RaY

Research at the University of York St John

For more information please contact RaY at
ray@yorksj.ac.uk

Bringing intersectionality to the forefront: a call for transformation in UK inclusive education

Cassie Price

Published online: 10 Sep 2025.

Submit your article to this journal ↗

Article views: 244

View related articles ↗

View Crossmark data ↗

Bringing intersectionality to the forefront: a call for transformation in UK inclusive education

Cassie Price

York St John University, York, UK

ABSTRACT

While higher education institutions prioritise inclusion for moral, ethical, legal, and performance-related reasons, current approaches to equality, diversity, and inclusion often still prove in practice to be exclusive and ineffective. This article studies how inclusive education can benefit from, and be employed through, the intersectionality lens. Using the Intersectionality-Based Policy Analysis method, as applied to the educational sector for the purposes of documentary research, the findings of this study show that the Inclusive Education Framework, whilst a positive addition to the UK educator's resource bank, still has a way to go to explicitly cater to intersectional disadvantage – termed here as *unacknowledged disadvantage*. The article discusses the opportunities available to the framework to explicitly incorporate intersectionally mindful inclusive education and highlights the challenges surrounding intersectionality as a concept.

Introduction

The global demand for higher education is ever-increasing, subsequently generating greater diversity, or as this paper prefers, greater *representation*, among the student and staff population (HESA 2023; UCAS 2024). Although higher education institutions prioritise inclusion for moral, ethical, legal, and performance-related reasons, current approaches to equality, diversity, and inclusion often still prove in practice to be exclusive and ineffective. Consequently, many marginalised individuals and groups of individuals within higher education, are subject to *second-rate* experiences (Blake 2023; Mowat 2015; Stevenson et al. 2019).

It is documented that the success of inclusive education, in catering to the increasingly diverse body of people, hinges on the equitable engagement of all individuals in a meaningful way (Advance 2022; Bolton and Lewis 2023; Donelan 2022; UNESCO 2005). Yet, the concept is heavily contested, with interpretation varying greatly across nations, perhaps due to the decentralised tendency of education systems globally (Waitoller and Artiles 2013). Though literature on the topic of equality, diversity and inclusion

over the last decade has played an important role in education policy, discourse, and practice (Advance 2022; Hernández-Torrano, Somerton, and Helmer 2020; Stevenson et al. 2019; UCAS 2020) what is less well understood is the intersection of disadvantage, about an individual or group of individual's identities and experiences, and what this might mean for building a *truly* inclusive student experience.

Disadvantage complexity and the significance of intersectionality

Disadvantage manifests in various forms, characterised by complexity, relativity, and interactivity. While many disadvantaged individuals achieve remarkable success despite facing personal, organisational, and societal obstacles, this success often comes at a considerable cumulative cost, requiring additional physical, cognitive, and emotional exertion (Mowat 2015). Such efforts can prove unsustainable and, from a standpoint of social justice, fundamentally unjust. Addressing the intricate nature of disadvantage calls for a comprehensive approach – one that incorporates the *significance of intersectionality*.

It has been argued that intersectionality can serve as a valuable and vital tool in effectively implementing inclusive education (Bešić 2020). As such, this article studies how inclusive education might benefit from, and be employed through, the intersectionality lens. Designed in the UK, the newly formed Inclusive Education Framework (IEF; Hubbard and Gawthorpe 2023) positions itself as a practical *toolkit* designed to *move away from a culture of reasonable adjustments for individual students but instead consider the needs of a diverse student body* (Hubbard and Gawthorpe 2023). The framework is freely available via its own website as well as promoted through the Quality Assurance Agency – an internationally renowned professional body, who declare their commitment to tackling quality enhancement and inclusion in higher education. The IEF was selected as the core component of this study because of the Quality Assurance Agency's widespread recognition and accessibility, as well as its potential to influence educational practice on a global scale. Although this study examines the IEF from the position of the UK, the framework is an interesting vehicle for examining the integration of intersectional perspectives in inclusive education practices.

The framework broadly promotes inclusive higher education providers as sensitive to student needs. However, if *reasonable adjustments* are necessary at the individual level, this would suggest that the default position for the community is one of exclusion – compensating after the fact, not accommodating during the design process. The framework states that it caters to commuters, those with neurodiversities, those with caring responsibilities and more – noted collectively as those with *aspects of student life that might impact on student success* (Hubbard and Gawthorpe 2023). In response, this study applies relevant elements of the Intersectionality-Based Policy Analysis method (Hankivsky et al. 2014) in an educational context as demonstrated by Varsik and Gorochovskij (2023) with an objective to critically examine how effective the IEF is at *explicitly* addressing intersectional inequalities to *truly* impact inclusion.

The Intersectionality-Based Policy Analysis approach allows the examination of cumulative disadvantage at a descriptive and transformative level. The findings of this study show that the IEF, whilst a positive addition to the UK educator's resource bank, still has a way to go to *explicitly* cater to intersectional disadvantage – which is so often unacknowledged. The intersection of student/staff identity and experience is

highly relevant to education. As competition for university places rise, there is concern among England's industry regulator (Office for Students; OfS), that without proactive intervention there is a real-terms risk of *widening participation regression* (OfS 2023). This is to suggest, failings about the intended opening of education to *all*, not just the privileged as was historically designed (Catalano et al. 2023). This has been demonstrated with initiatives looking to tackle these concerns, such as the UK 2021 Widening Participation Access Reboot, and more recently the UK government's response to the highly influential Augar Review (Advance 2022; Donelan 2022; Lewis and Bolton 2022).

Challenging conventions and emphasising connections

Although disadvantaged groups are researched, which is positive and this article does not dispute that, groups are often *lumped together* in much of the sector conversation. This has potential to result in limiting and highly controversial categorisations such as 'Black, Asian and Minority Ethnicities' which is argued here, as well as in literature, as a blunt view of understanding disadvantage (Bunglawala 2019; Race Disparity Unit 2022). Intersectionality emphasises the interconnectedness of various aspects of individuals' lives, underscoring that these factors interact to shape unique identities and experiences – and something that remains fluid across a lifetime. Understanding individuals requires considering these intersections rather than analysing each identity or experience dimension in isolation, or as *lumped together*, from its social and historical contexts. This approach challenges conventional categorisation (e.g. male vs. female, immigrant vs. native etc.) viewing identity and experience as a spectrum.

