

OfS access and participation consultation: Frequently asked questions

Risk

Q. The expanded timescale is welcome (3-5 years) but how will 'high risk' be defined? Some transparency in this area would be welcome (e.g. would an institution be considered high risk if they were felt to be high risk in only one of access, success or progression?).

A. Our view of risk in relation to access and participation plans (APPs), and therefore for condition A1 of the regulatory framework, will be informed by:

- the extent of the gaps between different student groups in respect of access, success and progression, on the basis of local and national data and other forms of evidence
- the rate of progress in narrowing those gaps
- the ambition and credibility of a provider's plan, including their self-assessment of performance.

There is not a specific formula for risk assessments. We make judgements about the risk of a provider taking many factors into account, and tailor regulatory interventions to each individual situation.

Evaluation

Q. I am struggling to understand how the self-evaluation tool can be completed by one person given the need to evaluate activities which are undertaken by a number of different offices/services across the university.

A. The process of completing the self-assessment tool should involve all the relevant people who are involved in evaluation and use of evidence in programme design. This may require one person to coordinate the response but it would be good practice to include the views of all appropriate internal stakeholders.

Q. Benchmarks from the self-assessment tool: Who will use this? Will it be public facing?

A. We are still developing our approach but the main objective for setting benchmarks is to understand where we need to focus our support for providers and to understand where progress is being made.

Q. How will the evaluation self-assessment tool 'contribute to new OfS key performance measures relating to the quality level of providers' evaluation strategies'?

A. The self-assessment tool will ask providers to assess their performance in relation to evaluation and provide evidence for the scores provided. The aggregated scores should allow us to measure the quality of providers' evaluation strategies.

Q. We agree with the need to monitor activity and evaluation work, but the routes proposed require enormous additional expenditure in staff time and software etc. For an SSI there is no proportionality and value for money is a real concern.

All providers are currently expected to describe their evaluation strategies and use of evidence in access and participation plans. We do not expect the process of completing the self-assessment tool to require significantly more staff time and are not expecting any additional expenditure required on software. The self-assessment tool has been designed to account for all types of providers.

Q. Has the self-assessment tool been trialled in a small provider? I noticed it has been trialled in a university and the intention is that the toll will work in different types of providers.

The self-assessment tool is being piloted in a variety of different providers, including small and specialist providers and further education colleges, to ensure it is fit for purpose in all types of providers.

Data

Q. What will the new measures to identify improvements in diversity be? There was mention by Chris Millward to continue to understand student performance in the student journey.

A. The measures which we are proposing to be included in the access and participation dataset are included in appendix B of the access and participation consultation document which can be found here: www.officeforstudents.org.uk/publications/a-new-approach-to-regulating-access-and-participation-in-english-higher-education-consultation/

Q. Post-GDPR, our students (primarily mature) are increasingly resistant to providing data and see it as intrusive, notwithstanding explanation of purpose. Collecting more data (e.g. free school meals) will be very challenging. Has the OfS thought about this in terms of targets they are considering?

A. Thank you for your feedback. We have had many providers report similar challenges and are considering it as part of the consultation.

Q. What is the definition of a mature student?

A. In line with the national strategy for access and student success we define mature students as those aged 21 or over at the time of starting their course.

Student engagement

Q. How might you capture the impact or understand the quality of voluntary work initiatives by students in outreach and access areas - noting it is a valuable measure too of student engagement?

A. Individual initiatives form a part of the picture in creating better outcomes for students. Therefore while an individual programme of work would not have its own target in the APP, hopefully these voluntary programmes would contribute to overall outcomes for students. There is also the opportunity to discuss this work in the written text in the APP and in the yearly impact report. It is definitely worth considering whether you are able to evaluate the impact of the voluntary programmes so that you can provide this as evidence and inform future development of the programme.

Q. What are OfS expectations for the student consultation in the monitoring reports? Linked to this - publishing guidance in February, with a deadline of April and monitoring return deadline of August in the first year, clashes with student holidays etc. which makes it more difficult. Can this be taken into consideration when you review timings?

