligned to the Welsh Government categories of provision or to their rationale;
+ establishing targets without being explicit as to how these aligned to provision (and sometimes objective).

Throughout the report, we offer recommendations on improving the explicitness and/or clarity of the plan, which again aim to strengthen each section, ease readability and consequently improve the overall argument for the focus and contents of plans.

5. Creating a coherent plan

For many of the reasons outlined in this section, the plans could often appear disjointed with coherency between rationale, identified underrepresented groups, objectives, provision, targets and investment obscured.

We offer a variety of ways throughout the report in which this could be addressed; however, at its heart, this is about creating a coherent narrative.

A Fee and Access Plan, we suggest, should weave a tale that tells the reader where the institution has been (critical review), where they are now (overall rationale and underrepresented groups), where they want to go (objectives) and how they will address this (provision, targets, investment), all embedded within a process that ensures the journey will be successful (student engagement, strategic alignment, monitoring and evaluation).
We speculate that by considering the plan in this light, a stronger and more coherent plan might emerge.

6. Considering partner institutions
HEFCW guidance makes it clear that fee income should be invested equally in students on courses delivered by partners (here meaning franchise partners, though within the report as a whole we consider broader partnerships). Not all institutions work with partner institutions; however, those that do considered their partners to varying accounts:

+ partners tended to be considered in relation to student engagement in institutional governance / quality, but rarely did institutions consider how partner students were involved within the development, implementation and monitoring / evaluation of the plan itself;
+ partners were considered in relation to the plan rationale to the extent of considering partnership provision, but rarely did institutions consider data / evidence from partners in their critical review or how the plan was embedded in the strategic life of partner institutions;
+ rarely did institutions consider partners within their identification of underrepresented groups;
+ partners were considered extensively in relation to provision, but rarely brought into objectives or targets.

Many of the recommendations arising from the review focus on bringing partner institutions into the plan; this will provide nuance to the plans and ensure their focus and contents serve all of an institution’s students.

7. Considering Fee and Access Plan audience
In their guidance, HEFCW notes that the “key audiences [for the plans] include HEFCW, Welsh Government, students and potential students, researchers and the media. Plans should be accessible and informative for all audiences.”

However, it is challenging for institutions to reach this breadth of audience and meet Fee and Access Plan requirements. For example:

+ the requirement for extensive amounts of information results in the inclusion of much material that might be of little interest to non-HEFCW, non-HE management audiences;
+ the requirements necessitate some HE-speak, particularly around widening access-related terms and corporate language, which would likely be inaccessible to non-HEFCW, non-HE management audiences.

Institutions have worked to make their plans more accessible to all types of audiences in terms of the presentation of the documents, but the review found that the plans are likely only able to be found by those who are already aware of what the document is and have reason to search for it. Further improvement could certainly be made in this area.

Within the report, we recommend requiring institutions to:

+ think about where they publish their plans to reach as many people as possible;
+ consistently provide Welsh language and alternative formats of the plans;
+ continue to enhance the ease of understanding of the plans, including through use of language, formatting and design;
+ strengthen their executive summaries to enable communication of these to other audiences, which we suggest would involve:
  – using more accessible language, particularly thinking about a student audience;
  – fully summarising the plan;
– publishing the summary as a webpage.

This would assist institutions to ensure their plans deliver on HEFCW requirements, while not forgetting the broad range of individuals to whom they may be of interest.

8. Balancing Fee and Access Plan emphasis
First and foremost, the plans are regulatory documents that enable institutions on approval to access student support. Additionally, there are two emphases within the plans:

+ providing a justification for and presentation of the activities / provision undertaken by institutions in their work to advance equality of opportunity and promote higher education; and

+ demonstrating an enhancement-focused, strategic approach to advancing equality of opportunity and promoting higher education, recognising that widening access is a long-term agenda.

The review found that balancing both of these emphases within the plan is challenging (see in particular section 6.2). The former is focused on activity, and requires detailed information about provision; the latter requires a strategic approach, which places emphasis on appropriateness of objectives and targets and the coherency between these and earlier sections of the plans in order to make progress towards securing equality of opportunity and the promotion of higher education.

Overall, a balance must be struck: institutions need to demonstrate to HEFCW that their plans will make progress, effectively, towards equality of opportunity and the promotion of higher education through a strategic, contextual and institution-wide approach, with effective provision underpinning that approach. In several places in the report, we provide recommendations for how institutions might achieve this balance.
3. Presenting the Fee and Access Plan

In their 2019/20 guidance, HEFCW asked that Fee and Access Plans be accessible and informative for all audiences, including HEFCW, Welsh Government, students and potential students, researchers and the media.

In this section, we share findings relating to how institutions present their plans, including findings about the accessibility of the plans and their executive summaries, both of which were included in the original analysis framework. Additionally, since it was found to be an important factor in the accessibility and coherency of the plans, we consider the ways in which institutions chose to structure their documents.

3.1 Accessibility

For the purposes of this review, accessibility did not focus on design for disabled people but instead looked more broadly at “ease of access” and “ease of understanding” for all readers. We address each of these in turn.

3.1.1 Ease of access

**Overall development**

Overall, it was not easy to access the plans: they were difficult to find on websites, online summaries were rare, Welsh language versions were not ubiquitous or necessarily easy to locate, and no mention of alternative formats was made. This likely significantly limits the number of readers of the plans and the range of audiences they reach.

**Ease of finding the Fee and Access Plans**

Although the plans of all but one of the institutions could be found through the link on the relevant HEFCW webpage, they were not easy to find without this link or without some prior knowledge of where to look. Often, when not using the HEFCW link, plans were best – and sometimes only – found through use of Google. This means that potential readers must already be aware of what the plans are and be motivated to read them prior to access.

A particular challenge for potential readers was that there is no consistency among institutions as to where the plans are situated (table 2). The most frequent location of plans was sections relating to student fees and/or finance, but “publications”, “governance” and “policies” sections were also utilised.

While “fees” or “finance” sections might be obvious places to look for those who know what a Fee and Access Plan is, for those without prior knowledge, this may not be where they expect to find them given the strategic nature of the documents and their focus on student access. Again, without knowledge of what these plans are, and an explicit intent to search for them, it is unlikely that the plans would be accessed.

<table>
<thead>
<tr>
<th>Website section</th>
<th>Fees / finance</th>
<th>Publications</th>
<th>Governance</th>
<th>Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of institutions</td>
<td>6</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 2: Location of Fee and Access Plans on institutional websites

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8 An institution that published their 2019/20 plan under “governance” also had a link to their 2018/19 plan on their tuition fees webpage.
RECOMMENDATION: Institutions think carefully about where they publish their plans to reach as many audiences as possible, considering including them on more than one webpage / section of their websites.

RECOMMENDATION: HEFCW considers recommending at least one section of institution websites where plans should be positioned.

**How Fee and Access Plans are presented on websites**

Plans were mostly – with a few exceptions – placed on websites with little explanation as to what they are, or why someone might want to read them. Sometimes plans were provided simply as links in the sidebar of the page with no explanatory text.

Four institutions provided explanatory text about their plans on the webpage hosting them and fuller summaries of their current plan were provided by two institutions.

Without any explanation of what they are, it is unlikely that plans would be accessed by audiences that did not have prior knowledge about them.

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**Online summary of the plan**

**Aberystwyth University** provided, on the webpage hosting their plans, a summary including:

- the purpose of their plan;
- progress on, and continued investment in, the two key areas of their plan: social justice and widening access, and student employability;
- a list of examples of measures (provision) included in the plan;
- tuition fees for 2018/19 and information on how fees will be set and communicated for future years;
- a statement about bursaries and scholarships available from the university.

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RECOMMENDATION: Institutions provide an online summary of their plan, perhaps using their executive summary, in order to communicate it to a wider audience and encourage access.

**Welsh language Fee and Access Plans**

Although Welsh versions of plans were usually available on the Welsh version of webpages, this is not the case for all plans, including for earlier years, which contravenes the statutory requirement to publish Welsh and English versions simultaneously.

Two institutions also included Welsh language versions of their plans on the English versions of their webpage, which means they would be accessible no matter on which version of the site a potential reader is browsing. We would suggest that publishing both language versions on both versions of websites would be the optimal approach.

RECOMMENDATION: Institutions simultaneously publish Welsh and English language versions of all their plans.

**Alternative formats**

No institution made it clear whether plans could be made available in alternative formats or languages (aside from Welsh), potentially limiting access to the plan by some audiences, including underrepresented groups.
All plans were presented in PDF format. This can be difficult for users to customise for ease of reading and often does not work well with assistive technologies like screen readers. It would be good practice to make alternative formats available at time of publication and/or to make clear that alternative formats can be made available, as well as how to obtain them, on the webpage hosting the plans.

RECOMMENDATION: Institutions make alternative formats of the plans available, stating this on the webpages hosting their plans, with information provided about how people can access them.

RECOMMENDATION: HEFCW provides guidance on the publication of plans to ensure ease of access.

**Titles and dates**
All institutions titled their plans, though this tended to appear only on the cover and/or front page and rarely throughout the document as a header or footer.

All institutions also provided the date of approval within their plans, albeit only on the approval page and not the front of the document. However, although HEFCW explicitly require it in the 2019/20 guidance (paragraph 165), no institution provided a date of publication.

RECOMMENDATION: Institutions include the date of publication within their plan.

**Alternative methods of communicating the Fee and Access Plan**
Information about how institutions communicated plans beyond the documents themselves, particularly to students and prospective students, was limited. Exceptions included:

- Some institutions noted how plan content and/or monitoring of plans were communicated to student unions, student representatives and/or governance structures / committees on which students sit;
- One institution claimed, “information regarding the HE Fee Plan is included in the HE Student Newsletter which is published termly and distributed to all HE learners.”

Although not a requirement, communication of policy or governance documents relevant to students has proven effective in engaging the student voice. Take, for example, the University of Exeter’s website for students on teaching excellence, which breaks down the information in their official Teaching Excellence and Student Outcomes Framework submission, and translates it for ease of access, ease of understanding and to encourage student engagement.

RECOMMENDATION: While the primary mechanism for communicating the plans is the plan document itself, institutions should also raise awareness of their plans among students and prospective students through other mechanisms.

**Communication of in-force changes**

It was not always clear where variation to plans already in force had been made. Where this was made clear, only a few institutions were explicit as to what these changes were (this usually orientated around fee levels and changes in programmes); most gave no further information.

RECOMMENDATION: Institutions provide details of in-force changes when they occur, including information on what has changed, and consider adding these details to the webpages hosting their plans.

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9 Fee and Access Plans are “in force” once they have received HEFCW approval. They remain “in force” either until the day on which the period to which the plan pertains expires (i.e. the end of the academic year to which the plan relates) or the date of a withdrawal notice, whichever occurs sooner. As such, in-force changes are changes that have occurred after HEFCW approval while the plan is still in effect.
3.1.2 Ease of understanding

Overall development

Institutions have mostly made a concerted effort over the three years to improve the ease of understanding of their plans, with more strategic and effective use of formatting and a reduction in higher education jargon, acronyms and abbreviations.

However, as is perhaps unavoidable for this type of document, the plans were still quite text dense, still used HE-speak, presumed a lot of knowledge, and were therefore likely to be inaccessible to a non-HE audience, including students and prospective students, particularly those from underrepresented groups.

Length

Many published plans were considerable in terms of page count, which could detract potential readers or prevent the plan from being read in full. The longest document was 65 pages and the shortest was 24. Average (mean) document length was 45.3 pages (figure 1). It should be noted that the required annexes and approval pages added at least six pages to the length.

![Figure 1: Number of pages per (unnamed) institution in 2019/20](image)

Shorter documents tended to make more use of bulleted lists and tables to present information. One institution typeset the document into two columns, presenting the illusion of a shorter document while still providing a useful amount of text.

A couple of institutions published pages from the HEFCW template that were not required to be published, for example publishing the template text in full, including HEFCW guidance sections. This both added to the total page length and made it more difficult for a reader to find the actual plan within the document.

Ultimately, institutions need to ensure they meet all HEFCW requirements in as concise a way as possible.

**RECOMMENDATION:** Some institutions consider reducing the length of their plans, including ensuring they do not publish unnecessary parts of the template, while ensuring they meet all HEFCW requirements.\(^\text{10}\)

Language

In their 2019/20 guidance, HEFCW encouraged institutions to use less HE acronyms, jargon and technical or complex terms without explanation. While language has evolved over the three-year period, with a little less jargon, acronyms and abbreviations being used from year to year, the majority of the 2019/20 plans still used language best suited to an HE audience. There was also still a considerable amount of presumed knowledge, particularly relating to widening access terms.

\(^{10}\) NB Many of the recommendations in subsequent sections lay out how reduction in length of plans can be achieved.
For example:

+ there was regular use of terms such as WIMD (Welsh index of multiple deprivation), HESA (Higher Education Statistics Agency), and Reaching Wider without explanation of what these are;
+ there was regular use of corporate language, for example “benefits realisation of initiatives”.

While this is fine for an HEFCW or HE-management or governance audience, the majority of students or prospective students would be unlikely to understand what these are.

A significant challenge for institutions is that the nature of the document in its current form does demand use of some HE-speak, and specifically widening access-related terms, as well as corporate terminology. Owing to their purpose and contents, the plans will necessarily involve such language.

Ultimately, it is extremely challenging for institutions to create plans that are appropriate for all audiences. However, there is opportunity for some institutions to use more simple language wherever possible and to consistently explain any technical terms, abbreviations and acronyms.

In addition, while the main document might not be completely accessible to all in terms of language, we recommend that the executive summary be written in different language so that more audiences might engage with the plan at least at this level. We suggest that it could be written with a student and prospective student audience in mind.

**RECOMMENDATION:** Institutions ensure plans are written in language that is as simple as possible, with necessary technical terms, abbreviations and/or acronyms being explained the first time they are used.

**RECOMMENDATION:** Institutions make their executive summaries even more accessible in terms of language than their main plans, particularly thinking about appropriateness for a student audience.

**RECOMMENDATION:** HEFCW strengthens its guidance in relation to use of accessible language, and requests more accessible language throughout plans, and in particular in executive summaries.

**Design**

The majority of institutions chose to use the HEFCW template design for their plan, inserting their logo on the front page and name in the header, and perhaps making small changes, such as to fonts and colours. This reemphasised the sense that the plan was a strategic document for a non-student audience.

A few institutions, however, chose to create their own branded design. This not only gave more of an institutional identity to the document, but in some cases also aided ease of understanding in terms of improving readability, with text appearing less dense on the page.

**RECOMMENDATION:** Institutions consider creating their own design for their plan to give it more of an institutional identity and to improve readability.

**Formatting**

Development in formatting over the three years was evident in the plans of most institutions, who had clearly worked to adapt their formatting to improve readability.

Six formatting trends stood out:

1. All institutions made use of **headings and subheadings** to help the reader navigate the text. However, in some cases there could be more use of subheadings.
2. Many institutions used **bold font** to draw attention to headings or key points within the document.
3. Many institutions made good use of **bulleted or numbered lists** to break up the text and convey key points succinctly.
4. **Tables**, outside of those required by the annexes of the HEFCW template, were used effectively by a number of institutions to present elements such as fee levels, underrepresented groups and provision.\(^{11}\)

5. Two institutions inserted **contents pages** at the front of their plans; tables of contents are particularly useful for such typically long documents with their multiple sections and we recommend adopting them in future iterations of the plans.

6. Occasionally, a perceived lack of care was evident in relation to formatting; for example, a mismatching of formatting highlighted when plans had copied and pasted from other documents / materials, or previous plans. The **lack of reformatting** prevented these plans from achieving a smooth appearance and/or cohesive identity.

**RECOMMENDATION:** Institutions continue to make effective use of formatting, including headings, subheadings, bulleted lists and bold font, to aid readability of the plans.

**RECOMMENDATION:** Institutions consider using tables creatively to present elements of the plan in a more user-friendly style; though alternative format versions should take into account how tables present challenges to assistive technology like screen readers.

