

Review of Approach to Widening Participation in Higher Education

Public Consultation — Response

Department for the Economy, Northern Ireland

Organisation Details

Q1. What sector is your organisation in?

- Statutory
- Charitable / Voluntary
- Private
- Housing Association
- Health Trust
- Individual
- Other (please specify): Sector body for quality assurance in higher education

Q2. Name

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Q3. Organisation

The Quality Assurance Agency for Higher Education (QAA)

Q4. Email Address

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Section 1.1: Strategic Foundations for Inclusive Higher Education

Vision and Principles

Q5. Do you agree with the proposed vision for widening participation?

- Yes
- No

Q6. Are the proposed principles appropriate and sufficient to guide future action?

- Yes
- No

QAA broadly supports the principles as set out. We would welcome explicit reference to the UK Quality Code, noting that the principles map well to [Quality Code Principle 9: Recruiting, selecting and admitting students](#). Making this connection explicit would strengthen the framework and signal alignment with the established quality assurance infrastructure across the UK. We would also encourage the Department to foreground the relationship between equality and quality, which are increasingly understood as

mutually reinforcing rather than separate concerns - a position reflected by quality and regulatory bodies across the UK nations.

We also note that the language used in the principles - in particular the reliance on the term “background” - may not fully capture the structural and contextual barriers that shape learner participation. There is value in considering a shift toward language centred on “context” and “circumstance”, reflecting both evolving discourse among learners and broader sectoral understanding. We recognise that inclusive language continues to evolve across different national contexts and would encourage the framework to commit to reviewing its terminology over time.

Q7. Are there additional principles that should be considered?

- No
- Yes

QAA does not propose additional principles at this stage. We would note, however, that centring the learner - and learner voice - more explicitly within the principles would strengthen the framework. The UK [Quality Code Principle 2](#), which addresses students as partners, provides a clear basis for this and could usefully be referenced directly.

Q8. How can these principles be embedded across the sector to ensure consistency and impact?

Embedding principles consistently across the sector requires clear linkage to existing quality assurance mechanisms. QAA would encourage the Department to ensure that the principles are integrated into Northern Ireland’s developing quality arrangements, including institutional annual visits and peer review processes. This would give the principles regulatory grounding and help to ensure that widening participation is treated as an integral dimension of quality provision rather than a standalone agenda.

There would also be value in ensuring that institutional access and participation plans - or their Northern Ireland equivalent - explicitly reference these principles and are considered as part of any quality review methodology. QAA’s developing work on quality arrangements in Northern Ireland provides a potential vehicle for taking this forward.

Section 1.2: Strategic Foundations for Inclusive Higher Education

System-Level Targets

Q9. Should Northern Ireland introduce a national target for underrepresented learners in higher education?

- Yes
- No
- Don’t know

QAA does not support the introduction of a single national target. While high-level aspirations can help raise the profile of widening participation - as demonstrated by experience elsewhere in the UK - a single national target risks masking significant variation between institutions and priority groups, and may incentivise narrow access-focused activity at the expense of the full learner journey.

There are also practical considerations specific to the scale of the Northern Ireland sector. Where priority group cohorts are small, percentage-based targets can be highly volatile from year to year, making it difficult to draw meaningful conclusions about

progress. A percentage change applied to a very small cohort may represent the movement of only one or two individuals, which is not a sound basis for accountability or institutional planning.

Q10. Would a flexible model of targeting, focused on priority groups and institutional targets, be effective?

- Yes
- No
- Don't know

A flexible model is preferable to a single national target, provided it is designed carefully. QAA supports an approach that sets targets in the context of each institution's student population and geographic catchment, rather than applying uniform expectations across a sector that serves very different communities.

It will be important, however, to ensure that any targeting framework captures the full student lifecycle - covering access, retention, attainment and outcomes - rather than focusing primarily on entry. Targets that measure only admissions can incentivise institutions to meet numerical thresholds without addressing the underlying barriers to learner success. This is an area where alignment with quality review processes could help to ensure that targeting supports genuine improvement rather than compliance alone.