When applied to education, adopting an intersectional stance can facilitate the development of more tailored and effective policies/practices related to aspects such as participation, learning outcomes, students' attitudes towards the future, identification of needs, and socio-emotional wellbeing (Hankivsky et al. 2014; Varsik and Gorochovskij 2023). Moreover, educational gaps not only have the power to effect current wellbeing and human potential, but also the outlook for future generations (Reimao and Tas 2017). Labour market outcomes relative to UK and USA education for example, show significant variation. Students who are an ethnic minority, first-generation or from a low-income household are half as likely to graduate, and two and a half times more likely to be unemployed compared to their privileged White and Asian peers (Blake 2023; Stevenson et al. 2019). But what is rarely factored, or portrayed within public discussions and scholarly work, is if individuals possess more than one of these elements in the makeup of their life – what does this mean for them? Without explicit reference to intersectionality, inequalities *within* inequalities will likely continue to be neglected in literature and practice – a concern this article considers the consequences of *unacknowledged intersectionality*.

The findings of this study contribute to the narrative on inclusive education and intersectionality in three primary ways. First, the article documents, using the emerging Intersectionality-Based Policy Analysis method (Varsik and Gorochovskij 2023), how cumulative student disadvantage can be considered within the context of the new IEF (Hubbard and Gawthorpe 2023). This is particularly apparent as England's industry regulator moves to condone and promote intersectionality (OfS 2022, 2023, 2024), which has caused a surge in attention within UK higher education (Advance 2022; Blake

2023; TASO 2022; WONKHE 2023). To be (and remain) relevant, guiding principles and frameworks, need to account for this pivot. Second, it argues that inclusive education has the capacity to pragmatically incorporate intersectionality *meaningfully*. Although combinational research regarding inclusive education and intersectionality is increasing in its presence in literature and professional forums (Bešić 2020; Cerna et al. 2021; Hernández-Torrano, Somerton, and Helmer 2020; Mowat 2015; Nichols and Stahl 2019; Stevenson et al. 2019; TASO 2022; Varsik and Gorochovskij 2023) challenge surrounding how to practically deploy intersectionally leaves a knowledge gap. The IEF has the capacity to bridge this gap. Finally, the paper reveals how adopting an equality or *intersectional position* within the wider concept of inclusion can contribute to an initiative's uptake and assurance. Something that higher education institutions do not appear to be overtly addressing of current and thus representing a practice gap.

The changing landscape of inclusive higher education

The concept of inclusion has developed, expanding its reference from (narrow) perspectives of solely disability, in effort to encompass the full spectrum of learner diversity (or *representation*), looking beyond the mere removal of physical barriers typically (and incompletely) associated with *access challenge*, that create a culture of exclusion. This can be seen via the UN Sustainable Development Goals (UN-SDG, 2015) in which SDG4 *Quality Education* emphasises the need to *ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.*

Intersectionality has risen as a recognised concept (Collins and Bilge 2016; Crenshaw 1989), albeit with varied interpretations (Hancock 2007). According to Hankivsky et al. (2014) there are several fundamental principles summarising the concept:

1. Individual lives cannot be simplified to single characteristics,
2. Understanding human experiences requires considering a range of factors rather than prioritising any one factor or a combination of factors,
3. Social categories and identities, such as race/ethnicity, gender, class, sexuality, ability, giftedness (and so on) are socially constructed and subject to change,
4. Social identities are interconnected and influenced by intersecting social processes and structures, which are in turn shaped by power dynamics and contextual factors,
5. Prioritising social justice and equity is of utmost importance.

For the above reasons, a contemporary intersectionally-mindful approach to inclusion should emphasise that diverse elements of individuals' experiences and identities are interconnected, and this cannot be fully understood by analysing each dimension in isolation. To prevent one form of inequality from reinforcing another, intersections need to be engaged in a meaningful and open way. This approach differs with traditional efforts regarding equality, diversity and inclusion, which have the tendency to consider one marginalisation, or form of disadvantage, at a time (Christoffersen 2021) and often focus on *inequality in outcomes* without interrogating the *underlying inequities* – that is, the unfair systems and structures – that produce them.

According to the European Institute for Gender Equality (2024) the term *multiple discrimination* serves as a neutral umbrella concept encompassing all instances of

discrimination based on several discriminatory factors. This experience can occur in two primary forms. Initially, there is *additive discrimination,* wherein discrimination occurs separately based on multiple factors added in. Secondly, there is *intersectional discrimination,* where two or more factors interact in a way that they are intertwined and inseparable (ibid). An intersectional approach challenges the notion of viewing dimensions of diversity in an additive manner (Hancock 2007) – i.e. those that are singularly categorised and thus added together. Hankivsky and Cormier (2011) caution that policies focused on individual dimensions of diversity, using an additive lens, may result in marginalised groups competing for limited resources, or being inappropriately clustered in a tick-box or tokenistic effort to consider wider demographics. Moreover, prioritising a single dimension of diversity ignores the *diversity within* these groups, potentially neglecting various and differing needs. For example, the controversial clustering of groups as discussed e.g. Black, Asian and Minority Ethnicities (Bunglawala 2019; Race Disparity Unit 2022). As a result, an authentic and diligent intersectional approach not only prevents disproportionate benefits to small groups from mis/-informed/one-dimensional targeted interventions but also facilitates the development of more effective policies that can address issues or needs more efficiently.