**RECOMMENDATION:** HEFCW requires institutions to include a contents page within their plans to assist readers in navigating the document.

### 3.2 Executive summary

Following a request from NUS Wales, HEFCW has asked institutions to include an executive summary in their plans. They ask that this:

- provides a clear and succinct overview of the content of the plan;
- sets out the plan’s main features and highlights key priorities.

An executive summary was added to the guidance both for accessibility reasons and with a view to enabling HEFCW, and/or others, to use executive summaries as standalone synopses of institutions’ plans.

Institutions have mostly worked to improve their executive summaries over the years, in particular around providing more information on objectives and underrepresented groups. However, some institutions have made no changes to this section of their plan, and there are some areas that still require development.

Current common aspects of the plans’ executive summaries and the number of institutions including them are outlined in table 3. These are listed in order of commonality.

**Table 3: Common aspects of Fee and Access Plan executive summaries**

<table>
<thead>
<tr>
<th>Common aspect</th>
<th>Number of institutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement of strategic underpinning</td>
<td>8</td>
</tr>
<tr>
<td>List of objectives or priority areas of focus</td>
<td>6</td>
</tr>
</tbody>
</table>

\(^{11}\) However, it should be noted that while helping to break up dense text, complex tables can sometimes pose challenges for those using screen readers.
We are not arguing that all of the above elements should, or should not, be included within the executive summaries. However, it can be seen that there is variance in the level of detail provided within this section.

Indeed, there are seemingly some misunderstandings as to what the executive summary should do: act as a standalone summary of the plan. Some institutions instead tended to provide an introduction.

Others included summaries of some parts of their plan, notably the Fee and Access Plan process, objectives, underrepresented groups and overall investment levels. However, they mostly missed other vital elements, such as the plan rationale and/or an impression of distance to be travelled, pace of progress and/or current intentions.

One reason for this may be that institutions find it difficult to fully summarise their plan within the 500-word limit and so are having to select what to include.

**RECOMMENDATION:** Institutions ensure they provide a succinct summary of the plan within their executive summary, rather than an introduction, focusing on the plan’s main features and key priorities.

**RECOMMENDATION:** HEFCW be more explicit in its guidance and template regarding the content required in the executive summary. This might include a list of the elements they expect to see.

**RECOMMENDATION:** HEFCW considers extending the word limit for the executive summary by 500 words to allow for the main features and key priorities of plans to be summarised effectively.

### 3.3 Structure

Structure is revisited throughout this report, particularly in the Fee and Access Plan rationale section (section 5 under critical review and underrepresented groups) and when discussing provision (section 6.2). Here, we briefly address overall structure.

This varied considerably across the plans. As mentioned above, most institutions chose to follow the HEFCW template. Some followed the numbered list of requirements in the template very closely, while others interpreted it more loosely.

Strict adherence to the template often led to repetition of content. For example, within the same document, objectives were listed under both “making the case for the focus and contents of the plan” (template section 15) and under “objectives” (template section 17). Repetition of text is also explored in sections 4.3 and 6.2 of this report in relation to monitoring and evaluation and communication of fees and financial support.

A few institutions, however, created their own structure. These positioned the required information in alternative orders to that suggested by the template, in one instance to a great extent. Such use of own structures, or even slight adaptations to the structure, often made the plan more coherent and accessible.
However, there were occasions when restructuring, while often creating a better narrative, meant that some required elements were omitted or not covered in enough detail. Additionally, reordering of elements without clear cross-referencing to the template may make it more difficult for HEFCW to be sure that all requirements have been met. It is necessary, therefore, to take care when restructuring to ensure that key elements or details do not get lost and that the new structure is cross-referenced to the HEFCW template. The aim must be for a document that is as concise, coherent and comprehensive as possible.

**RECOMMENDATION**: Institutions consider whether they want to be more inventive with their structure in order to create more coherent and accessible documents, while ensuring that required elements and level of detail are retained.

**RECOMMENDATION**: HEFCW reviews its template in relation to the ordering of requirements, considering where elements may be helpfully grouped together or separated, and ironing out the potential for repetition.¹²

¹² Further recommendations within the report outline where HEFCW can best streamline their guidance and template.
4. The Fee and Access Plan Process

In this section, we present the findings on the student voice and strategic alignment elements of the plans, the latter of which is a subsection of the rationale within the HEFCW template. Although not an explicit requirement, it was found that a common theme within these elements was the Fee and Access Plan process.

A note on monitoring and evaluation as it appears in the plans is also included here since it is an important element of the Fee and Access Plan process.

4.1 Student voice

The 2019/20 HEFCW guidance and template asked institutions to articulate:

1. Student engagement in the Fee and Access Plan process.
2. Student engagement in institutional governance and quality, taking account of institutions’ Student Charters.
3. How fees and financial support are communicated to current and prospective students.
4. The extent to which plans reflect the principles within Wise Wales’ statement on partnership for higher education, UUK’s 2015 report Breaking down the barriers to Student Opportunities and Youth Social Action, and HEFCE’s guidance on providing information to prospective students.

Here we split the section in two, focusing first on student engagement and then on communication of fees and financial support.

4.1.1 Student engagement

Overall development

A common development across the student voice section was a tendency to include more information each year. With regard to student engagement, this focused on the addition of information regarding student involvement in institutional governance and quality, and on proving institutional allegiance to Wise Wales principles. Student engagement in the Fee and Access Plan process itself tended to see little change, and, in some instances, a reduction in the detail provided.

This has resulted in student engagement in the Fee and Access Plan process becoming lost: in the increasing amounts of information, it can be difficult to discern which elements of student engagement in institutional governance and quality are relevant to student involvement in the Fee and Access Plan process.

The reflection on institutional alignment with Wise Wales – and other – principles also appears to distract from the core focus of student involvement in the Fee and Access Plan process. Institutions could better illustrate alignment with the principles by presenting a students-as-partners ethos throughout the student voice section, demonstrating alignment by action rather than by reflection.

It is recommended that institutions re-focus the student engagement element of the student voice section back to student involvement in the Fee and Access Plan process.

Focusing on the process

The trend of increasing loss of focus on the Fee and Access Plan process is not ubiquitous. For example, Swansea University and University of Wales Trinity Saint David have given more focus to student involvement in the Fee and Access Plan process over the three years.
This does not mean that student involvement in institutional governance and quality or alignment to Wise Wales principles must be lost. Instead, we advise that focus be on how students are involved in the Fee and Access Plan process and subsequently how this is embedded in a broader students-as-partners ethos. This would illustrate coherency between the Fee and Access Plan process and institutional governance and quality, and the Fee and Access Plan process and the Wise Wales principles, while saving space and ensuring relevance.

**RECOMMENDATION:** Institutions re-orientate the focus of the student engagement element of the student voice section back to the Fee and Access Plan process.

**RECOMMENDATION:** HEFCW re-writes the Fee and Access Plan guidance to require a focus on how students are involved in the Fee and Access Plan process first and how this is embedded in a broader students-as-partners ethos second, requiring demonstration of, rather than reflection on, Wise Wales and other principles.

**Engagement approaches**

Student involvement in the Fee and Access Plan process orientated around existing institutional governance / quality structures, existing activities and the use of bespoke activities. These included, but were not limited to, the approaches outlined in table 4.

Table 4: Student engagement approaches in the Fee and Access Plan process

<table>
<thead>
<tr>
<th>Use of existing governance / quality structures</th>
<th>Use of other existing activities</th>
<th>Bespoke actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student membership of board of governors</td>
<td>Use of various student feedback mechanisms to inform the plan</td>
<td>Co-writing of plan with student union officers</td>
</tr>
<tr>
<td>Student representation on relevant councils, committees and groups</td>
<td>Incorporation of themes arising through general student union / institutional interactions in the plan</td>
<td>Strategy / plan development workshops</td>
</tr>
<tr>
<td>Student charter</td>
<td>Use of annual student conference to help identify themes for the plan</td>
<td>Specific student union / institutional meetings</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Annual report to student unions on progress and use of fees income</td>
</tr>
</tbody>
</table>

Where student involvement in the Fee and Access Plan process was explicit, it often cohered with student involvement in institutional governance and quality to the extent that it tends to be through the latter processes that the former occurs.

The approaches articulated in the plans align to those advocated in HEFCW’s briefing *Students’ involvement in fee and access planning processes*, with the exception of campaigns. HEFCW notes how student campaigns (institutional, Welsh and UK-wide) can inform the plan. Although campaigns were referenced by some institutions in relation to identification of underrepresented groups (see 5.2.1), they were not included within the student voice section and could be an element to be considered in future plans.

**Fee and Access Plan stages**

In their student involvement briefing, HEFCW also suggested that institutions could involve students and student unions in target setting and monitoring and evaluation activities. To this, we would add student involvement in the implementation of Fee and Access Plan provision.

Most institutions concentrated on student involvement in the development and approval stages of the plan. Language ranged from students “endorsing” or “approving” plan contents, to students “co-
developing” and “co-writing” the plan. The latter of these presented a stronger students-as-partners ethos than the former, and thus aligned more strongly with the Wise Wales principles.

**Operationalising engagement**

Grŵp Llandrillo Menai is in the process of developing an action plan that aims to capture, and develop, student engagement in institutional governance and quality. The Fee and Access Plan cycle is being built into the plan to strengthen student engagement in all stages of the Fee and Access Plan process. This should operationalise student involvement in the Fee and Access Plan process while ensuring coherency with wider student engagement in institutional governance and quality.

Six institutions discussed student involvement in the monitoring and evaluation of the plan, usually through student representation on the appropriate group who oversee the work.

Only one explicitly talked of student involvement in implementation of their plan, albeit very briefly, by claiming that their plan is a shared document for delivery by both the university and the student union.

**RECOMMENDATION**: Institutions include information regarding student involvement in all stages of the Fee and Access Plan process, including development, approval, implementation and evaluation.

**Engaging the wider student body**

Owing to the type of approaches used to engage students in the Fee and Access Plan process, involvement was usually at the student union / student representative level. However, some examples of wider engagement did emerge. These included:

+ **Ensuring engagement of students in partner institutions.** Some institutions discussed their students in partner institutions. These focused either on:
  - student engagement systems at partner institutions (e.g. student representatives);
  - the mechanisms in place at partner institutions to gather student feedback more generally (e.g. student surveys, student panels, focus groups etc.); and/or
  - the mechanisms in place to feed back the outputs of student engagement at partner institutions (e.g. through partnership links staff, annual reports, partnership network meetings etc.).

Only a few, however, discussed the involvement of their students at partner institutions specifically in the Fee and Access Plan process, choosing instead to focus on more general institutional governance and/or quality.

+ **Engaging with underrepresented groups.** Plans rarely discussed how underrepresented groups were engaged in the Fee and Access Plan process. Exceptions were Grŵp Llandrillo Menai in 2017/18, who mentioned discussions with students from deprived areas in relation to the development of their plan, and Cardiff Metropolitan University in 2019/20, who mentioned how they work to engage students not typically represented in student surveys. Although not explicitly part of the Fee and Access Plan process, this feeds into general student feedback, which then informs plan development.

**RECOMMENDATION**: Institutions explicitly involve their students from partner institutions in the Fee and Access Plan process as well as within broader governance / quality processes.

**RECOMMENDATION**: Institutions include considerations of how they engage with their identified underrepresented groups in all stages of the Fee and Access Plan process.
RECOMMENDATION: HEFCW develops guidance, collaboratively with institutions, on how to engage underrepresented groups and students from partner institutions in the Fee and Access Plan process.

**Supporting student involvement in the Fee and Access Plan process**

HEFCW’s briefing on student engagement advocated supporting students, student representatives and student unions to be involved in the Fee and Access Plan process. They suggest:

+ in-house student representative training on Fee and Access Plans;
+ engaging in NUS Wales training and events on Fee and Access Plans;
+ handover updates, including written updates, from outgoing student representatives to their incoming counterparts;
+ annual review of progress on engagement with students in the Fee and Access Plan process.

While institutions tended to reference student representative training as part of wider student involvement in institutional governance and quality, there was no discussion of how students are supported specifically to be involved in the Fee and Access Plan process.

**RECOMMENDATION:** Institutions consider how they support students to be engaged in the Fee and Access Plan process and how they ensure the support – and the engagement itself – is appropriate and effective.

### 4.1.2 Communication of fees

Similarly to student engagement, institutions have all – excepting one – included more information each year in relation to communication of fees and financial support.

**Communicating fee levels within the Fee and Access Plan**

Over the years, most institutions have provided greater clarity regarding their fee levels, with many including information regarding maximum fee levels and fees that are not at maximum levels. It was rarer to see institutions articulating the overall fee level for the duration of a course, which is a statutory requirement.

Information regarding fee levels could, however, become text heavy and difficult to understand, with much numerical information provided in narrative format. Institutions that chose to articulate their fee levels through tables were clearer and it is recommended that this be adopted for all plans.

**RECOMMENDATION:** Institutions ensure they include the overall fee level for the duration of a course in their plans.

**RECOMMENDATION:** Institutions consider communicating fee levels within the plan in tabular rather than narrative format.

**Communicating fee levels outwith the Fee and Access Plan**

Institutions were increasingly clear about how their fees are communicated to prospective students, with the 2019/20 plans discussing a range of communication mechanisms including websites, key information sets, social media platforms, printed materials, offer letters / emails, newsletters, UCAS, prospectuses, open days, recruitment fairs, other events and more besides.

Examples of practice that particularly stood out were:

+ ensuring **bespoke communication** for identified underrepresented groups;
+ **designing communication activities** in line with institutional Student Charters, Welsh Language Schemes, Equality Plans and universal design for learning (UDL) principles;
+ embedding communication activities within wider institutional communication plans, frameworks and systems;
+ considering communications by partner institutions and ensuring consistency between institutional and partner approaches to communication;
+ in line with HEFCW’s guidance on communicating costs of study,\(^{13}\) including information regarding additional course costs within fee communication activities, being specific about mandatory, necessary and optional costs;
+ ensuring Money Advice Teams are openly available to prospective students.

**Communicating financial support**

Most institutions tended to concentrate on what their financial support comprised rather than its communication and/or did not differentiate between communication of fees and financial support.

The few that did discuss communication of financial support focused on websites, presentations, application letters and one-to-one discussions.

While a couple of institutions considered bespoke communication of fees for identified underrepresented groups, only one explicitly articulated this in relation to financial support.

**RECOMMENDATION**: Institutions demonstrate more clearly how they have considered their identified underrepresented groups in their communications of fees and financial support.

**RECOMMENDATION**: Institutions either differentiate between communication of fees and communication of financial support within the plans or are explicit that they are being considered together.

**Coherency of section**

Overall, there was a lack of coherency between the student engagement and communication of fees / financial support elements of the student voice section. The former was ostensibly focused on engaging the student voice in the Fee and Access Plan process. The latter, however, was not:

+ information about fee levels seems best understood in relation to investment levels;\(^{14}\)
+ communication of fees and financial support is more about what institutions do: it aligns more closely to “provision” than “student voice”.\(^{15}\)

Fees and financial support, and their communication, would seem to be best considered within the context of equality of opportunity / widening access rather than student voice (see also section 6.2). We surmise that re-contextualising it thus has the potential of focusing institutions on ensuring

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\(^{14}\) Hence, we see institutions including this information elsewhere; for example, in their executive summary or in a bespoke “fees” section.

\(^{15}\) Cf. the Welsh Government category of provision a6: provide effective provision of information to students from underrepresented groups before and during their courses.
communication mechanisms and processes are designed with accessibility – particularly accessibility for identified underrepresented groups – in mind, thus strengthening their widening access activities.

**RECOMMENDATION**: HEFCW reconsiders where fee levels and communication of fees / financial support should be articulated within the plans and streamlines guidance accordingly.

### 4.2 Strategic alignment

HEFCW’s 2019/20 guidance asked institutions to demonstrate a strategic approach to fee and access planning. It requested information on:

1. How the plans are informed by and align with strategic and other similar documents, including strategic planning and engagement documents, strategic equality plans and Welsh language strategies / commitments.