Q11. Are the principles identified sufficient to guide the development of a region-wide taxonomy of priority groups to ensure relevance and inclusivity?

- Yes
- No
- Don't know

Q12. How can institutional visits and peer review be structured to promote shared learning and sector-wide improvement?

QAA sees significant potential for institutional visits and peer review to serve as a vehicle for both accountability and shared learning on widening participation. We would encourage the Department to ensure that the proposed approach to institutional visits is developed in alignment with Northern Ireland's emerging quality arrangements, so that widening participation is embedded within the broader quality review methodology from the outset.

Evidence from QAA's review work, including data-informed institutional visits undertaken in both Scotland and Wales, suggests that this approach can provide a structured basis for considering the effectiveness of approaches at a provider level, with external cyclical peer review offering an opportunity for cross-sector and cross-nation learning. QAA would welcome the opportunity to explore how this developing work could support the Northern Ireland sector.

Section 1.3: Strategic Foundations for Inclusive Higher Education

Proposed Approach to Refining Target or Priority Groups

Q13. Are the proposed priority groups appropriate and sufficient to guide future action?

- Yes

- No
- Don't know

Q14. Would a thematic model better reflect learner realities?

- Yes
- No
- Don't know

A thematic model offers a more flexible and nuanced approach than a fixed list of designated groups. It can better accommodate the intersecting disadvantages that many learners face, and allows institutions to respond to locally relevant circumstances - which is particularly important given the distinct social and demographic context of Northern Ireland. QAA supports the thematic approach in principle.

Q15. Are there additional thematic groupings that should be considered?

- No
- Yes

Q16. Are there too many priority groups for WP activities and financial support to be meaningful within the resources available?

- Yes
- No
- Don't know

There is a risk that an extensive list of priority groups may dilute the effectiveness of WP activity and financial support. Strategic focus requires making choices about where resources can achieve the greatest impact for the most learners. QAA would encourage the Department to ensure the taxonomy is accompanied by clear guidance on how institutions should exercise judgement about prioritisation where resources are constrained.

Experience from Access to HE provision elsewhere in the UK demonstrates that well-designed adult pathways can target resources effectively while delivering strong participation and outcome gains at scale.

Q17. Do you agree that all groupings should be priority groups?

- Yes
- No
- Don't know

QAA does not take a firm position on this at present. There may be value in considering whether a tiered or differentiated model - distinguishing between nationally designated priority groups and those that institutions may choose to support based on local context - could offer a more workable and accountable framework. This is an area where further stakeholder engagement and evidence would be beneficial before a final position is adopted.

Q18. Should any of the groups be prioritised over others?

- No
- Yes

QAA does not recommend formal prioritisation of groups over others at a national level. Institutional context, informed by robust local data, is a more appropriate basis for

prioritisation. It will be important, however, to ensure that groups facing particularly pronounced participation gaps - including those with specific regional significance in Northern Ireland - receive adequate attention within institutional WP plans.

Q19. Should institutions retain flexibility to support additional groups not formally designated as priorities, such as Travellers, asylum seekers, or refugees?

- Yes
- No
- Don't know

Institutional flexibility is important to ensuring that WP activity remains responsive to emerging needs and locally relevant communities. The groups cited - Travellers, asylum seekers and refugees - may face significant barriers to participation that are not fully captured by the formal taxonomy, and institutions should be enabled and encouraged to support them where local evidence points to need.

Q20. Should a formal mechanism be established to regularly review and update priority groups based on emerging data, lived experience, and stakeholder feedback?

- Yes
- No
- Don't know

A formal review mechanism is important to ensure the taxonomy remains current and responsive to change. QAA would recommend that such a mechanism draw on a combination of quantitative data on participation trends and qualitative evidence from learners, community organisations and institutions. The inclusion of lived experience is particularly important to ensure that definitions reflect the realities faced by underrepresented groups, rather than being determined solely on the basis of administrative categories.

