



## University of Technology, Sydney response to HEPPP Guidelines - Consultation 2009

UTS welcomes the opportunity to comment on the HEPPP Guidelines, and provides general commentary as well as detailed suggestions about individual Guideline points.

Many of the points raised by UTS will be consistent with other ATN universities as a result of joint discussions, although this response provides additional UTS commentary and suggestions.

### GENERAL COMMENTARY

#### 1. Systemic, long-term change and individual institution performance

UTS strongly supports the proposal that funds from both HEPPP Components A and B are identified for partnership and outreach activities, targeting access to higher education for significant a proportion of the low SES population. The focus on early intervention activities will, ideally, not only increase the participation of low SES people but also better prepare them for admission to University and ease their transition once enrolled.

The guidelines propose that activities should be directed to areas where 'aspirations to enter higher education are lowest and where articulation to universities is poorest' and to 'communities most in need' (1.70.1 (a) and (b)).

The nature of the programs that will be implemented under HEPPP, particularly the breadth and length of outreach programs, means that their effectiveness cannot be solely assessed by increased participation rates at individual universities in the short term. In the longer term, participation rates should be measured against increased rates of participation with any provider, in keeping with the Government's national targets. Point 2 (below) elaborates on the issue of measurement.

#### 2. Measurement of performance by annual enrolment outcomes v. long term programming outcomes – Indicator Framework and HEPPP Guidelines

As above, UTS notes the inherent tension between:

- the use of enrolment data as a measurement of program success (as described in the Indicator Framework and 1.55.7 of the HEPPP Guidelines), and
- the need to implement programs that may not yield results for a number of years (as suggested by the HEPPP Guidelines) and may not lead to enrolments in the institution delivering the program in any case.

The HEPPP Guidelines rightly steer away from the development of institution-specific programs when recommending types of outreach and partnership activities. However, both the Indicator Framework and clause 1.55.7 of the HEPPP Guidelines use measures and rewards that are tied to institutional data.

UTS accepts the necessity for institution specific measurements, but notes that they may not be good indicators for assessing the effectiveness of outreach programs.

Inclusion within the Guidelines of principles for appropriate program types will assist in the additional assessment of long-term program outcomes. The attached suggestions to clauses 1.65, 1.85, 1.70, 1.90 and 1.95, as attached to this response, attempt to include these important elements.

### **3. Need for greater recognition of mature-age students from low SES backgrounds**

The proposed HEPPP Guidelines place a significant focus on programs for current school students. This is consistent with the Government's 2025 goal that 40% of 25-34 year olds have a qualification at bachelor level or above. However, as the impact of school programs will take some time to flow through to enrolments, it should be recognised that there is capacity for increased enrolments of mature age students from low SES backgrounds which would impact upon low SES participation rates much sooner. It would be appropriate for the Guidelines to explicitly recognise the validity of programs encouraging mature age low SES people to participate in higher education.

### **4. Over-emphasis on aspiration-raising in the guidelines**

UTS believes the high degree of emphasis on aspiration-raising in the guidelines may diminish other important elements of the Widening Participation agenda. In particular, other elements such as inclusive admission pathways, awareness, affordability, and school achievement should be included. The Guidelines would then position universities to work in an integrated way on all elements that contribute to participation. Supporting aspiration is just one of those elements.

The attached suggestions to clauses 1.65, 1.85, 1.70 and 1.90, as attached to this response, attempt to include these important elements.

### **5. Reporting**

UTS has a continuing concern about the total volume of reporting required across Government programs. The necessity for a level of reporting on outcomes of funded programs is accepted. However, in this case, the reporting requirements appear to add to universities' reporting load without any indication of how this might be ameliorated.

## **DETAILED COMMENTARY ON INDIVIDUAL GUIDELINES**

### **6. Program Funds for 'existing funding commitments' at 1.50.1(a)**

UTS notes that national funding is likely to be reduced by expenses relating to 'existing funding commitments' as described at 1.50.1(a). In this context, UTS highlights the importance of maintaining sufficient HEPPP funds to allow for new programs to come on stream as programs mature and develop in response to emerging needs.

### **7. Program Funds for 'grants in response to proposals' at 1.50.1(b)**

UTS notes the importance of a transparent and open process for the allocation of HEPPP grants, not only as appropriate process, but to encourage and inform better practice and collaboration in the sector.

### **8. Objectives of Participation Fund at 1.55.10(a)**

UTS suggests that paragraph 1.55.10(a) include an expanded description of the types of activities foreseen to more reflect the intention of the HEPPP.

### **9. Inclusion of Indigenous students in distribution formula for Participation Funds at 1.55.5, 1.55.7 and 1.60.1**

UTS agrees with the proposal for an interim funding formula that counts both low SES and Centrelink status.

