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A RISK SHARED: DEVELOPING A REGIONAL APPROACH FOR ADDRESSING RISKS TO EQUALITY OF ACCESS TO HIGHER EDUCATION

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Executive summary

This report examines how higher education providers across London are responding to the risks set out in the Office for Students' (OfS) Equality of Opportunity Risk Register (EORR) through their Access and Participation Plans (APPs). Although the Post-16 Education and Skills White Paper calls for a more risk-based regulatory approach, long-standing inequalities in higher education access and outcomes persist, notably the slow progress in narrowing attainment gaps for disadvantaged and underrepresented students. Under the current regulatory framework, individual providers in England are responsible for identifying and addressing local risks through their APPs, yet many of the most significant barriers to opportunity in London fall beyond what autonomous institutions can meaningfully influence alone.

Our review of 43 London providers' APPs shows clear shifts in the pattern of regulated targets. There has been a substantial reduction in access targets and only modest increases in targets relating to student success. Declines in access targets are evident across almost all student-characteristic groups, with particularly concerning reductions for care-experienced and disabled students.

Mapping interventions to the EORR reveals a strong emphasis on Information, Advice and Guidance (IAG), with most providers prioritising risks which relate to information gaps among prospective students. Although these activities are valuable, their prevalence raises questions about duplication, given the density of London's higher education landscape. By contrast, interventions targeting cost pressures and accommodation-related capacity issues – arguably among the most material barriers to London learners – are limited or absent.

Evidence of collaboration has also declined, particularly with Uni Connect partnerships, despite a regulatory environment that increasingly encourages cross-provider working. Where collaboration is reported, it is often transactional rather than strategic, with only a small number of examples demonstrating deeper, sustained joint work.

When viewed collectively, the bottom-up structure of APP development results in a misalignment between the risks experienced by London learners and the interventions being delivered across the region. This was reinforced through feedback from access professionals, who ranked cost of living and accommodation pressures as some of the most significant risks, yet these remain largely unaddressed within APPs. This suggests a structural gap in the current regulatory framework: while providers have met expectations individually, the sector lacks a mechanism to ensure coordinated action on regional challenges.

To address this, our report recommends establishing a regional approach to understanding and mitigating equality of opportunity risks. This includes developing a regional EORR; supporting providers to design interventions aligned with shared regional priorities; coordinating and delivering region-wide or sub-regional initiatives that exceed the remit of individual institutions; and creating a regional evaluation function to strengthen the evidence base for effective practice. Together, these measures would complement provider-level planning, reduce duplication, and ensure that London's most pressing barriers to higher-education access and success are addressed coherently and at scale.

Introduction

In the Post-16 Education and Skills White Paper, the Government sets out a clear intention for reform of access and participation regulation, with a call for the Office for Students (OfS) to take a more risk-based approach. While there is a general sense that our sector has done well on improving access over time, the reality is that there is much more to do, and there has been relatively little change in outcome gaps for those underrepresented and disadvantaged student groups who are accessing higher education. For example, the gap in attainment between students who did and did not receive free school meals has reduced by just 1.2%, from 13.6% in 2018/19 to 12.4% in 2023/24, and the gaps in continuation and completion for these students have remained static over the past six years.

Much of what is proposed in the white paper focuses on actions expected of the OfS, and of individual providers, in terms of driving improvements in access and participation. This does, of course, reflect the realities of a regulatory framework whereby individual, autonomous providers are expected to account only for their own contributions towards improving access and participation, through their Access and Participation Plans (APPs). Ultimately, this means that the vast majority of resource allocation for APP activity is being driven by a bottom-up process across the sector, where individual providers are reflecting upon the work they feel best able to deliver, to improve access and outcomes for the students they can be reasonably expected to reach.

This provider-level model means that many significant risks, including cost of living, accommodation, or regional differences in the availability of subject choice and study mode, fall beyond the scope of what individual APPs can realistically address.

While the OfS strongly encourages collaboration as part of APPs, the reality is that this is difficult to enforce, when providers are ultimately accountable to the regulator for delivering on their commitments. It presents an obvious governance risk to any institution that makes a commitment to delivering an outcome which is too heavily dependent on external stakeholders. As a result, the current system lacks a strong mechanism to ensure that region-wide or cross-provider risks are being tackled in a coherent way.

As part of reforms to the regulatory framework which underpins APPs in 2023, the OfS provided the sector with a useful tool in the form of its Equality of Opportunity Risk Register (EORR). The EORR comprises twelve distinct risks, which cover the whole student journey from access, through to on-course outcomes and graduate progression. The evidence base underpinning each EORR risk is used by individual providers to consider their own local risks, alongside other evidence and insights they might wish to include as part of their plan.

On its own terms, the EORR is an excellent resource for the sector. However, it does require providers to undertake their own local analysis of whether and how each risk applies in their context. What is unclear is the extent to which this provider-level approach has led to a set of actions and interventions which, in aggregate, ensure that the various EORR risks are being adequately addressed at a regional and national level.

In this report, we present a detailed analysis of provider APPs across London, with a view to understanding the range and type of interventions to improve access and participation at a regional level.

Analysis of London's Access and Participation Plans

In order to explore changes in the nature and number of APP targets over time, we undertook a review of the current and previous APPs for 43 providers across London. The criterion for inclusion in this review was that a provider needed to have published at least two APPs, inclusive of their current plan under the most recent APP guidance.