2. How the plans align with institutional strategic objectives.

3. The nature and extent of the relationship between fee and access plan-funded activity and regional Reaching Wider Partnership provision.

HEFCW noted that they “want to understand clearly the relationship between fee and access plan objectives, identified groups underrepresented in higher education and the priorities set out in institutions’ relevant, broader documents” (paragraph 108).

The 2019/20 template differs slightly from the guidance in three ways:

1. It asks for information on how the plans are embedded at a strategic level across the institution.

2. It focuses on alignment between the plan and strategic objectives and documents.\(^{16}\)

3. It asks for broader information on how the plans support collaborative and/or regional coherence agendas, which could include the Reaching Wider Programme.\(^{17}\)

**RECOMMENDATION**: HEFCW reviews its Fee and Access Plan guidance and template documents to ensure consistency across the two.

**Overall development**

In the review, we brought the guidance and template together and focused on both strategic embeddedness and strategic alignment (including alignment to and/or the relationship between the plans and the Reaching Wider Programme). We did not consider broader regional coherence.

It became clear that while strategic alignment does relate to the Fee and Access Plan rationale, in that how the plan aligns to and is informed by institutional priorities can support a case for the focus and contents of the plans, institutions tended to use it to better articulate the Fee and Access Plan process, particularly the development stage. It is for this reason that strategic alignment is included here.

Overall, as explored further below, development is mixed in this section: the majority of institutions have worked both to increase the information in this section and to improve their case for alignment; however, a significant few have made little, if any, changes.

### 4.2.1 Strategic embeddedness

Strategic embeddedness can be understood in two ways: the extent to which the Fee and Access Plan process is embedded in the strategic life cycle of the institution, that is to say its structures and

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\(^{16}\) The guidance asks for information on how these documents inform – as well as align to – the plan.

\(^{17}\) The guidance does not ask for wider regional coherence and focuses specifically on Reaching Wider.
processes, and an overall sense of embeddedness developed as a consequence of the embedding of the plan in strategic documents.

**Strategic life cycle**

Only a few institutions considered how their plan was embedded in their strategic structures and processes. Those that did included:

+ **Grŵp Llandrillo Menai**, who demonstrated how all stages of their Fee and Access Plan process are overseen by a subcommittee of their Corporation Board, with particular oversight by staff who lead on the strategic direction of higher education in the institution and who lead on equality and diversity.

+ **Wrexham Glyndŵr University**, who illustrated how development of their plan was supported by their Strategic Planning Office, which also leads on the development of other institutional strategic documents, strategies and objectives, thus ensuring complementarity across documents and across the strategic life cycle of the institution.

By demonstrating that their plan was a core element of their strategic life cycle, these institutions provided a strong case for strategic embeddedness, reassuring the reader that the development, implementation and monitoring of their plans were not just aligned to the strategic life of the institution, but were indivisible from it.

**RECOMMENDATION**: Institutions consider demonstrating where and how the Fee and Access Plan process is embedded in their strategic structures and processes.

**Embedded in strategic documents**

Other institutions seemed to interpret embeddedness as the extent to which plans were embedded in strategic plans and other strategies, rather than in their structures and processes.

For example, three institutions articulated how their Fee and Access Plan objectives, targets and/or key provision were shared by those of their strategic plan and other similar documents.

**RECOMMENDATION**: HEFCW provides clarity on what they mean by strategic embeddedness.

### 4.2.2 Strategic alignment

Most institutions concentrated on strategic alignment rather than embeddedness, in particular noting the strategies / plans / schemes to which their plan aligned. A range of types of strategies was referenced in this section, over and above those suggested in the guidance and template. This is shown in table 5.

**Table 5: Types of strategies / plans included in Fee and Access Plans**

<table>
<thead>
<tr>
<th>Strategy / plan types</th>
<th>Number of institutions referencing strategy / plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategic plan, including objectives and/or priorities</td>
<td>10</td>
</tr>
<tr>
<td>Equality plans</td>
<td>10</td>
</tr>
<tr>
<td>Welsh language strategies / commitments / schemes*</td>
<td>10</td>
</tr>
<tr>
<td>Learning and teaching / student experience strategies</td>
<td>6</td>
</tr>
<tr>
<td>Strategic planning and engagement documents</td>
<td>2</td>
</tr>
<tr>
<td>Widening access and participation strategies</td>
<td>2</td>
</tr>
<tr>
<td>Annual implementation plans</td>
<td>1</td>
</tr>
<tr>
<td>Employment strategies</td>
<td>1</td>
</tr>
<tr>
<td>Healthy university strategies</td>
<td>1</td>
</tr>
<tr>
<td>Strategy / plan types</td>
<td>Number of institutions referencing strategy / plan</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Mental health strategies</td>
<td>1</td>
</tr>
<tr>
<td>Retention strategies</td>
<td>1</td>
</tr>
<tr>
<td>Student charters</td>
<td>1</td>
</tr>
<tr>
<td>Student union strategic plans</td>
<td>1</td>
</tr>
</tbody>
</table>

* Six institutions referred to specific Welsh language strategies; four had Welsh language commitments embedded in their strategic plans and/or other strategies.

With regard to the Reaching Wider Programme, five institutions mentioned this specifically in this section. These tended to focus on the activities undertaken in relation to the programme rather than considering the relationship or alignment between it and the plan.

However, one institution provided a table that illustrated how the objectives of the relevant Reaching Wider strategy aligned to their Fee and Access Plan objectives. This approach better articulated strategic alignment between the plan and the programme and could be a model to follow in future iterations of plans.

While the three years have seen more reference to strategies / documents / plans, this has sometimes led to the inclusion of documents that appear tangential to the plan, resulting in loss of focus on the plan itself. This has been exacerbated by the ways in which alignment is evidenced.

**Evidencing alignment**

Institutions approached evidencing alignment in three ways:

1. **Describe and claim**: institutions would describe the relevant strategy / plan / scheme to which the Fee and Access Plan aligned and claim alignment (i.e. state that the plan aligned to the strategy or that the strategy informed the plan with no elaboration).

2. **List and claim**: institutions would list the relevant elements of the strategy / plan / scheme to which the Fee and Access Plan aligned and claim alignment. This differs to “describe and claim” in that institutions selected the relevant elements of the strategies rather than describing them wholesale.

3. **Describe / list and explain**: institutions would describe or list the relevant elements of the strategy / plan / scheme to which the Fee and Access Plan aligned and explain in varying levels of detail how the plan aligned to, was informed by, and/or supported these.

Institutions tended to adopt a mixture of these approaches; i.e. one plan could include a “describe and claim” for one strategy and a “describe / list and explain” for another.

“Describe / list and claim”, owing to its primary focus on other strategic documents, resulted in loss of focus on the plan: it could be difficult to discern where the plan fit within the wider mass of information.

“Describe / list and explain”, owing to its explicitness, was more convincing in its evidencing of Fee and Access Plan alignment, was more focused on the plan, illustrated stronger coherency between the plan and strategic documents / approaches and also contributed to an overall sense of the embeddedness of the plan in the strategic life of the institution. We recommend institutions look to adopt such an approach across their strategic alignment section.

However, whichever the approach chosen, this section could become particularly text heavy. This was eased by some institutions through judicious use of formatting (e.g. use of bullets and bold text) and creative use of tables.

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18 Others mentioned it under critical review or in relation to their provision.
RECOMMENDATION: Institutions adopt an “explain” approach to strategic alignment, being careful to ensure communication of alignment is accessible, and that the strategies / plans / schemes referenced are relevant.

RECOMMENDATION: HEFCW provides guidance on how to ensure the strategic alignment section is relevant and accessible.

4.3 Monitoring and evaluation

Although monitoring and evaluation was not explored as part of the review, it emerged as an important element of the Fee and Access Plan process and so is considered briefly here.

Institutions seemed unsure about where to place information regarding monitoring and evaluation. Within the 2019/20 plans, it appeared within:

+ **student voice** sections, illustrating how students were engaged in the monitoring and evaluation of the plan;

+ **critical review** sections, using the annual monitoring process and outputs to inform the rationale of the plan;

+ **strategic alignment** sections, illustrating how monitoring and evaluation is embedded within the strategic life cycle of the institution;

+ **provision**, where it is treated as an aspect of provision aligning to Fee and Access Plan objectives.

Sometimes, information on monitoring and evaluation appeared in all four sections within the same plan, resulting in repetition across the document.

Its appearance in provision appears to be motivated by its inclusion as an investment line in Annex Aii and its inclusion within this section of the HEFCW 2019/20 template (see section 6.2). While it is understandable that monitoring and evaluation should be considered as part of investment, and indeed should be built into provision activities, it can become lost in the extensive amount of information in this section.

Since monitoring and evaluation pertains to the plan as a whole, it might be best positioned elsewhere. We would recommend it be requested in full at the strategic alignment stage, put to use to illustrate in particular how this stage of the Fee and Access Plan process is embedded in an institution’s strategic life cycle. Subsequently, we would suggest that it is referenced – as currently in the 2019/20 guidance – as relevant in relation to student voice and critical review.

RECOMMENDATION: HEFCW reconsiders where information on monitoring and evaluation should sit within the plan and streamlines guidance accordingly.
5. The Fee and Access Plan Rationale

This section focuses on how institutions “make the case” for the focus and contents of their plans. It presents findings on the critical review and underrepresented groups elements of the plans.

Although not explicitly part of the rationale in the HEFCW guidance, we include underrepresented groups here because, we would argue, identification of them is critical to developing a more coherent approach and convincing case.

Unlike in the HEFCW template, strategic alignment is dealt with under “The Fee and Access Plan process” rather than here; this is because the strategic alignment sections tended to be more concerned with how the plan was developed than with the rationale (see section 4.2).

5.1 Critical review

HEFCW expects the Fee and Access Plan rationale to justify the plan’s focus and contents; that is that it “makes the case” for the institution’s approach to advancing equality of opportunity and promoting higher education.

Within their guidance and template, HEFCW required institutions to:

1. Present a critical assessment of:
   a. available data, including reference to regional, Wales or UK reports and/or other evidence;
   b. outcomes achieved from previous plans;
   c. lessons learned from previous plans.

2. Take account of international, national or regional research and data on the effectiveness of their intervention strategies.

3. Set out clearly how the justification of the plan’s focus and contents informs its objectives, provision and targets.

Overall, HEFCW seeks a strong and coherent narrative to enable them and other interested parties to understand an institution’s direction of travel, anticipated pace of change and progress to be made.

We explore this in two parts: critical review and making the case.

5.1.1 Critical review

Overall development

While most institutions retained their overall approach to the presentation of their critical review, there was evolution over the three-year period in terms of elaboration and refinement, particularly in the range and quality of evidence used.

Institutions approached this element of the plan in very different ways, with some focusing on lessons learned, some on outcomes achieved, and some on progress against past targets. In some instances, this section was significant, spanning many pages. In others, it was much shorter. However, quantity did not always equate with quality, with some of the more effective critical reviews finding ways to organise and highlight findings more concisely.

Importantly, the extent to which institutions provided what could be considered a “critical” review varied greatly across the plans. Overarching findings showed that:
most institutions tended to focus on overall past performance (e.g. around overall participation, retention and employment figures), but this did not always read like a review of past Fee and Access Plan performance and/or reviews of available data and evidence;

there was often limited or no explicit reference to past plans, including past objectives and targets, meaning it was not always clear whether progress being shown was linked to the plans themselves;

stories told were overwhelmingly positive: many institutions prioritised exploring areas where they were doing well / outperforming the sector and downplayed or did not discuss areas where they were performing less well;

it was not always clear how review of past performance informed objectives, provision and targets.

Additionally, we found it was a mixed picture as to whether institutions considered partnership provision, in terms of courses delivered with franchise partners, within this section, and it was uncommon for data from partners to be part of the critical review.

**RECOMMENDATION:** Institutions focus their critical review on their delivery of past Fee and Access Plans, and make it clear that they have done so within the document.

**RECOMMENDATION:** Institutions present a balanced review of performance, highlighting challenges as well as successes.

**RECOMMENDATION:** Institutions reflect partnership provision in their critical review where relevant, including considering evidence or data from partners.

**RECOMMENDATION:** HEFCW provides further guidance on how to conduct and present the findings of an effective critical review within plans.

**Data and evidence used**

Institutions used a range of data and evidence within the critical reviews in their 2019/20 plans. Examples are outlined in table 6.

Table 6: Types of data and evidence used

<table>
<thead>
<tr>
<th>Data</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>attainment data;</td>
<td>academic plan of Coleg Cymraeg Cenedlaethol;</td>
</tr>
<tr>
<td>employment data from DLHE (Destination of Leavers from Higher Education survey);</td>
<td>HEFCW Corporate Strategy 2013-17;</td>
</tr>
<tr>
<td>employment data from HESA (i.e. Employment Performance Indicator (EPI));</td>
<td>institutional context information;</td>
</tr>
<tr>
<td>internal survey responses, e.g. on satisfaction with study skills services or employability services;</td>
<td>priorities of regional Reaching Wider programmes;</td>
</tr>
<tr>
<td>participation data as per HESA;</td>
<td>regional employment and skills plans;</td>
</tr>
<tr>
<td>reach data, e.g. number of students studying through the medium of Welsh, in receipt of bursaries / hardship funds, or accessing services; number of prospective students reached through Reaching Wider etc.;</td>
<td>research from sector agencies such as the Higher Education Academy (now Advance HE);</td>
</tr>
<tr>
<td>retention statistics as per HESA;</td>
<td>Teaching Excellence and Student Outcomes Framework (TEF) rating and panel response;</td>
</tr>
<tr>
<td>student satisfaction data as per the NSS</td>
<td>Universities UK, HEFCE, HEFCW and other governmental research and reviews such as the Hazelkorn and Diamond reviews;</td>
</tr>
<tr>
<td></td>
<td>Welsh Government higher education strategy</td>
</tr>
</tbody>
</table>
We are not claiming that such data / evidence types should, or should not, be adopted by institutions within their plans; instead we aim to illustrate the range of data / evidence being used in the critical review section.

It was clear that institutions used more data / evidence / research within their review year by year, working to improve the robustness of their rationale. Particular examples of effective practice included:

+ use of **baseline data** alongside the most recent data for particular areas of focus to illustrate pace of progress;
+ use of **benchmarks** to illustrate progress in comparison to the wider sector;
+ use of **impact metrics** from the delivery of initiatives, including the use of **control data** to ensure strength of evidence.

However, many institutions – including those who exhibit effective practice – still proffered general statements within this section with little recourse to data / evidence / research (or up-to-date or relevant data / evidence / research) for proof. This made their arguments less robust.

**RECOMMENDATION**: Institutions use data / evidence / research as the basis for their critical review, presenting it throughout their rationale.

**RECOMMENDATION**: Institutions compare most recent / current data with baselines, benchmarks and internal control groups to help show distance travelled, progress to be made and effectiveness of interventions.

**Outcomes achieved**

Institutions tended to focus their critical review either on outcomes achieved or on lessons learned, rather than both.

Outcomes appeared to range from improved NSS responses, DLHE returns, participation rates and retention rates to increased uptake of Welsh-medium provision, professional service provision and financial support.\(^\text{19}\) However, it was not always easy to ascertain what were outcomes and what were general institutional trends. Additionally, presentation of outcomes rarely gave a clear picture of distance travelled, progress to be made and effectiveness of interventions.

This is partly because presentation of outcomes varied considerably within the plans:

+ some included a few examples that could be viewed as outcomes, but these were **scattered across the rationale** section and did not jump out immediately;
+ others included outcomes relating to specific activity / provision, which showed **micro level (activity-based) impact** but were less focused on strategic assessment of the overall plan;
+ many did not explicitly link their discussion of outcomes to their past plans, often **including quite general data**, so it was not made clear to what extent outcomes were related to previous Fee and Access Plan objectives / targets and/or Fee and Access Plan activity;

\(^\text{19}\) Though note the finding above on the tendency of institutions to focus on the positive only.
Aligning review to targets

Swansea University included a section within their plan titled “Performance of Previous Fee Plan”.