To prevent the risk of neglecting any specific group, an intersectional approach avoids preconceived assumptions, for example the significance of one category or structure over another (Hankivsky and Jordan-Zachery 2019). The significance, relevance, and relation of categories (such as specific student groups) for a given social issue are uncovered during the investigative process throughout policy/framework formulation and implementation. This stands in contrast to conventional policymaking, where specific marginalised groups may not be acknowledged due to their underrepresentation or absence in datasets (Varsik and Gorochovskij 2023). To illustrate this, Strand (2014) established that while specific ethnic backgrounds are believed to (and tend to) achieve *lower* academic outcomes; in examining the intersection between ethnicity and socio-economic status, revealed diverse effects. On one hand, socio-economically privileged White British students at age 16 were among the highest achieving ethnic groups, while in tandem, socio-economically disadvantaged White British students are also among the lowest performing categories (Strand 2014). When special education needs are further intersected with ethnicity, gender, or socio-economic background, significant differences emerge regarding the unequal representation of particular ethnic groups among the wider narratives. So, what does this tell us? An individual's identity and experience cannot be broken down into isolated characteristics – otherwise we run the risk of neglecting inequalities, enabling unchecked bias. So, if this is clear, and has been in circulation for a significant period – more than a decade in accordance with this publication at least – why hasn't this concept been converted to practice more readily? Particularly considering the global goals of inclusive education (UN-SDG4 2015).

According to Christoffersen (2021) intersectionality is a challenging concept to apply. So, although long standing, it presents a conundrum for those involved in policy and educational practice – in navigating the complexity of a vast number of *equality strand silos* (Christoffersen 2021, 573). Types of intersectional approaches, whilst they seem understood, lack specificity, and are used in *contradicting ways* (Christoffersen 2021, 574) despite intensification of interest (Cho, Crenshaw, and McCall 2013;

Collins and Bilge 2016; Hankivsky and Cormier 2011; Hankivsky and Kapilashrami 2020). As such, implementation remains an area of challenge.

Tensions in transitioning from concept to practice

Creating an incentive to advance the transition from concept to reality, more recently in March 2023, England's regulator the Office for Students, launched the new Equality of Opportunity Risk Register, advocating for intersectionality in practice. The register comprises updated guidance for Access and Participation Plans (Condition A1–A2 of Registration). This means that higher education providers are now expected to complete a self-assessment of student risk, in which the aim is to understand which students might be disproportionately at risk of poor outcomes, and what measures can be put in place to aid those individuals. The register categorises twelve sector risks that could impact access to, and success in, higher education as clustered over three stages of a student's journey – *access, on course,* and *progression* (OfS 2024). Whilst the register references intersectionality when examining who is most likely impacted by each risk, it is presented without explicit intersectional guidance, analysis, or scaling (WONKHE 2023). Rather, the Office for Students offer … *it is important to consider how different student characteristics might interact with each other … it is recommended that providers consider intersectionality closely when looking at their own data.*

Adding to this challenge, the register does not incorporate a calculation of the likelihood or severity of risks. Instead, it relies on indicators to illustrate how risks manifest in data. If a higher education provider's data shows unexpectedly *low outcomes* for students within a specific identity or demographic, it serves as an indicator. This means that the underlying risk is the primary concern, rather than the data itself, which prompts questions about causality (WONKHE 2023). A lack of data poses its own risk too – which may be evident in the presence of indicators within the available data. In other words, data gaps for example. Given the degree of ambiguity and interpretation involved, for a register that does not explicitly factor intersectionality despite declaring its importance, means it is difficult to see how higher education providers might be more meaningful in their inclusion efforts. Taken as a whole, there appears an apparent underlying tension between the ideology of intersectionally informed inclusive education and the pragmatics of development and implementation. The underlying reasons of this tension are less well understood.

For the IEF to truly be … *an inclusive approach* [that] *celebrates diversity and embraces differences throughout all areas of university life* (Hubbard and Gawthorpe 2023) *explicit* application of intersectionality is argued here as essential. The impact of this moves beyond education, as the framework speaks to the ripple effect – … *all students benefit from … diversified, decolonised, and inclusive education … the values we demonstrate and embed through our approach to education will be those that will* [be] *take*[n] *into society* (Hubbard and Gawthorpe 2023). To this paper's knowledge, there are no studies that examine the scope of the IEF as a vehicle for intersectionality. This is an important knowledge gap, as the sector grows in its scale and diversity (or *representation*), prioritising intersectionally-mindful inclusive education (e.g. UN-SDG4) in times of widening participation threat (OfS 2023; UCAS 2020, 2024). There is disagreement in the literature as discussed above, on how to effectively develop and implement

intersectional inclusivity – meaning there is demand for a framework to guide higher education providers in how to do this effectively. In addition to this, education is often highlighted as an important determinant of other outcomes disparities – for example, labour market inequalities (Blake 2023; Stevenson et al. 2019), in both a current and future-generational context (Reimao and Tas 2017). Therefore, understanding how intersectional inclusive education might tackle inequalities across the student body, including how they converge, is of significant value to society. To contribute to the knowledge, the objective of this study is to critically examine how effective the IEF is at explicitly addressing intersectional inequalities to truly impact inclusion.

Methodology

Theoretical framing

As discussed, a persistent challenge in advancing the field of intersectionality, is the ongoing refinement of credible approaches that can more efficiently translate theory to practice (Hankivsky et al. 2014) – making it clearer to the sector. Addressing this shortfall, the Intersectionality-Based Policy Analysis method originally developed for the health sciences, comprises a set of eight guiding principles that underpin twelve headline questions, split between the 'descriptive' and 'transformative' levels of intersectionality (Figure 1).