Q21. How can institutions best balance strategic focus on priority groups with flexibility to support emerging or locally relevant groups?

Institutions should be supported to develop clear, evidence-based WP strategies that set out their approach to both nationally designated priority groups and locally identified groups. Transparency about how institutions exercise discretion - and how they evaluate the impact of their activity across all groups - is important for maintaining accountability while preserving necessary flexibility. QAA's review processes provide one mechanism through which this transparency can be assessed.

Q22. Are there any gaps in the proposed approach that would need to be considered?

- No
- Yes

QAA would highlight three potential gaps. First, the proposed approach does not appear to include part-time learners as a distinct priority group, despite the well-evidenced barriers this group faces in accessing and completing higher education. There may be value in considering whether part-time learners warrant explicit recognition within the priority group framework.

Second, there is limited consideration of postgraduate learners within the priority group taxonomy, despite the consultation's welcome recognition elsewhere that WP should extend beyond undergraduate entry. Addressing this would help to ensure the framework is genuinely whole-journey in its scope.

Third, there is scope to build a better articulated adult progression pathway within the widening participation framework. While the consultation recognises the importance of supporting adult and mature learners, there is an opportunity that QAA can support

as regulator of the Access to HE Diploma. The very limited scale of recognised Access to HE provision in Northern Ireland suggests not an absence of need, but substantial headroom for growth. Developing or expanding structured adult access pathways would directly address this gap and support the consultation's ambitions around inclusion, regional balance and skills development.

Section 2.1: Enabling Success Across the Learner Journey

Communication and Outreach

Q23. Is the proposed purpose of communications and outreach appropriate to guide future sector-wide action?

- Yes
- No
- Don't know

Q24. Would a coordinated sector-wide plan improve consistency and impact across institutions and communities?

- Yes
- No
- Don't know

Q25. How can messaging be tailored to effectively engage priority groups?

Q26. Would a joint brand or visual identity strengthen recognition and trust in widening participation efforts?

- Yes
- No
- Don't know

Q27. How can employer involvement in outreach be strengthened to reflect regional economic needs and learner aspirations?

Q28. Are there any gaps in the proposed approach that should be addressed to ensure outreach is inclusive, locally relevant, and sustainable?

- No
 - Yes
-

Section 2.2: Enabling Success Across the Learner Journey

Strengthening Contextual Admissions and Pathways

Q29. Is the proposed approach to contextual admissions and alternative pathways appropriate to guide future sector-wide action?

- Yes
- No

Don't know

The emphasis on contextual admissions and alternative pathways is welcome and creates a clear opportunity to consider the role of structured adult access provision. The Access to Higher Education Diploma provides a proven, nationally recognised Level 3 pathway designed specifically for adults without traditional qualifications.

In 2024–25, **2.5% of all UCAS entrants** entered higher education holding a QAA-recognised Access to HE Diploma. The profile of these learners demonstrates the pathway's widening participation impact: 83% were aged 21 or over, 24% came from low participation neighbourhoods, and 25% declared multiple impairments, health conditions or learning needs - significantly higher proportions than for learners entering via other Level 3 routes. These data demonstrate that Access to HE operates both as a genuinely inclusive route and as a high-quality academic preparation for higher education.

Exploring how similar structured adult pathways could be developed or expanded in Ireland would strengthen admissions flexibility while maintaining academic credibility and transparency.

Q30. Should a consistent framework/approach for contextual admissions be developed across providers to ensure fairness and clarity for applicants?

Yes

No

Don't know

A consistent framework would provide greater clarity and fairness for applicants, particularly those from underrepresented groups who may be unaware of, or uncertain how to navigate, contextual admissions processes. Transparency about criteria and how they are applied is important for maintaining public and learner confidence in admissions.