A. We expect student consultation to be integral to a provider's access and participation work, rather than an activity which is done once a year for the impact report, or is a 'tick box' exercise. The impact report and access and participation plan may draw on this ongoing student consultation and involvement. We appreciate the challenges with contacting students during the period between February and April; however, we have to follow this timeframe so that universities and colleges can have their plans approved in time to advertise their tuition fees to students. We will consider this further as part of the consultation.

We don't yet know the format of the impact report, and therefore we don't yet know what the student consultation section of this will look like. We very much appreciate the offers to get involved in the development of this. We will continue to consult students at each stage of the development of our access and participation proposals, including the development of the impact report.

It is a good question about how students can use the dataset to hold their providers to account, as it can be complex information to understand. We are considering how we could use a flagging system, or similar, to make the information as understandable as possible. We would encourage students to take a 'critical friend' approach where you ask constructive questions about where they are doing well, where they need to improve, and then hold them to account for their commitments.

School partnerships and raising attainment

Q. Where does school sponsorship sit in sector-wide priorities? Has the focus on this shifted to a broader requirement to raise attainment in schools?

A. Our expectations around school engagement to raise attainment is set out in Regulatory Notice 1¹; Access and participation plan guidance for 2019-20 paragraphs, 170 to 172, which states:

"We expect all providers, in particular those with the weakest performance on access, to demonstrate how they are developing deeper relationships with schools and colleges to raise attainment and enable more students from underrepresented groups to enter higher education if they wish to. We encourage providers also to take account of this engagement with students and their understanding of students' backgrounds within their entrance requirements. We also expect that we will see greater numbers of higher education providers sponsoring schools (either as a main sponsor or co-sponsor) or with advanced plans to do so. Advice on effective practice in working with schools to raise attainment and other sustained activities can be found in 'Regulatory Advice 6: Good practice advice on the preparation of access and participation plans for 2019-20' (OfS 2018.06)²."

More information can also be found in the OfS raising attainment briefing³.

The Department for Education's viewpoint on school sponsorship can be found in the 'Schools that work for everyone; Government consultation response (May 2018)⁴ which states:

"Universities and independent schools with the capacity and capability to sponsor an academy or establish a free school are strongly encouraged to do so; and those that do not have the capacity and capability to sponsor an academy or free school are expected to support state schools through sustainable and reciprocal partnerships, in at least one of the following areas: teaching... curriculum... leadership... other targeted partnership activity."

Q. More advice/support would be welcomed in relation to raising attainment targets.

A. We recognise the request from universities and colleges to provide more guidance around raising attainment targets, and we will work on this. In the meantime, please see the answer to the above question.

¹ www.officeforstudents.org.uk/publications/regulatory-notice-1-guidance-on-access-and-participation-plans-for-2019-20/

² www.officeforstudents.org.uk/publications/regulatory-advice-6-good-practice-advice-on-the-preparation-of-access-and-participation-plans-for-2019-20/

³ www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/using-evidence-to-improve-access-and-participation-outcomes/

⁴ www.gov.uk/government/consultations/schools-that-work-for-everyone

Q. Further Education Colleges (FECs) may struggle to work with 16 justifications, as they are seen as competition. Will the OfS take on board the environment we operate in when reviewing spend/targets/progress in this area?

A. The OfS does take context into account when assessing the risk of a provider breaching condition A1. We would expect providers to try to overcome for these barriers. The Baker clause, an amendment to the 2017 Technical and Further Education Act which gives FECs access to schools, should support FECs with this agenda.

Targets

Q. Will specific institutional targets be 'weighted' the same level as OfS targets when assessing how well an institution has met its targets?

A. It depends on the target and the provider context. There is not a formula for understanding the risk of a provider being in breach of condition A1 of the regulatory framework as we take many factors, including context, into account to form a judgement. If a provider or the OfS has identified a key area for improvement in their assessment of performance we would expect this issue to be addressed in the provider's targets and see progress against these targets. Also, there are no OfS specified targets for care leavers or estranged students for example, because there is no nationally available, comparable dataset. We see the need to support these groups of underrepresented students as important as for those groups specified in the OfS specified targets.