UTS notes that the draft Indicator Framework allows universities to choose an additional equity target group relevant to the university, and that there is currently no provision in the HEPPP Guidelines funding formula for recognising additional groups.

UTS suggests that Indigenous students should be explicitly included in the measurement formula outlined at 1.55.7 and 1.60.1 to encourage and enhance university efforts to improve educational opportunities for this cohort.

**10. Principles for Partnership and Outreach activities at 1.65, 1.70, 1.85 and 1.90**

UTS recommends that a set of principles be established to guide the implementation of Partnership and Outreach activities, regardless of the funding source. That is, Partnership and Outreach activities funded from either the Partnership Component or the Participation Component should all be shaped and assessed by the same principles. Using the Guidelines to mandate the characteristics of acceptable activities would help to ensure that funds are used appropriately.

This would have an impact on the wording of 1.65.1(b), 1.70, 1.85, and 1.90.

**11. Attached redrafting of clauses 1.65, 1.70, 1.85 and 1.95**

Please find attached the detailed redrafting of the above clauses, as a suggestion for improvements that align with the comments above.

**12. Distribution formula for Partnership Funds at 1.75.1**

UTS agrees with the distribution formula of Partnership funds for 2010. It is assumed that the base allocation for 2011 and 2013 will be indexed relative to the prior year amount. If this is correct, there would be value in including a statement to that effect.

The distribution formula provides for an increasing proportion of funds to be made available for collaborative project based activities. UTS supports the proposed ratio of base and project funding.

**13. Ensure that adequate Partnership funds remain available over the long term at 1.80.10**

UTS welcomes the inclusion of both single-year and multi-year programs in the funding guidelines. However, in implementation it will be important to balance the allocation of funds to different length programs to ensure that a range of effective programs are supported by HEPPP.

**14. Simplify reporting at 1.95**

Reporting as described in 1.95 should be simplified to reflect the likelihood of cross-subsidisation of Outreach and Partnership activities between the two funding sources (Component A and Component B), as artificially separating expenditure on the basis of funding source would lead to double reporting.

UTS notes that reporting will inevitably need to focus on activities, as measurable shifts in annual outcomes data are unlikely in the first few years of programs.

The attached suggestions to 1.95 recommends reporting in two parts: Outreach and Partnership activities, and Student Support activities (rather than Component A and Component B).

Should the structure of 1.95.10 be retained as proposed in the discussion draft, it should be noted that reporting accurately on school students who participate in partnership activities and then go on to university (1.95.10(e)) will not be possible given the length of time between HEPPP activities and university admission, and that they are not guaranteed to go to the university that provides the activities.

## **15. Paragraph Referencing**

As a general point, there are a number of cross-references to paragraphs within the document that appear to be inaccurate, as well as some duplication of numbers, and reference to paragraphs that do not exist in the document.

## ATTACHMENT 1: UTS RESPONSE TO THE DRAFT HEPPP GUIDELINES

### Redrafted clauses of HEPPP Guidelines – 1.65, 1.70, 1.85 and 1.95

#### 1.65 Eligibility to receive Participation Funds

1.65 A *provider* must be an eligible Table A provider under the *Higher Education Support Act 2003*.

#### 1.65.1 Appropriate activities for Participation Funds

Activities that a *provider* may undertake, can include, but is not limited the following:

- (a) develop and implement appropriate support services and programs for Australian resident undergraduate students from low SES backgrounds enrolled or seeking enrolment within their institution, including but not limited to:
  - (i) inclusive entry processes;
  - (ii) ~~transition programs to support cultural issues of assimilation and for regional and remote Australian resident undergraduate low SES students;~~
  - (iii) academic preparation;
  - (iv) mentoring and peer support;
  - (v) education programs for parents of students who are first in family to access higher education;
  - (vi) tutoring and continued academic support; and
  - (vii) monitoring of student progress.
- (b) develop and implement partnership activities consistent with the principles outlined in 1.85.1 for the purpose of encouraging the awareness, aspirations and achievement of people from low SES backgrounds ~~to for~~ access to higher education;
- (c) administer application and selection processes for Commonwealth Scholarships in accordance with the Commonwealth Scholarship Guidelines;
- (d) continue to offer institutional equity scholarships.

## 1.70 Component B – Partnership Objectives

1.70.1 The objectives of Component B - Partnership are to increase the ~~aspirations~~ participation of low-SES people ~~to access and participate~~ in higher education through effective outreach and related activities with schools, VET providers, community groups and other stakeholders. Partnership activities for ~~such low-SES~~ people are intended to:

- (a) ~~assist in understanding and considerations~~ supporting the awareness of an aspiration towards university as a viable option for them to undertake;
- (b) assist achievement at school or in a post-school setting or via an alternative pathway in order to be capable of being considered by a *provider* for admission; and
- (c) encourage an increase in proportion of low SES ~~students~~ people who apply for attendance at any provider.

