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Strategic ambiguity and/or policy ad-hocery? The positioning of evaluation in higher education widening participation discourses. (0554)

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The April 2018 launch of the Office for Students provides an opportunity to take stock of changes in the relationship between regulation, widening participation and evaluation that have occurred since the 2004 launch of the Office for Fair Access (OFFA). In this paper, taking an analytical approach aligned with policy trajectory studies (Ball 1993; Ball 2015; Gale 1999; Taylor 1997; Vidovich 2003), I adopt a cross-sectional perspective to explore the formulation of policies concerned with the evaluation of widening participation activities.

I argue that regulatory guidance in this area bears all the hallmarks of what Ball (1993; 2015) refers to as policy 'ad-hocery', the dynamics of a policy's interaction with issues of real world implementation, but that it can also be framed through concepts of strategic ambiguity (Jazabkowski et al 2015; Davenport and Leitch 2005; Abdallah and Langley 2014), in which policy creators knowingly leave 'loopholes' to allow for practical challenges in 'coal-face' implementation.

Context

The evaluation of WP outreach is viewed by practitioners and researchers as presenting significant of methodological or epistemological challenges (Crawford et al 2017; Gorard and Smith 2006; Hayton and Stevenson 2018; Harrison and McCaig 2017; Harrison and Waller 2016; Torgerson et al 2015). Nonetheless, policy interest in the evaluation of HE-delivered widening participation activities has grown over the last 15 years (Dytham and Hughes 2017; Harrison and Waller 2016; Harrison and Waller 2017; OFFA 2013). Governmental interest is most visibly expressed through Ministerial letters of guidance to the Director of Fair Access. In turn, OFFA mediates this policy primarily through three interlocking sets of guidance to HEIs, which cover the preparation of Access Agreements and institutional WP 'monitoring reports', as well as providing periodic sector analysis. I suggest that its structural position between Government and HEIs makes OFFA the locus for many of the tensions generated by shifting HE WP policy agendas.

Policy narrative

An analysis of the regulatory documents listed above suggests that evolving WP evaluation policy can be divided into 4 main phases:

Phase 1 is dominated by a focus on monitoring / targeting activities. The formation of OFFA was driven primarily by concerns that the 2006 increase in tuition fees would discourage potential WP students. Initially, policy focussed on ensuring that universities' investment, and the outreach activities and bursaries it paid for, were reaching the low-income students for which they were intended. There appeared to be little policy interest in formal evaluation. Indeed, the first Ministerial guidance letter, Clark (2004), to OFFA appeared to view the identification and dissemination of good practice as an inevitable by-product of OFFA's oversight of institutional activity.

Phase 2 marked a shift towards a more comprehensive evaluation approach, when Denham's (2008) instruction to bring together OFFA and HEFCE's respective widening participation agendas hitched HEFCE's greater experience in regulating and evaluating the Aimhigher access programme to OFFA's embryonic approach. The resulting focus on evaluation was underwritten by an emerging value for

money agenda, with Ministers positioning evaluation as a key mechanism for ensuring that universities allocated resources effectively.

Phase 3 is characterised by an intensifying emphasis on return-on-investment. In response to Lammy's (2009) Ministerial letter stressing the need for HEIs to evaluate the targeting of their WP spend, OFFA produced *What more can be done to widen access to highly selective universities* (Harris 2010), which both promoted the importance of evaluating WP activities and flagged the significant challenges of attempting to do so. As such, it explicitly repositioned OFFA in the space between Government and HEI interests.

Phase 4 emerges, I suggest, with the Regulators' shift to a meta-evaluative register. Despite the policy pressure exerted on it, the HE sector has so far failed to deliver robust and decisive evidence of 'what works' in WP. OFFA's own analysis (2017), for example, points to an over-reliance on participant feedback coupled with a paucity of work measuring more concrete changes in behaviour or social change. As Harrison and Waller (2016; 2017) argue, this failure is almost inevitable given the complexity of the social world in which young people live and the scarcity of predictable and measurable outcomes.

Trapped between Ministerial policy pressure on one side and their own sympathetic understanding of institutional practices on the other, OFFA were caught in a double-bind. To resolve this tension, I argue that they introduced a policy loophole for HEIs unable to deliver against Ministerial expectations, by shifting the focus of evaluation from intervention outcomes to the evaluation process itself. OFFA guidance required HEIs to indicate the extent to which they were evaluating their WP activities and whether they had an evaluation strategy in place. This meant HEIs could tick the necessary regulatory box merely by indicating that they were engaged in evaluation activity, irrespective of its outcomes or impacts (OFFA and HEFCE 2014; OFFA and HEFCE 2015). This constitutes a classic move in neoliberal regulation regimes in which meeting the targets becomes more important than improving the quality of the services (Steers et al 2007).

By refusing to push for specific concrete outcomes or even proscribe rigid requirements, I suggest that OFFA was also deploying 'strategic ambiguity' to create a space in which slow sector progress could be managed. Strategic ambiguity is variously described as a rhetorical device to manage ambiguous goals with 'multiple, indistinct, incoherent or fragmented meanings' (Jazabkowski et al 2015), a means of delegating responsibility for interpretation to stakeholders further down the power structure (Davenport and Leitch 2005) or covering over policy contradictions or tensions (Abdallah and Langley 2014).

At the same time, this loophole approach reflects what Ball (1993; 2015) describes as policy 'ad-hocery', an acknowledgement that policy formation is a dynamic process, negotiated between framers, interpreters and enactors. This is particularly apparent in cases, such as this, where delivery throws up significant implementation challenges for policy subjects.

Conclusion

Through a range of textual policy strategies, I suggest, OFFA and HEFCE moved from a straightforward transmission of Government policy into a more ironic and meta-evaluative stance as the limitations and unfeasibility of the policy they had been charged to deliver became clear.

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