Consistency should not, however, mean uniformity. Institutions should retain the flexibility to design contextual admissions approaches that reflect their specific academic context and student population, within a shared framework of principles and definitions. Maintaining confidence in academic standards across different entry routes remains important, and any consistent framework should be designed with this in mind.

Q31. How should prior learning, life experience, and transversal skills be recognised meaningfully within admissions processes for WP learners?

Recognition of prior learning and life experience should be embedded within a structured and transparent framework, rather than applied inconsistently at institutional discretion. QAA would encourage the Department to consider how micro-credential and Recognition of Prior Learning (RPL) frameworks, like those created by QAA in collaboration with the sector in both Scotland and in Wales and Northern Ireland, could provide a more systematic basis for recognising non-traditional qualifications and experiences within HE admissions, while maintaining confidence in academic standards.

Q32. What support should be embedded alongside contextual admissions to promote retention and learner success?

Contextual admissions should be understood as the beginning, not the end, of an institution's commitment to a WP learner. There is evidence that learners admitted through contextual routes may experience challenges around confidence or belonging if institutional support does not match the expectations created at entry. Providers should consider how holistic, whole-journey support - responsive to the specific circumstances of WP learners, including financial pressures, caring responsibilities and mental health - is embedded from the point of admission. This is also an area where the quality review process can support accountability.

Evidence from Access to HE provision shows that learners entering via this route achieve degree outcomes comparable to those of students entering with other Level 3 qualifications, including strong proportions of top-degree awards. This demonstrates that recognising adult experience through structured pathways can support both equity and academic standards.

Q33. How can communication of contextual and flexible admissions policies be improved for WP applicants and those who support them?

Communications should be proactive, accessible and delivered through trusted channels, including schools, colleges, community organisations and employers. Information about contextual admissions should be presented in plain language and made available well in advance of application deadlines, with outreach to advisers and support workers who engage directly with priority group learners.

Q34. What further actions are needed to strengthen regional accessibility and progression routes, particularly in rural areas?

Geographic accessibility remains a significant barrier to HE participation in parts of Northern Ireland. There is value in considering how digital and blended delivery models, satellite provision and flexible study modes can extend access to learners in rural and more sparsely populated areas. The role of further education colleges as progression partners is also important in this context and should be explicitly supported within the WP framework. Ensuring clear and well-understood progression routes between FE and HE is an area where quality assurance processes can play a supporting role. Evidence from Access to HE provision elsewhere in the UK shows that flexible, locally delivered adult pathways enable learners to remain rooted in their communities while progressing into higher education. Around 77% of Access to HE learners who progress to higher education study within their local area, supporting regional participation and community cohesion. Expanding adult Access to HE pathways in Northern Ireland could therefore play a key role in addressing geographic inequalities in higher education participation. There is also scope to work with the South of Ireland to explore cross-border provision.

Q35. Are there any gaps in the proposed approach that should be addressed to ensure admissions and pathways are inclusive, equitable, and sustainable?

- No
- Yes

Section 2.3: Enabling Success Across the Learner Journey

Supporting Retention and Outcomes

Q36. Is the proposed whole-journey support model appropriate to guide future sector-wide action?

- Yes
- No
- Don't know

QAA welcomes the commitment to a whole-journey approach and the recognition that WP activity should extend beyond initial access. This is an important shift in framing. However, while the intent to support the full learner lifecycle is clearly articulated in the consultation document, it is not yet fully reflected in the substantive proposals around

targeting and data. In particular, there is limited attention to attainment - the quality of the educational experience between entry and graduation - which is where quality provision can make the greatest difference for WP learners. We return to this below.

Q37. What mechanisms are needed to ensure early identification and consistent access to support for WP learners?

Early identification systems should be integrated into institutional induction and early assessment processes, with clear referral pathways to financial, academic, pastoral and mental health support. Where data sharing protocols allow, timely information sharing between admissions, student services and academic teams can help to ensure that learners who may be at risk of disengaging are identified and supported before difficulties escalate.

