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*Society for Research  
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**What counts? Who  
counts? Ethics in access  
and participation  
evaluation**

**Research report**

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## Executive Summary

Evaluation of access and participation work in England has become increasingly formalised and is now part of regulatory expectations. However, relatively little attention has been paid to ethics within any training, guidance, or institutional support structures, leaving individual evaluators and teams to navigate complex choices about the ethics of their evaluation practice. This research, involving 13 evaluators in different settings, provides insight into the challenges evaluators face, what influences these challenges, and how they are currently managed.

- Many of the challenges faced by access and participation (AP) evaluators are 'mixed' ethical concerns, where the ethical principles are clear but context makes it difficult to enact these principles.
- AP evaluators identify ethical challenges in nearly all aspects of their work, far beyond those considered in ethical review. This includes evaluation design, implementation, and dissemination, but also in the structures of their roles and positioning of evaluation within their institution.
- Several of the ethical challenges faced by evaluators are seen as limiting what AP evaluators see as the purpose of evaluation, including developing learning, ensuring accountability, enhancing practice, and contributing to social justice aims.
- The contexts in which evaluators work are crucial for identifying and managing ethical challenges, however there are no clear patterns about organisation type, size, or mission, that can be identified within the small group involved in this research.
- How evaluators, their organisations, and funders see the purpose of evaluation is a key factor in ethical challenges and their resolution. Ethical challenges can arise in mismatches between expectations.
- In evaluation ethics guidance, evaluators are often framed as responsible for ensuring ethical evaluation. However, few evaluators felt that they had the necessary authority or responsibility within their organisations to do so.
- The contexts of regulation and marketisation were felt by evaluators to have a notable impact on expectations of evaluation within their organisations and, as a consequence, the ethical challenges they faced. Several evaluators expressed frustration with evaluation being 'reduced' to reporting or marketing activity, with focus on the outputs.

Outcomes from this research are being disseminated via sector networks and academic publications, with recommendations for practice and regulation also developed. It is intended that some of these recommendations may lead to a toolkit for practitioners and further opportunities for research.

## Project Overview

Formal evaluation of people, programmes and systems is becoming increasingly embedded within higher education (HE) in a western context. Within English HE, this can be seen in the regulatory practices of the Office for Students (OfS), particularly within access and participation (AP), where evaluation forms part of regulatory guidance and expectations (Moore et al., 2023). Higher Education providers in England who wish to charge the highest fee level must have an 'Access and Participation Plan' (APP) approved by the OfS. This plan sets out the actions a provider will take to ensure equality of access to and outcomes from its HE provision. In addition, from 2023, providers must also state how and when they will evaluate their activity and, where appropriate, where they will share the findings. This requirement to share the findings of evaluation has prompted scrutiny of an area of evaluation practice not previously tackled by the OfS in its guidance to institutions – ethics and ethical review. As a consequence, OfS guidance now explicitly states that, in evaluation, “regardless of whether ethical approval is sought, well established ethical principles should be considered” (OfS, 2023). As with other elements of APP guidance, it is up to individual providers how they interpret and implement this expectation.

The challenge of interpreting and considering 'well established ethical principles' is not limited to AP evaluation. Wider research points to the significance of ethical practice for who is included in evaluation and for how evidence, knowledge and different values are distributed and to whom (Barnett and Camfield 2016). It also highlights the lack of consistent frameworks or agreed norms for ethical evaluation, and the limitations of guidance for evaluators which make little reference to context and focus primarily on the ethical practice of the evaluator (Picciotto, 2021). Context, including professional identity and personal values of evaluators, are all indicated as relevant to how evaluators identify and view ethical concerns and how they navigate those concerns (Onyura et al., 2023). These points are particularly relevant in the context of AP evaluation, where evaluation is still an emergent profession, and evaluators may be assessing value of activity that aims to contribute to social justice but operating in environments where a new public management approach to evaluation is entrenched (Gordon, Lumb, Bunn & Burke, 2022). Navigating whose values, priorities, and ethical norms be included in ethical considerations is therefore not an easy task, nor is it supported by consistent practices or professional identities across organisations.

## Project Aims

This research aimed to work collaboratively with evaluators of access and participation (AP) activity to explore how they define and negotiate the concept of ethics in their work. This was broken down into three core research questions:

1. How do AP evaluation practitioners conceptualise 'ethics' in the context of their evaluation practice?

2. How do they practice ethics in evaluation?
3. What factors shape their understanding and enactment of ethics?

These questions were focused on the practical application of ethics, with the intention that findings could both contribute a growing body of literature on evaluation ethics in context, and provide insights that could be valuable to AP evaluation practitioners and commissioners. This dual research-practice focus reflects my own position as an evaluator-researcher and also guided the design and outputs from this research.