This used data from their annual monitoring statement (reporting on their 2015/16 plan), showing that the university had achieved 10 out of 12 metric targets.

The use of the annual monitoring statement and explicit exploration of performance in relation to targets made this section more robust in its use of data.

Level, to show progress on past objectives and targets, with presentation of outcomes at the activity level, to show efficacy of past provision.

Additionally, we acknowledge the difficulty institutions faced in terms of the timing of the critical review and available data. The 2019/20 plans, developed as they were in early 2018, would have mostly had recourse to data / evidence from institutions’ annual monitoring of 2016/17. This would have been part of the pre-Higher Education (Wales) Act 2015 Fee and Access Plans. We anticipate that the next round of plans (2020/21) will be able to refer more strongly to the reviews embedded in their annual monitoring of 2017/18 plans, the first plan post-Act, thus making their arguments more coherent and robust.

RECOMMENDATION: Institutions focus their critical review of outcomes achieved on 1) their performance against past Fee and Access Plan objectives, with reference to past targets, and 2) highlights from delivery of past Fee and Access Plan provision to support assessment of overall progress.

RECOMMENDATION: HEFCW provides further guidance on what it expects to see in relation to presentation of outcomes achieved, including how it expects institutions to present a coherent picture of outcomes achieved at both the strategic level (referencing past objectives and targets) and the activity level (past provision).

Lessons learned

HEFCW expected applicants to set out the lessons learned, that is what worked and what did not, from the delivery of previous plans, and how these lessons had contributed to the development of the 2019/20 plan.

Overall, lessons learned tended to be scattered throughout the plan, rather than forming a core part of the rationale. When included within the rationale, focus ranged from:

+ reflection on challenges and contributing factors to not meeting previous targets;
+ reflection on effectiveness of provision;
+ exploration of how the Fee and Access Plan document itself has developed;
+ reflection on how the Fee and Access Plan process has been refined, in particular in relation to monitoring and evaluation activities.

With regard to reflection on challenges and contributing factors to not meeting previous targets, this occurred within those plans that had explicitly connected their exploration of outcomes to previous objectives / targets. Together, these elements coalesced into a robust review of strategic progress, though in some cases with less of a sense of reflection on the efficacy of past activity.
Plans that did not focus on past objectives and targets tended to focus lessons learned on their provision. This sometimes led to an activity-focused review and an absence of a sense of overall or strategic review.

A more comprehensive approach to the critical review would involve a combination of lessons learned at both the activity and the strategic level.

**RECOMMENDATION:** Institutions present the lessons they have learned from the delivery of past activity, objectives and targets, and link this to their exploration of outcomes achieved.

### 5.1.2 Making the case

HEFCW asks institutions to use their critical review to present a strong and coherent narrative that justifies the focus and contents of their plans. Overall, however, the critical review section appeared quite disjointed. There are two related areas where institutions could refine their work in this area: in structure and in coherency.

#### Structuring the rationale

Overwhelmingly, the critical review section of the plan was text dense, making it more difficult to identify key elements like outcomes achieved or lessons learned.

This, in addition to the general shortage of linking between the information given and previous plans, made it difficult – for most but not for all institutions – to understand the story so far; that is to say, what institutions have achieved through previous plans and what they have still left to do.

A further issue for some institutions was that adherence to the template led to grouping of information on strategic alignment with the critical review, which did not always work together to create a sense of a rationale.

#### Coherency of rationale

It was not always clear how an institution’s critical review informed the focus and contents of their 2019/20 plans. Institutions tended to use a range of approaches, including:

- presenting a current focus with no exploration of this within the critical review;
- presenting outcomes / lessons learned within the critical review with no explicit mention of how this relates to 2019/20 focus;
- explicitly linking some outcomes / lessons learned to 2019/20 focus, but not others;
- explicitly linking outcomes / lessons learned to 2019/20 focus with no corollary exploration within objectives / provision / targets.\(^{20}\)

\(^{20}\) NB Coherency of objectives / provision / targets with the Fee and Access Plan rationale is explored further in section 6.
Most plans tended to include elements of each approach. This made the direction of travel, distance to be travelled and pace of change difficult to ascertain and undermined the overall coherency of the rationale.

**RECOMMENDATION**: Institutions ensure they are clear about how the findings of their critical review have informed their new Fee and Access Plan objectives and provision.

**RECOMMENDATION**: Institutions consider how they structure their rationale to ensure they present a clear narrative of past Fee and Access Plan performance, current state of play, and consequent future focus.

### 5.2 Underrepresented groups

**Overall development**

In their 2019/20 guidance, HEFCW requested that institutions set out clearly an “evidence-based assessment and definition of” underrepresented groups. They expect this section to inform overall Fee and Access Plan objectives, provision and investment, particularly those under equality of opportunity.

Institutions have clearly worked to improve the presentation of their underrepresented groups over the three years, with most of the 2019/20 plans providing:

- more explicit identification of groups;
- more evidence / data in support of group selection;
- greater care in the communication of this section.

However, there is room for further improvement. We explore this through considerations of use of evidence, group focus and coherency of section.

#### 5.2.1 Use of evidence

HEFCW was clear in its guidance about the need for identification of underrepresented groups to be evidence-based. A range of evidence was used by institutions.

1. **Internal evidence** included participation, retention, attainment, satisfaction and employment data; data on the number of students in receipt of DSA and the number studying in Welsh; institutional strategies and policies; and equality plan objectives.

2. **External evidence** included Welsh and UK research on student access, experience and outcomes across protected characteristics and “hard to reach” groups; Welsh Government and HEFCW policy priorities and strategic aims; and NUS Wales campaigns on mental health and black, Asian and minority ethnic (BAME) students.

While some institutions made good use of both internal and external evidence when identifying their groups, others used less, or less appropriate, evidence, which weakened the justification of their group selection.

Some issues included:

- a lack of evidence / data to support statements about underrepresentation, which meant the group may or may not be relevant to the institution;

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21 We use the term underrepresented here since this is the terminology used by the Welsh Government and in the HEFCW guidance. However, Advance HE would usually use the phrase “underrepresented, disadvantaged and/or with different needs” to encompass a fuller range of people whom it may be appropriate to target through access work.
Of UK or Welsh-level data in justification of groups with no reference to institutional data, which meant it is not clear if the group is relevant to the institution;

+ only referencing institutional data with little exploration of the UK or Welsh context, such as benchmarking their position with other institutions, which can mean the scale / severity of the underrepresentation is not clear;

+ use of older evidence sources to support justification of groups, such as research reports, which may no longer be relevant;

+ identifying a group where performance is actually significantly better than Welsh / UK benchmarks, which occasionally implied that the group might not be the priority for the institution at this time;

+ identifying a group based on past activity or successes in relation to that group, which can appear more like a continuation of existing work than an identification of a priority underrepresented group.

Evidence-based selection of groups

University of South Wales presented their underrepresented groups within a three-columned table, which comprised:

1. The identified underrepresented group.

2. The rationale for identification for each group, including broad contextualisation (e.g. through Welsh Government and HEFCW strategies, NUS Wales campaigns or other information) and institutional context (e.g. student data).

3. The measures by which progress will be gauged.

RECOMMENDATION: Institutions consistently use both (up-to-date) institutional and external / contextual evidence to aid in the identification of relevant priority groups specific to them.

5.2.2 Group focus

Number of groups

HEFCW noted in their 2019/20 guidance that institutions should "consider the number of groups fee and access plan investment can reasonably and effectively support".

The number of underrepresented groups identified in plans ranged from five to nine. However, there was often a clustering of disparate groups together into one category (see further below), and when these were fully separated out, there were significantly more individual groups – up to a maximum of 15.

More was not always better: where a large number of groups were identified, there was typically insufficient evidence to justify the selection of them all, and it was rare to see all of the groups being specifically considered in subsequent objectives, provision or targets. This suggests that it is not practical to have a large number of groups.

Groups identified

Rarely did institutions use the same language for underrepresented groups, so it was difficult to establish precise commonalities. However, groups could be broken into:

+ most commonly identified: Welsh-medium students;
likely to be identified: disabled students; students from low-participation / Communities First / WIMD areas; students from low-income backgrounds; students from care backgrounds or with caring responsibilities;

sometimes identified: BAME students; mature students; “all underrepresented students”;

occasionally identified: students with mental health conditions; women in science, technology, engineering and maths (STEM); part-time students; “hard to reach” students;

rarely identified: female or male students,\(^{22}\) students who are the first in their family to enter higher education; students with hearing impairments; students entering with non-traditional qualifications.

Groups identified by institutions generally remained similar across the three years, with institutions perhaps discontinuing or adding one or two groups. This is understandable since widening access requires a long-term and sustained approach.

**Specificity of groups**

Many institutions clustered disparate groups together; for example:

+ considering care leavers, carers and estranged students as one group (very common);
+ bringing care leavers, students with autism, asylum seekers, refugees,\(^ {23} \) carers, forces veterans,\(^ {24} \) estranged students and first in family together under a single “hard to reach” group.

There was generally no evidence presented in support of clustering these different groups. It might be that this has occurred owing to common trends within the sector (i.e. it is common for the higher education sector to class care leavers and carers as one group despite their differences), or even owing to the inclusion of a list of “hard to reach” groups within the HEFCW guidance.

Additionally, a number of plans identified “all students” or, more commonly, “all underrepresented groups” and/or “protected characteristic groups” as one group.

Every group has different circumstances and faces different challenges in accessing and succeeding in higher education. This lack of specificity therefore makes targeting provision difficult: for example, ex-service personnel will have different needs than students with caring responsibilities. This was evident in plans, where provision rarely explicitly targeted, or even mentioned, all of the groups that had been clustered together.

**RECOMMENDATION:** Institutions prioritise identification of an achievable number of groups that can be targeted in the year to which the plan pertains. Prioritisation might consider:

+ Does information at both a local and national level highlight this group as an important area of underrepresentation?
+ How many people are affected and what is the severity of the effect? (NB The issue is not necessarily less important when the number of people affected is small.)
+ Are there external drivers for concentrating on that group?
+ Are these priorities for students themselves?

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\(^ {22} \) Men were more frequently identified as underrepresented in 2017/18 plans; however, they were often discontinued in subsequent plans. One institution claimed that this was owing to difficulty in making progress.

\(^ {23} \) We use the terms used within the documents themselves. However, a more suitable term here might be “forced migrants (including e.g. asylum seekers, refugees and those with discretionary leave to remain)”. Universities UK uses the term “displaced people”.

\(^ {24} \) Again, this is the term used by HEFCW and institutions; however, it is not the typical term used in the UK, where “ex-service personnel” or “ex-forces” may be more appropriate.
RECOMMENDATION: Institutions take care not to group disparate groups into one category or identify a broad grouping such as “protected characteristics”.

**Intersectional groups**
Intersectionality recognises that people’s identities and social positions are shaped by multiple factors. Among others, a person’s age, disability, ethnicity, gender, gender identity, religion and belief, sexual orientation and socioeconomic background contribute towards their unique experiences and perspectives.

Intersectionality tells us that social groups, such as women and disabled people, are not homogeneous: different combinations of elements of identity can lead to different lived experiences of individuals in comparison to other individuals who might share one or more, but not all of the same, elements.

A handful of institutions have begun to consider intersectionality in their selection of underrepresented groups. This tended to be around mature students and part-time students as an intersecting group, or mature and/or part-time students in relation to disadvantaged areas.

While it can be complex with regard to data analysis, considering interactions between two or more elements of identity can assist in identification of more specific underrepresented groups, and subsequent development of appropriate initiatives to address underrepresentation.

RECOMMENDATION: Institutions and HEFCW recognise the need for and challenges in taking an intersectional approach to assist in the identification of underrepresented groups.

**Partnership provision**
It was very rare for plans to articulate consideration of student underrepresentation at partner institutions as a factor in their identification of underrepresented groups.

**Partnership provision**
Grŵp Llandrillo Menai discussed progress with its undergraduate programmes and “introduction to British Sign Language” sessions, both delivered in partnership with Bangor University, as justification for its selection of deaf students as an underrepresented group in their 2019/20 plan.

Issues may be very different at partner institutions, and partnerships may be a means to address certain areas of underrepresentation. Therefore, it is important to investigate this as part of identification of underrepresented groups.

RECOMMENDATION: Institutions consider their students at partner institutions in their evidencing of underrepresented groups.

5.2.3 Coherency of section

**Alignment with Strategic Equality Plans**
Most institutions identified some protected characteristic groups as underrepresented, with BAME students, disabled students and mature students (as well as the general “protected characteristics groups”) appearing in many plans.

However, it was uncommon for plans to demonstrate explicit alignment between identified underrepresented groups and those targeted in their Strategic Equality Plans (SEP). While many claimed alignment within the strategic approach section, it was not often explained either in that section or in this one (see 4.2.2).

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Explicit alignment could enable more precise identification of relevant underrepresented equality groups. This was seen in two institutions:

1. **Cardiff University** identified three groups from their SEP: disabled students, male students and BAME students.

2. **The University of South Wales**, in their rationale for identifying BAME students, noted, “our strategic equality plan includes targets for recruitment, retention and achievement of this population of students.”

**RECOMMENDATION:** Institutions explicitly draw on Strategic Equality Plans when identifying underrepresented protected characteristic groups and subsequent targeted provision.

**Underrepresented groups and the rationale**

While general underrepresented groups do tend to appear in institutions’ critical reviews in relation to performance or progress in a particular area, only a few that are later identified are explicitly mentioned in the earlier section. This causes a disconnect between the rationale of the plan and the discussion of underrepresented groups.

A particular issue with this disconnect is that Fee and Access Plan objectives / provision / targets tended to be aligned either to the rationale or to underrepresented groups, rarely both (see section 6).

However, the underrepresented groups section often presents important analyses about an institution’s progress, which would not only be helpful as part of the critical review, but is core to it. There are two ways that we suggest to address this:

1. **Incorporate the underrepresented groups section within the rationale section.** While some institutions did do this, others did not, which increased the sense of disjuncture between the two. Since identification of underrepresented groups should be a fundamental element as to why institutions choose to invest in certain objectives / provision, it would make sense to bring these sections together.

2. **Embed the consideration of underrepresented groups within the critical review process.** For some of those institutions that brought the two sections together structurally, there was still a lack of integration. This suggests what is required is a full embedding of the consideration of underrepresented groups within the critical review process.

**RECOMMENDATION:** Institutions embed their identification of underrepresented groups within their rationale section, ensuring it forms part of the critical review and justification for its focus and contents.

**RECOMMENDATION:** HEFCW reviews its guidance and template to encourage the integration of underrepresented groups in the critical review and within the overall rationale for the plans.
6. Implementing the Fee and Access Plan

In this section, we present the findings on objectives, provision, investment and targets, in particular considering the extent to which these align both with each other and with the earlier rationale and underrepresented groups sections of the plans.

We group these sections under “implementing the Fee and Access Plan”, since they are concerned with what institutions are planning on doing in the pursuit of equality of opportunity and the promotion of higher education.

6.1 Objectives

HEFCW’s 2019/20 guidance asked institutions to establish objectives to support equality of opportunity and the promotion of higher education. Neither the guidance nor the template was prescriptive regarding objectives; however, they did provide three guiding suggestions:

1. While it would be neither beneficial nor meaningful to identify a wide range of objectives, there should be a sufficient number to account for the level of public investment to which the plan relates.

2. Institutions might want to consider adopting the Welsh Government categories of provision (henceforth “WG categories”) as objectives.

3. There should be a logical connection between the Fee and Access Plan rationale, identified underrepresented groups and the objectives established.

Overall development

Each year has seen most institutions refining their objectives, working to establish a feasible number and to ensure greater coherency between them and either their rationale or underrepresented groups, and to improve their measurability.