For the purposes of this paper, the most relevant aspects of the expansive Intersectionality-Based Policy Analysis method are harnessed from the educational position (Varsik and Gorochovskij 2023), with the term *policy* viewed as a synonym for '*framework*'. This approach was selected as it offers a credible and recognised structure, with the capacity to provide intersectional insights that may not be attainable through other equity-focused
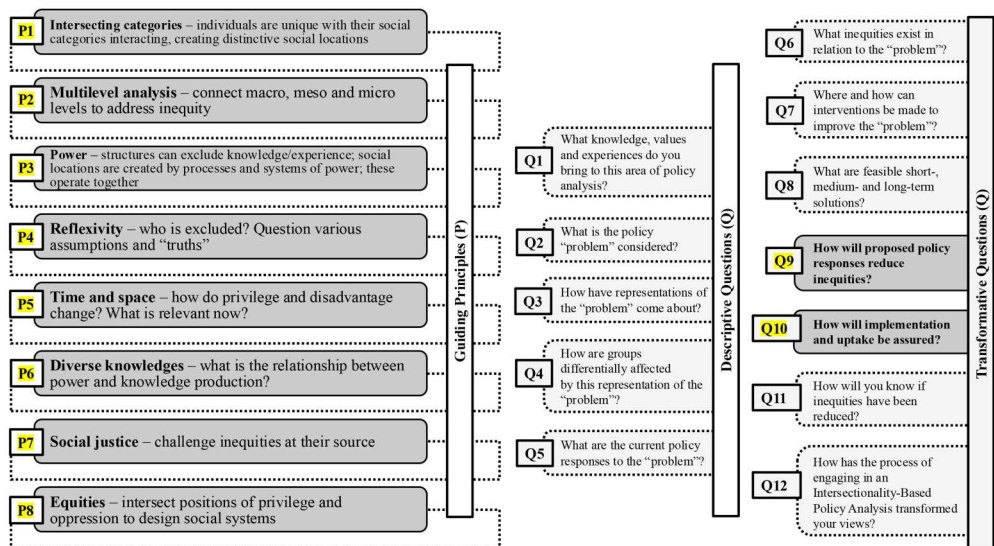

Figure 1. Intersectionality-based policy analysis overview (adapted from Varsik and Gorochovskij 2023).

models (Hankivsky et al. 2014). Of the twelve questions, this study focuses on those most salient to understanding how the framework explicitly portrays itself in guiding the **reduction** of intersectional inequalities (**Q9**) and how it positions **implementation** (**Q10**; Figure 1) in a bid to understand inclusion. For the full list of Intersectionality-Based Policy Analysis questions, please refer to the Varsik and Gorochovskij (2023), 25–26, open access article.

Documentary method

Documents, including frameworks, are not neutral artefacts but are shaped by their creators' perspectives, intentions, and the sociopolitical contexts in which they are produced (Prior 2003). As such, they require careful interpretation to uncover both *explicit claims* and *implicit assumptions* (Bowen 2009). Applying analysis through the Intersectionality-Based Policy Analysis method, this study interrogates how the IEF positions itself to meaningfully address intersecting inequalities, or whether it remains limited to surface-level inclusion, by evaluating one of the framework's modes – the implementation *checklists* owing to their pragmatic nature (of which there are fifteen; Hubbard and Gawthorpe 2023). As the *checklists* are pragmatically designed for immediate use, educators may adopt them without consulting the full framework. This amplifies the need for intersectionality to be woven into them – clearly, explicitly, and without reliance on prior knowledge – if the IEF is to be more than a surface-level commitment to inclusion.

While this study provides a critical foundation, and essential starting point in determining the IEF's position and transformative power, a fuller evaluation of its interpretation by higher education institutions and subsequent impact would require further analysis of the remaining elements including the *case studies* and *self-paced course.* These components, while valuable, fall outside the immediate scope of this paper. However, future research incorporating these elements – alongside empirical data from universities that have implemented (or intend to implement) the framework – would build upon this study, adding to the knowledge base in understanding the framework's effectiveness and limitations in practice.

Key findings: applying the intersectional lens

If we cross-reference the Intersectionality-Based Policy Analysis [Q9] *how will proposed policy responses reduce inequalities?* and [Q10] *how will implementation and uptake be assured?* (Varsik and Gorochovskij 2023) to the IEF, at first glance they appear to harmonise. Overall, the framework provides an array of concepts and examples regarding inclusion and equality. This is seen across the framework wholesale, including the *checklists, self-paced course* and *case studies* (Hubbard and Gawthorpe 2023) – although the former remains the focus here. Inequalities addressed include aspects such as awarding gaps, retention challenges, widening participation, decolonisation, sense of belonging, self-belief, access and participation, and education personalisation – all important to inclusive education and social justice (Bešić 2020). The IEF also gives attention to student diversity, or greater forms of *representation*, less frequently considered in mainstream equality, diversity and inclusion research and policy (Cerna et al. 2021) e.g.

students with caring responsibilities and non-native English speakers. Whilst this is encouraging, and a testament to a substantial framework, when applying a deeper level of critical evaluation to the *checklists* as underpinned by Intersectionality-Based Policy Analysis principles, reservations become apparent.

Recurring language

As part of the documentary analysis, a word cloud (Figure 2) and word frequency count were used to identify recurring language within the *checklists.* By foregrounding which terms appear most frequently, this approach helps surface dominant framings – particularly around inclusion, diversity, and equality. Conversely, it also reveals what is missing. In this case, the absence of terms such as *intersectionality, cumulative disadvantage,* or similar constructs, underscores a key critique of the framework, in that intersecting inequalities are not *explicitly* acknowledged or integrated. As Prior (2003) and Bowen (2009) suggest, analysing documents not only involves interpreting their content, but also recognising the social and ideological contexts in which they were created. Thus, word frequency analysis is a helpful diagnostic tool here, in assessing how inclusive or exclusionary the IEF's language *truly* is.

Gap mapping

To systematically assess the extent to which the IEF reflects an explicit intersectional approach, Table 1 presents a gap mapping analysis across the *checklists* five core domains. Each domain's present focus areas are compared against what would be expected from an intersectional lens by drawing on principles from the

Figure 2. NVivo checklist word generalisations (accounting for frequency).

Table 1. Gap mapping of IEF 'checklists' against intersectional expectations.