Information recorded from this review included:

- 01** Total number of targets for Access, Success and Progression (current and previous APP)
- 02** Access targets coded by student characteristic (current and previous APP)
- 03** Targets coded by the 9 EORR risks which relate to access (current APP only)
- 04** Explicitly reported collaborative arrangements with Uni Connect partnerships (current and previous APP)
- 05** Explicitly reported collaborative arrangements with other providers and organisations (current and previous APP)





Overall changes in targets

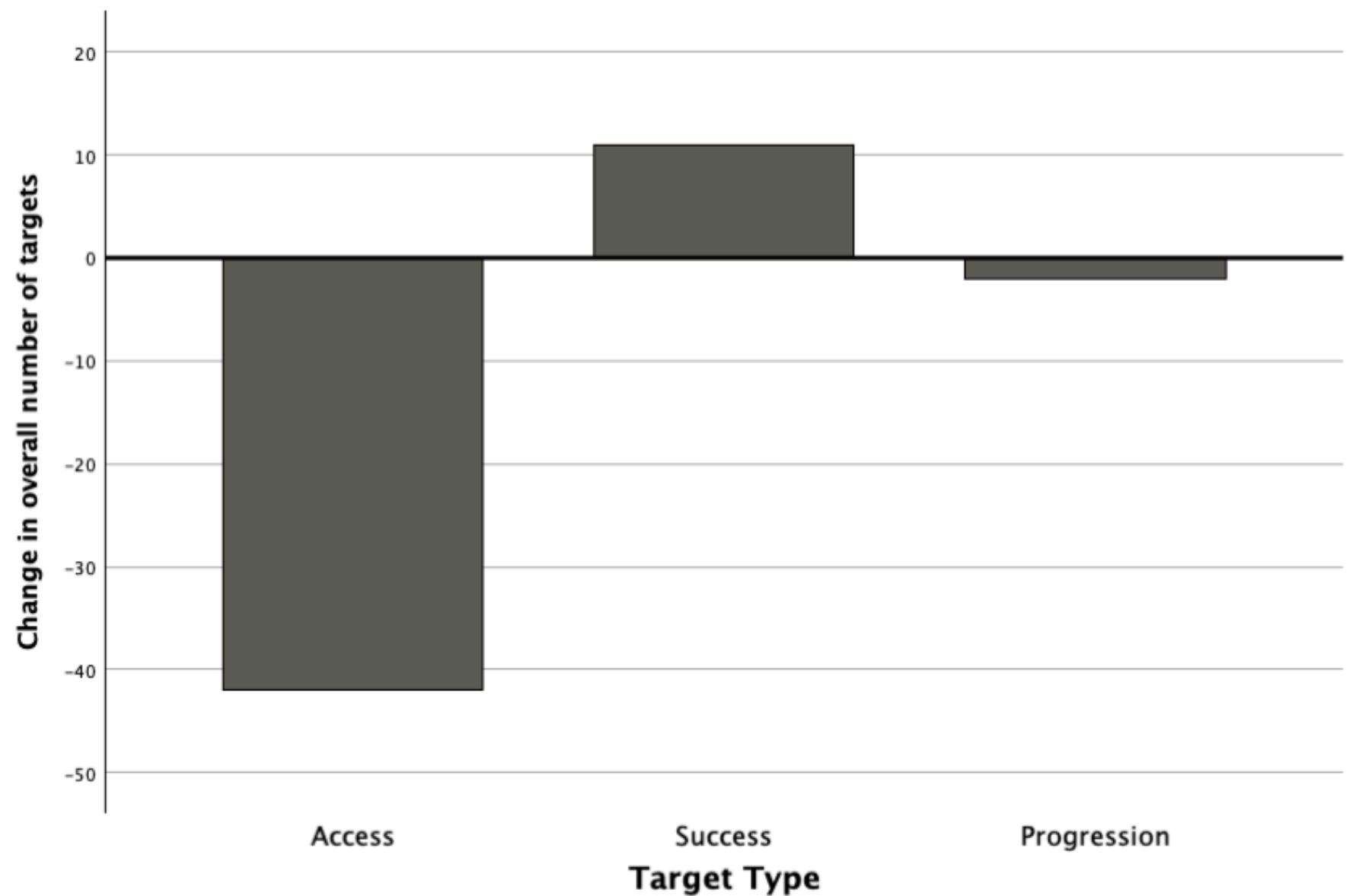
Analysis of these data highlighted several trends. As shown in chart 1, there has been a significant reduction in the number of access targets included in the most recent set of APPs.

Given the context of London being a high participation region in absolute terms, this may be partly attributable to providers refocusing resources towards participation risks.

Nine of the 43 current APPs that we reviewed have no access targets at all (21%), which is up from four providers (9%) under the previous regulatory framework. While there has been a smaller increase in student success-related targets, there has also been a very small decline in the number of progression-related targets.

The net effect of this change is that there are fewer regulated targets for all areas of access and participation across London.