However, institutions appeared unsure as to the feasibility of adopting the WG categories as objectives. In 2019/20, only four institutions did so, and only one institution has done so consistently since 2017/18. As we will explore, the WG categories can be both a hindrance and a help in relation to the plans and, regardless of position regarding their adoption, require careful negotiation to ensure coherency between objectives and the rationale / underrepresented groups is not lost.

Numbers of objectives

In 2019/20, objective numbers range from seven to 31. The range is shown visually in figure 2.

![Figure 2: Number of objectives per (unnamed) institution](image-url)
Those with 12, 14 and 17 objectives adopted the WG categories. Most institutions have remained consistent in number of objectives, with small variances year by year. Two institutions have made extreme changes, moving from three and four objectives in 2017/18 to 13 and 31 respectively.

Those objectives in the higher numbers, including those in the high teens, appear unfeasible for a one-year plan: we suggest refining objectives to an achievable number.

Types of objectives
As mentioned, four of the ten institutions adopted the WG categories as their objectives. We reproduce these in table 7.

Table 7: Welsh Government Categories of Provision

<table>
<thead>
<tr>
<th>Equality of opportunity</th>
<th>Promotion of higher education</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. promote and safeguard <strong>fair access</strong> to higher education, including identifying individuals with the greatest potential from underrepresented groups;</td>
<td>i. deliver more effective <strong>engagement</strong> with private, public or voluntary bodies and communities in Wales;</td>
</tr>
<tr>
<td>ii. <strong>attract and retain</strong> students and potential students from underrepresented groups;</td>
<td>ii. improve the <strong>quality of learning and teaching</strong>, with reference to the quality of the student experience;</td>
</tr>
<tr>
<td>iii. raise the <strong>educational aspirations and skills</strong> of people from underrepresented groups to support success in higher education;</td>
<td>iii. strengthen the <strong>employability</strong> of Welsh graduates;</td>
</tr>
<tr>
<td>iv. support and increase <strong>retention, progression and completion</strong>, particularly for people from low-participation neighbourhoods, looked-after children, care leavers and carers;</td>
<td>iv. <strong>promote</strong> Welsh higher education more effectively <strong>internationally</strong>;</td>
</tr>
<tr>
<td>v. improve the <strong>higher education experience</strong> for groups underrepresented in higher education;</td>
<td>v. deliver <strong>sustainable</strong> higher education;</td>
</tr>
<tr>
<td>vi. provide to underrepresented groups <strong>effective information</strong>, before and during their studies;</td>
<td>vi. raise <strong>awareness of the value of higher education</strong> to potential students;</td>
</tr>
<tr>
<td>vii. provide high-quality <strong>academic and welfare support</strong> to groups underrepresented in higher education;</td>
<td>vii. <strong>other measures</strong> to support the promotion of higher education such as evaluating fee and access plans’ effectiveness, supporting the regional Reaching Wider Partnership and/or other relevant provision.</td>
</tr>
<tr>
<td>viii. support the <strong>progress to employment or further study</strong> of groups underrepresented in higher education;</td>
<td></td>
</tr>
<tr>
<td>ix. <strong>other measures</strong> to support groups underrepresented in higher education such as evaluating fee and access plans’ effectiveness, supporting the regional Reaching Wider Partnership and/or other relevant provision.</td>
<td></td>
</tr>
</tbody>
</table>

Those institutions that did not use WG categories still orientated their objectives around the same themes. These are outlined in table 8 over the page.

In addition to what might be termed “expected” objectives, one institution explicitly included partnership provision, one included Reaching Wider activity, and two included the Well-Being of Future Generations (Wales) Act 2015.

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26 “Other measures” for both equality of opportunity and promotion of higher education is an addition to the core WG categories. Those institutions with 12 and 14 objectives that used the categories did not adopt this measure (the institution with 12 objectives collapsed a further three categories together). The institution with 17 objectives separated “other measures” and “supporting Reaching Wider” as per investment categories.
Table 8: Common objective themes for those institutions that did not adopt WG categories

<table>
<thead>
<tr>
<th>Common equality of opportunity objective themes</th>
<th>Common promotion of higher education objective themes</th>
</tr>
</thead>
<tbody>
<tr>
<td>+ developing inclusive environments and curricula;</td>
<td>+ creating sustainable higher education;</td>
</tr>
<tr>
<td>+ enhancing Welsh-medium provision;</td>
<td>+ engaging in Reaching Wider activity and in other partnership work;</td>
</tr>
<tr>
<td>+ improving student attainment;</td>
<td>+ enhancing community engagement;</td>
</tr>
<tr>
<td>+ improving student employment / employability;</td>
<td>+ enhancing the internationalisation of higher education;</td>
</tr>
<tr>
<td>+ improving student retention and completion;</td>
<td>+ enhancing the student experience;</td>
</tr>
<tr>
<td>+ providing effective academic and welfare support;</td>
<td>+ ensuring high-quality teaching;</td>
</tr>
<tr>
<td>+ providing effective information, advice and guidance;</td>
<td>+ improving overall student attainment;</td>
</tr>
<tr>
<td>+ widening access to higher education.</td>
<td>+ improving overall student employment / employability;</td>
</tr>
</tbody>
</table>

**The Welsh Government categories of provision**

Adoption of the WG categories both helped and hindered institutions. In adopting the categories, institutions were provided with a clear direction and could ensure they aligned their objectives to the priorities of the Welsh Government. Adoption also eased the articulation of provision and investment (see 6.2 and 6.3) and enabled easier comparison between plans.

However, adoption of the WG categories also created obstacles:

1. **Not all of the WG categories are objectives.** For example, provision of effective information and provision of high-quality academic and welfare support are activities rather than objectives. This is because the categories were not designed to be objectives, but rather categories under which measures / provision can be grouped. This can lead to a blurring of objective, provision and target.

2. **Some of the WG categories overlap.** For example, attract and retain students and prospective students from underrepresented groups and support and increase student retention and completion, particularly for people from low-participation neighbourhoods, both include a focus on retention of underrepresented groups.\(^{27}\) This can cause difficulties in allocating provision and investment to objective.

3. **The WG categories can cause mismatch between objective and underrepresented group.** The WG categories are both vague in talking more generally about underrepresented groups and are specific in identifying certain groups (e.g. care leavers, those from low-participation neighbourhoods). This can lead to objectives that are divorced from an institution's underrepresented groups section, either because the identified groups are not captured through the general “underrepresented” terminology or because the identified group according to the Welsh Government does not cohere with institutional data. For example, institutional data might identify care leavers as a target group for widening access but not retention; the WG category, however, specifies them only under retention.

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\(^{27}\) Hence, one institution collapsed these categories together, establishing an objective to “attract, support and increase retention, progression and completion, and raise the educational aspirations and skills of students.”
4. **The WG categories can cause mismatch between objective and rationale.** As the WG categories are prescriptive, they do not necessarily relate to the Fee and Access Plan rationale, causing disjunction between the two sections. That is to say, it can cause disconnect between an institution’s evidence base and their objectives, resulting in actions and targets aligned to objectives but potentially unsuited to the particular issues the institution faces.

**Overcoming obstacles**

**University of South Wales** ensured that logical connections between their rationale / underrepresented groups and objectives were maintained despite adopting WG categories:

+ Their rationale justified the focus and contents of the plan by reference to Welsh Government and HEFCW strategies and policies, rather than internal evidence and data. As such, the adoption of WG categories as objectives was logical.
+ They included tables within their plan that outlined institutional targets and then “ticked” to which WG categories / objectives they align. Since the targets were more focused on the groups they identified as underrepresented in the earlier section, the link between the objective and group was made clearer.

If HEFCW would prefer institutions to adopt WG categories as objectives, as suggested in the 2019/20 guidance, then we recommend that guidance be developed around:

+ the extent to which institutions can edit the specificities of category terminology;
+ whether all categories need be adopted;
+ the ways in which institutions can ensure coherency between rationale / underrepresented group and objective when travelling this route.

**RECOMMENDATION:** HEFCW considers how the Welsh Government categories of provision could be presented more clearly to allow more effective objectives to be developed.

**RECOMMENDATION:** HEFCW provides further guidance on how to ensure coherency between rationale / underrepresented groups and objective if adopting Welsh Government categories of provision as objectives.

**Adopting institutional objectives**

Six institutions adopted their own objectives, which, as indicated above, often overlapped with those of the Welsh Government categories of provision. This approach also yielded both benefits and issues.

1. **The logical connection between rationale and objective was, on the whole, stronger** for these institutions. Though there were some specific objectives that did not appear to arise from the rationale, particularly around those that referenced the Well-Being of Future Generations (Wales) Act 2015 or those focused on inclusive curricula. While these made sense from an equality of opportunity point of view, they tended not to be an explicit consequence of the evidence base explored in the rationale.

2. **The logical connection between underrepresented groups could be, but was not always, stronger.**

   a. Where the rationale for the underrepresented groups was strong, articulating clearly the current institutional landscape, objectives tended to follow. For example, if the underrepresented groups section highlighted poor retention of disabled students, this tended to be reflected in an objective.
b. However, mismatch still arose; for example, an institution might reference attainment and/or employment of an identified group as an area of concern, but the objective might focus on participation. Similarly, an objective might focus on a range of student journey elements (participation to employment), but the underrepresented groups rationale might focus only on one. This mismatch was relatively common across all plans.

c. Institutions still used the terminology “underrepresented groups” in their objectives. Whether this included all those identified in the relevant section could only be ascertained through reference to provision and/or targets.

3. Similarly to the WG categories, objectives established by institutions were sometimes activities, outputs or targets rather than objectives. A small number of institutions used their targets as objectives.

4. Owing to the requirement to align provision and investment to WG categories, the adoption of independent objectives could cause a disconnect between these three elements (see further 6.2 and 6.3).

RECOMMENDATION: Institutions ensure their objectives are not activities, outputs or targets.

RECOMMENDATION: Institutions continue to refine their objectives, ensuring they reflect and arise from the evidence base within their rationale and identification of underrepresented groups.

RECOMMENDATION: HEFCW provides further guidance on objective setting, highlighting distinctions between objectives and activities / outputs / targets, and offering ways in which institutions can illustrate alignment with categories of provision if adopting their own objectives.

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Bridging the objective / WG categories gap

Four institutions attempted to overcome the disconnect caused by adopting independent objectives:

- **Bangor University** grouped their objectives according to the WG categories to which they align.
- **The NPTC Group of Colleges** listed their objectives and indicated to which WG category they align.
- **University of Wales Trinity Saint David** and **Wrexham Glyndŵr University** provided tables illustrating to which categories their objectives aligned.

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6.2 Provision

When discussing provision, HEFCW’s 2019/20 guidance noted that:

1. Provision supporting equality of opportunity should be clearly distinguished from provision supporting the promotion of higher education.

2. Provision should not include activity of a more routine nature (e.g. untargeted marketing and recruitment), but rather should make a significant and targeted contribution to supporting equality of opportunity and the promotion of higher education.

3. Provision should be grouped according to the Welsh Government categories of provision.

4. Provision must include measures to:
   - attract applications from groups underrepresented in higher education;
   - retain individuals from groups underrepresented in higher education;
   - provide financial assistance to students;
   - make available to students or prospective students information on financial assistance;
e. inform prospective students of the aggregate amount of fees to be charged for the completion of the course;

f. monitor compliance with the provision of the plan;

g. monitor progress in achieving the objectives set out in the fee and access plan application.

Under this section of their guidance, HEFCW also noted that plans must include information about the packages of financial support to be made available to students, including a rationale for levels of support, explanations regarding changes in levels, and clarification around how the impact of financial support on access and retention will be measured. This is connected to points d and e of guidance note four above.

While some institutions included both of these elements under provision, others placed it elsewhere in their plans, particularly in the section on communication of fees and financial support.

As noted in section 4.1.2, the communication of fees and financial support would seem best suited to provision rather than student voice. Currently, there is overlap between the two sections. We recommend streamlining the guidance to request such information at only one point.

Conversely, points f and g of note four are possibly best placed elsewhere. As suggested in section 4.3, monitoring and evaluation seems better suited to the evidencing of a strategic approach to the Fee and Access Plan process than to provision, as is reflected in the fact that not all institutions discuss it here. As stated in section 4.3, we recommend HEFCW reconsider the positioning of this section, and, again, streamlines the guidance to prevent repetition.28

**Overall development**

For most institutions – excepting two who have experimented with their provision section over the years – the content within this section has changed little. Institutions have tended to repeat provision of previous years, with some additions of information, particularly where new activities have been introduced or activities have evolved. This is unsurprising: activities to support equality of opportunity and promote higher education tend to be long term in scope and so will not change much year by year.

However, development has been seen in the communication of the provision within the plan itself: institutions appeared to be experimenting with format to ease the accessibility of this information for the reader and – in a few cases – to improve alignment between objective and provision. This has included:

+ detailing provision explicitly under objective rather than WG category;
+ the adoption of a tabular format to more easily segregate provision and to illustrate alignment between provision and objective;
+ the use of headings / subheadings to clearly distinguish provision;
+ the use of tables to illustrate provision alignment to WG category and/or the seven measures HEFCW require to be included;
+ the inclusion of a summary table of provision;
+ the inclusion of targets and/or investment within provision to illustrate alignment between the three elements.

We explore provision further in two sections: provision content and coherency of provision.

28 The difficulties with these two sections is perhaps best evidenced by University of Wales Trinity Saint David who separates them entirely, presenting two separate sections following their objectives and provision on financial support and monitoring and evaluation.
Provision content

Most institutions included a large range of content within their provision sections. The amount of provision is too numerous to summarise completely here. It spans (though is not limited to): outreach activity; financial support; academic and welfare support; software investment; estate investment; investment in staff; information, advice and guidance; placement, work experience, internship and volunteering support; student union investment; on-campus and off-campus events; investment in internationalisation activities; careers service provision; Welsh-medium provision; community engagement; implementation of learning and teaching strategies; partnership working; and staff training.

The extent of provision described is perhaps best seen in the range of space given to the section by institutions. This is summarised in figure 3.

It should be noted that those at the lower end of the range were not necessarily doing less than those at the top end, but perhaps aimed to summarise provision and/or provide details only of targeted activities specific to their objectives. The challenge here was ensuring that the robustness of provision was comprehensively communicated when less detail was given.

Conversely, for those at the top end of the range, the issue was one of ensuring the significant and targeted contribution that their provision would make to supporting equality of opportunity and the promotion of higher education did not get lost. This is explored further below.

Clarity of provision

As articulated under “overall development”, institutions have worked to enhance the clarity of their provision, particularly in relation to the way in which provision is communicated. However, we identified three further areas where improvements could be made.

1. Inclusion of extraneous information. Some institutions – especially those with larger provision sections – included mini-evaluations of provision (illustrating past impact and reach of provision); information regarding who was responsible for delivery; and/or mini-rationales for identified underrepresented groups. This information may be best suited to the annual monitoring report, an action plan, and/or – where relevant – the critical review and underrepresented groups sections of the plan where some of this information might strengthen the view presented of the efficacy of past provision and the justification for selected groups.

2. Loss of focus. Some institutions – including some with fewer pages dedicated to provision – included broader activities that were not as obviously relevant to the objective to which the provision was allocated. This resulted in loss of focus on the supporting of equality of opportunity and/or promotion of higher education. For example, some plans included general information, advice and guidance, website development or general personal tutoring systems under equality of opportunity, rather than describing bespoke, targeted versions of – or uses of – these activities for advancing equality of opportunity for underrepresented groups.
3. **Overlap between equality of opportunity and promotion of higher education provision.** Some institutions articulated clearly how provision that was relevant to both equality of opportunity and promotion of higher education was distinguished. For example, one institution included investment in library provision within both sections of provision: under promotion of higher education this connected to overall student experience; under equality of opportunity this focused specifically on Welsh-medium provision and enhancing the experience of Welsh-medium students. However, this distinction was not always obvious.

**RECOMMENDATION:** Institutions present information that gives a view of the robustness of their provision in supporting equality of opportunity or promotion of higher education while avoiding extraneous information.