Partnership activities undertaken by a *provider* are intended to:

- ~~(a) — concentrate resources to most effectively raise aspirations to higher education among students experiencing educational disadvantage therefore widening and deepening the effective equity footprint to school communities where aspirations to enter higher education are lowest and where articulation to universities is poorest; and~~
- ~~(b) — supporting collaboration between providers to ensure that there is a coordinated approach to identifying and engaging with appropriate schools and communities most in need are the ones that benefit from involvement in relevant programs.~~
- (a) support collaboration between providers and concentrate resources most effectively, to ensure that there is a coordinated approach to identifying and engaging with appropriate schools, communities and cohorts; and
- (b) ensure that those schools, communities and cohorts most in need are the ones that benefit from involvement in relevant programs.

## 1.85 Eligibility to receive Partnership funding

To be eligible to receive Partnership funding, a provider must satisfy the eligibility requirements of the Participation component as outlined in 1.65.

### 1.85.1 Principles for conducting partnership activities

Providers will need to conduct partnership activities that address the following principles:

- (a) **Collaboration.** Providers are expected to collaborate with other key stakeholders including at the local, regional and state/territory levels. This includes working together and partnerships at the level of program design and implementation (school staff, community groups, other universities etc) and in terms of engaging student communities through programs, rather than targeting individuals.
- ~~(b) **Early intervention.** Early intervention means a program and /or activities that commence prior to Year 9 in order to maximize the impact of increasing aspirations.~~
- ~~(c) **Continuing engagement.** As students progress through school they are continuously engaged and supported by providers with appropriate and relevant activities.~~
- (b) **Early intervention and continuing engagement.** The program of activities should focus on the long-term process of building awareness, aspiration and achievement by engaging with low-income people well before the point of enrolment, eg. in middle schooling and not just senior schooling. Programs should be age-appropriate and scaffolded.
- ~~(d)(c) **Awareness.** Providers are to ensure that students' awareness and confidence of how to access higher education are managed in a positive manner.~~
- ~~(e)(d) **Evidence based.** Providers will be required as part of their partnership programs to design programs and develop mechanisms that measure and track outcomes based on evidence.~~
- ~~(f)(e) **Integrated and multi-layered.** The activities should meet the needs of the different student groups and are complementary to other programs and activities which are being conducted.~~
- (f) **Related to educational disadvantage:** The choice of schools, communities and cohorts must be explicitly related to evidence of educational disadvantage such as school-based, place-based or cohort-specific data on SES status or other measures of educational disadvantage.
- (g) **Widening participation:** The program of activities and associated themes and messages should be focussed on encouraging tertiary participation in general and not solely focussed on promoting the benefits of a single provider.

## 1.95 Reporting

- 1.95.1 *Providers* are to report to the Department by 31 October 2010 on activities and outcomes achieved in that calendar year on Component A and Component B. The report will be in a format to be specified by the Department.
- ~~1.95.1 For Component A, *providers* will be required to report on activities undertaken and engagement and support strategies including alternative pathways to university for students.~~
- 1.95.5 Providers will be required to report on all outreach and partnership activities funded under Components A and B, including the scale of activities, consistent with the objectives and principles outlined in 1.65.1(b), 1.70.1 and 1.85.1.
- 1.95.10 Providers will be required to report on all support services and programs funded under Component A, including alternative pathways to university and the scale of activities, consistent with the objectives and principles outlined in 1.55 and 1.65.1(a).
- 1.95.5 The Department will include the progression of targeted low SES students by year in terms of participation, retention, completion and success rates from commencing at university as part of assessing outcomes.
- ~~1.95.10 For Component B, *providers* will be required to report on:~~
- ~~(a) How many and what schools are subject to partnership activities;~~
  - ~~(b) How many secondary school students by year are participating in partnership activities;~~
  - ~~(c) What is the equity distribution of the students (i.e. low SES metropolitan, low SES regional and remote, and low SES Indigenous)~~
  - ~~(d) The progression of secondary school students as they advance from their commencing partnership activities to Year 12.~~
  - ~~(e) How many secondary school students are admitted to university who have been participating in partnership activities.~~
  - ~~(f) Other matters that may be required as part of any grant.~~
- 1.95.15 As a condition of funding, the Department may require a report estimating the expenditure of HEPPP funds against the criteria in paragraph 1.65 estimates of expenditure of HEPPP funds within the respective activity reports.