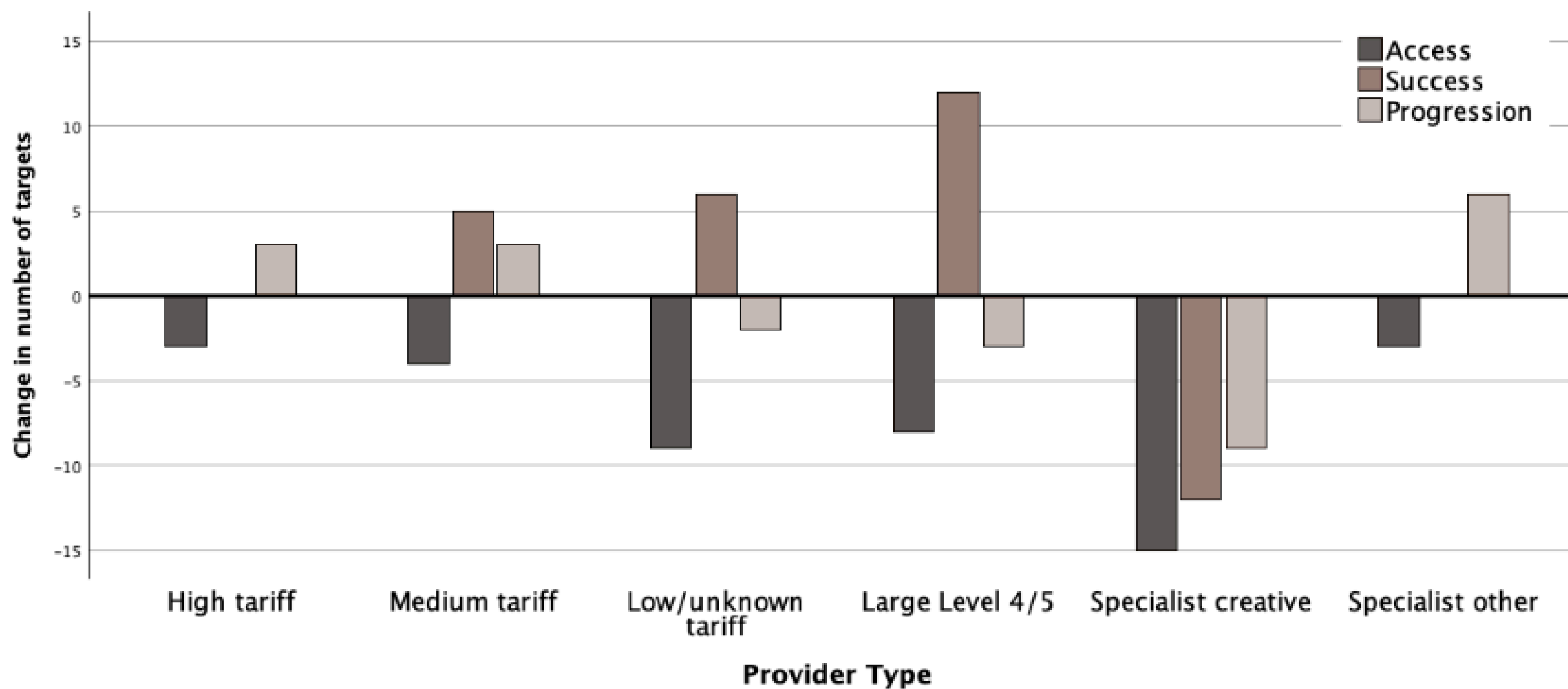
Chart 1. Overall change in number of APP targets, by student lifecycle stage





We went on to explore these changes by provider type, using standard OfS categories. As illustrated in chart 2, the reduction in focus on access targets is consistent across all provider types in London. Changes in the number of progression targets do not follow a consistent pattern but are relatively modest in scale. A more significant finding is that there does appear to be a larger increase in success targets for Large L4/5, Medium and Low/unknown tariff providers, with a correspondingly large reduction in the same target category for Specialist Creative providers.

Chart 2. Overall change in number of targets, by student lifecycle stage and provider type

