Dear Ms Vandermark,

Thank you for your email of 31 January 2011 providing the pro forma reporting template for the Higher Education Participation and Partnerships Program (HEPPP) for 2010. The Vice-Chancellor has asked me to provide you with some feedback on the proposed new equity reporting requirements as the administration of the HEPPP sits within my portfolio.

The University of Sydney endorses the Australian Government’s social inclusion objectives. We are excited about applying the HEPPP funding to strengthen our activities and performance in this area, and are looking forward to discussing some of our plans with your department as part of the upcoming compact negotiations.

We appreciate the importance of ensuring that there is transparency and accountability in the use of public funds. Building an evidence-base by which to monitor progress and demonstrate the impact of the HEPPP will also be important when it comes to securing the continuation of and, we hope, the expansion of the program from 2015.

Nevertheless, having reviewed the form there are several issues that we feel obliged to raise with you in the hope that they can be addressed prior to its finalisation. These are detailed in the attached submission in the order they appear in the form, rather than in order of priority.

In summary, we are concerned that while the stated purpose of the proposed reporting is to evaluate the effectiveness and appropriateness of activities pursued as a result of the HEPPP, the form appears to require institutions to report on all initiatives that cover, or are related to, participation or partnership activities that are acceptable under HEPPP.

This will serve to duplicate reporting, which will make it difficult to distinguish any additional impacts that result directly from the funding increases that will flow as a result of the HEPPP. It also risks overstating the impact of the program through the inclusion of complementary initiatives that are funded from a variety of other sources and in most cases are already reported and monitored elsewhere.
We therefore recommend that the form be amended to focus on the collection of information explicitly about the application of HEPPP funds, with a separate section included at the end of the executive summary sections for the participation and partnership components, where institutions are asked to provide additional overview information about complementary expenditures and activities that are supported from other sources.

We note that the form indicates that the annual HEPPP reporting is intended to inform Institutional Performance Portfolio discussions with universities (p.1). We have understood that the compact process will replace these from 2011, with the new IPP report to support the compact process. We further note that we are now required to report on our equity strategies, initiatives and performance in the compact, as well as in the IPP for disability and Indigenous support programs and equity scholarships, all of which have elements that are relevant to the HEPPP. We also question whether the level of additional detailed reporting about inputs and individual activities proposed in sections 3.1, 4.2.2 – 4.2.4, 4.3.2 – 4.3.4 and 4.4.2 – 4.4.4 is necessary in order to achieve the department’s objectives for the HEPPP.

Requiring institutions to report annually on every partnership activity, whether funded by the HEPPP or not, down to the level of each individual project, is, in our view, excessive. As many of our partnerships with schools are identical in substance and intended to be long term, this requirement is likely to result in the provision reports that are largely indistinguishable. We question the value of the information that will be obtained from this requirement and recommend that you only collect overview information detailing: the range of activities being pursued by the university; a list of the school, VET and other partners involved in each type of activity; the number of participants; and the outcomes achieved as data become available to measure these. We also suggest that a three level activity matrix be included in this section to describe the intensity of each partnership or relationship.

If you would like to discuss any of these issues with us, please contact Ms Annette Cairnduff, Director, Social Inclusion, annette.cairnduff@sydney.edu.au, 02 8627 8517, in the first instance.

Yours sincerely,

(Signature removed for electronic distribution)

Professor Derrick Armstrong
Deputy Vice-Chancellor, Education and Registrar
The University of Sydney, comments on the proposed annual reporting requirements for the Higher Education Participation and Partnerships Program (HEPPP) Reporting Pro Forma, February 2011

P.1 ‘inform Institutional Performance Portfolio discussions with universities’.

Comment: Given that triennial compact discussions with annual reviews will replace the biennial Institutional Assessment Framework discussions from 2011, this statement does not appear to reflect the new arrangements.

