

Russell Group response to OFFA consultation on a draft Strategic Plan 2015-2020

1. Key areas

- 1.1 We welcome this opportunity to respond to the consultation on OFFA's draft Strategic Plan 2015-2020 and have focused our comments on the following key areas:
- The commitment to develop evidence based policy.
 - Enhanced communication and engagement with institutions.
 - The 'student lifecycle' approach.
 - Potential 'over reach' of OFFA's remit in relation to institutional autonomy.
 - Aspects of the plan that seek to increase targets, regulation, monitoring and reporting.

2. Evidence based approach

- 2.1 The draft Strategic Plan looks at the need for an evidence based approach in what it describes as the 'context of the complex and evolving higher education landscape'. The Plan also outlines the desire to work with partners to support faster progress collectively across HEIs and at individual institutions.
- 2.2 The Russell Group welcomes the intention to look carefully at the evidence base around access and widening participation. We would also like OFFA to take note of the importance of institutions offering generous bursaries as a key tool in opening up access to leading institutions for those from less advantaged backgrounds and lower socio-economic groups. Bursaries are a useful tool in helping to encourage students from less advantaged backgrounds that attending a world-leading institution is possible.
- 2.3 Policies and programmes based on evidence are welcome and further research into the effects of an institution's bursary work on access and retention should inform future plans. We welcome the recent call for evidence on the impact of financial support to students.
- 2.4 Any findings from research and evaluation by OFFA should take into account the diversity of higher education institutions and should allow universities to implement policies or programmes in line with their own strategic mission and access agreements.

3. Student lifecycle

- 3.1 The draft Strategic Plan defines the 'student lifecycle' as the entirety of the higher education experience for students. Three stages are looked at: access, student success and progression. The draft Strategic Plan asserts that, 'the lifecycle approach

to widening participation helps to ensure that approaches to widen access, improve retention, and support student success and progression are developed and delivered strategically.

- 3.2 Universities work hard to ensure students are retained and succeed, but it is not necessary to implement a centrally reported model for this work. Russell Group universities already offer pastoral support to help students feel part of university life, or help with skills and work experience to improve employability.
- 3.3 A whole student lifecycle approach involves engaging from an early stage with prospective students to raise aspirations and attainment, and then supporting these students during their studies to stay on course, achieve a qualification, and go on to graduate-level employment or further study. We do not believe that this sort of institutional activity should be directed or monitored by OFFA.
- 3.4 We have no objection to the use of a student lifecycle model in *informing* the development of access and employability activity within higher education institutions themselves. Indeed, many of our member universities have embedded the student lifecycle model in their Access Agreements and strategic planning.
- 3.5 However, the top-down imposition of a student lifecycle approach is unnecessary, particularly in relation to the setting of targets around outcomes. The role of OFFA should be to identify and facilitate the dissemination of effective practice, drawing on experience both within the UK and more widely.

4. Institutional autonomy

- 4.1 The draft Strategic Plan highlights seeking to grow existing collaborative work . and working in new ways . with the universities and colleges that OFFA regulates, HEFCE and other sector bodies, and Government. The stated aim for this work is to support faster progress collectively across the sector and at individual institutions.
- 4.2 Russell Group institutions collaborate on access initiatives where this adds value for them, for schools or colleges, or for prospective students. Examples of collaboration through the Russell Group include the *Future Scholar Awards (FSA)* funded by DfE, the Russell Group Teacher Conferences and the *Informed Choices* guide to help students make good post-16 subject-choices. Institutional autonomy is a key principle at the heart of higher education governance and it is important that institutions should be able to determine their own priorities and focus resources appropriately, within the constraints of an already heavily regulated environment.
- 4.3 We certainly agree with OFFA that undertaking and commissioning research and analysis that provides a broader and more nuanced view of the higher education regulatory environment is helpful. Equally, it will be important to ensure that the research and analyses are robust, and that institutions retain the ability to interpret and apply the results in ways that best suit their particular circumstances.

5. Reduce regulatory burden and streamlining the collection of OFFA/HEFCE data requirements

- 5.1 The role of OFFA in regulating access to universities has grown substantially. OFFA now requires any university wishing to charge higher fees to submit complex Access Agreements for its approval on an annual basis. Millions of pounds of fee income to Russell Group universities can only be spent in line with regulations and guidance issued by OFFA, and subject to annual changes in OFFA's policies and direction.

- 5.2 A further change since 2011 is that universities must now agree numerous access targets with OFFA, against which their performance is monitored regularly. There are real challenges in setting and achieving specific targets for access when universities do not have the power to solve the underlying root causes of the problem . even though they do put significant effort and resources into addressing issues where they can make a difference. But universities face substantial financial consequences if their performance does not meet with OFFA's approval.
- 5.3 The Russell Group has a strong interest in producing robust data about the HEIs and student behaviour to inform our own policy and decision making processes and there is an existing framework for institutions to share data via HESA, which is used by various external agencies to analyse the performance of higher education institutions. Data collection and reporting need to be proportionate and every effort should be taken to ensure that requirements on universities do not add unnecessary burdens. Each year our universities are required to make some 550 separate data returns to government or government agencies.¹ A more streamlined approach, with clear linkages between projects where this is helpful, would be of considerable benefit in reducing the duplication of effort.