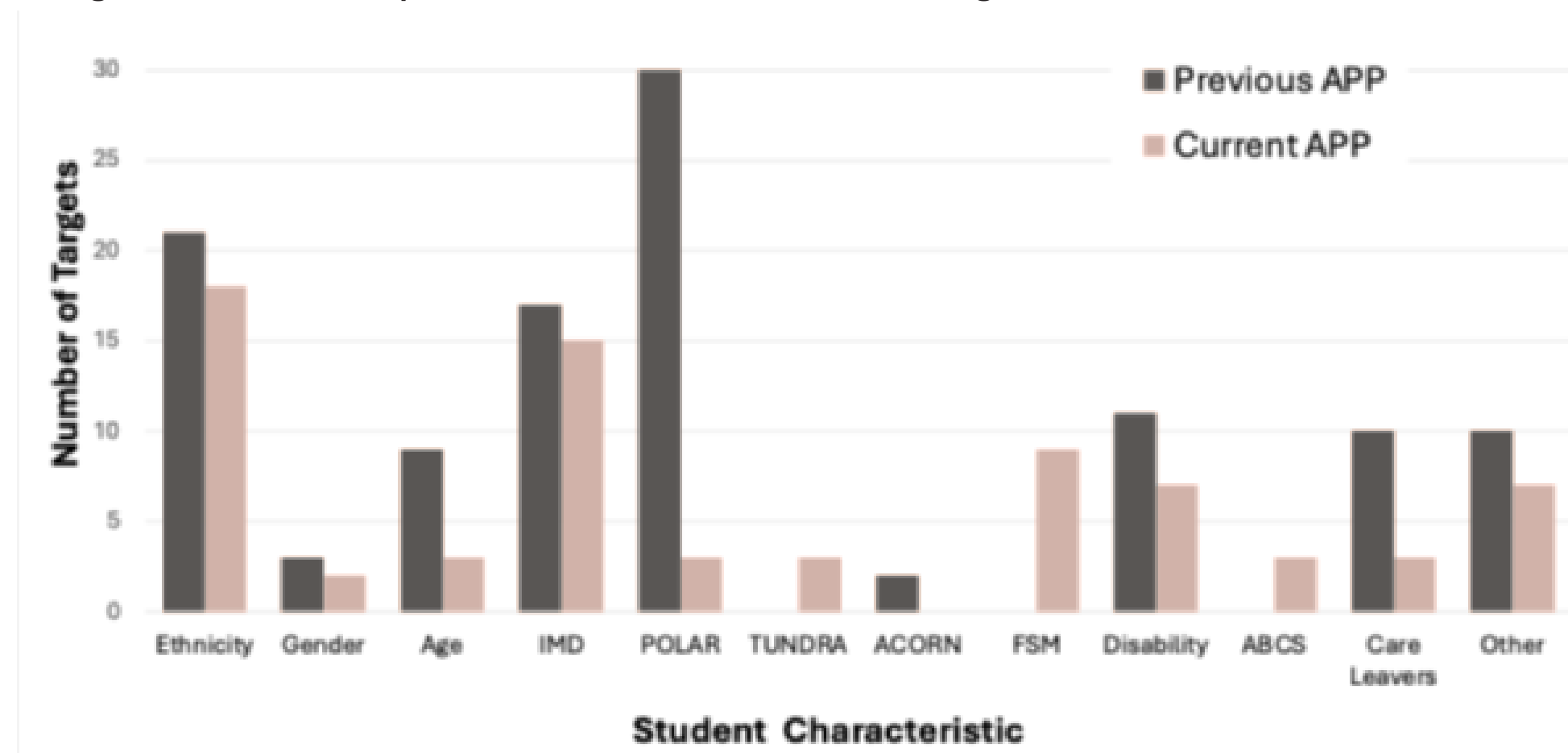




To explore the reductions in access targets, we went on to examine these changes in relation to student characteristic groups. Chart 3 shows the change in the number of providers with at least one access target linked to each student characteristic. It is very clear that almost all student characteristics are negatively impacted. The most notable decline is in the use of the POLAR metric, which can reasonably be explained by the well-known difficulties associated with the use of area-based metrics of deprivation in Londonii. However, if the driver of this specific reduction was a shift towards the use of more appropriate student characteristics to target access interventions, we should see a larger increase in targets linked to other groups. The largest increase has been towards the use of Free School Meals as a target characteristic; however, this is an increase of nine providers, which is less than a third of the total decrease of 30 providers targeting students based on POLAR.

While one might make a case for reductions targeting any of these groups being of concern, we would particularly highlight the reduction in the number of providers targeting support towards Care Experienced students (seven fewer providers) and disabled students (four fewer providers). These are groups for whom the risks of access are well documented, and the interventions we can deploy to improve access are in some cases very well understoodiii.

Chart 3. Change in the number of providers with at least one access target focused on each student characteristic group





Profile of targets in relation to EORR

The implementation of the current access and participation framework was accompanied by the launch of the Equality of Opportunity Risk Register (EORR). This tool was developed by the OfS as an evidence-based overview of the key risks which are known to impact access, success and progression for higher education students and graduates. Under the current APP framework, providers are asked to consider how their interventions align with each EORR risk. Out of the 12 risks in the EORR, nine are specifically connected to access, and chart 4 shows the profile of interventions regarding these nine access risks.

What is immediately apparent is that almost all providers have interventions linked to risks one, two and three. Collectively, these risks and associated interventions could be categorised as ‘information dissemination’ focused, in that they relate to barriers created when prospective students lack sufficient information about different aspects of higher education opportunity. The majority of interventions in these areas involve finding ways to effectively disseminate this information. These generally include campus visits, subject taster sessions and IAG delivered alongside attainment raising projects.