Suggestion: Amend to read: ‘prepare the Institutional Performance Portfolio, inform the Government’s triennial compact discussions with universities and the annual review of individual compact agreements’

P.3 Financial summary

Table 1.2 & 1.3

Comment 1: We will have not completely spent the 2010 HEPPP allocation by 31 May 2011. This means that we will not be completing parts of sections 1.2, 1.3 and 1.4 for 2010. We can provide expenditure data from existing programs that cover eligible participation and partnership activities. Once we start drawing down on HEPPP funds, however, we question the value to the Government of collecting financial data in a way that does not appear to allow for co-investment in specific HEPPP initiatives to be disaggregated easily.

Comment 2: Tables 1.3 & 1.4, ‘Expenditure from other Government sources’
The inclusion of these sources is likely to result in the reporting of expenditure from sources such as the Disability Support Program, the Indigenous Support Program, the Diversity and Structural Adjustment Fund and other sources that will be reported elsewhere.

Suggestion 1: Separate the collection of summary financial information to distinguish between those activities that are supported by a HEPPP funding component and those that are supported completely from other sources. Ask institutions to provide separate summary financial information about their range of activities that align with the objectives of the HEPPP, but which are not directly supported by, or connected with, specific activities that have been funded through the HEPPP.

See page 4 below in relation to the proposed executive summaries for the participation and partnership components of the HEPPP for suggestions about how this might be achieved.

Comment 3: Table 1.3, ‘Equity scholarships’
We are concerned that without a clear definition of the term ‘equity scholarships’ it will be difficult to draw meaningful comparisons between information provided by different institutions. Members of the Group of Eight recently sought to share such information with each other, with some institutions reporting scholarships that appeared to be largely merit-based. This made it difficult to use the data for benchmarking purposes. As currently proposed in the form, it is also possible that some institutions will include Commonwealth Scholarships in this section when the intention appears to be to capture information about additional scholarships provided with HEPPP funds, university funds or non-government sources. Further, while the focus of the HEPPP is on low SES participation, the term ‘equity’ is generally understood to include many other groups that are underrepresented in Australian higher education institutions.

Suggestion 2: Include a clear definition of what is meant by the term ‘equity scholarships’. This could be, for example: ‘Equity scholarships are scholarships that are awarded principally on the basis of criteria other than academic merit. They include scholarships targeted at prospective students from low SES backgrounds, with disabilities, from non-English speaking families, from rural and remote areas, Indigenous students, and female students in fields where women are
under-represented. They include (or do not include) Commonwealth Scholarships. Table 1.3 would include the total expenditures on all types of reportable scholarships, but the breakdowns of expenditure and source for each equity sub-group would also be provided.

P.5 Executive Summary (Participation Component)

Comment 1: Statement of objectives
We recognise that it may be difficult to refine the stated purpose of the participation component of HEPPP in the guidelines, but it seems incongruous to us that the statement does not include the objective of achieving improved success as well as participation rates for students from low SES backgrounds. The inclusion of activities covered by items (iii), (iv), (v) and (vii) in subsection 1.65.1 of the guidelines, which are all clearly focused on improving levels of attainment, suggests that the omission of a reference to success or attainment in the statement of objectives is an oversight. Further, while the HEPPP is primarily directed at achieving the Government’s 2020 low SES participation target, the 40 percent bachelor degree attainment target is also significant. The HEPPP can contribute positively to the achievement of that equally ambitious target through a focus on improving low SES retention and success rates at the bachelor degree level.

Suggestions 1: Amend the objective of the participation component of the HEPPP to include a reference to enhancing the success of low SES students as a core objective of the program.

Comment 2: ‘d Case studies or examples of positive practices’
While we are more than happy to provide case studies, it will be important for the Government to agree with the sector on key data, other than low SES participation rate data, that will be used to monitor the success of institutions’ approaches. Clear definitions of key terms will also be essential if the performances of institutions are to be compared.

Suggestion 2: Such data might include, for example: the numbers of applicants applying/admitted through alternative entry programs; the number of potential students participating in transition and academic preparation program and applying/being accepted into post secondary education as a result; the numbers of low SES students receiving mentoring, tutoring, counselling and academic support assistance; the staff hours and estimated cost of the assistance provided; the retention, success and completion rates of low SES students.

See below in relation to the reporting of participation activity for further suggested refinement to the executive summary of the partnership component.

