

A new approach to regulating access and participation in English higher education:

Oxford SU draft response to the OfS Consultation

Proposal 1: The OfS will place the approval of access and participation plans onto a more strategic timescale, with the **number of years during which a plan may be in force to be based on risk**. Plans should continue to demonstrate clear long-term ambitions for how providers will achieve significant reductions in the gaps in access, success and progression over the next five years. We will review progress against plans each year. Providers at increased risk of a future breach of condition A1 will normally be expected to submit plans every three years. Providers considered not at increased risk of a future breach of condition A1 will be expected to submit their plans every five years. Where we have serious concerns about a future breach, we may expect more frequent resubmission.

1. To what extent do you agree or disagree with the proposal that plans should normally remain in place for a period of at least three years, rather than annually as at present?

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|-------------------|------------------|---------------|----------------|-------------------------------|
| Strongly disagree | Tend to disagree | Tend to agree | Strongly agree | Don't know/ prefer not to say |
|-------------------|------------------|---------------|----------------|-------------------------------|

Oxford SU strongly welcomes the longer timescales, which should allow for more strategic action on targets, and the use of a risk-based approach which guides further intervention.

However, we do believe that a three year “baseline” with a five year “deviation” may be preferable to a five year baseline. The typical undergraduate or graduate life cycle is shorter than five years so five-year renewal risks excluding some students from the ability to hold providers to account.

We would highlight that the determination of risk is a key part of the scheme, and that this must be done transparently and should in our view include the student perspective and engagement. Students may be well placed to weigh up the different aspects of access, progression and support as they experience these issues directly.

Proposal 2: Providers will be required to **publish and submit to the OfS an impact report each year**. Financial information previously collected in our annual access and participation monitoring process will be submitted as part of wider OfS financial reporting processes.

2a. How effective, if at all, would the proposed approach of annual impact reports and action plans be for...

| | Not at all effective | Not very effective | Fairly effective | Very effective | Don't know/ prefer not to say |
|---|----------------------|--------------------|------------------|----------------|-------------------------------|
| ...Assessing a provider's progress compared to the sector as a whole? | | X | | | |
| ...Assessing a provider's progress compared to other institutions? | | | | X | |

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|---|--|--|---|--|---|
| ...Improving a provider's strategy to improve access and participation? | | | | | X |
| ...Engaging students in the monitoring of access and participation? | | | X | | |
| ...Capturing good practice, and findings from evaluation? | | | | | x |

2b. To what extent do you agree or disagree that the submission of an action plan would make providers more accountable to their students, the OfS, and the public for their performance in access and participation?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
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The submission of action plans is an important part of the process of setting and achieving goals, and the annual submission is an important nexus to seek student feedback. We very much welcome the provision of mechanisms by which students' unions might be able to report on and monitor Provider's performance directly with the OfS, rather than through the Provider's own communications. .

2c. To what extent do you agree or disagree that the approach of a longer-cycle plan with annual impact reporting, and ongoing OfS monitoring, will reduce the level of burden for low risk providers and apply greater scrutiny for providers at increased risk of a future breach of one or more conditions?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
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This is the purpose of risk-based assessment and should be of general benefit. Oxford SU again highlights the issue of ensuring student engagement in determining levels of risk and in working on access and participation plans in both low and high risk providers.

Proposal 3: Providers will be expected to include in their access and participation plans a set of strategic, outcomes-focused targets. A small number of these will be recommended by the OfS for use across all providers, and providers will also continue to be able to set outcomes-focused targets related to their own contexts.

3a. To what extent do you agree or disagree, that...

| | Strongly disagree | Tend to disagree | Tend to agree | Strongly agree | Don't know/ prefer not to say |
|---|-------------------|------------------|---------------|----------------|-------------------------------|
| ...the stated OfS specified-aims are the national priority areas for access and participation? | | | X | | |
| ...the OfS should specify measures that we encourage providers to use when setting targets related to OfS-specified aims? | | | | X | |

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|--|--|--|--|---|--|
| ...providers should also be able to set additional targets relative to their context? | | | | X | |
| ...the proposal allows for comparability of performance in access and participation across the sector? | | | | X | |
| ...the proposal allows for progress to improve access and participation to be measured? | | | | X | |

Oxford SU broadly agrees that the OfS aims reflect national priority areas, and strongly agrees that the OfS should have a role in setting targets to ensure providers do not avoid setting ambitious targets. We think it is correct to look at intake proportions rather than numbers, to aim to create a more representative HE system.