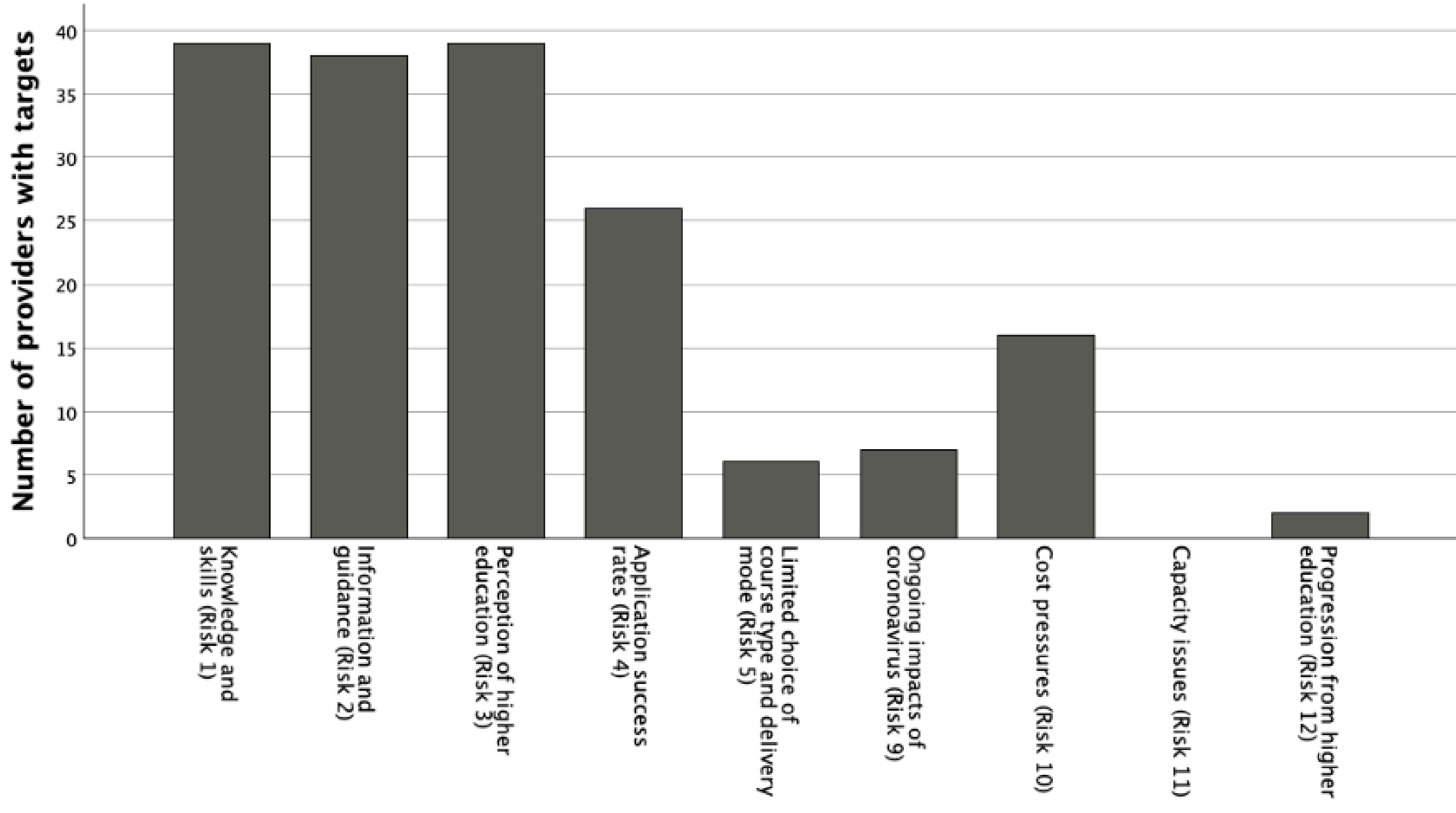
Risk 4 is addressed by more than half of the providers in our sample and relates to interventions aimed at reducing biases in acceptance rates for categories of students where application success has been low. Providers mostly mention contextual admissions policies, including guaranteed interviews for certain underrepresented groups, while some offer various forms of pre- and post-UCAS support students in writing applications.

While Risk 5 is only addressed by six providers, this is a risk which is less relevant in a London context. Put simply, London has the highest density of higher education providers of any city on the planet, and so this naturally means that risks associated with choice and diversity in modes of study is less of a concern across the capital. Having said this, a small number of providers are looking to develop alternative pathways for students to access higher education study, including offering foundation years, new Higher Technical Qualifications (HTQs), or improving flexibility to study part time or via hybrid modes.

We would suggest that of greater concern is the relatively small number of providers who have targeted interventions to address Risk 10 (Cost Pressures), and the fact that no providers have interventions to mitigate Risk 11 (Capacity Issues – which relate to the wider range of resources students require to be able to successfully access higher education, including accommodation). In relation to Risk 10, we found that 13 providers offer travel bursaries to facilitate students from underrepresented groups attending pre-entry events, and five of the 11 specialist creative HEIs offer application/audition fee waivers.



Chart 4. Total number of providers with at least one target associated with each EORR Access Risk



Our analysis shows that London providers are prioritising information, advice and guidance-related activities above all others. However, it is reasonable to ask whether such a large volume of IAG activity is necessary in the capital, and whether this is leading to significant duplication as providers compete in the same spaces to engage with the same students. The issue of duplication has also been identified in recent London Higher research analysing London-based APPs and their relationship to regional skills and employment priorities, where clustering of interventions in certain areas of the capital is evident. ^[OBJ]

On the other hand, relatively few providers are addressing cost pressures (Risk 10) even though the cost of living in London is a major barrier for disadvantaged students who wish to study in the capital.

A recent report from the Higher Education Policy Institute on the minimum income standard for students^{iv} indicates that annual living costs for first year students in London are £24,900 – more than anywhere else in the UK – and that in London, rent makes up nearly half (46%) of students’ costs. The report estimates that only 55% of first year students’ costs in London are covered by the maximum maintenance support available, which further suggests a need to consider capacity issues, such as the availability of accommodation at a reasonable price.