Q38. How can employer collaboration be strengthened to support inclusive progression into employment and further study?

Employer collaboration is most effective when structured around meaningful partnerships that support work-based learning, mentoring and flexible employment alongside study. Employers with genuine commitments to inclusive hiring and progression can play an important role in supporting WP learners' transitions into graduate employment. The WP Forum provides a potential vehicle for developing shared commitments in this regard.

Q39. Do you agree that WP support should be extended to include postgraduate learners?

- Yes
- No
- Don't know

Yes. Postgraduate study is increasingly a requirement for career progression in many fields, and access to postgraduate education is itself highly stratified by socioeconomic background and prior educational experience. Extending WP activity to postgraduate learners is consistent with a genuine whole-journey approach and with the ambition set out elsewhere in the consultation document.

Q40. What actions should be prioritised to support WP learners beyond initial access and throughout their full learner journey?

QAA would highlight the importance of addressing attainment gaps as a priority action. The consultation document places significant emphasis on access and on graduate outcomes, but the attainment gap - the difference in academic achievement between WP learners and their peers during their studies - is a central measure of whether higher education is genuinely working for all students. Without explicit attention to attainment gaps, there is a risk that improvements in access statistics are not accompanied by improvements in the quality of the educational experience or outcomes for WP learners.

High-quality academic provision, inclusive learning and teaching practice, and responsive student support are the primary levers for closing attainment gaps. QAA would encourage the Department to ensure that future WP strategies include explicit expectations around data collection, target-setting and evaluation in relation to attainment, not only access and graduate employment.

Q41. How can institutions better tailor support for priority groups?

Tailored support is most effective when informed by disaggregated data on the experiences and outcomes of specific groups, co-designed with those groups, and embedded within a broader institutional commitment to inclusive practice. Support should not be conceived solely as targeted interventions for individual learners, but should be accompanied by systemic attention to curriculum design, assessment practice

and institutional culture. This is an area where QAA's review and enhancement work can support institutions in developing and evidencing their approaches.

Q42. Should support services be extended beyond graduation to assist WP learners during transitions into employment or further study?

- Yes
- No
- Don't know

Yes. The transition from HE to employment or further study can be a particularly challenging period for WP learners, who may have fewer informal networks and support structures to draw on than their more advantaged peers. Graduate support services, alumni mentoring and careers provision that is sensitive to the specific circumstances of WP learners can make a meaningful difference to longer-term outcomes.

Q43. Are there any gaps in the proposed approach that should be addressed to ensure retention and successful outcomes for WP learners?

- No
- Yes

The most significant gap in the proposed approach, as noted above, is insufficient attention to attainment gaps. The consultation focuses primarily on access and graduate outcomes but largely omits the quality of the educational experience in between — which is where the attainment gap is formed and where quality provision and inclusive practice can make the greatest difference. QAA would encourage the Department to address this explicitly in the final strategy, including through clear expectations around data collection and institutional accountability for attainment outcomes.

Section 3.1: Enabling Systems and Structures

Improving Financial Support

Q44. Is the proposed approach to improving financial support appropriate to guide future sector-wide action?

- Yes
- No
- Don't know

Q45. What changes to eligibility thresholds or support mechanisms would have the greatest impact for WP learners, including part-time learners?

Financial support for part-time learners remains an area of significant unmet need. Many WP learners choose part-time study because of financial and caring constraints, yet eligibility for maintenance support and other financial mechanisms may not adequately reflect their circumstances. There would be value in reviewing current thresholds with specific attention to the barriers faced by part-time and mature learners, who form an important part of the Northern Ireland HE participation landscape.

Q46. Would regional pooling of resources improve consistency and equity in financial support across institutions?

- Yes
- No
- Don't know

Q47. How can communication and awareness of available financial support be improved, particularly for under-represented and part-time learners?