**RECOMMENDATION:** Institutions clearly distinguish between provision targeted at equality of opportunity and provision targeted at promoting higher education.

**RECOMMENDATION:** Institutions ensure their provision is clearly aligned to one or more of their objectives, and that they show this alignment within the document.

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## Well-being of Future Generations (Wales) Act 2015

HEFCW is interested in how the Well-being of Future Generations (Wales) Act 2015 appears in the plans. Four ways were identified:

1. Two institutions included the Act as an objective.
2. One of the above institutions also explicitly aligned their other relevant objectives to the Act’s goals.
3. Another institution claimed that they “have placed the seven goals and five ways of working of the Well-Being of Future Generations (Wales) Act 2015 at the core of our planning”.
4. Other institutions, while not explicit within the plan, described objectives and provision that align to the goals of the Act.

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### Partnership provision

Most institutions included consideration of partnerships within this section. This comprised:

+ working with the **Reaching Wider Programme** to support widening access;
+ working with **Coleg Cymraeg Cenedlaethol** to support Welsh-medium provision;
+ activities with a wide range of local authorities, public bodies, community groups and organisations to enhance both widening access and community engagement;
+ collaborating with business and industry in the development of programmes of study and careers service activities;
+ collaborating with franchise partners to widen access, provide academic, welfare and financial support and to improve the overall student experience.

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### 6.2.2 Coherency of provision

HEFCW expects there to be a logical connection within plans between provision, objective and underrepresented group / rationale.
**Objectives, provision and rationale**

It is a requirement that institutions articulate their provision according to the WG categories. Where institutions adopted the categories as objectives, the link between provision and objective was ostensibly clearer. However, difficulties arose in that:

+ just as there is overlap across the WG categories, there was corollary overlap of provision across objectives;\(^\text{29}\)
+ where there was disconnect between objective and rationale / underrepresented groups owing to adoption of WG categories, there was a consequential disconnect between provision and rationale / underrepresented groups.

Where institutions adopted their own objectives, three approaches were used:

1. Some institutions detailed provision under the WG categories with no reference to objectives. This resulted in no obvious, or easily discerned, link between objective and provision and still incurred the difficulties of overlap of provision and disconnect between provision and rationale.
2. Others provided provision information under their own objectives, grouping the objectives under select WG categories. Here link between objective and provision was clearer, but overlap between provision was still likely.
3. One institution articulated their provision according to their own objectives, providing tabular information as to how each objective aligned to the WG categories. Although this diverted somewhat from the HEFCW requirement to group provision under category, it still demonstrated how provision supported the WG categories, while displaying a strong link between provision and objective and provision and rationale, as well as ensuring minimal overlap in provision description.

**RECOMMENDATION:** Institutions that adopt their own objectives ensure they illustrate how provision aligns to objective as well as to category of provision.

**RECOMMENDATION:** HEFCW provides further guidance to those adopting their own objectives regarding how to ensure objective and provision links when grouping provision under WG categories.

**Underrepresented groups and equality of opportunity provision**

Within the plans, the link between underrepresented groups and equality of opportunity provision was mixed, ranging from:

- **Clear alignment** between provision and underrepresented group, including alignment between issue evidenced within the earlier section and provision offered. For example, an institution might have identified women in STEM as an access issue, and so details provision directly related to widening access for this group.
- **General alignment** between provision and underrepresented groups, where underrepresented groups identified in the earlier section are covered by provision but not necessarily according to the student journey stage identified. For example, an institution might identify employment as an area to target in relation to students from Communities First / WIMD areas, but the provision might focus instead only on participation of this group.

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\(^{29}\) One institution overcame this by cross-referencing provision under categories rather than repeating it.
Lack of alignment between provision and underrepresented groups, including:

- identified groups not being explicitly targeted within the provision;
- provision targeting groups that were not evidenced as a focus within the underrepresented groups section.

No one plan inclined to one alignment type: all three were present in each plan.

**RECOMMENDATION:** Institutions ensure all their equality of opportunity provision is aligned to their identified underrepresented groups.

**Balancing provision**

There is a balance to be struck relating to the amount – and details – of provision being presented in the plan. Where a more extensive amount of provision was outlined, this appeared to be a contributing factor to the obfuscation of the link between provision, objective and underrepresented group and rationale; the overlaps across provision; the blurring between equality of opportunity provision and that aimed at the promotion of higher education; and the inclusion of extraneous information.

Where less provision, or high-level information about a range of provision, was presented, it was not always clear whether the amount of activity to be delivered was sufficient to account for investment, and/or there was a lack of evidence of the targeting of activity to identified groups.

That institutions are grappling with this can be seen in the case of:

- the University of South Wales who provided an extensive description of provision, and then summarised this in an eight-page table in an annex to their plan;
- Wrexham Glyndŵr University who, in 2017/18, provided a one-page summary of provision with two tables: the first aligning provision to WG category, and the second aligning provision groups to the seven measures HEFCW requires. Although Glyndŵr omits these tables in 2018/19 and 2019/20, choosing instead to represent a longer – though still relatively short – outline of provision, the tables are explicitly made available to the reader on request.

The plans are essentially tasked with being both focused on activity / provision and enhancement / improvement. They must both provide a view of the robustness and efficacy of their provision in advancing equality of opportunity and promoting higher education, and demonstrate a strategic approach that clearly shows the appropriateness of their provision and its logical connection to their rationale, identified underrepresented groups and objectives.

**RECOMMENDATION:** HEFCW provides clarity regarding the priorities of the Fee and Access Plans in relation to provision, providing guidance on the depth of exploration required.

### 6.3 Investment

In outlining the amount of fee and access plan income they will invest in different categories of provision, institutions are advised that:

1. HEFCW recognises that institutions might not invest in all WG categories, nor invest equally across all WG categories.
2. They are required to identify investment by WG categories to enable reporting at a national level on investment by Welsh Government measures.
3. Although each institution will cost provision differently, cost trends over time will support HEFCW to understand institution focus and priorities.

We explore this in two parts: investment levels and coherency of investment.
6.3.1 Investment levels

For 2019/20 plans, institutions planned to invest £108,659,663; this is an increase of £2,932,258 since 2017/18. In cash terms, investment ranged from £107,000 to £25,484,500. However, this is perhaps best seen as proportion of total income; in which case, planned investment ranged from 14.3% to 22.5% of institutional income. Trends with regard to investment are shown in figure 4.

![Investment per institution per year in ascending order](image)

**Figure 4: Percentage of investment across the three years per (unnamed) institution**

Most institutions have either maintained or slightly increased their investment levels over the three years. Institution I has seen a more significant increase. However, for five institutions (B, C, D, E and F), this increase – or maintenance – of investment levels reflects a decrease in real cash terms. This likely reflects the difficult financial environment institutions are operating in, as well as the challenges inherent in having to predict the funds they will have available in two years’ time.

**Proportions of investment**

Overall, £62,114,078 is planned to be invested in equality of opportunity provision in 2019/20 (57.2% of whole), while £46,545,585 is planned for provision promoting higher education (42.8% of whole).

Institutions ranged from planning to invest 46.2% of total investment in equality of opportunity (53.8% in promotion of higher education) to 81.7% / 18.3%. The range of proportions is outlined in figure 5 over the page. Note, the order of institutions have changed in this chart from figure 4 to reflect ascending proportion of investment in equality of opportunity rather than ascending order of overall investment.

Proportion levels have also changed over the three years, as is indicated in figure 6 over the page; for ease of reading, this figure illustrates percentage of overall investment planned for equality of opportunity only.

As can be seen, six of the ten institutions have decreased the proportion of investment committed to equality of opportunity over the three years, while four have increased it.
With regard to proportions of investment in categories of provision, this was difficult to discern from the template provided. This is because the template requires this information to be in cash form. We translated this to percentage of total institutional investment, which eased understanding. This is replicated in table 9 over the page.

Within this table, highest proportions of investment per category across all institutions are highlighted in purple, while the category receiving the highest proportion of investment by each individual institution is highlighted through a bold border.

**Proportions of investment in categories of provision**

With regard to proportions of investment in categories of provision, this was difficult to discern from the template provided. This is because the template requires this information to be in cash form. We translated this to percentage of total institutional investment, which eased understanding. This is replicated in table 9 over the page.

Within this table, highest proportions of investment per category across all institutions are highlighted in purple, while the category receiving the highest proportion of investment by each individual institution is highlighted through a bold border.
Table 9: Allocation of investment per Welsh Government category, 2019/20

<table>
<thead>
<tr>
<th>Category of provision</th>
<th>Proportion of investment (%) per institution (anonymised)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i</td>
</tr>
<tr>
<td>EQUALITY OF OPPORTUNITY</td>
<td></td>
</tr>
<tr>
<td>Promoting and safeguarding fair access to higher education</td>
<td>4.5</td>
</tr>
<tr>
<td>Attracting and retaining students and prospective students</td>
<td>17.5</td>
</tr>
<tr>
<td>Raising education aspirations and developing skills</td>
<td>1.0</td>
</tr>
<tr>
<td>Supporting and increasing student retention and completion</td>
<td>3.3</td>
</tr>
<tr>
<td>Improving the experience of higher education</td>
<td>2.2</td>
</tr>
<tr>
<td>Providing effective information to students</td>
<td>0.3</td>
</tr>
<tr>
<td>Providing high-quality academic and welfare support</td>
<td>10.5</td>
</tr>
<tr>
<td>Supporting students to progress to employment / further study</td>
<td>4.2</td>
</tr>
<tr>
<td>Contribute to Reaching Wider Partnerships</td>
<td>1.7</td>
</tr>
<tr>
<td>Other equality of opportunity measures</td>
<td>1.0</td>
</tr>
<tr>
<td>PROMOTION OF HIGHER EDUCATION</td>
<td></td>
</tr>
<tr>
<td>Engagement with private, public or voluntary bodies / communities</td>
<td>1.0</td>
</tr>
<tr>
<td>Improving quality of learning and teaching</td>
<td>27.9</td>
</tr>
<tr>
<td>Strengthening the employability of Welsh graduates</td>
<td>4.2</td>
</tr>
<tr>
<td>Promoting Welsh higher education more effectively Internationally</td>
<td>0.8</td>
</tr>
<tr>
<td>Improving delivery of sustainable higher education</td>
<td>5.5</td>
</tr>
<tr>
<td>Raising awareness of value of higher education among potential learners</td>
<td>7.4</td>
</tr>
<tr>
<td>Other promotion of higher education measures</td>
<td>7.0</td>
</tr>
</tbody>
</table>

As can be seen, the WG categories of attracting and retaining students and prospective students and improving the quality of learning and teaching attracted the highest proportions of planned funding in 2019/20 from most institutions. Institutions ix and vi instead allocated their highest proportion of intended spend to promoting and safeguarding fair access to higher education and strengthening the employability of Welsh graduates respectively.

There were no overarching trends in development over the three years in relation to allocation of investment to WG categories. For example, for each institution that increased their allocated spend on attracting and retaining students and prospective students since 2017/18, there was another that
decreased its planned spend in this area. Patterns were instead best understood on an institution-by-institution basis.

The review did not explore investment levels specifically in student support, but this could appear under either equality of opportunity or promoting higher education.

**RECOMMENDATION:** HEFCW requires investment per category to be articulated as proportion of total investment as well as real cash terms to ease understanding of patterns of spend.

### 6.3.2 Coherency of investment

HEFCW expects coherency, that is to say a logical connection, between investment level, provision, objective and rationale. It was mixed as to whether this was easy to ascertain through the review.

**Investment and provision**

Since provision often overlapped and was frequently too extensive to provide clarity, it was difficult to decipher the extent to which investment aligned to it.

However, there were some instances where increase in provision, or the addition of a particular intervention in provision, was reflected in investment amounts. For example, one institution highlighted in their 2019/20 plan new activities being implemented around their international strategy, which was specifically aligned to the WG category of improving the quality of learning and teaching. This was reflected in an increase in proportion of investment allocated to this category.

**Investment and objective**

Where institutions adopted the WG categories as objectives, link between investment and objective was clear. Correspondingly, for those institutions who adopted their own objectives, coherency was less easy to discern.

Those institutions that included investment levels within their objective / provision section as well as in Annex Aii eased clarity. This was accomplished in a variety of ways:

- **inserting a projected expenditure line** for each WG category within provision sections (utilised by an institution who adopted the WG categories as objectives);
- **copying and pasting the relevant investment table** in Annex Aii into the objectives section;
- **inserting a table within the objectives section** which provided the WG categories, the amount allocated to each and the objectives to which these aligned (utilised by an institution who adopted their own objectives).

**Investment and rationale**

The link between investment and rationale was again more difficult to discern, this time owing to the overlapping nature of the WG categories. For example, where an institution might talk of a stronger focus on retention of underrepresented groups in their rationale, this could be reflected in two of the WG categories under equality of opportunity.

Further, where alignment might have been easier to ascertain owing to specificity of WG category, there was sometimes mismatch.

For example, an institution might focus on employment and employability within their rationale, but allocate only a small proportion of investment in the corresponding WG category; or an institution might dedicate high
proportions of investment in the promotion of Welsh higher education internationally, with little to no mention of this within the rationale.

However, once investment amounts were turned into percentages, some alignment could be seen. For example, a concentration on the experience of underrepresented groups within the rationale could be seen to be reflected within the corresponding WG category.

Overall, coherency between investment and rationale was mixed, often within each institution’s plan: where some investment levels could be seen to reflect the rationale, at the same time, others were less easy to connect.

In summary, where institutions took control of the plan and inserted further information in the earlier sections around investment, showing – in a variety ways – how investment aligned to rationale, objective and WG category (if not always to provision), the plan was more comprehensive and seemed to articulate a more strategic approach to advancing equality of opportunity and promoting higher education.

**RECOMMENDATION:** Institutions consider how they present investment within their plan – in addition to the Annex Aii – to ensure the link between investment level, provision, objective and rationale is clear, and consider adding an investment section within their rationale.

**RECOMMENDATION:** HEFCW provides guidance, and perhaps template tables, to support institutions in clearly articulating the link between investment level, provision, objective and rationale within the body of their plans, and considers requiring investment exploration within the critical review.

### 6.4 Targets

Institutions are required to outline targets that demonstrate their commitment to increasing and/or maintaining the number or percentage of students from their underrepresented groups and to their other Fee and Access Plan objectives. HEFCW requires these targets to:

- be SMART (that is specific, measurable, achievable, realistic and time-bound) and auditable;
- demonstrate the level of ambition, pace of progress and distance to be travelled by institutions;
- directly relate to objectives, provision and levels of investment;
- directly relate – in the case of equality of opportunity targets – to the underrepresented groups identified in the plan;
- be focused on areas where improvements can be made.

While there has been little change for most institutions in targets between 2018/19 and 2019/20, since 2017/18, targets have been refined – both in number and focus – and work has been undertaken by some institutions to ensure their targets are more SMART and benchmarkable.

**Number of targets**

In 2019/20 the number of targets ranged from 18 to 28, with most clustered around 18-20 (see figure 7 over the page). In previous years, this ranged from 10 to 31. Since 2017/18, two institutions have maintained their number of targets, two have decreased their number of targets and six have increased them.

That the 2019/20 target numbers tended to cluster around the 18-20 mark suggests that institutions are working to find, and may have approached, an appropriate / feasible number to which to commit.
Target types

2019/20 targets tended to cluster around the same themes. These are articulated in table 10.