Research from 2024 indicates that, whilst providers in London have been proactive in supporting financially precarious students since the onset of the cost-of-living crisis, responses are not always whole-provider, strategic measures that have been incorporated into APPs.^v



Evidence of collaborative activity

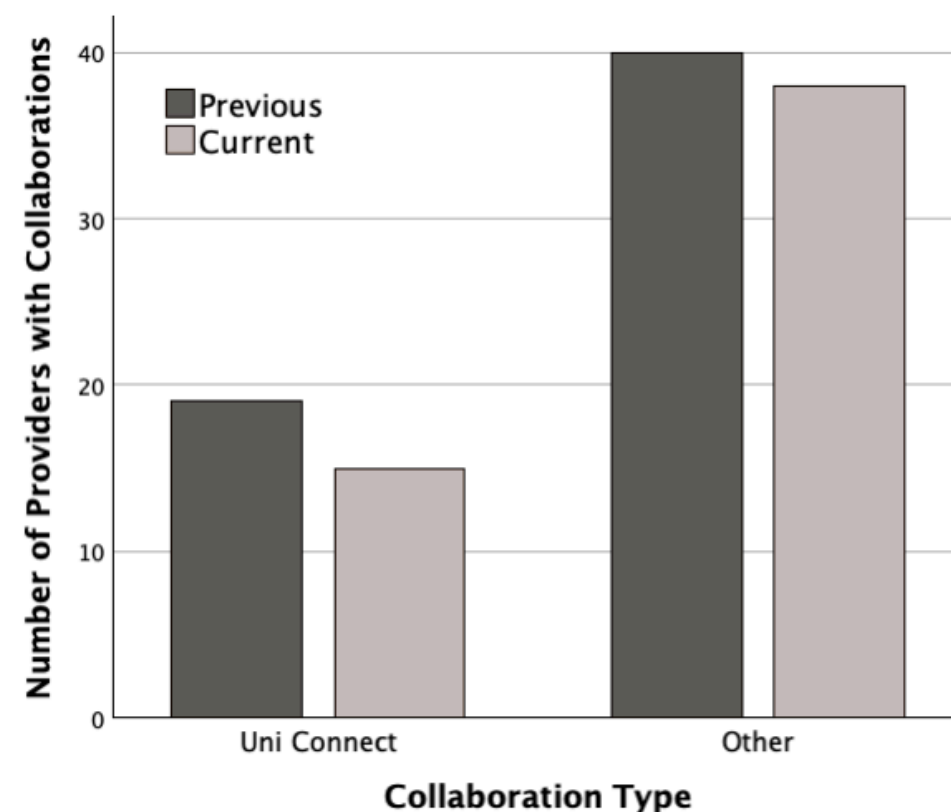
Finally, we also compared the number of providers reporting explicit collaborative activity as part of their APP and compared current and previous plans. As shown in Chart 5, below, the broad picture is a slight decline in the number of providers reporting any type of collaborative activity. Uni Connect collaborations, specifically, declined more than other forms, although with the continued uncertainty regarding the long-term future of Uni Connect as a programme, and a national collaborative outreach programme more generally, this is not a surprising finding.

As part of the implementation of the new APP framework, and, indeed, more general communication from the OfS to the sector in general, there has been an increasing push towards greater collaboration in this area. In this context, any decline in collaborative partnership working, as opposed to the increase the regulator clearly sought, is important to explore.

It is fair to say that providers' definitions of partnership and collaboration vary considerably throughout APPs. For example, some providers indicate that they are working in partnership with a large number of schools, but do not provide a great level of detail on the nature of this partnership working. Some relationships appear to be transactional in nature in the way they are presented in the APP. For example, partner organisations being commissioned to deliver specific activities as part of their wider activity elsewhere in the sector, or providers delivering outreach sessions within schools with no clear evidence of how this is being undertaken as a collaborative endeavour.

There are, however, some examples of deeper collaborations contained in the APPs. These tended to include providers who are working with organisations such as Uni Connect, The Brilliant Club, Realising Opportunities and the National Saturday Club, where the collaborations described focused on longer-term and more complex interventions and initiatives. There are also some instances where providers collaborate with one another to improve access, such as initiatives between Royal Academy of Dramatic Arts and Guildhall School of Music and Drama, and LSE and Imperial. One example of deeper collaboration with schools can be seen at London School of Economics and Political Science (LSE), which has recently launched a School Governor Scheme collaborating with Governors for Schools, which matches LSE staff and alumni with school governance opportunities across the country and launching a community of practice for school governors to share experience and best practice. These examples of collaborative working were, however, far less frequently seen than more transactional examples.

Chart 5. Total number of providers with explicitly reported collaborations in previous and current APPs



What does this analysis tell us?

It is important to acknowledge that APPs do not represent the entirety of WP-related work which is undertaken by any given provider. As key regulatory documents, they provide an overview of the activity and targets each provider is required by the regulator to work towards. However, it is very clear that there has been a shift in focus of providers since the introduction of the new regulatory framework for APPs, and this provides important insights which should inform ongoing discussions about the future regulatory approach to improving access and participation across the sector.