Q. We are keen to develop new and innovative interventions to improve access and success - these have been included in our AAP 2019-20. However, our targets and milestones relate to old Access Agreements that don't really mirror new activities. At what point will we be able to revise (and add new) impact-focused targets and milestones?

A. We expect all providers to revise targets for their next access and participation plans. The guidance will be released in February 2019.

Q. Are there plans to consider measures other than POLAR to measure gaps between different socio-economic groups that will work more efficiently for London?

A. The intention is that universities and colleges will be able to include provider specific targets which are relevant for a provider's own context. For example, London providers may use alternative measures of socioeconomic status in addition to the OfS specified POLAR target.

Q. Re-evaluation self-assessment: for many interventions (especially access ones) the outcomes are long term (e.g. working with pre-16 years - they won't progress to higher education for 2-3 years). Will the toolkit help us develop evaluation metrics/targets that show impact/outcomes within a year, bearing in mind the need to produce annual impact reports - or is it acceptable that there aren't outcomes within 1 year?

A. It would be acceptable if the outcomes were not measurable within one year of starting a programme of work. One of the reasons for extending the cycle of plans is because providers have told us that sometimes it takes longer than a year to see outcomes, and to put in place findings from formative evaluation. Providers have told us that they can be more ambitious and see greater results by having longer to implement programmes. For long-term outreach projects we would suggest using intermediate outcomes as targets which are developed using a 'theory of change' type approach. For an example see figure 3 in the raising attainment topic briefing⁵.

⁵ www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/using-evidence-to-improve-access-and-participation-outcomes/

Q. If the targets are already stretching and ambitious, and we are meeting them, is it enough for the OfS for HEIs to focus on maintaining consistently good performance? Can there always be continuous improvement (I realise this sounds unambitious)?

A. As detailed in paragraph 112 of the consultation document, for OfS-specified targets where a provider has no gaps, they may be able to maintain performance in this area instead of demonstrating continuous improvement.

Other

Q. How might franchise arrangements be viewed in terms of targets/monitoring where those student numbers may reflect an underrepresented gap in a different way to the core institution. Would these numbers be disaggregated?

A. This is a good question and will require more consideration from the OfS. We will consider this further as part of the consultation.

Q. Can you share any initial view of what subsequent annual monitoring returns might look like in any interim or transitional period?

A. More information about the next monitoring process will be sent to providers in mid-November.

Q. How best can spending and real commitments to access (e.g. pre-16 work) be protected without a defined percentage spend requirement placed on HEIs?

A. This is a good question and one that will require some more consideration. We will look carefully at the consultation responses and release more information about this in due course.

Q. Where student success/progression expenditure is being collected through other OfS reporting requirements, will this be by WP students?

A. This is not currently the intention. Universities and colleges have reported to us that student success and progression expenditure reported in this way is unreliable.

Q. Is the pre/post-16 spend linked to work in schools only? Are mature students in FE counted in post-16 spend?

A. It is the intention that pre/post-16 work will include work with students up to around 18 years old. Work with FE colleges would be categorised under 'adults and the community'.

Q. The focus on outcomes, clearer strategy, 5 year plans etc. is all good! However, we don't yet have a national data framework. HEAT is excellent but prohibitive for small specialists and not all HEIs signed up to it. If we are to measure sector wide outcomes, it should be in a joined up manner (i.e. ALL HEIs feeding data into ONE national hub). How likely is this? I make no apology for saying this again!

A. Thank you for your comments. The OfS is commissioning research into the use of trackers to understand how they can be used to greatest effect. We will provide the sector with more information about this in due course.

Q. Working in an FE college providing HE programmes, the majority of our students are mature/non-traditional entrants on non-prescribed HE. How flexible will reporting and tools be in ensuring we can demonstrate impact for all our students?

A. We will provide the opportunity to supply a commentary alongside quantitative data from targets in the impact report. This will give universities and colleges the opportunity to talk about context and findings from the evaluation of your programmes.