## Methodology

This research situates practitioners as experts in their own practices, able to interrogate these through reflexive and dialogic processes. Initiated and designed by myself, a researcher-evaluator in a medium-sized HE institution, the research involved participants from different HEIs and third sector organisations whose roles largely involved AP evaluation. Participants were recruited via sector network e-mail lists, with 33 individuals responding to a call for expressions of interest. All 33 were invited to a 1-1 discussion to outline the details of the research. Of these, 12, in addition to myself, were selected to reflect a range of different organisation and role types, with a mix of seniority and experience in evaluation. Although not intended to be representative of the sector, this mix was chosen with the intent of enhancing discussion and capturing a range of contexts and experiences.

Collaboration was a core element of research design, with an expectation that the majority of analysis and coordination would be undertaken by myself as instigator. There were three stages:

1. Online workshop discussing 'evaluation ethics'. This was used to identify common areas of interest, which were then used to design the next phase. (Autumn 2024)
2. An audio recorded 'self-interview' completed by all participants, including myself. A question sheet of open questions, based on the themes identified in the online workshop, was provided. Self-interviews have been identified as a valuable method for sensitive topics or where, as was the case here, reflection and memory are a core focus (Keightley, Pickering & Allett 2012). (January 2025)
3. A full-day, in-person analysis workshop. This was attended by 11 participants, including myself. The first half involved discussing initial themes identified from our self interviews, alongside two frameworks on evaluation ethics. The second half was reflection on what was important for fellow evaluators, our organisations, and funders/regulators, to understand about evaluation ethics. (March 2025)

Audio recordings from stages one and two, alongside written materials from stages one and three, were analysed by me in NVivo using a reflexive thematic analysis framework (Braun & Clarke, 2019). Ethical approval for this project was granted through Leeds Trinity University's ethics committee (ref: 2024-FSSE-STA-0027).

## Analysis and Conclusions

Findings are presented below under headings broadly aligned to the research questions, though there was some overlap between these.

### Understanding Ethics

Evaluators referenced ethical evaluation as a factor in nearly all aspects of their work, whether within specific evaluations or other professional activity such as training colleagues. In general, participants did not refer to specific ethical principles or application of ethical guidelines, instead focusing on ethical challenges. None of these challenges were unique to an individual but there was variation in how ethical challenges were identified, explained, and managed. For example, most participants discussed challenges in transparency of reporting but the specific details depended on their context.

Areas of ethical consideration common to over half of participants were:

1. Evaluation design (is it equitable, inclusive, serving the right purposes, delivered by those with the relevant skillsets?)
2. Protecting participant/potential participant rights (managing participant data, rights to participate, over-surveying)
3. Evaluator and evaluation independence (establishing and maintaining it, desirability)
4. Consent (informed consent, incentivisation)
5. Impact of evaluations (beneficially to participants, applied to local or national decision-making?)

In many cases, evaluators were clear on how they believed ethical principles *should* be applied, but often felt that their context made it challenging, if not impossible, to consistently uphold these principles. Literature on evaluation ethics sometimes distinguishes between two types of ethical issues – true ethical dilemmas and ‘mixed’ dilemmas (Leone, Stame & Tagle, 2016). A ‘true’ dilemma involves conflict between two ethical principles, such as transparency and protecting an individual’s anonymity. A ‘mixed’ dilemma is where the ethical principle is deemed to be clear but context makes it challenging to uphold, for example ensuring transparency in a context where a university may prefer to be selective about how it presents its activities publicly. Many of the challenges experienced by AP evaluators were mixed dilemmas that were impacted by their own values, professional identity, and organisation and governance contexts.

### Doing Ethics

For most evaluators, making ethical evaluation decisions and applying these to their practice was a lonely endeavor. Even where there were multiple evaluators within an

organisation, they could feel isolated in their considerations of ethical evaluation practice. Convincing colleagues of the importance of ethical practice was often challenging, due to a lack of shared knowledge of ethical principles and different understandings of evaluation. For example, where colleagues felt that the purpose of evaluation was to produce outputs that would validate and promote institutional activity, there were different expectations about, for example, freedom of data sharing, selection and incentivisation of evaluation participants, and transparency in reporting. Evaluators could sometimes feel that they were the 'ethics police', trying to enforce ethical practice without the authority or remit to do so.

Relationship management, developing institutional processes, and influencing institutional culture were all core skills used by evaluators to enact ethical practice. In many cases, evaluators were reliant on others to carry out the ethical commitments they made. This included in recruiting participants, managing participant data, communicating findings, and acting on those findings. Most of us had examples of evaluation decisions being made by non-experts and of experiencing institutional pressure to deliver evaluation and its findings in specific forms. In some cases, evaluators questioned where their roles ended, as they felt responsible for the ethical practice in activities that they had no authority or responsibility for.

## Shaping Ethics

We identified four elements of our contexts that shaped the ethical issues we identified and how we managed them, adapting a framework from Leone, Stame, and Tagle (2016).