There are a number of changes observed across APPs which are positive. Specifically, providers appear to be moving away from targets linked to area-based measures of deprivation, which have long been problematic in a London context. This suggests that providers are focusing on the use of metrics which are more appropriate to their context. It is also encouraging to see an increase in the number of targets set which relate to outcomes for students. While fair access to higher education is important, ensuring that students are successful once they have entered higher education is just as important, but easily overlooked.

However, not all of the changes observed in our analysis are encouraging. With particular regard to collaborative activity, there has been a slight decline in the number of providers reporting any kind of partnership working. For those who do report collaborations, the majority of these related to very transactional activities involving the delivery of specific interventions, with far fewer examples of deeper, sustained collaborative partnership working with stakeholder organisations.

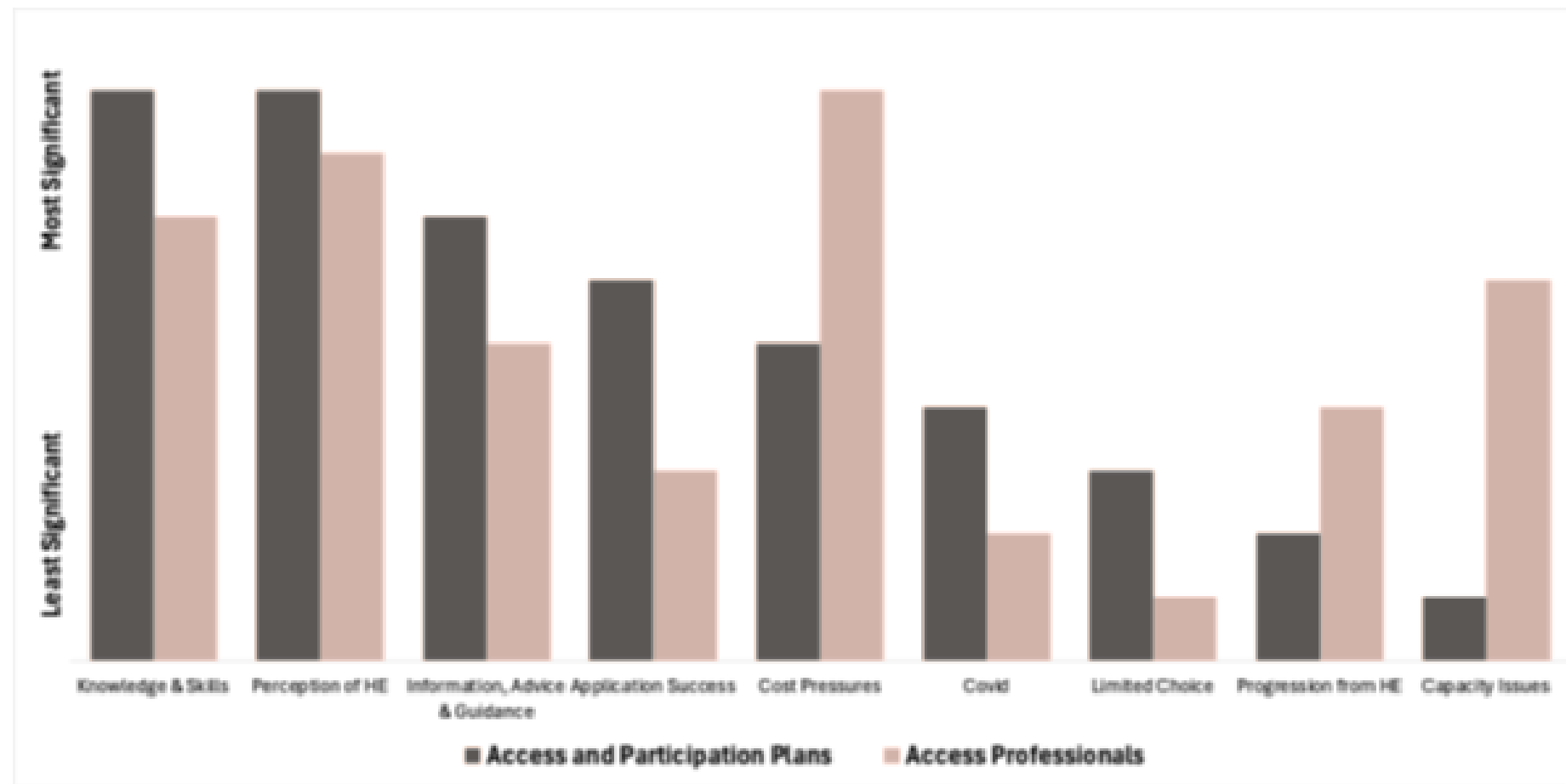
We would also highlight the significant reductions in the number of access targets linked to care leavers and disabled students. While most other student characteristic groups have seen a reduction in targets associated with them, these two stand out as they are groups where the evidence base is relatively mature in terms of knowing what works to reduce or eliminate inequalities of access and outcome. This raises a concern about the extent to which, as a sector, we are effective in embedding effective interventions, once an evidence base has been established.

Our most striking finding is the distribution of access targets in relation to the nine EORR access risks. As noted previously, APPs are created by individual institutions, with the expectation that they align their interventions and targets with the EORR, and any relevant data and insights they have regarding their local student communities. Nothing we have seen in our analysis of APPs across London suggests that providers, individually, have done anything less than this. However, when looked at holistically, it becomes clear that some of the biggest areas of risk to access across London are receiving remarkably little attention.

