## Consultation on principles and future requirements for the UK's public interest data about graduates

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1	Name of Organisation	Council for Higher Education in Art & Design (CHEAD)
2	Is this response on behalf of? (please choose the category that fits best)	A HE sector body
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6	Do you agree that linked data can provide a critical part of the data product?	Yes
7	Do we need a survey?	Yes
8	Does a survey need to be universal (a census of graduates)?	Yes

#### 9 Further comments

Whilst we accept that a high response approach will be more expensive to carry out, the information that this generates provides a rich source of careers information. Staff currently use this information to demonstrate the types of occupations that graduates from specific courses have moved into which can, in turn, be used to help prospective and current students identify possible future career options and labour market trends that may affect them as a result of specialising in a particular subject.

Institutions have teams who are highly experienced in collecting and reporting this data. As they are likely to elicit a higher response rate than a centralised survey, it makes sense for them to continue with this work. The graduate services staff at HEIs also

use information about the organisations in which graduates have found work to identify, target and develop their relationships with potential employers to facilitate recruitment of more graduates in the future. All of these relationships are key to graduate services and it is extremely important to all our members that DLHE remains embedded within graduate services.

Creative careers are generally highly specialised and diverse and a portfolio of jobs and related activities are characteristic of early creative careers for at least 4 years after graduation. In order to accurately document this range of activities and recognise a mix of paid and unpaid work, explanation of reporting choices can be required. Occupations and job titles are also changing very fast in the creative industries and, additionally, many creatives will be embedded in noncreative industries. We do not see how a sampled survey could capture the complexity in a way which would provide useful and actionable data both to graduates and HEIs' graduate services. HEIs need to be able to customise and facilitate data collection.

Do you agree with the high-level scope of topics?

Yes

Do you agree with the principle that it is desirable to find appropriate additional ways of measuring graduate

Yes

#### 13 Further comments

outcomes?

CHEAD's membership is very strongly committed to DLHE including a skills framework which will draw out evidence relating to the kinds of 'social capital' and life skills which we believe are greatly enhanced by a creative education. It will also demonstrate the transferability of skills acquired through creative education which graduates may apply in the wider economy. The skills framework would provide extremely useful information to show students how university courses and occupations are linked due to transferable skills. There is something of a disconnect at the moment resulting in Careers Services spending considerable effort in enabling students to recognise the relevance of their course to employment in general or to specific jobs post facto.

We would also caution strongly against over-reliance on an exclusive use of salary and economic data. We would encourage the use of other impact data, including cultural and community engagement and value and we would reference the work of

Geoffrey Crossick in the AHRC Cultural Value project [https://is.gd/v2H7v9]. We believe it is crucial that DLHE includes a Student Wellbeing Framework and we would also strongly support a new self-evaluative question.

Both the skills framework and wellbeing framework would show that success can not be defined purely in terms of the type of job a person enters or the salary they are earning, but should also provide useful information for those studying arts (or thinking of studying arts) where wellbeing may be their main motivation for choosing courses and types of employment.

If the Net Promoter score approach is adopted, we would strongly argue that this should include a free-text entry comment box as a sliding scale response does not provide any actionable data for the HEIs to be able to identify, understand and address any issues which students may have.

CHEAD's members have already identified serious issues with the SOC coding which is important in ensuring the integrity of the DLHE data and these may be exacerbated in the new DLHE framework. The current SOC coding approach fails to take account of the widespread self-employment among ADM graduates or to take account of high levels of positive motivation as a perceived

compensation for low wages in the sector. The government is currently proposing a 10% uplift to the creative economy stats to represent this 'invisible' entrepreneurial sector - most would estimate a much higher uplift for the ADM sector. Some of the SOC group 4 activities, we would argue are graduate in the level of skills used and actively develop from the subject studied.

Attention needs to be given to the relationship of vocational / nonvocational courses with graduate destinations. Furthermore, creative graduate patterns of employment frequently include an extended period of portfolio working with a low level paid job as part of the mix, if the graduate destination is defined solely by earnings this will not represent the graduate's contribution to the economy across the portfolio as a whole. Studies such as "Creative" Graduates. Creative Futures" commissioned by CHEAD [https://is.gd/k6vhTW] show a characteristic portfolio career working across multiple jobs which may be unpaid or low paid, only stabilising over a 3 – 4 year period after graduation.

Current SOC codes do not accurately reflect creative graduate destinations in terms of the diverse and nuanced job titles in creative occupations. Currently, human judgements by HEIs in administering the DLHE survey are required to achieve any degree of

accuracy. A more fine-grained and flexible approach to SOC coding is required.

It would be useful if the survey also makes it easy for respondents to show that they are engaged in multiple pursuits, including portfolio-building activities so that the data can reflect the prevalence of portfolio careers of arts students. It would also be useful to strengthen the survey's ability to report on self employment as a destination. As many arts students do not identify with the term 'self employment' alternative terminology may need to be used: ie 'artist', or 'designer maker.'