Financial support information should be integrated into all stages of the learner journey, from outreach and pre-application through to in-study guidance. Trusted community intermediaries, as well as schools and colleges, can play an important role in ensuring that prospective learners are aware of available support before they make decisions about whether and where to study. Plain language and accessible formats are important across all communications.

Q48. What role should employers and philanthropic partners play in supporting WP learners?

Q49. Are there additional actions or interventions that should be prioritised to ensure financial support reaches those most in need?

- No
- Yes

Q50. Are there any gaps in the proposed approach that should be addressed to ensure financial support is effective, equitable, and sustainable?

- No
- Yes

Section 3.2: Enabling Systems and Structures

Enhancing Data, Accountability and Reporting

Q51. Do you agree with the proposal to develop a regional WP data plan with common definitions, indicators, and reporting formats?

- Yes
- No

QAA strongly supports the development of a regional WP data plan with agreed definitions and indicators. Consistent data collection is a prerequisite for meaningful accountability and for the cross-institutional comparison that can drive improvement. Alignment with approaches taken by sector bodies elsewhere in the UK - including the use of HESA data and established dashboard methodologies - could provide a useful starting point, while the plan should also reflect the specific characteristics and scale of the Northern Ireland HE sector.

Any regional data plan will need to be developed with close attention to its practical implications for institutional data teams, particularly at a time when the sector is absorbing significant changes to data requirements in other areas. QAA would encourage the Department to align data collection requirements as closely as possible with existing reporting obligations to minimise additional burden on providers.

Q52. Would a regional WP dashboard be a useful tool for monitoring progress and informing decision-making?

- Yes
- No

A well-designed WP dashboard could be a valuable tool for monitoring progress, supporting accountability, and enabling benchmarking across the sector. QAA would welcome further detail on the proposed scope and governance of the dashboard,

including whether it would be available only to members of the WP Forum or publicly accessible; whether it would operate at institutional or regional level, or both; and how data lag – given reliance on HESA data, which typically lags by at least a year – would be managed and communicated to users.

QAA would favour a publicly accessible dashboard, consistent with the transparency principles articulated elsewhere in the consultation. Public availability supports scrutiny by learners, community organisations and other stakeholders, and is in keeping with the accountability ambitions of the strategy.

Q53. What additional data is needed to better understand and support the learner journey, particularly for underrepresented or priority groups?

As noted throughout this response, data on attainment gaps – disaggregated by priority group – represents a significant gap in the current evidence base. Beyond access and graduate employment, institutions should be expected to collect and report on in-study outcomes, including continuation rates, degree classifications and attainment differentials between WP and non-WP learners.

The question of small cohort data is also important given the scale of the Northern Ireland sector. Some priority group cohorts will be very small, leading to significant year-on-year volatility in reported metrics. Any dashboard or reporting framework should include appropriate guidance on interpreting small-number data, and should encourage analysis of multi-year trends rather than annual snapshots to avoid misleading conclusions.

More granular data on adult learner entry routes would strengthen understanding of participation, progression and outcomes. In particular, clear differentiation between regulated QAA Access to HE Diplomas and other access-type provision would improve transparency and enable more effective monitoring of widening participation pathways.

Given the scale and robustness of Access to HE data elsewhere in the UK, there is an opportunity to use similar evidence to inform future development of adult pathways in Northern Ireland.

Q54. How can data be used to support accountability and continuous improvement across the sector?

Data is most effective as a driver of improvement when it is embedded within clear accountability structures, linked to meaningful consequences, and supported by professional development and sector learning. QAA would recommend that data reporting be integrated into institutional visit and peer review processes, so that WP data informs quality conversations at provider level rather than sitting in a separate reporting silo. This integration would support a more coherent approach to accountability and continuous improvement across the sector.

Q55. Would you support the introduction of annual WP impact reviews or peer learning mechanisms?