We argue here that the range of access-related interventions captured from our bottom-up analysis of APPs in chart 4 does not correspond with the risks which should be prioritised in a London context. Moreover, we have collected further data which directly supports this argument. The data presented in this report were presented at London Higher and AccessHE's Growth for All conference on the 11 February 2026. Prior to sharing the results related to the mapping of interventions to EORR risks, we invited attendees to provide their own ranking of each risk. Specifically, they were asked to consider how significant each risk is at a regional level for London. These results are presented in chart 6, below, alongside a ranking of each risk based on APP intervention volumes. Responses were obtained from a total of 38 access professionals working across London. Delegates included representatives of a range of different provider types, as well as third sector organisations supporting access to opportunity in London.



Chart 6. Ranking of EORR Access Risks in a London regional context, comparing data from APPs and the opinion of Access Professionals



The absence of any interventions focused on addressing capacity risks in APPs, which includes accommodation, in the context of London is a significant concern, where the cost and availability of accommodation is a major issue for all residents, let alone students. While some providers recognised cost of living pressures as a barrier to accessing higher education in their APPs, this risk was the 5th most commonly addressed in terms of targeted APP interventions, whereas access professionals working across London ranked this as the most significant risk.

These results highlight an important gap in our current approach to regulating access to higher education. The EORR is a valuable tool which has helped the sector to focus on a discrete number of evidence-based risks, but it is presented at a national level. APPs themselves are then written by providers at a local level, reflecting the risks they have identified and feel able to address with targeted interventions. This means that risks which exist at a regional level, or risks which are simply beyond the ability of individual providers to meaningfully address, are being overlooked.

Recommendations for a regional approach to improving equality of access

Our analysis highlights the need for a regional approach to understanding and addressing the barriers and risks to accessing and succeeding in higher education.

None of the analysis we have presented reflects a failure on the part of providers, nor a failure of the existing regulation to be implemented fully, on its own terms.

APPs have improved in focus and quality under the current framework, but some material risks lie beyond the influence and resources of individual providers. A regional approach would complement provider-level planning and ensure that cross-provider regional risks are tackled coherently.

While we await the outcome of the recent OfS call for evidence on Regional Access Partnerships^{vi}, we have identified a number of activities which could be led by such a partnership approach at a regional level.





01

Development and maintenance of a regional equality of opportunity risk register

We are not yet midway through the current period of most providers' APPs, which presents an opportunity to develop an approach which would enable better coordination of interventions at a regional level. This could be achieved through the development of a Regional EORR, within which a detailed assessment of both the type of risks, and their root causes could be established. This would recognise the reality that, even where different regions might observe similar risks in relation to student access and outcomes, the underlying causes may differ. Indeed, at a subregional level the same will sometimes hold true, and it would be important to involve a wide range of regional stakeholders in the development of the Regional EORR to capture this complexity.

Developing a London-specific EORR – through consultation with providers, local authorities, schools, colleges, third-sector organisations and student groups – would ensure a shared understanding of the region's most material risks and support more coherent planning across institutions. Regularly updating this regional EORR would help track changes in the higher-education landscape and provide a foundation for more coordinated interventions.

02

Support for providers in developing regionally-focused interventions

A regional partnership could play an important role in supporting providers to design interventions that respond to shared risks while remaining compliant with regulatory expectations. This support might include access to shared data resources, analytical tools, common evaluation frameworks, and regionally agreed outcome measures. By reducing duplication of effort and creating a common evidence base, providers would be better placed to align their APPs with regional priorities without compromising autonomy or accountability. This would also increase consistency in how risks are interpreted and addressed across the capital.





03

Coordination and delivery of regional and subregional interventions

Under the current APP regulation, providers are strongly incentivised to focus effort on the largest groups of underrepresented students, for two reasons. First, the OfS’s own regulatory guidance makes clear that providers should consider the “most pressing or significant risks”^{vii}, which can reasonably be interpreted to mean those risks which impact the largest number of students. Second, publicly available data for access and participation at provider level include categories related to larger subgroups such as ethnicity, age, IMD, free school meals, and disability, while excluding metrics for smaller groups, who are nonetheless significantly underrepresented in HE, such as care leavers, young adult carers, Gypsy, Roma and Traveller students, and students from service family backgrounds.

Rather than requiring providers to refocus efforts on developing a large number of distinct provider-level interventions to support these groups, a more efficient model would be for a regional partnership to have direct responsibility for developing, delivering and evaluating interventions. Providers could then be encouraged, through the APP framework, to support such interventions, such as through the contribution of expertise and access to existing networks and partnerships, without having primary responsibility for delivery and evaluation.

04

Regional evaluation of access and participation interventions

A regional evaluation function would strengthen the evidence base for what works in a London context. A regional approach would also enable more robust assessment of interventions delivered across multiple providers or subregions. Commissioning independent evaluations where appropriate, and disseminating findings widely, would accelerate learning, support more effective targeting of resources, and help embed evidence-informed practice across the region. Over time, this could significantly enhance the sector’s ability to address entrenched inequalities in access and outcomes, while also minimising the burden on individual providers to generate evaluation evidence in isolation.



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