

## Summary of responses to the equality impact assessment consultation and involvement process relating to our *Approach*

1. In October 2010, we published circular W10/26HE: *HEFCW's Strategic Approach and Plan for Widening Access to Higher Education 2010/11 to 2012/13* as part of our equality impact assessment process.
2. The circular invited views from higher education institutions, directly funded further education institutions and other interested parties. We particularly sought views on the extent to which:
  - i. our proposed strategic objectives, priorities and initial actions promote our aims of ensuring equity, opportunity and success in higher education to enable learners of all ages and backgrounds who face the highest social and economic barriers to fulfil their potential as students, lifelong learners and citizens;
  - ii. our *Approach* references the new equality and diversity legal framework and promotes and encourages best practice;
  - iii. our *Approach* will encourage cultural change and proactive approaches to ensure that equity and diversity issues are fully integrated into our own and the sector's policies and priorities.
3. We received **fifteen** consultation responses, including **ten** from higher education institutions, **one** from a further education institution, and **two** from third sector organisations and **two** from Wales-wide or UK-wide bodies. Four responses were submitted after the 22 November deadline, but were taken into account to fully inform the development of the *Approach*. Officers analysed the responses, which included views on the *Approach* priorities, as well as views specifically focusing on points i – iii above. The summary analysis below takes account of the views received. All responses welcomed the *Approach*.
4. Generally, the responses confirmed that equality and diversity issues had been addressed sufficiently and embedded within the *Approach* and no negative impact was identified in relation to groups with protected characteristics.
5. While questions i – iii above were not specifically addressed, respondents did raise a range of more general policy-related issues including the following, our responses are also:
  - i. Whether there was **sufficient emphasis on under-represented groups** compared to the more specific references to Communities First areas.  
HEFCW response: The focus in our *Approach* on prioritising Communities First areas builds on our Corporate Strategy commitment to 'align our focus on under-represented communities with the Welsh Assembly Government's Communities First programme, to address inconsistencies in access and opportunity for those from areas of multiple deprivation in Wales'.<sup>1</sup> However,

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<sup>1</sup> HEFCW Corporate Strategy 2010-11 to 2011-12 p. 9. [www.hefcw.ac.uk/publications/corporate\\_documents](http://www.hefcw.ac.uk/publications/corporate_documents)

our widening access funding mechanisms also support the sector to improve access for other under-represented groups including those from low participation neighbourhoods and those in receipt of the Assembly Learning Grant.

- ii. Several responses focused on **measures of success**, suggesting:
- the need to confirm the methods of monitoring and evaluating the success of the strategic intentions;
  - the need to confirm the specific details of evidence of success we required from HEIs and the format of monitoring;
  - that progression indicators could be used as a success measure;
  - that the difference between Community First learners' achievement in HE and other groups could be monitored and reductions in the gap between the groups rewarded;
  - that success measures should include progression into employment;
  - that measures should take account of the HEI recruitment profile as well as disability, ethnicity and age profiles of learners;

HEFCW response: Our widening access measures of success are as set out in our Corporate Strategy. Further correspondence with the sector, including supplementary guidance for Widening Access and Reaching Wider strategies will outline the measures of success and monitoring formats we require from institutions when reporting performance. We recognise the need to monitor the sector's performance in the admission, retention and success of students from Communities First areas and we will use funding mechanisms to encourage institutions to support the retention and success of these students. We will also monitor HEIs' student populations more generally, including taking account of a range of equality and diversity indicators. With regard to graduate employment being a measure of the sector's success, we recognise that a number of economic and other factors impact on graduate employment, many of which are outside the sector's control, and therefore, would be neither helpful nor consistent as indicators of success.

- iii. **Improving the evidence base** to support institutional data collection, analysis and action planning, the use of qualitative as well as quantitative data and evidencing impact were all proposed ways of improving institutions' strategic planning and performance.

HEFCW response: We recognise the benefits of using a range of data measures, including qualitative data, where appropriate, and we will work with the Higher Education Academy and the sector to ensure effective measures are identified to evidence institutions' progress and demonstrate their success in widening access.

- iv. **Fair Access to the Professions** priorities would be challenging to achieve given that many professions are only accessible with postgraduate qualifications and potentially higher undergraduate fees could result in fewer widening access students affording postgraduate study;

HEFCW response: We recognise the importance of, and potential challenges to, widening access to postgraduate studies and the professions and we will

work with the sector, professional bodies and sector skills councils to identify, and where possible ameliorate, barriers to accessing the professions.

- v. **Implications of potentially higher undergraduate fees** should be considered when the Assembly Government's response to higher fees (proposed by the Browne Review) is known, however, given popular assumptions that the Browne Review applies in full to Wales, it will be harder to persuade learners from lower income families of the cost benefits of higher education. [This point was made before the Welsh Assembly Government's position statement on tuition fees for Welsh students was made].  
HEFCW's response: We will work with Assembly Government officials and the sector to ensure that changes in fee policy, including fee plans, take account of the impact on students from lower income families.
- vi. **Retention** references in the *Approach* were welcomed including: the recognition of the role of student support structures and pre-entry information, advice and guidance in aiding retention; and noting that Assembly Government policies such as those relating to financial support for students can impact on retention and are outside HEIs' control.  
HEFCW response: At the time of writing, issues relating to fees, fee plans and financial support for students are still being finalised by the Assembly Government and they will be the subject of further correspondence with the sector.
- vii. While **Recognition of Prior Learning** was increasingly used by HEIs, references to encourage APEL (accreditation of prior experiential learning) should be highlighted.  
HEFCW response: We recognise the importance of APEL as a mechanism for increasing progression to higher education, as set out in our circular W10/42HE.<sup>2</sup>
6. All consultation responses have been taken into account in finalising our *Approach*.

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<sup>2</sup>[http://www.hefcw.ac.uk/documents/publications/circulars/circulars\\_2010/W10%2042HE%20Funding%20the%20accreditation%20of%20prior%20experiential%20learning%20APEL.pdf](http://www.hefcw.ac.uk/documents/publications/circulars/circulars_2010/W10%2042HE%20Funding%20the%20accreditation%20of%20prior%20experiential%20learning%20APEL.pdf)