

Russell Group response to New DLHE consultation

1. Summary

- The data which emerges from the DLHE survey is incredibly valuable to the higher education sector and enables universities to develop their understanding of the 'risk factors' associated with employability and to provide appropriate support to their students. It is imperative that the benefits of the current DLHE model are maintained and any unintended negative consequences of the move to a new model are minimised, particularly given the weight of the DLHE as a metric in the TEF.
- There are benefits associated with the proposed new model. The timing of the new survey 15 months after graduation could offer a more accurate picture of graduate destinations as graduates may have been in the labour market for longer. However, the potential impact of the change in the timing of the survey, the move to open centralisation and the forthcoming implementation of the GDPR could all negatively impact on expected response rates. We therefore question whether the proposed 70% response rate is realistic.
- We fully support HESA's intention to maximise value for money and reduce the costs associated with the DLHE. However, we are cautious about the extent to which the proposed model will deliver this. It seems likely that institutions will continue to be required to chase graduates in order to improve response rates, and this could reduce the prospect of significant savings being made. An assessment of this risk should be undertaken.
- The provision of near real-time access to individualised DLHE data is critically important for institutions in order to enable them to interrogate trends in graduate outcomes and to provide tailored and swift support to their alumni. Similarly, the careers service referral should be part of the standard service model to enable all institutions to better support their graduates and enhance their outcomes.

2. Russell Group response

- 2.1 **The data which emerges from the DLHE survey is incredibly valuable to the higher education sector and enables universities to develop their understanding of the 'risk factors' associated with employability and to provide appropriate support to their students. It is imperative that the benefits of the current DLHE model are maintained and any unintended negative consequences of the move to a new model are minimised, particularly given the weight of the DLHE as a metric in the TEF.**
- 2.2 We therefore welcome the opportunity to respond to this consultation. The purpose of The Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.

Challenges associated with the expected response rate

- 2.3 **There are benefits associated with the proposed new model. The timing of the new survey 15 months after graduation could offer a more accurate picture of graduate destinations as graduates may have been in the labour market for longer.** It is important that the new survey accurately captures further study destinations and ensures that this is counted as a positive outcome, even where those who have recently finished postgraduate studies are unemployed at the point of being surveyed.

- 2.4 The move from 6 to 15 months after graduation, however, is likely to have a negative impact on response rates. This may be compounded by the move to open centralisation with an external contractor undertaking the survey rather than institutions contacting their alumni directly. Based on the experience of our universities, we consider that the responsiveness of graduates is linked to their willingness to engage with their university.
- 2.5 The impending changes to data protection regulations which are due to be implemented in 2018 may pose additional challenges in achieving high response rates. HE providers will be required to supply full and accurate contact details for their graduates to the survey contractor. While the consultation references the implementation of the EU GDPR, it does not take full account of the implications this will have on the sector. If universities are required to ask graduates to opt in to future contact the ability to maintain contact details will be diminished. Given that under current proposals an external contractor will be in possession of student data, it is likely that explicit consent could need to be sought for universities to share this data with third parties.
- 2.6 **We welcome the proposal for HESA to work with the survey contractor in order to develop a robust communications plan to support the achievement of high response rates. However, given the potential impact of the change in the timing of the survey, the move to open centralisation and the forthcoming implementation of the GDPR, we question whether the proposed 70% response rate is realistic. Further evidence should be provided to confirm the expectation that response rates could exceed 70% under the proposed new model.**
- 2.7 Further information regarding whether the response rate target relates to the overall provider and whether it will be broken down by domicile and cohort is needed. International students and those domiciled abroad are much harder to reach than those within the UK. The response rate should relate to UK domiciled undergraduate students rather than a provider wide rate. Although we welcome HESA's aim for the survey contractor to achieve responses that are representative across different courses, firm targets should not be set for this.
- 2.8 **We would welcome further detail on the consequences for both providers and the contractor if the response rate is not met.** If there is pressure on the external contractor to reach 70% then they may be incentivised to pursue a more aggressive approach to achieve the target. The relationship between providers and their alumni is highly sensitive and there is a concern that this approach could undermine or damage these relations. It is imperative that providers can rely on the professionalism and sensitivity of the contractor and their staff and we would like to see provisions built into the contract to secure this. The nature of the relationship which the provider will have with the contractor is somewhat unclear and we would welcome further detail on this.

Achieving efficiency savings

- 2.9 **We fully support HESA's intention to maximise value for money and reduce the costs associated with the DLHE. However, we are cautious about the extent to which the proposed model will deliver this.** Whilst centralisation could reduce the burden on many providers, there is a risk that significant onus may be placed on institutions to support the external contractor given the high target response rate – and particularly in the context of the move to a 15 month survey. If institutions are required to chase graduates in order to improve response rates, this would impact on the cost of delivery and could reduce the prospect of significant savings being made. An assessment of this risk should be undertaken.

The provision of data and the service for institutions

- 2.10 **The provision of near real-time access to the individualised DLHE data is critically important for institutions in order to enable them to interrogate trends in graduate outcomes and to provide tailored and swift support to their alumni.** Universities use current DLHE data in a variety of ways and match outcomes against indicators including POLAR, ethnicity, gender, parental income as well as subject and degree class. This work is even more important in the context of the TEF which requires institutions to understand and assess patterns of progression and success. Institutions should continue to have access to individualised DLHE data capable of being linked to student records which contain data on individual characteristics.
- 2.11 **Furthermore, we would encourage HESA to move the careers service referral option into the standard service model rather than classifying this as an advanced service.** Putting a premium on careers service referrals places an additional barrier in the way for institutions wishing to better support their graduates and enhance their outcomes.
- 2.12 We support the use of linked data however we are conscious that this is only available for UK domiciled students. Without the provision of data on income for international students, there will be a number of courses with incomplete and patchy data, especially for subjects which enrol a high number of international students. It therefore remains essential to collect salary information from graduates as well as using linked data.
- 2.13 Finally, further consideration should be given to the disruption which may be caused by the eighteen month gap in destinations data during the transition to the proposed new model, and the impact this will have on league tables and TEF outcomes in particular.

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