IEF checklist domain	Present focus areas	Expected from an intersectional lens	Gap identified	Intersectionality-Based Policy Analysis principle
Curriculum design	Decolonisation, personalised learning, pre-HE curriculum gaps	Intersection of race, class, gender, neurodiversity, caring roles, etc.	No mention of converging identities or compounding marginalities	P1 Intersecting categories P6 Time and space
Community and belonging	Student voice, social interaction, inclusive culture	Recognition of classed, racialised, gendered belonging and exclusion	Belonging not linked to specific intersecting identities or risks	P1 Intersecting categories P7 Social justice
Structures and processes	Awarding gaps, reasonable adjustments, access to data	Data tracking intersecting identities and cumulative disadvantage	No analysis of how multiple forms of disadvantage interact in data	P2 Multi-level analysis P3 Power P8 Equity
Assessment and feedback	Diverse assessment formats, clear feedback, accessible materials	Acknowledgement of compounding barriers in assessment experience	Assessment inequity not framed in intersectional or systemic terms	P1 Intersecting categories P3 Power P6 Time and space
Pathways to success	Career readiness, mentoring, role models	How career access is shaped by structural and cumulative inequalities	Success framed individually, not in relation to structural barriers	P1 Intersecting categories P7 Social justice P8 Equity

Intersectionality-Based Policy Analysis (Figure 1; Varsik and Gorochovskij 2023). This comparison highlights critical omissions, particularly around the acknowledgement of compounding disadvantage and converging identities. Shortfalls centre around principles such as **Intersecting Categories** (**P1**), **Multi-Level Analysis** (**P2**), and **Equity-Focused Systems Change** (**P8**). The resulting gaps demonstrate that while the IEF reflects a general commitment to inclusion, it lacks the conceptual and practical scaffolding required to *meaningfully* address intersectional inequalities.

Building on the gap analysis, Table 2 distils these findings into an intersectionality integration matrix, offering a visual summary of the IEF's readiness across five core spheres. While Table 1 surfaces specific conceptual and structural omissions, Table 2 synthesises this evidence to highlight where intersectional integration is weakest and where future development should be prioritised to realise the framework's transformative aims.

Discussion

Q9. 'How will proposed [framework] responses reduce inequalities?' (Varsik and Gorochovskij 2023)

The Centre of Intersectional Justice (2023) argues that without a purposeful intersectional approach, equality initiatives may unintentionally reproduce the very

Table 2. Intersectionality integration matrix.

	Sphere	Current status	Intersectional integration
1	Language	[**Red**] Absent or unclear	Add explicit terms, guidance
2	Checklist content	[**Red**] Mono-categorical	Embed intersectional case prompts
3	Implementation support	[**Amber**] Basic principles	Develop macro-level strategies
4	Theoretical grounding	[**Red**] Sparse reference	Draw on intersectional scholarship
5	Structural potential	[**Green**] Present and promising	Foundation for future reform

disadvantages they aim to eliminate – particularly for minorities *within* minorities. This reflects Intersectionality-Based Policy Analysis **principles one** and **eight**: *Intersecting Categories* and *Equity* respectively, which urge recognition of overlapping social positions and the systematic design of equitable outcomes (Varsik and Gorochovskij 2023).

Analysis of the IEF *checklists* revealed that intersecting identities and converging disadvantages are not explicitly addressed. None of the fifteen *checklists* reference intersectionality or related terminology (e.g. *intersect*, *cumulative disadvantage*). Moreover, the framework lacks theoretical grounding in intersectional scholarship, with only one isolated, unused citation of Crenshaw (1989). Globally, equality initiatives often adopt mono-categorical approaches – treating identities/experiences in isolation (Cho, Crenshaw, and McCall 2013; Collins 2019, 35) This *siloed* logic assumes that *social groups are marginalised homogenously and singularly*, ignoring the intersectionally marginalised (Christoffersen 2021, 573). As a result, progress in higher education remains limited despite increasing attention to equality and intersectionality (Bešić 2020). The IEF, in its current form, reflects this same limitation.

Although intersectionality is not limited to identity politics, its ties to lived experience are well-established in critical theory (Collins 2019). The IEF assumes its users already understand intersectional disadvantage, despite not modelling or defining it within the *checklists*. This risks reader misinterpretation or complete oversight of its relevance to inclusive education (Bešić 2020). Practically, this may result in users defaulting to mono-categorical responses. This diverges from current regulatory expectations; the Office for Students now requires intersectional considerations in Access and Participation Plans (OfS 2022, 2023, 2024). For the framework to be (and remain relevant) it is argued here that it must adopt a *purposeful* intersectional position and propose *explicit* guidance to tackle intersectional inequalities (Varsik and Gorochovskij 2023).

Reframing Intersectionality-Based Policy Analysis Q9 to suit the IEF's current position raises a critical question: *How might the framework explicitly guide the reduction of intersectional inequalities?* **Principles three** and **six** stress the importance of recognising *Systems of Power* and *Diverse Knowledges* – acknowledging how structures may exclude certain experiences from policymaking (Varsik and Gorochovskij 2023). The IEF would benefit from drawing on a broader range of intersectional scholarship to more accurately represent the communities it seeks to support. Modelling an explicit intersectional position would also empower higher education providers to follow suit. As Christoffersen (2021) notes, conceptual clarity enables the identification of both the potential and limits of frameworks – while some approaches entrench inequalities, others open pathways to justice.

While the IEF does not yet explicitly adopt an intersectional stance, it appears to take a *pan-equality* approach – addressing issues broadly relevant to most equality strands (Christoffersen 2021). This distinguishes it from approaches such as *generic intersectionality* or *multi-strand* models. Its focus on shared marginality offers a conceptual foundation, but without clear articulation of intersecting forms of disadvantage, its capacity to advance structural justice remains limited. Greater precision in how the framework engages with cumulative inequalities would deepen its commitment to intersectionality and thus inclusion.

Q10. 'How will implementation and uptake be assured?' (Varsik and Gorochovskij *2023*)

Intersectionality is often seen as complex and difficult to operationalise (Hankivsky and Cormier 2011), particularly across rigid *equality strand silos* (Christoffersen 2021). Yet, as Collins and Bilge (2016) argue, educators increasingly engage with intersectionality as *critical praxis*. Practical guidance on implementation and success criteria is therefore essential. The IEF promotes the embedding of its principles across all institutional levels, emphasising shared responsibility and flexible application. While principles-based systems often assume shared understanding and values (Arjoon 2006), this assumption is risky – especially in contested areas like inclusive and intersectional education (Waitoller and Artiles 2013). Without clear implementation guidance, uptake may be inconsistent (Viennet and Pont 2017). As Gouëdard, Pont, and Viennet (2020) note, implementation is as critical as framework design – especially when stakeholders are empowered from the outset. Meaningful educational transformation depends not only on what is proposed, but on how it is enacted.