Oxford SU would however highlight that in a highly differentiated British HE system the OfS may want to set specific widening participation priorities for “elite” universities such as Oxford. For example. BME students are not underrepresented across HE as a whole, but are underrepresented at Russell Group institutions and even more so at Oxford and Cambridge. At the moment we feel the OfS should encourage institutions to use their “provider-specific” targets to reflect this, without any loss of ambition.

We strongly believe that a small range of clear targets will allow for much more comparability across the sector. At the moment it is difficult for students to judge progress or hold providers to account. In our specific context it has been difficult for the SU to judge progress as POLAR targets have shifted from POLAR 2 to POLAR 3, and many other institutions set targets on only bottom quintile admissions whilst Oxford uses the bottom two quintiles.

Proposal 4. The OfS will collect predicted access spend disaggregated by pre-16 activity, post-16 activity and work with adults and communities in access and participation plans. We will also continue to collect information on the financial support that providers give to students, and set expectations that this financial support is robustly evaluated, and communicated clearly to students. We will no longer require providers to report on student success and progression spend.

4a. To what extent do you agree or disagree with the proposal to collect and publish, in a transparent way, access investment?

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| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|----------------|---------------|------------------|-------------------|-------------------------------|

Oxford SU considers that transparency is generally beneficial to allow students to hold providers to account.

4b. To what extent do you agree or disagree with the proposal to disaggregate access spend by post-16, pre-16 and work with adults and communities?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|----------------|---------------|------------------|-------------------|-------------------------------|

Oxford SU considers that transparency is generally beneficial to allow students to hold providers to account.

4c. To what extent do you agree or disagree that a strong focus on targets and outcomes alone, creates enough pressure to secure sufficient funding in access and participation to achieve change, without an expectation of spend?

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| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|----------------|---------------|------------------|-------------------|-------------------------------|

Outcomes measures seem more reasonable than input measures.

4d. To what extent do you agree or disagree with the principles in paragraph 140 which we propose should underpin our approach to funding and investment in access and participation?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|----------------|---------------|------------------|-------------------|-------------------------------|

These principles seem reasonable.

Proposal 5: Providers will need to complete a **self-assessment of their evaluation activities against a set of criteria**, as part of their APP. The core purpose of the tool will be to identify and support continuous improvement in evaluation.

5a. To what extent do you agree or disagree that an evaluation self-assessment tool will contribute to improvements in evaluation practice?

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| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
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We are unclear what form this tool should take in practice. We think it would be important for any evaluation tool to involve student feedback and evaluation, which will be able to provide an arms-length review and constructive critique.

5b. What support do you think the OfS could provide to enable more effective use of tracking services? (max 300 words)

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Proposal 6: The OfS will undertake further work to explore if it should require providers to **submit and publish transparency data by age and disability**. This is in addition to data split by gender, ethnicity and socioeconomic background which is part of the transparency information condition (F1) in the current OfS regulatory framework.

6a. To what extent do you agree or disagree that OfS should undertake further work to explore whether data split by age could be included within the transparency information condition?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|----------------|---------------|------------------|-------------------|-------------------------------|

Oxford SU considers that transparency is generally beneficial to allow students to hold providers to account.

6b. To what extent do you agree or disagree that OfS should undertake further work to explore whether data split by disability status should be included within the transparency information condition?

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|----------------|---------------|------------------|-------------------|-------------------------------|
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
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Oxford SU considers that transparency is generally beneficial to allow students to hold providers to account.

Proposal 7: The OfS will create, publish and maintain an **access and participation dataset** that provides a picture of access and participation across the higher education sector and at individual providers.

7a. To what extent do you agree or disagree that OfS should create and maintain an access and participation dataset?

| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
|--|---------------|------------------|-------------------|-------------------------------|
| Oxford SU strongly believes that such a dataset would increase transparency and accountability. | | | | |
| 7b. To what extent do you agree or disagree that the proposed datasets would support you to hold providers to account on their performance against targets? | | | | |
| Strongly agree | Tend to agree | Tend to disagree | Strongly disagree | Don't know/ prefer not to say |
| As a students' union we strongly support this measure, but think that a searchable database of the access targets set by institutions, to allow us to easily contrast ambition between comparable institutions would be even better. Currently, to establish if an institution's access targets are feasible, ambitious, shared or unique it is necessary to trawl through a number of individual PDFs. This reduces our ability to hold providers to account by comparing them with other institutions. | | | | |
| 7c. Are there any measures you feel are missing from the dataset? (max 300 words) | | | | |
| We think it would be important to provide a searchable database of the access targets set by institutions, to allow us to easily contrast ambition between comparable institutions. We think that the distinction between 1 st and 2:1 should be captured also. Gender is a further breakdown which could be useful. | | | | |