6. Benchmarking and target setting

- 6.1 There are some particular problems with the HESA benchmarking for Widening Participation. The benchmarks are fundamentally flawed because they fail to provide a full picture of the student body actually qualified to enter many courses. They take no account of the fact, for example, that someone with four A*s at A-level might not have a strong chance of acceptance on a very competitive Medicine course, unless their A-levels are in the required subjects. In addition:
- The benchmarks do not consider whether able students apply in the first place. Despite all the efforts of Russell Group universities to encourage applications from disadvantaged students, our universities cannot offer places to those who do not apply.
 - By their nature these benchmarks are a moving target; if institutions with very different challenges meet their benchmarks, then this means the benchmarks for all universities become more challenging. Universities could meet them one year and fail the next with exactly the same intake.
 - Performance against the benchmarks only gives an indication of an institution's performance relative to other institutions, and they do not give a very good indication of an institution's improvement in widening participation over time.
 - The robustness of some of the data used to calculate the benchmarks is questionable. For example, data on socio-economic class (SEC) is based on self-reported information from students about their parental occupation.
- 6.2 Extra targets could distract attention, effort and resources away from the many successful access schemes run by Russell Group universities. If institutions are asked to set targets around particular benchmarks, it is important that the criteria are transparent and open to challenge.

¹ *The HE data and information landscape: a pathway to reform - Report to IRPG*, p. 14

7. Sector outcome objectives

- 7.1 The draft strategic plan proposes a series of sector outcome objectives. Generally, the Russell Group is concerned that an increased emphasis on target setting at a national level, will result in moves to require individual universities to adopt common targets for their outreach and access programmes. The challenges facing different universities in widening participation are many and varied, and each will be best placed to decide how best to address these. It is appropriate that universities should continue to be able to decide their own priorities and set their own targets and that this should not be constrained by a set of over-arching national targets.
- 7.2 Our further comments on the proposed sector outcome objectives each are set out below:
- 7.3 To make faster progress to increase the proportion of higher education entrants from under-represented and disadvantaged groups.**
- 7.4 The Russell Group would welcome greater clarity as to what is meant by this objective and the timescales involved. If progress against this objective is expected to be measured against centrally set targets, we would be concerned about the effects this may have on our universities in terms of higher monitoring requirements and increased data collection burdens.
- 7.5 To make faster progress to increase the proportion of under-represented and disadvantaged groups entering more selective institutions.**
- 7.6 This objective singles out selective institutions for disproportionate focus; equally it would seem likely that this approach will result in increased targets for Russell Group universities in England and other highly selective institutions.
- 7.7 Russell Group institutions are already making great efforts and are spending a significant proportion of additional fee income on outreach and access initiatives. In developing new sector outcome objectives, OFFA should seek to ensure it has the full support of higher education providers.
- 7.8 To improve non-continuation rates for students from under-represented and disadvantaged groups and reduce the gap in non-continuation between advantaged and disadvantaged students.**
- 7.9 No comment is necessary on this point.
- 7.10 To improve the proportion of students from under-represented and disadvantaged groups achieving a good degree outcome and reduce the gap in attainment between advantaged and disadvantaged students.**
- 7.11 We have concerns that this objective could lead to interference with admissions arrangements. Bursaries and other measures can be used to improve retention and achievement. It is preferable for institutions to address these issues however they can, independent of regulatory control.
- 7.12 To improve rates of progression into graduate-level employment or further study for students from under-represented and disadvantaged groups.**
- 7.13 Russell Group graduates remain highly sought after in the labour market; institutions offer a good careers advice service to students, with employability embedded into

most courses. Universities provide extensive careers guidance and advice on progression routes from higher education into the world of work. OFFA target setting for employability would be unhelpful.

7.14 To rebalance access agreement spend so that it more closely reflects institutional priorities based on their performance in access, student success and progression.

7.15 Rebalancing in itself should not be an aim. Student success, employability and retention are all positive aspects of Russell Group universities offer to their students. Balancing performance may be specific to a particular institution and not something that ought to be set by OFFA.

7.16 To build OFFA's contribution to the evidence base through research.

7.17 We would endorse this approach, and would like OFFA to take this into consideration when evaluating future policy in balancing outreach work with bursaries. Bursaries are increasingly a factor in prospective students deciding which university to apply to and which to attend. They can also be useful in encouraging students from low-income families to consider institutions located further away from home. Moreover, in an environment of variability in graduate contributions between institutions and courses within a large and diverse higher education sector, bursaries have a role to play in widening access to the most selective institutions, and those with the highest fee levels.

7.18 To ensure that OFFA uses an evidence-based approach to support and challenge the sector, and OFFA regulates universities and colleges through ongoing engagement.

7.19 We would support an evidence-based approach to assessing the widening participation landscape and welcome OFFA's commitment in this respect. However, this is welcomed with some caveats: OFFA should take notice of the substantial body of evidence suggesting that bursaries enhance the student experience of those from less advantaged backgrounds, as well as helping with retention.

7.20 To produce robust and clear qualitative and quantitative data. This will support the regulation of access agreements, ensure transparency, and will be fit for use by institutions and other stakeholders.

7.21 The Russell Group would welcome the use of robust and clear qualitative and quantitative data, however this should be limited to the data that is already being collected, and not lead to an expansion of data collection.

7.22 We hope OFFA will seek ways to reduce the amount of data it collects unilaterally, streamlining its data collection capacity in collaboration with other agencies. It is noted that the KPI attached to this objective includes a commitment to improve processes to ensure that the data institutions provide is robust; this should not involve increased or more frequent data requests on HEIs.

7.23 To develop higher levels of knowledge and understanding within OFFA and across the sector by dissemination of OFFA in-house and commissioned research.

7.24 The development of knowledge and understanding of the wider policy environment should be considered in the light of the excessive regulatory burden already faced by HEIs.

7.25 To demonstrate best practice under the Regulators' Code.

7.26 To work continually to benchmark and improve OFFA's governance, management and operational performance.

7.27 To work continually to improve the professionalism, motivation, and capabilities of our staff.

7.28 To deliver value for money in all of our activities

7.29 These four objectives relate to OFFA's own management and governance. These objectives appear appropriate for a public body such as OFFA.

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