The IEF *checklists* pay attention to the way individual and community responsibility can be implemented in a task-oriented manner – from senior leaders to programme teams and individual educators (Hubbard and Gawthorpe 2023). At a glance, this is reflective of Intersectionality-Based Policy Analysis **principle two** *Multi-Level Analysis* in which recognition of the macro (organisation/sector), meso (group) and micro (individual) levels are considered and connected, to address inequality (Varsik and Gorochovskij 2023). Despite seemingly aligning, it is argued here that the framework does not fully cater to the macro level, as it lacks guidance and scholarly underpinning surrounding organisational implementation strategy(s) – let alone one that is intersectionally-mindful. Rather, the position taken is *with a plethora of interactive resources … we hope … the sector will find the case studies and practical suggestions helpful and easy to implement* (Hubbard and Gawthorpe 2023). It is suggested here that whilst this approach is flexible, given the topic's discourse, this could result in a piecemeal approach, particularly from the perspective of the value the *checklists* offer.

The journey towards successful educational change is often fraught with obstacles, and setbacks or initial mixed outcomes. This should not necessarily prompt a shift in focus away from long-term goals. Unforeseen challenges are to be expected with any framework, underscoring the importance of adopting a strategic approach to implementation (Gouëdard, Pont, and Viennet 2020; Viennet and Pont 2017).

The IEF's structure suggests an implicit '*hub and spoke*' logic, where the central framework acts as a coordinating hub and its implementation radiates through various institutional spokes – programme teams, senior leaders, and staff. However, this model is not explicitly stated in the framework's resources. Without formal integration of this logic, the risk is that cultural change remains aspirational rather than systemic. This distributed model may support broader uptake, but it also complicates impact measurement – particularly as the IEF is not designed to be the sole catalyst for equality outcomes. Broader sociopolitical shifts, such as movements for social justice, play a role in shaping inclusive education and further blur attribution.

This aligns with Intersectionality-Based Policy Analysis **principles six** and **seven**, which highlight how privilege and oppression shift across time and context, and the

need to challenge inequalities at their source (Varsik and Gorochovskij 2023). While the IEF lacks an explicit implementation plan, it has the foundation to evolve. Implementation must remain flexible – tailored to each institution's landscape, resources, and community. As Misra, Curington, and Green (2020) remind us, there is no single model for intersectional work, but there is a need for organisations to clearly articulate how their epistemological and methodological choices reflect intersectional commitments.

To deliver stronger implementation, Varsik and Gorochovskij (2023) argue that higher education providers and stakeholders must develop the knowledge and skills required for intersectionally informed inclusive education. Capacity-building efforts can help address the complexity of intersectionality by raising awareness of its educational and societal relevance, and by challenging resistance, prejudice, and stereotyping. Given the IEF's increasing reach, it is important that its messaging (and especially its most accessible components, such as the *checklists*) make intersectionality both *explicit* and *actionable*. As these *checklists* are pragmatically designed for immediate use, they risk being applied in isolation from the broader framework. Embedding intersectionality clearly within them is therefore critical. More broadly, IEF campaigns should spotlight both the challenges and opportunities of intersectional inclusion, while offering practical responses tailored to diverse student needs. This would align the framework with growing regulatory expectations – for instance, through Access and Participation Plans and the Office for Students' intersectional benchmarks (OfS 2022, 2023). In doing so, the IEF can support a more purposeful, sector-wide approach to implementing intersectionally grounded inclusive education.

Conclusion

This study has shown that there is an apparent underlying tension between the ideology of intersectionally-informed inclusive education and the pragmatics of development and implementation (Bešić 2020; Hankivsky and Jordan-Zachery 2019; Varsik and Gorochovskij 2023). To make the IEF truly inclusive, it has been argued that *explicit* application of intersectionality is crucial, given its power in identifying and addressing cumulative disadvantage – an area neglected in mainstream equality, diversity and inclusion literature currently (Bešić 2020). Without *explicit* reference to intersectionality, inequalities *within* inequalities will continue to be ignored – positioned here as *unacknowledged intersectional disadvantage*.

The outcomes of this study make three main contributions to the discourse on inclusive education and intersectionality. Firstly, utilising the emerging Intersectionality-Based Policy Analysis method (Varsik and Gorochovskij 2023), the article demonstrates how the consideration of cumulative, or intersectional, student disadvantage can be integrated into the IEF (2023). This is particularly evident as England's industry regulator moves towards advocating for intersectionality (OfS 2022, 2023, 2024), catalysing action across UK higher education (Advance 2022; Blake 2023; TASO 2022; WONKHE 2023). Therefore, guiding principles/frameworks must adapt to accommodate this shift to remain relevant.

Secondly, the study illustrates that inclusive education has the potential to effectively incorporate intersectionality practice. While there is growing research on the combination of inclusive education and intersectionality in literature and professional

discussions (Bešić 2020; Cerna et al. 2021; Hernández-Torrano, Somerton, and Helmer 2020; Mowat 2015; Nichols and Stahl 2019; Stevenson et al. 2019; Varsik and Gorochovskij 2023), there remains a gap amongst the discourse – on how to effectively implement intersectionality. The IEF has the potential to address this gap.

Finally, the paper highlights how adopting an equality or *intersectional position* within the broader concept of inclusion can enhance the effectiveness of initiatives. This is an aspect that higher education institutions do not seem to be explicitly addressing at present, indicating a gap in practice.

Overall, it is believed that the IEF has the capacity to embrace intersectionality in a *meaningful way*. Recommendations for the framework include modelling and debating its 'intersectional position', incorporating intersectionality overtly by drawing on relevant scholarly practice, engaging with implementation strategies at the macro level, and promoting of intersectional campaigns. If the IEF is to fulfil its mission, to *move away from a culture of reasonable adjustments for individual students,* [and] *instead consider the needs of a diverse student body* (Hubbard and Gawthorpe 2023) it has been argued here that it needs to account for the voices and experiences of those who remain intersectionally marginalised and thus, as this paper declares, *intersectionally unacknowledged.*

Disclosure statement

No potential conflict of interest was reported by the author(s).