P. 6 Executive Summary (Partnership Component)

Comment: ‘d Case Studies or examples of positive outcomes or practices’
As for the participation component, in addition to case studies, we would like to see the executive summary section of the form include key data, agreed with the sector, which will be used to monitor the success of institutional approaches and measure outcomes attributable to the HEPPP.

Suggestion 1: For school partnerships for example, relevant data might include: rates of year 12 attainment; rates of year 12 attainment at the level required for admission to university; post secondary school application numbers and rates; university applications and acceptances from the school. All of these could be benchmarked against comparable rates for students from similar backgrounds who are not exposed to the programs.

Suggestion 2: After the two executive summary sections for the participation and partnership components, allocate space for institutions to provide summary financial data and overview of their activities, which, while not directly linked to projects supported by HEPPP funds, are nevertheless relevant to the objectives of the program. This is where institutions would provide a summary of
their overall investment levels in social inclusion initiatives, as well as overview of key complementary activities that are administered separately to initiatives supported by HEPPP funds.

PP.7-8 Participation Activity Reporting

Comment: We consider the level of detail sought in this section about each university activity, whether supported by HEPPP funds or not, to be excessive and of limited use. We cannot see how the provision of information at this level of detail will add value to the information that will be provided in the compact agreement and in the executive summary section for the participation component of the form (p.5).

Suggestion 1: Section 3, except for subsection 3.1.2, should be removed from the form for the 2010 reporting period, with further consultation to occur with the sector about what information, if any, should be reported at the level of the individual participation activity.

Suggestion 2: Give institutions more space in the executive summary section for the participation component (p.5), to allow them to provide an overview of their strategies, initiatives and outcomes achieved in relation to each area of acceptable activity, as well as other activities not included in section 1.65.1 of the guidelines, but nevertheless considered relevant by the institution.

Suggestion 3: Move current section 3.1.2 concerning unspent funds relevant to a specific acceptable participation activity to the end of the executive summary section of the participation component. Make this new section about expenditure of the participation component as a whole, not in relation to individual activities, and limit it explicitly to activities that are supported in full or in part by HEPPP participation funds only.

PP.9-15 Partnership Activity Reporting

Comment: As for the participation component, we consider the level of detail required in this section in relation to each individual partnership activity, whether supported by the HEPPP or not, to be excessive and of limited use. By way of example, under our Compass program the University will have relationships with 25 disadvantaged primary and high schools in the Sydney metropolitan area by the end of 2011. We also have numerous partnerships of different types with VET and community organisations supported from different sources. If we are able to continue the Compass program beyond 2011 we expect that the number of partnerships will grow considerably. Our hope is that in the future it will involve hundreds of schools. We are already required to report on Compass under the requirements of the Diversity and Structural Adjustment Fund and cannot understand what value is added by reporting on it again for HEPPP at this level of detail.

Suggestions 1: Roll sections 4.1.1 - 4.1.4 into the executive summary section of the partnership component (p.6). For the table in 4.1.1, require institutions to only:

- list the name of each partner (school, VET provider, community group or other);
- provide the partner’s address;
- provide the total number of students participating; and
- detail how the outcomes of the project will be measured.

Suggestion 2: Although we understand the importance of volume data, the collation of participant numbers will not reflect the richness and depth of the programs provided. We therefore propose that a three level activity matrix be developed, which would be used by institutions as part of their description of their relationship with partners and allow for more accurate benchmarking and comparison of activities. The levels might be: intensive; moderate and developing.

Suggestion 3: Give institutions more space in the executive summary section to allow them to provide an overview of their strategies, initiatives and outcomes achieved in relation to each area of
acceptable activity, as well as other activities not included in section 1.70.1 of the guidelines, but nevertheless considered relevant by the institution.

**Suggestion 4:** Move the various sections concerning unspent funds relevant to a specific acceptable partnership activities (subsections 4.2.4, 4.3.4 and 4.4.4) to the end of the executive summary section of the partnership component. Make this new section about the university’s partnership component as a whole, not individual activities, and limit it explicitly to activities that are supported in full or in part by HEPPP partnership funds only.