- Yes
- No

Yes, with the caveat that the design of impact reviews should be proportionate to institutional capacity and clearly aligned with – rather than layered on top of – other reporting and quality review obligations. QAA would also emphasise the importance of robust evaluation – not merely monitoring – as part of any impact review process. This means going beyond quantitative data to assess what difference WP interventions are making and for whom, drawing on recognised standards of evidence where feasible. The

current consultation document does not address evaluation methodology in sufficient depth; we would encourage this to be developed further in the implementation phase.

Q56. Are there any gaps in the proposed approach to enhancing data, accountability, and reporting that should be addressed?

- No
- Yes

As noted in responses to Q53 and Q55, the proposed approach would benefit from a more explicit commitment to evaluation as distinct from monitoring and reporting. Evaluation – assessing what works, for whom and under what conditions – is important if the sector is to build a meaningful evidence base and improve the effectiveness of its WP activity over time. QAA would encourage institutions to be supported, and where appropriate expected, to develop evaluation plans for their WP interventions, drawing on established frameworks for intervention evaluation.

Section 3.3: Enabling Systems and Structures

Governance, Oversight and Peer Learning

Q57. Do you agree with the proposal to formalise and expand the WP Forum as the central cross-sector body for oversight and implementation of WP policy and practice?

- Yes
- No
- Don't know

QAA supports the formalisation and expansion of the WP Forum. A cross-sector body with clear governance and accountability arrangements provides a strong foundation for collaborative implementation of the WP strategy. In this context, QAA would welcome consideration of its inclusion in the WP Forum as a key stakeholder, given our role in quality assurance and enhancement across the Northern Ireland HE sector and our developing work on quality arrangements in Northern Ireland. Our participation would help to ensure that widening participation is systematically integrated into quality processes, and that the Forum benefits from expertise in quality assurance methodology, data analysis and sector enhancement.

Q58. What are your views on the proposed WP Covenant or Memorandum of Understanding (MoU)?

A Covenant or MoU provides a useful mechanism for articulating shared commitments and setting expectations for Forum members. QAA would encourage the document to be treated as a living instrument, subject to regular review, rather than a static agreement. It should include clear expectations around data sharing, evaluation and learner voice, as well as commitments to transparency and public reporting on progress.

Q59. How can the WP Forum best support mutual accountability among members and ensure that effective practice is shared and adopted across the sector?

Mutual accountability is most effective when structured around shared data and transparent reporting, supported by facilitated peer learning rather than purely compliance-oriented oversight. QAA would encourage the Forum to develop structured mechanisms for sharing evaluated evidence of effective practice, including cross-institutional learning visits and collaborative evaluation. Peer review informed by data can be a particularly valuable tool in a small, collegiate sector such as Northern Ireland's,

where the conditions for trust-based, improvement-focused relationships between providers are well-established.

Q60. How can learner voice and employer engagement be meaningfully embedded in WP governance structures?

Learner voice should be embedded in WP governance as a matter of principle. Quality Code Principle 2 – which addresses students as partners – provides a clear framework for this and could usefully be referenced in the governance arrangements for the Forum. QAA would encourage an approach to learner engagement that extends beyond formal representative structures to include co-design of WP strategy, participation in evaluation activity and genuine involvement in governance.

Employer engagement in governance should similarly be structured around genuine partnership. Employers represented on the Forum should be expected to make concrete commitments to WP-supportive hiring and progression practices, not simply to provide informational input on labour market needs.

Q61. Would a WP Data and Insights Hub be a valuable addition to support evidence-based decision-making and benchmarking?

Yes

No

QAA welcomes the proposal for a WP Data and Insights Hub in principle. The concept is reminiscent of dashboard approaches used by other quality and regulatory bodies, including OfS access and participation plan dashboards, and could be a genuinely useful resource for the sector. However, the consultation provides limited detail on what the Hub would contain, who would have access to it, and how it would be governed and maintained.

QAA would encourage the Department to clarify the intended scope of the Hub, the audience it is designed to serve, how data quality and timeliness would be assured, and how it would be governed. As noted in response to Q52, QAA would favour a publicly accessible resource. We would welcome the opportunity to contribute to the design of the Hub, drawing on our experience with data analysis and institutional benchmarking.