Notes on contributors

Cassie Price is Head of Programme Development and Academic Quality at York St John University, London Campus. Her research examines intersectionality, institutional culture, and social movements in advancing inclusion and wellbeing. A Senior Fellow of the Higher Education Academy (SFHEA) and Chartered Manager (CMgr FCMI), she bridges scholarship with practice to challenge systemic inequalities and amplify the voices of marginalised communities. She believes meaningful institutional change requires not only policy reform but also cultural transformation, ensuring higher education remains a space where all individuals can thrive.

References

Advance, H. E. 2022. "The Governor View" – Widening Participation and the Equality of Opportunity Risk Register [online]. Accessed January 10, 2024. https://www.advance-he.ac.uk/knowledge-hub/governor-view-widening-participation-and-equality-opportunity-risk-register.

Arjoon, S. 2006. "Striking a Balance between Rules and Principles-Based Approaches for Effective Governance: A Risks-Based Approach." *Journal of Business Ethics* 68 (1): 53–82. https://doi.org/10.1007/s10551-006-9040-6.

Bešić, E. 2020. "Intersectionality: A Pathway towards Inclusive Education?" *Prospects* 49 (3-4): 111–122. https://doi.org/10.1007/s11125-020-09461-6.

Blake, J. 2023. "Consultation on a New Approach to Regulating Equality of Opportunity: Analysis of Responses and Decisions [online]. Accessed January 13, 2024. https://www.officeforstudents.org.uk/publications/consultation-on-a-new-approach-to-regulating-equality-of-opportunity-analysis-of-responses/commentary/.

Bolton, P., and J. Lewis. 2023. "Equality of Access and Outcomes in Higher Education in England." House of Commons Library [online]. Accessed January 12, 2024. https://commonslibrary.parliament.uk/research-briefings/cbp-9195/.

Bowen, G. 2009. "Document Analysis as a Qualitative Research Method." *Qualitative Research Journal* 9 (2): 27–40. https://doi.org/10.3316/QRJ0902027.

Bunglawala, Z. 2019. "Please, Don't Call Me BAME or BME! [online]." Accessed April 21, 2024. https://civilservice.blog.gov.uk/2019/07/08/please-dont-call-me-bame-or-bme/.

Catalano, D. C. J., K Schrum, E Fay, and S Abbot. 2023. "I Can Learn from the Past': Making the History of Higher Education Relevant through Social Justice Education Pedagogy." *The History Teacher (Long Beach, Calif.)* 56 (3): 367–386.

Centre for Intersectional Justice. 2023. "Intersectional Justice [online]." accessed December 27, 2023. https://www.intersectionaljustice.org/.

Cerna, L., C. Mezzanotte, A. Rutigliano, O. Brussino, P. Santiago, F. Borgonovi, and C. Guthrie. 2021. *Promoting Inclusive Education for Diverse Societies: A Conceptual Framework*. OECD Education Working Papers, No. 260. Paris: OECD Publishing. https://doi.org/10.1787/94ab68c6-en.

Cho, S., K. W. Crenshaw, and L. McCall. 2013. "Toward a Field of Intersectionality Studies: Theory, Applications, and Praxis." *Signs* 38 (4): 785–810. https://doi.org/10.1086/669608.

Christoffersen, A. 2021. "The Politics of Intersectional Practice: Competing Concepts of Intersectionality." *Policy and Politics* 49 (4): 573–593. https://doi.org/10.1332/030557321x16194316141034.

Collins, P. H. 2019. *Intersectionality as Critical Social Theory*. Croydon: Duke University Press.

Collins, P. H., and S. Bilge. 2016. *Intersectionality*. Cambridge: Polity.

Crenshaw, K. 1989. *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics*. University of Chicago Legal Forum, 139–167.

Donelan, M. 2022. "Higher and Further Education Minister Michelle Donelan speech on the Augar Review [online]." Accessed April 22, 2024. https://www.gov.uk/government/speeches/higher-and-further-education-minister-michelle-donelan-speech-on-the-augar-review.

European Institute for Gender Equality. 2024. "Multiple Discrimination [online]." Accessed December 21, 2023. https://eige.europa.eu/publicationsresources/thesaurus/terms/1069?language_content_entity = ens.

Gouëdard, P., B. Pont, and R. Viennet. 2020. "Education Responses to COVID-19: Shaping an Implementation Strategy." OECD Education Working Papers, 224. https://doi.org/10.1787/8e95f977-en.

Hancock, A. M. 2007. "When Multiplication Doesn't Equal Quick Addition: Examining Intersectionality as a Research Paradigm." *Perspectives on Politics* 5 (1): 63–78. https://doi.org/10.1017/S1537592707070065.

Hankivsky, O., and R. Cormier. 2011. "Intersectionality and Public Policy: Some Lessons from Existing Models." *Political Research Quarterly* 64 (1): 217–229. https://doi.org/10.1177/1065912910376385.

Hankivsky, O., D. Grace, G. Hunting, M. Giesbrecht, A. Fridkin, S. Rudrum, O. Ferlatte, and N. Clark. 2014. "An Intersectionality-Based Policy Analysis Framework: Critical Reflections on a Methodology for Advancing Equity." *International Journal for Equity in Health* 13 (1): 119. https://doi.org/10.1186/s12939-014-0119-x. http://www.equityhealthj.com/content/13/1/119.

Hankivsky, O., and J. Jordan-Zachery. 2019. "Introduction: Bringing Intersectionality to Public Policy." In *The Palgrave Handbook of Intersectionality in Public Policy*, 1–28. Cham: Springer International Publishing. https://doi.org/10.1007/978-3-319-98473-5_1.