Table 10: Types of target within the 2019/20 plans

<table>
<thead>
<tr>
<th>Target type</th>
<th>Select examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participation</td>
<td>Participation in higher education by students from identified underrepresented groups. Most institutions measured this by overall participation rate; however, one measured it according to their position in the UK with regard to proportions of participation.</td>
</tr>
<tr>
<td>Retention</td>
<td>Retention and/or continuation of all students and students from identified underrepresented groups.</td>
</tr>
<tr>
<td>Satisfaction</td>
<td>Satisfaction of all students and students from identified underrepresented groups with:</td>
</tr>
<tr>
<td></td>
<td>+ their overall experience (as per the NSS);</td>
</tr>
<tr>
<td></td>
<td>+ their teaching, academic support, assessment and feedback etc. (as per the NSS);</td>
</tr>
<tr>
<td></td>
<td>+ professional and support services (as per internal surveys).</td>
</tr>
<tr>
<td>Attainment</td>
<td>Attainment of all students and identified underrepresented groups.</td>
</tr>
<tr>
<td>Employment</td>
<td>Employment / further study rates and/or highly skilled employment rates for all students and students from identified underrepresented groups.</td>
</tr>
<tr>
<td>Engagement</td>
<td>Engagement of all students / prospective students and students / prospective students from identified underrepresented groups in:</td>
</tr>
<tr>
<td></td>
<td>+ academic and welfare support provision;</td>
</tr>
<tr>
<td></td>
<td>+ financial support (i.e. uptake of bursaries / hardship funds / scholarships);</td>
</tr>
<tr>
<td></td>
<td>+ international opportunities;</td>
</tr>
<tr>
<td></td>
<td>+ outreach activities;</td>
</tr>
<tr>
<td></td>
<td>+ student union clubs and societies;</td>
</tr>
<tr>
<td></td>
<td>+ Welsh-medium provision;</td>
</tr>
<tr>
<td></td>
<td>+ work experience and similar opportunities.</td>
</tr>
<tr>
<td>Activity</td>
<td>Number of bespoke projects and/or activities delivered.</td>
</tr>
<tr>
<td>External validation</td>
<td>For example, Environmental Management accreditation; Matrix accreditation; number of subjects in top 25% of The Times Good University Guide league table; Race Equality Mark etc.</td>
</tr>
</tbody>
</table>
It appears as though many institutions have kept the HEFCW corporate strategy 2013-17 in mind when developing their targets, since there is correlation between these and the themes and measures within HEFCW’s document. This has resulted in a number of institutions having similar targets, which should prove useful for future analysis of sector performance in specific areas. The forthcoming HEFCW national measures for HE performance may prove similarly helpful for future target setting.

**SMART Targets**

Targets tended to be – though were not always – SMART, verifiable and auditable. Institutions tended to focus on incremental change in their 2019/20 targets, which seemed more realistic and achievable.

Three institutions have not changed their targets much, if at all, over the three years. In addition to the previously explored number of targets, those institutions that have changed the content of their targets seem to have done so in order to make them more SMART and benchmarkable. This has been achieved by:

- **refinement of target wording** to ensure they can be measured (e.g. making targets numbers-based);
- **increased inclusion of targets that can be benchmarked**, either internally (through use of internal surveys, control groups and/or through comparing identified underrepresented groups against all student measures) or externally (through use of HESA, NSS, DLHE/Graduate Outcomes Survey etc.);
- **move to more incremental changes** to ensure the target is realistic.

However, not all targets were SMART, particularly in relation to measurability:

- a few targets were provided with no baseline figures and/or without both numeric and percentage aims, making measurability difficult;
- targets were sometimes provided without the dataset that would be used to measure progress;
- there was occasional mismatch between measure and target wording; for example, a target might be activity-focused in wording (develop one-day events for prospective students in low-participation areas), but the measure might be engagement-based (90 prospective students attending such events over the year);
- target wording was sometimes vague. For example, “retention of students in receipt of targeted support” requires further explanation as to what targeted support means and how it can be ascertained.

**RECOMMENDATION**: Institutions continue to refine their targets to ensure they are SMART, auditable and, where possible, benchmarkable, and that they include both numeric and percentage aims.

**RECOMMENDATION**: HEFCW provides further guidance on targets, including around the range of types of targets that can be adopted beyond student numbers, encouraging a mix.

**Distance to be travelled**

Six institutions focused the majority – and some all – of their targets on improvement, while four focused both on improvement and maintaining the norm. While HEFCW recommends a stronger focus on improvement, it is clear that institutions are also working to ensure previous good work is not undone.

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30 This has resulted in less “Activity” type targets and more “Engagement” type targets.
The three years have seen more consistent inclusion of baseline data from which short-term progress could be ascertained.

Where institutions discussed previous targets as part of their critical review (see 5.1.1), pace of progress was clearer. Without this information and without the use of the optional long-term milestones, this was more difficult to ascertain from the template alone.

**RECOMMENDATION:** Institutions include long-term milestones, in addition to targets for the year to which the plan pertains, to enable clearer understanding of pace of progress and distance to be travelled.

**RECOMMENDATION:** HEFCW considers whether the long-term milestones section of the Annex Aii template should be mandatory.

**Coherency of targets**

HEFCW asks that targets directly relate to objectives, provision and levels of investment as well as to identified underrepresented groups. The coherency between these sections was, again, often mixed.

While most institutions specified their underrepresented groups in their targets, some were stronger in this than others, and coverage of identified groups was rarely comprehensive / complete.

There was not always a clear link between investment level and target, although this might be owing to the difficulties in the investment section articulated above rather than the target section.

While there were links between targets and provision, much was not reflected in targets owing to the sheer amount of provision articulated within the plans.

Two institutions did not differentiate between targets and objectives and some linked to objectives in target theme, but measured something different to that which the objective related (for example, a target might measure participation, but the corollary objective is about experience).

However, institutions did introduce three ways in which to strengthen the coherency of their targets with the rest of their plan:

1. Some institutions included tables under objectives that showed which targets related to which objectives. This made the link between the two coherent and comprehensive.

2. Some institutions listed the targets to which their provision aligned within their provision section, strengthening coherency between the two.

3. Some institutions used targets from their strategic plans, illustrating the embeddedness of the plan within institutional strategic life.

**RECOMMENDATION:** Institutions continue to strengthen their targets to ensure coherency between them and their identified underrepresented groups, objectives, provision and levels of investment.

**RECOMMENDATION:** HEFCW provides guidance, and perhaps template tables, to support institutions in clearly articulating the link between targets, objectives and provision within the body of their plans.
7. Recommendations

By way of a conclusion, we bring the recommendations scattered throughout the report together. These are articulated per section, separated according to whether they are aimed at institutions or HEFCW.

We offer two caveats to the recommendations:

1. Recommendations appear excessive in number; this is because many are orientated at the granular level and so are focused on small but significant changes.

2. Recommendations should be considered in the context of the section of the report in which they appear. There readers will find more information and examples of practice that might support their implementation.

### Presenting the Fee and Access Plan

<table>
<thead>
<tr>
<th>Recommendations for institutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Institutions think carefully about where they publish their plans to reach as many audiences as possible, considering including them on more than one webpage/section of their websites.</td>
</tr>
<tr>
<td>2. Institutions provide an online summary of their plan, perhaps using their executive summary, in order to communicate it to a wider audience and encourage access.</td>
</tr>
<tr>
<td>3. Institutions simultaneously publish Welsh and English language versions of all their plans.</td>
</tr>
<tr>
<td>4. Institutions make alternative formats of the plans available, stating this on the webpages hosting their plans, with information provided about how people can access them.</td>
</tr>
<tr>
<td>5. Institutions include the date of publication within their plan.</td>
</tr>
<tr>
<td>6. While the primary mechanism for communicating the plans is the plan document itself, institutions should also raise awareness of their plans among students and prospective students through other mechanisms.</td>
</tr>
<tr>
<td>7. Institutions provide details of in-force changes when they occur, including information on what has changed, and consider adding these details to the webpages hosting their plans.</td>
</tr>
<tr>
<td>8. Some institutions consider reducing the length of their plans, including ensuring they do not publish unnecessary parts of the template, while ensuring they meet all HEFCW requirements.</td>
</tr>
<tr>
<td>9. Institutions ensure plans are written in language that is as simple as possible, with necessary technical terms, abbreviations and/or acronyms being explained the first time they are used.</td>
</tr>
<tr>
<td>10. Institutions make their executive summaries even more accessible in terms of language than their main plans, particularly thinking about appropriateness for a student audience.</td>
</tr>
<tr>
<td>11. Institutions consider creating their own design for their plan to give it more of an institutional identity and to improve readability.</td>
</tr>
<tr>
<td>12. Institutions continue to make effective use of formatting, including headings, subheadings, bulleted lists and bold font, to aid readability of the plans.</td>
</tr>
<tr>
<td>13. Institutions consider using tables creatively to present elements of the plan in a more user-friendly style; though alternative format versions should take into account how tables present challenges to assistive technology like screen readers.</td>
</tr>
<tr>
<td>14. Institutions ensure they provide a succinct summary of the plan within their executive summary, rather than an introduction, focusing on the plan’s main features and key priorities.</td>
</tr>
<tr>
<td>15. Institutions consider whether they want to be more inventive with their structure in order to create more coherent and accessible documents, while ensuring that required elements and level of detail are retained.</td>
</tr>
</tbody>
</table>
Recommendations for HEFCW

1. HEFCW considers recommending at least one section of institution websites where plans should be positioned.
2. HEFCW provides guidance on the publication of plans to ensure ease of access.
3. HEFCW strengthens its guidance in relation to use of accessible language, and requests more accessible language throughout plans, and in particular in executive summaries.
4. HEFCW requires institutions to include a contents page within their plans to assist readers in navigating the document.
5. HEFCW be more explicit in its guidance and template regarding the content required in the executive summary. This might include a list of the elements they expect to see.
6. HEFCW considers extending the word limit for the executive summary by 500 words to allow for the main features and key priorities of plans to be summarised effectively.
7. HEFCW reviews its template in relation to the ordering of requirements, considering where elements may be helpfully grouped together or separated, and ironing out the potential for repetition.

The Fee and Access Plan Process

Recommendations for institutions

1. Institutions re-orientate the focus of the student engagement element of the student voice section back to the Fee and Access Plan process.
2. Institutions include information regarding student involvement in all stages of the Fee and Access Plan process, including development, approval, implementation and evaluation.
3. Institutions explicitly involve their students from partner institutions in the Fee and Access Plan process as well as within broader governance / quality processes.
4. Institutions include considerations of how they engage with their identified underrepresented groups in all stages of the Fee and Access Plan process.
5. Institutions consider how they support students to be engaged in the Fee and Access Plan process and how they ensure the support – and the engagement itself – is appropriate and effective.
6. Institutions ensure they include the overall fee level for the duration of a course in their plans.
7. Institutions consider communicating fee levels within the plan in tabular rather than narrative format.
8. Institutions demonstrate more clearly how they have considered their identified underrepresented groups in their communications of fees and financial support.
9. Institutions either differentiate between communication of fees and communication of financial support within their plans or are explicit that they are being considered together.
10. Institutions consider demonstrating where and how the Fee and Access Plan process is embedded in their strategic structures and processes.
11. Institutions adopt an “explain” approach to strategic alignment, being careful to ensure communication of alignment is accessible, and that the strategies / plans / schemes referenced are relevant.
Recommendations for HEFCW

1. HEFCW re-writes the Fee and Access Plan guidance to require a focus on how students are involved in the Fee and Access Plan process first and how this is embedded in a broader students-as-partners ethos second, requiring demonstration of, rather than reflection on, Wise Wales and other principles.

2. HEFCW develops guidance, collaboratively with institutions, on how to engage underrepresented groups and students from partner institutions in the Fee and Access Plan process.

3. HEFCW reconsiders where fee levels and communication of fees / financial support should be articulated within the plans and streamlines guidance accordingly.

4. HEFCW reviews its Fee and Access Plan guidance and template documents to ensure consistency across the two.

5. HEFCW provides clarity on what they mean by strategic embeddedness.

6. HEFCW provides guidance on how to ensure the strategic alignment section is relevant and accessible.

7. HEFCW reconsiders where information on monitoring and evaluation should sit within the plan and streamlines guidance accordingly.

The Fee and Access Plan Rationale

Recommendations for institutions

1. Institutions focus their critical review on their delivery of past Fee and Access Plans, and make it clear that they have done so within the document.

2. Institutions present a balanced review of performance, highlighting challenges as well as successes.

3. Institutions reflect partnership provision in their critical review where relevant, including considering evidence or data from partners.

4. Institutions use data / evidence / research as the basis for their critical review, presenting it throughout their rationale.

5. Institutions compare most recent / current data with baselines, benchmarks and internal control groups to help show distance travelled, progress to be made and effectiveness of interventions.

6. Institutions focus their critical review of outcomes achieved on 1) their performance against past Fee and Access Plan objectives, with reference to past targets, and 2) highlights from delivery of past Fee and Access Plan provision to support assessment of overall progress.

7. Institutions present the lessons they have learned from the delivery of past activity, objectives and targets, and link this to their exploration of outcomes achieved.

8. Institutions ensure they are clear about how the findings of their critical review have informed their new Fee and Access Plan objectives and provision.

9. Institutions consider how they structure their rationale to ensure they present a clear narrative of past Fee and Access Plan performance, current state of play, and consequent future focus.

10. Institutions consistently use both (up-to-date) institutional and external / contextual evidence to aid in the identification of relevant priority groups specific to them.

11. Institutions prioritise identification of an achievable number of groups that can be targeted in the year to which the plan pertains. Prioritisation might consider:
a. Does information at both a local and national level highlight this group as an important area of underrepresentation?
b. How many people are affected and what is the severity of the effect? (NB The issue is not necessarily less important when the number of people affected is small.)
c. Are there external drivers for concentrating on that group?
d. Are these priorities for students themselves?

12. Institutions take care not to group disparate groups into one category or identify a broad grouping such as “protected characteristics”.

13. Institutions and HEFCW recognise the need for and challenges in taking an intersectional approach to assist in the identification of underrepresented groups.

14. Institutions consider their students at partner institutions in their evidencing of underrepresented groups.

15. Institutions explicitly draw on Strategic Equality Plans when identifying underrepresented protected characteristic groups and subsequent targeted provision.

16. Institutions embed their identification of underrepresented groups within their rationale section, ensuring it forms part of the critical review and justification for its focus and contents.

**Recommendations for HEFCW**

1. HEFCW provides further guidance on how to conduct and present the findings of an effective critical review within plans.

2. HEFCW provides further guidance on what it expects to see in relation to presentation of outcomes achieved, including how it expects institutions to present a coherent picture of outcomes achieved at both the strategic level (referencing past objectives and targets) and the activity level (past provision).

3. Institutions and HEFCW recognise the need for and challenges in taking an intersectional approach to assist in the identification of underrepresented groups.

4. HEFCW reviews its guidance and template to encourage the integration of underrepresented groups in the critical review and within the overall rationale for the plan.

**Implementing the Fee and Access Plan**

**Recommendations for institutions**

1. Institutions ensure their objectives are not activities, outputs or targets.

2. Institutions continue to refine their objectives, ensuring they reflect and arise from the evidence base within their rationale and identification of underrepresented groups.

3. Institutions present information that gives a view of the robustness of their provision in supporting equality of opportunity or promotion of higher education while avoiding extraneous information.

4. Institutions clearly distinguish between provision targeted at equality of opportunity and provision targeted at promoting higher education.

5. Institutions ensure their provision is clearly aligned to one or more of their objectives, and that they show this alignment within the document.

6. Institutions that adopt their own objectives ensure they illustrate how provision aligns to objective as well as to category of provision.

7. Institutions ensure all their equality of opportunity provision is aligned to their identified
underrepresented groups.

8. Institutions consider how they present investment within their plan – in addition to the Annex Aii – to ensure the link between investment level, provision, objective and rationale is clear, and consider adding an investment section within their rationale.

9. Institutions continue to refine their targets to ensure they are SMART, auditable and, where possible, benchmarkable, and that they include both numeric and percentage aims.

10. Institutions include long-term milestones, in addition to targets for the year to which the plan pertains, to enable clearer understanding of pace of progress and distance to be travelled.

11. Institutions continue to strengthen their targets to ensure coherency between them and their identified underrepresented groups, objectives, provision and levels of investment.

**Recommendations for HEFCW**

1. HEFCW considers how the Welsh Government categories of provision could be presented more clearly to allow more effective objectives to be developed.