Q62. What are your views on introducing an annual WP Impact Review process?

QAA supports the introduction of an annual WP Impact Review, provided it is designed proportionately and integrated with existing institutional reporting obligations rather than adding a further separate layer of requirement. The review process should be accompanied by clear expectations about the quality of evidence institutions are expected to provide, and should include structured mechanisms for cross-institutional learning as well as individual accountability.

As noted in response to Q55, there is an important distinction between monitoring (tracking what happened) and evaluation (assessing why and whether interventions worked). Impact reviews should incorporate both, with an expectation that institutions can demonstrate not only what WP activities they undertook but what difference those activities made for the learners concerned.

Q63. What support or capacity-building would be most helpful for WP practitioners and institutional leads to strengthen delivery and collaboration?

Capacity-building support would be valuable across a range of areas, including data analysis and interpretation, evaluation methodology, inclusive learning and teaching practice, and community engagement. QAA would be pleased to explore how our enhancement work could contribute to a structured programme of professional development for WP practitioners in Northern Ireland, building on our existing work and drawing on cross-UK networks of expertise.

Q64. How could funding mechanisms be better aligned with WP priorities to incentivise collaboration and reduce duplication?

Funding mechanisms should reward collaborative approaches and shared evidence of impact, rather than incentivising institutions to duplicate activity or compete for the same learner populations. There may be value in considering how WP funding could be linked to participation in the Forum, contribution to shared evaluation and data infrastructure, and demonstrable progress against agreed indicators, as part of a coherent approach to aligning funding with strategic priorities.

Q65. Are there any gaps in the proposed approach that should be addressed to ensure effective and consistent support for WP learners?

No

Yes

QAA would highlight two overarching gaps that run across several sections of the consultation. First, as noted throughout this response, the strategy does not give sufficient attention to attainment gaps as a dimension of widening participation. Access and graduate outcomes are important, but they do not capture the quality of the educational experience in between – and it is in that space, through high-quality teaching, inclusive practice and responsive support, that meaningful gains for WP learners can be made and sustained.

Second, the consultation does not explicitly address the relationship between this WP strategy and the developing Northern Ireland quality arrangements. QAA considers this alignment to be important: a WP strategy that sits alongside quality processes rather than being integrated within them may risk being treated as a compliance exercise rather than a genuine driver of institutional improvement. We would encourage the Department to work with quality bodies to ensure that WP expectations are embedded within the quality framework for Northern Ireland HE from the outset.

Closing Statement

QAA welcomes this consultation and the ambition it represents for widening participation in Northern Ireland higher education. We are supportive of the direction of travel set out in the consultation document, and recognise the significant work that has gone into developing a comprehensive framework. The comments provided throughout this response are offered constructively, with the aim of strengthening the proposals in areas where greater depth or clarity would enhance their impact.

Three themes recur across our response and are worth restating. First, there is a need to address attainment gaps alongside access and graduate outcomes, to ensure the strategy covers the full learner journey in a meaningful way. Second, widening participation expectations should be embedded within the developing quality arrangements for Northern Ireland, rather than operating as a parallel framework. Third, robust evaluation – not just monitoring – is essential to building the evidence base for what works and supporting continuous improvement across the sector.

As the regulator of the Access to HE Diploma, we would also draw attention to evidence from across the UK that demonstrates how structured Access to HE provision can operate at scale, deliver strong progression and attainment outcomes, and make a significant contribution to social mobility and regional participation. The limited scale of recognised Access to HE provision in Northern Ireland suggests clear scope to explore future growth. Doing so would align closely with the consultation's ambitions for inclusion, skills development and place-based opportunity, while drawing on a mature, regulated model with a strong national evidence.

QAA would welcome the opportunity to discuss our response further with the Department, and looks forward to playing an active role in the implementation of the strategy.