Hankivsky, O., and A. Kapilashrami. 2020. "Beyond Sex and Gender Analysis: An Intersectional View of the COVID-19 Pandemic Outbreak and Response [online]." Accessed January 10, 2024. https://mspgh.unimelb.edu.au/news-and-events/beyond-sex-and-gender-analysis-an-intersectional-view-of-the-covid-19-pandemic-outbreak-and-response.

Hernández-Torrano, D., M Somerton, and J Helmer 2020 "Mapping Research on Inclusive Education since Salamanca Statement: A Bibliometric Review of the Literature over 25

Years." *International Journal of Inclusive Education* 26 (9): 893–912. https://doi.org/10.1080/13603116.2020.1747555.

HESA. 2023. "Who Is Studying in Higher Education? [online]." Accessed April 19, 2024. https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he.

Hubbard, K., and P. Gawthorpe. 2023. "The Inclusive Education Framework [online]." Accessed December 10, 2023. https://www.inclusiveeducationframework.info/.

Lewis, J., and P. Bolton. 2022. "The Post-18 Education and Funding Review: Government Conclusion." House of Commons Library [online]. Accessed April 22, 2024. https://researchbriefings.files.parliament.uk/documents/CBP-9348/CBP-9348.pdf.

Misra, J., C. V. Curington, and V. M. Green. 2020. "Methods of Intersectional Research." *Sociological Spectrum* 41 (1): 9–28. https://doi.org/10.1080/02732173.2020.1791772.

Mowat, J. G. 2015. "Towards a New Conceptualisation of Marginalisation." *European Education Research Journal* 14 (5): 454–476. https://doi.org/10.1177/1474904115589864.

Nichols, S., and G. Stahl. 2019. "Intersectionality in Higher Education Research: A Systematic Literature Review." *Higher Education Research and Development* 38 (6): 1255–1268. https://doi.org/10.1080/07294360.2019.1638348.

OfS. 2022. "Consultation on a New Approach to Regulating Student Outcomes [online]." Accessed January 11, 2024. https://www.officeforstudents.org.uk/media/c46cb18a-7826-4ed9-9739-1e785e24519a/consultation-on-a-new-approach-to-regulating-student-outcomes-ofs-2022-01.pdf.

OfS. 2023. "Rebuilding Student Outcome and Experience Measures used in OfS Regulation 2023 Rebuild Instructions [online]." Accessed January 2, 2024. https://www.officeforstudents.org.uk/media/d75846c3-9e50-4841-9f18-28ebc4c03605/rebuilding-student-outcome-and-experience-measures-used-in-ofs-regulation.pdf.

OfS. 2024. "Equality Opportunity Risk Register [online]." Accessed January 11, 2024. https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/equality-of-opportunity-risk-register/.

Prior, L. 2003. *Using Documents in Social Research*. London: Sage.

Race Disparity Unit. 2022. "Why We No Longer use the Term BAME in Government [online]." Accessed April 21, 2024. https://equalities.blog.gov.uk/2022/04/07/why-We-No-longer-use-the-term-bame-in-government/.

Reimao, M. E., and E. O. Tas. 2017. "Gender Education Gaps among Indigenous and Non-indigenous Groups in Bolivia." *Development and Change* 48 (2): 228–262. https://doi.org/10.1111/dech.12292.

Stevenson, J., J. O'Mahony, O. Khan, F. Ghaffar, and B. Stiell. 2019. "Understanding and Overcoming the Challenges of Targeting Students from Under-Represented and Disadvantaged Ethnic Backgrounds." Report to the Office for Students [online]. Accessed January 12, 2024. https://www.officeforstudents.org.uk/media/d21cb263-526d-401c-bc74-299c748e9ecd/ethnicity-targeting-research-report.pdf.

Strand, S. 2014. "Ethnicity, Gender, Social Class and Achievement Gaps at Age 16: Intersectionality and 'Getting It' for the White Working Class." *Research Papers in Education* 29 (2): 131–171. https://doi.org/10.1080/02671522.2013.767370.

TASO. 2022. "Call for Evidence – Risks to Equality of Opportunity [online]." Accessed January 10, 2024. https://taso.org.uk/news-item/call-for-evidence-risks-to-equality-of-opportunity/.

UCAS. 2020. "UCAS Analysis Shows Potential for Step Change in Equality by 2030 [online]." Accessed December 27, 2023. https://www.ucas.com/corporate/news-and-key-documents/news/ucas-analysis-shows-potential-step-change-equality-2030.

UCAS. 2024. "The Number of UK 18 Year Olds and International Students Applying for a Place in Higher Education Has Slightly Increased Compared to Last Year [online]." Accessed April 22, 2024. https://www.ucas.com/corporate/news-and-key-documents/news/2024-sees-more-18-year-olds-apply-higher-education.

UN. 2015. "Department of Economic and Social Affairs." Sustainable Development Goals 2030. Accessed January 3, 2024. https://sdgs.un.org/goals.

UNESCO. 2005. "Guidelines for Inclusion: Ensuring Access to Education for All." Paris. Accessed January 20, 2024. https://unesdoc.unesco.org/ark:/48223/pf0000140224.locale = en.

Varsik, S., and J. Gorochovskij. 2023. "Intersectionality in Education: Rationale and Practices to Address the Needs of Students." Intersecting Identities, Organisation for Economic Co-operation and Development (OECD) Education Working Paper, 302. Paris: OECD Publishing. https://doi.org/10.1787/dbb1e821-en.

Viennet, R., and B. Pont. 2017. "Education Policy Implementation: A Literature Review and Proposed Framework." OECD Education Working Papers, 162. Paris: OECD Publishing. https://doi.org/10.1787/fc467a64-en.

Waitoller, F. R., and A. J. Artiles. 2013. "A Decade of Professional Development Research for Inclusive Education: A Critical Review and Notes for a Research Program." *Review of Educational Research* 83 (3): 319–356. https://doi.org/10.3102/0034654313483905.

WONKHE. 2023. "New Approach to Regulating Access and Participation [online]." Accessed January 13, 2024. https://wonkhe.com/blogs/the-ofs-new-approach-to-regulating-access-and-participation/.