2. HEFCW provides further guidance on how to ensure coherency between rationale / underrepresented groups and objective if adopting Welsh Government categories of provision as objectives.

3. HEFCW provides further guidance on objective setting, highlighting distinctions between objectives and activities / outputs / targets, and offering ways in which institutions can illustrate alignment with categories of provision if adopting their own objectives.

4. HEFCW provides further guidance to those adopting their own objectives regarding how to ensure objective and provision links when grouping provision under WG categories.

5. HEFCW provides clarity regarding the priorities of the Fee and Access Plans in relation to provision, providing guidance on the depth of exploration required.

6. HEFCW requires investment per category to be articulated as proportion of total investment as well as real cash terms to ease understanding of patterns of spend.

7. HEFCW provides guidance, and perhaps template tables, to support institutions in clearly articulating the link between investment level, provision, objective and rationale within the body of their plans, and considers requiring investment exploration within the critical review.

8. HEFCW provides further guidance on targets, including around the range of types of targets that can be adopted beyond student numbers, encouraging a mix.

9. HEFCW considers whether the long-term milestones section of the Annex Aii template should be mandatory.

10. HEFCW provides guidance, and perhaps template tables, to support institutions in clearly articulating the link between targets, objectives and provision within the body of their plans.
8. Appendix: Analysis Framework

The analysis framework was categorised according to Fee and Access Plan section, with an extra section on accessibility. Where questions suggested a yes/no answer, comments were sought for elaboration.

Institutions might want to consider the questions within the framework when developing future plans.

### 1. Accessibility of reports

<table>
<thead>
<tr>
<th>Question</th>
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<tbody>
<tr>
<td>1. Where can the plan be found on the institutional website (section and hyperlink)?</td>
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<tr>
<td>2. Is the plan easily found on the institutional website?</td>
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<tr>
<td>3. Is the plan clearly titled and dated?</td>
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<tr>
<td>4. How many pages is the plan?</td>
</tr>
<tr>
<td>5. Is the plan suitable for and accessible to different audiences?</td>
</tr>
<tr>
<td>6. Is the plan accessible to potential students within the institution’s identified underrepresented groups?</td>
</tr>
<tr>
<td>7. Any other comments?</td>
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<tr>
<td>8. Areas for improvement?</td>
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<td>9. Examples of effective practice?</td>
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<td>10. Could the HEFCW guidance be improved to strengthen the plans in this area?</td>
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#### 2019/20 plan

<table>
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<tr>
<td>11. Has the accessibility of the plans improved over the three years?</td>
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<td>12. Is it clear whether the earlier plans have been varied while in force? If so, what is the date of the approved variation(s) and what changes have been made?</td>
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<tr>
<td>13. Any other examples of effective practice?</td>
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### 2. Executive summary

<table>
<thead>
<tr>
<th>Question</th>
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<tbody>
<tr>
<td>1. Does the summary summarise the plan well?</td>
</tr>
<tr>
<td>2. Can the reader understand the institution’s intentions clearly from the summary?</td>
</tr>
<tr>
<td>3. Any other comments?</td>
</tr>
<tr>
<td>4. Areas for improvement?</td>
</tr>
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<td>5. Examples of effective practice?</td>
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#### 2019/20 plan

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<tr>
<td>7. How has the executive summary developed over the three years?</td>
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<td>8. Any other examples of effective practice?</td>
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#### 2017/18+ plans

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<td>8. Any other examples of effective practice?</td>
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31 Paragraph 88 of HEFCW’s 2019/20 guidance notes that the “key audiences [for the plans] include HEFCW, Welsh Government, students and potential students, researchers and the media. Plans should be accessible and informative for all audiences.” As part of this, the reviewers checked whether institutions had avoided abbreviations / acronyms / technical terms the general public would not understand. They also checked whether the plan was available, or could explicitly be made available, in different formats.

32 I.e. suitable for the audience / easy to understand; for example, the reviewers checked whether the plans were available through the medium of Welsh.

33 Changes to published plans (while the plans are in force) can be made with HEFCW approval. See paragraphs 175-179 of the 2019/20 guidance.

34 Executive summaries were introduced for 2018/19 plans following a recommendation by NUS Wales who proposed the introduction to improve the accessibility of the plans for students.
### 3. Student voice

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>1.</td>
<td>In what ways are students involved in the Fee and Access Plan process?[^35]</td>
</tr>
<tr>
<td>2.</td>
<td>In what ways are identified underrepresented groups involved in the Fee and Access Plan process?</td>
</tr>
<tr>
<td>3.</td>
<td>How are students in partner institutions involved in the Fee and Access Plan process?</td>
</tr>
<tr>
<td>4.</td>
<td>In which aspects of the Fee and Access Plan process are students involved?[^36]</td>
</tr>
<tr>
<td>5.</td>
<td>How are students supported to be involved in the Fee and Access Plan process?[^37]</td>
</tr>
<tr>
<td>6.</td>
<td>Is there coherency between student involvement in the Fee and Access Plan process and student involvement in institutional governance and quality?</td>
</tr>
<tr>
<td>7.</td>
<td>In what ways are fees communicated to students?[^38]</td>
</tr>
<tr>
<td>8.</td>
<td>In what ways is financial support communicated to students?</td>
</tr>
<tr>
<td>9.</td>
<td>Does fee and financial support communication consider accessibility and/or disparate student groups?[^39]</td>
</tr>
<tr>
<td>10.</td>
<td>Any other comments?</td>
</tr>
<tr>
<td>11.</td>
<td>Areas for improvement?</td>
</tr>
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<td>12.</td>
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</tr>
<tr>
<td>13.</td>
<td>Could the HEFCW guidance be improved to strengthen the plans in this area?</td>
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### 2017/18+ plans

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<tbody>
<tr>
<td>14.</td>
<td>How has the student voice section developed over the three years?</td>
</tr>
<tr>
<td>15.</td>
<td>Any other examples of effective practice?</td>
</tr>
<tr>
<td>16.</td>
<td>Any other comments?</td>
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### 4. Rationale

<p>| | |</p>
<table>
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<tbody>
<tr>
<td>Critical review</td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td>What lessons have been learned from previous plans and Fee and Access Plan processes?</td>
</tr>
<tr>
<td>2.</td>
<td>What outcomes have been achieved through previous plans and Fee and Access Plan processes?</td>
</tr>
<tr>
<td>3.</td>
<td>Have lessons learned / outcomes achieved resulted in changes to plans?[^40] If so, how?</td>
</tr>
<tr>
<td>4.</td>
<td>What evidence / data / research is used in justification of the plan?</td>
</tr>
</tbody>
</table>

[^35]: This was compared against the approaches advocated in HEFCW's [briefing on student involvement in the Fee and Access Plan process](https://www.hefcw.ac.uk/).[^36]

[^36]: E.g. development, implementation, monitoring and evaluation.[^37]

[^37]: HEFCW’s briefing was used as a reference point.[^38]

[^38]: Consideration was given to whether and how the plans articulated how a) maximum fee levels are communicated; b) fee levels other than maximum levels are communicated; and c) fee commitments for the duration of students' period of study are clear.[^39]

[^39]: This question considers both equality of opportunity (e.g. communication to those from widening access backgrounds or to Welsh-medium learners) and promotion of higher education (e.g. communication to international students).[^40]

[^40]: In particular, looking at underrepresented group focus, objectives, provision and targets.
5. How is evidence / data / research used in justification of the plan?
6. Is the evidence / data / research used robust and/or suitable?
7. Is there coherency between lessons learned / outcomes achieved / evidence / data / research and objectives / provision / investment?
8. Does the critical review take into account partnership provision?
9. Any other comments?
10. Areas for improvement?
11. Examples of effective practice?
12. Could the HEFCW guidance be improved to strengthen the plans in this area?

Strategic alignment
13. In what ways are plans embedded at the strategic level across the institution?
14. Do plans articulate how institutional documents inform the development of the plans? If so, how?
15. Does the plan illustrate how it aligns with institutional strategic objectives, strategic documents and strategic equality plans?
16. Is alignment between plans and strategic objectives, documents and equality plans coherent?
17. Does the plan illustrate how it aligns with institutional strategies and commitments to Welsh-medium higher education?
18. Is alignment between plans and Welsh-medium higher education strategies and commitments coherent?
19. Does the plan illustrate how it aligns with – or the relationship between it and – institutional involvement in regional Reaching Wider Partnership provision?
20. Is alignment between plans and institutional involvement in regional Reaching Wider Partnership provision coherent?
21. Does strategic alignment take into account partnership provision?
22. Any other comments?
23. Areas for improvement?
24. Examples of effective practice?
25. Could the HEFCW guidance be improved to strengthen plans in this area?

Overall
26. Does the rationale present a strong and coherent case for the plan?
27. Does the rationale enable the reader to understand the direction of travel, anticipated pace of change and progress to be made within the institution?

<table>
<thead>
<tr>
<th>2017/18+ plans</th>
<th>28. How has the rationale section developed over the three years?</th>
</tr>
</thead>
<tbody>
<tr>
<td>29. Has alignment between plans and a) institutional strategic objectives, documents and equality plans; b) Welsh-medium higher education strategies and commitments; and c) Reaching Wider provision improved over the three years? If so, how?</td>
<td></td>
</tr>
<tr>
<td>30. Any other examples of effective practice?</td>
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<tr>
<td>31. Any other comments?</td>
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41 This took into account the fact that Reaching Wider is currently going through changes and, owing to timing, this might not have been able to reflect the 2019/20 plans.
5. Underrepresented groups

<table>
<thead>
<tr>
<th>Question</th>
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<tbody>
<tr>
<td>1. How many underrepresented groups does the plan target?</td>
</tr>
<tr>
<td>2. Which underrepresented groups does the plan target?²²</td>
</tr>
<tr>
<td>3. Are intersectional / overlapping characteristics considered? If so, how?</td>
</tr>
<tr>
<td>4. Do plans make explicit alignment between identified underrepresented groups and those targeted in strategic equality plan objectives?</td>
</tr>
<tr>
<td>5. Are identified groups underrepresented at the institutional, Wales and/or UK-wide level?</td>
</tr>
<tr>
<td>6. What internal evidence is used for identifying underrepresented groups?⁴³</td>
</tr>
<tr>
<td>7. What external evidence is used for identifying underrepresented groups?⁴⁴</td>
</tr>
<tr>
<td>8. How robust are the arguments for identification of underrepresented groups?</td>
</tr>
<tr>
<td>9. Does the plan consider underrepresented groups in their partnership provision?</td>
</tr>
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<td>10. Any other comments?</td>
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2019/20 plan

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<tbody>
<tr>
<td>14. How has the underrepresented groups section developed over the three years?</td>
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</table>

2017/18+ plans

6. Objectives and provision

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<tr>
<th>Question</th>
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<tbody>
<tr>
<td>Objectives</td>
</tr>
<tr>
<td>1. How many objectives are in the plan?</td>
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<td>2. Does the plan adopt the Welsh Government categories of provision as their objectives?⁴⁵ If so, which ones?</td>
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<td>3. If not, what are the plan’s objectives and how do they align to the Welsh Government categories of provision?</td>
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<td>4. Does adoption of Welsh Government categories of provision, where it occurs, strengthen or hinder the plan? In what ways?</td>
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<td>5. Is there a clear link between equality of opportunity objectives and underrepresented groups?</td>
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<td>6. Is there a clear link between objectives and the Fee and Access Plan rationale?</td>
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<td>7. Do objectives take into consideration partnership provision?</td>
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<td>8. Any other comments?</td>
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<td>9. Areas for improvement?</td>
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<tr>
<td>10. Examples of effective practice?</td>
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<tr>
<td>11. Could the HEFCW guidance be improved to strengthen the plans in this area?</td>
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</tbody>
</table>

²² This was compared to the categories outlined in the 2019/20 guidance, which adds to traditionally underrepresented groups, hard to reach learners, part-time learners and mature learners.

⁴³ E.g. admissions, retention or attainment data; student campaigns; institutional sub-strategies (e.g. for widening access or equality and diversity) etc.

⁴⁴ E.g. NUS campaigns, national research, Welsh Government or HEFCW priorities etc.

⁴⁵ The categories of provision are outlined in sections 4.18 and 4.19 of the Welsh Government Guidance to HEFCW on fee and access planning.
Provision
12. To what types of provision does the plan commit?\(^{46}\)
13. Is there a clear link between objectives and provision?
14. Is the provision chosen appropriate for the objective to which it is linked?\(^{47}\)
15. Is provision supporting equality of opportunity clearly distinguished from provision supporting the promotion of higher education?\(^{48}\)
16. Is provision supporting equality of opportunity clearly distinguished from provision that is core business and so fundable from other sources?
17. Is there a clear link between equality of opportunity provision and identified underrepresented groups?
18. Does provision take into account partnerships?
19. Any other comments?
20. Areas for improvement?
21. Examples of effective practice?
22. Could the HEFCW guidance be improved to strengthen the plans in this area?

Overall
23. In what ways do the objectives and provision align to the Well-being of Future Generations (Wales) Act 2015?\(^{49}\)

2017/18+ plans
24. How have objectives developed over the three years?
25. How has provision developed over the three years?
26. Has alignment between objectives and provision developed over the three years? If so, how?
27. Any other examples of effective practice?
28. Any other comments?

7. Investment and targets

2019/20 plan
Investment
1. What proportions of total investment are being dedicated to equality of opportunity and promotion of higher education?
2. What proportions of total investment are being dedicated to each objective / category of provision?
3. Is there a clear link between investment level, provision, objective and rationale?

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\(^{46}\) This was compared to the provision suggested in paragraphs 93-96 and 121 of the 2019/20 guidance.

\(^{47}\) I.e. is there a clear link between provision and objective? For example, the development of a general learner analytics platform might support overarching retention, but, unless it was specifically used to support targeting of the plan’s chosen underrepresented groups, it would be less appropriate for the equality of opportunity category of supporting and increasing retention of underrepresented groups. Cf. paragraph 119 of the 2019/20 guidance, which discourages provision of a more routine nature (conferences, untargeted marketing, recruitment etc.) which is considered less suitable for the targeted nature of the plans.

\(^{48}\) Recognising that some institutions have a significant widening access mission and purpose, meaning some widening access activities are firmly embedded across activities and offered to all students.

\(^{49}\) The Well-being of Future Generations (Wales) Act 2015 articulates seven goals: a prosperous Wales; a resilient Wales; a healthier Wales; a more equal Wales; a Wales of cohesive communities; a Wales of vibrant culture and thriving Welsh language; and a globally responsible Wales.
4. What level of investment is being dedicated to the regional Reaching Wider Programme?
5. Does the plan articulate investment in other collaborative activity? If so, what?
6. Any other comments?
7. Areas for improvement?
8. Examples of effective practice?
9. Could the HEFCW guidance be improved to strengthen the plans in this area?

Targets
10. How many targets are in the plan?
11. What types of target does the plan set?
12. Are the targets SMART, verifiable and auditable?\(^{50}\)
13. Do targets demonstrate a level of ambition, pace of progress and distance to be travelled?
14. Are the targets focused on improvement or maintenance of the norm?
15. Is there a clear link between targets, objectives, provision and level of investment?
16. Is there a clear link between targets and identified underrepresented groups?
17. Are any objectives or underrepresented groups not represented within the targets?
18. Any other comments?
19. Areas for improvement?
20. Examples of effective practice?
21. Could the HEFCW guidance be improved to strengthen the plans in this area?

<table>
<thead>
<tr>
<th>2017/18+ plans</th>
<th>22. How has investment developed over the three years?</th>
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<tbody>
<tr>
<td></td>
<td>23. How have targets developed over the three years?</td>
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\(^{50}\) SMART: specific, measurable, achievable, realistic, time-bound. The reviewers kept in mind HEFCW’s guidance that targets should be measurable at the point of monitoring and evaluation and achievable within one year or be milestone targets set for 2019/20 that contribute towards a longer term target.