1. Organisational culture and resources (e.g. status of evaluation)
2. Personal and professional values, cultures and standards (e.g. what do we think good evaluation looks like?)
3. External stakeholders (e.g. what do funders want and what are the consequences?)
4. External systems and processes (e.g. marketisation and reputational concerns)

In contrast to Leone, Stame and Tagle's original model, which was based on evaluation in the Italian public system, we drew less on a professional identity and culture as an 'evaluator'. Professional AP evaluation roles are still relatively new and are largely embedded within organisations and even mixed with other professional functions, complicating identities as 'evaluators'. Few of us had professional evaluation training, having backgrounds in practice, research, or data analysis before evaluation. Our model also places greater weight on external influences, such as the expectations of funders or regulatory processes that drive demand for evaluation and data within our organisations.

The influence of the market, between universities and between third sector providers, and the associated primacy of reputation for our organisations, was felt to be a particularly important and specific influence for AP evaluation.

Although professional identity as an evaluator was not always an influencing factor, a professional and personal identity related to social justice was. Some ethical dilemmas were not specific to a single evaluation but related to concerns that, in AP evaluation as a practice, the interests of organisations and authority figures had taken precedence over a focus on benefitting and supporting the rights of potential and current higher education students. Views of evaluation as a practice to support social justice were common within our group but not felt to be commonplace in our organisations or in the view of evaluation held by funders and regulators. This mismatch could be the source of a mixed dilemma, with evaluators feeling pushed by their organisations and external influences to make compromises on their own ethical positions.

## Conclusions

The inconsistency of ethical processes and the neglect of interest in ethical concerns within organisations, even within our small group, raises serious concerns for evaluation as a part of access and participation in England. Current ethical guidance for AP evaluation places evaluators as the decision makers in ethical practice, without consideration for complex contexts that often do not give evaluators the necessary authority to enact those decisions. This research highlights the importance of those contexts and the wide range of ethical concerns that they can shape. Some of those ethical concerns point to important questions for what we want evaluation to be in the context of access and participation and in whose interests it operates. As noted by Thomas Schwandt, 'The field cannot simply posit that evaluation serves a social good without making it clear what it understands that to be.' (2018: 234).

## Recommendations

### **For funders and regulators**

- Ensure expectations and guidance around ethical evaluation practice are communicated to everyone, not just evaluators. This might require different approaches for different audiences.
- Model using evaluation to inform change and incentivise organisations to do the same.

### **For evaluators**

- Connect internally and externally on the topic of ethical challenges.

- Consider setting up cross-organisational groups to act as 'critical friends' for evaluation, including ethics.
- Talk about ethics - in your committees, planning meetings, reporting. Raise awareness of the importance of ethical considerations for good quality evaluation.

### **For APP practitioners**

- Build consideration of ethics into your evaluation and project planning from the start e.g. how can you make it easy to gather meaningful informed consent during your activities?
- Talk about ethics in your teams e.g. can you agree how you might resolve some common issues like ensuring anonymity or dealing with over-surveying of some groups?

### **For leaders**

- Consider how you want your organisation to use evaluation - for learning, for accountability, for compliance? How can you ensure that this happens consistently? Allocate clear responsibilities, with appropriate support.
- Develop an evaluative culture within your organisation, where ethical evaluation is valued

## **Reflections and Next Steps**

This was my first opportunity to carry out research collaboratively and to use the 'self-interview' method beyond my own practice, both approaches I want to develop further as a researcher. I believe that self-interviewing has valuable applications in practitioner research that have not been previously discussed and aim to publish further on this point. The timing of this funding has enabled me to carry out research at a crucial point in the development of AP evaluation, tackling a concern that has been at the forefront of evaluator and regulatory discussions over the past two years. I hope to be able to build on several of the recommendations mentioned above by engaging evaluators, practitioners, and funders with the findings of this research and the ethical concerns they raise. Thus far, this has involved presenting to fellow evaluators via the Evaluation Collective and co-authoring a sector-facing blog, as well as producing an accessible and more visually appealing version of my findings in a [short booklet](#). Working with evaluation colleagues, my next step is to explore developing resources that could be used by practitioners and evaluators to support ethical evaluation practice.

## Outputs

Harland, R., Kildunne, A., Pritchard, D. & Squire, R. (forthcoming). “Higher Education Institutions as Evaluating Machines”. WonkHE.

Squire, R. (2025). ‘Whose ethics is it anyway? Improvising ethical evaluation in access and participation’. *SRHE Conference 2025*, 28<sup>th</sup> Nov & 2-4<sup>th</sup> December 2025.

Squire, R. (2025). ‘Ethics beyond approval: dilemmas from practice’. *Evaluation Collective Lunchtime Seminars*, 8<sup>th</sup> December 2025, online. Paper available at: <https://evaluationcollective.wordpress.com/2025/12/09/evaluation-collective-event-ethics-beyond-approval-dilemmas-from-practice/>

Squire, R. (2025). ‘What counts? Who counts? Ethical evaluation in access and participation.’ In Lumb, M, Gordon, R.B, McKenzie, M & Ballangarry, J (Eds.) *Evaluation for Equity and Justice, an issue of Access: Critical Explorations of Equity in Higher Education*, vol. 13, issue 1, pp. 77–91.

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