Linkbacks to previous surveys or studies could enhance the value of the data but there is insufficient detail here to comment more fully.

14	Do you think a single survey point can work?	No
15	If a single survey were to be used, when should this take place?	12 months
16	If multiple surveys,	• 6 months

12 months

• 48 months

which points would

be most appropriate?

## 17 Further comments and explanations for your answers

Our membership is unsure as to the best time to administer the DLHE survey. The current 6 month census data does not allow creative graduates sufficient time to establish themselves in the occupation role consistent with their immediate career aim. A longer period between the point of graduation and the census date would be useful: the proposed year could be more appropriate, although it is generally agreed that this will reduce response rates significantly. A high response rate is also crucial to our sector. CHEAD is agnostic about the optimal date but would cautiously suggest 12 months as a median between response fall-off and opportunity for graduates to establish themselves in the job market or in a portfolio aimed at facilitating achievement of their career aims in the longer term. However, if response rates fell off very significantly, we would want flexibility to return to the 6 month period as a high response rate is crucial for our sector. We do not yet know how a more nuanced approach to SOC coding might assist in capturing more accurate information - it is too early for us to tell what the best compromise would be. Our ideal in terms of accurate data would be a census survey at 6 months and another at 36 months but we are aware of cost restraints.

In summary, we would suggest experimenting with 12 months if the survey is to be conducted by graduate

services within HEIs and 6 months if centralised.

The LDLHE cannot offer the kind of response rate required for reliable mapping of the complexity of successful establishment creative graduate careers but, given the cost restrictions and the rapid fall-off of response rates after 6 months, it would seem the least-worst option to continue with LDLHE at 36 months.

A method of gaining data about the long term career trajectory of graduates would be a rich data source and would help to put initial destinations into context, for instance a graduate may take a low skilled job immediately upon graduating as a stepping stone into a company or profession. However, as a second longitudinal survey will result in a lowered response rate and, as noted, it will be difficult to link data from these two sources, perhaps it would be useful, during the initial survey, to survey graduates about their future career goal and the extent to which their present job/ course will help them achieve this.

Do you currently outsource your DLHE data collection process?

No

Do you think a central survey would provide more demonstrably robust

results?

No

## What concerns would there be about a central survey?

We do not believe that decoupling the DLHE survey from graduate services will lead to more reliable information guite the reverse. It is crucial that our member HEIs retain the alignment of data collection with graduate support services and the flexibility to align data collection with the information needs of their students as well as with those of local or specialist employers. It is also important to ensure that the data collected will provide the most reliable information on the complexities of Art and Design graduate destinations and the specificities of the teaching and learning value add of Art and Design higher education. If a centralised solution is chosen, it is crucial that the flexibility remains to annex targeted questions to the centralised survey.

# 21 What drawbacks might there be in centralising and/or automating SOC-coding, and what weight should they be given?

As discussed in [13] above, we see SOC coding as highly important but seriously flawed for our sector. If SOC coding were to be automated using fine-grained responses from a census survey to create finer-grained SOC coding, this could help map creative graduate careers far more accurately. ACTR can dynamically update its knowledge base when it encounters an

entry that is not recognised by the system and subsequent occurrences will be correctly coded automatically to a high level of accuracy comparable with that of an expert coder and to a higher level of consistency, according to the ONS study of the automation of SOCs from birth and death registers [https://is.gd/flawBD]. Given the complexity of creative jobs and the shortcomings of the current system for creative occupations, this could be of significant benefit.

It would also greatly reduce the cost to HEIs in running DLHE in-house as hand-coding SOCs currently requires considerable staff time. If staff were able, instead, just to hand-code instances flagged by ACTR this would potentially be of significant value. However, it may be that if the survey is centralised in which case the expertise to hand-code flagged occupational titles in the creative sector accurately will not exist at the point of centralised administration of the survey. However, referring coding back from centralised survey administration to graduate services within HEIs would be cumbersome.

We do not have enough information about how this automation would be conducted at the level of the relationship of ONS, HESA, and graduate services within HEIs to make a clear judgement here. Much depends on how the DLHE is structured overall so it is difficult to commit an opinion at

	this stage. If SOC coding is to be automated using DLHE data, it needs to involve graduate services in HEIs who will understand the relevant occupational fields and the issues surrounding SOC coding for the DLHE.

Please tell us here about any other comments you wish to make in response to this section

It seems worth mentioning that JACS coding also needs overhauling.

Do you support the proposal for continued collection of data on activities and main activity?

Yes

Do you agree with adding examples of additional types of work here?

Yes

25	Please indicate your level of support for the following additions:	
25.1		'Working more than one job'
25.1.a		Very high
25.2		'Starting my own business'
25.2.a		Very high

25.3		'Volunteering'
25.3.a		Very high
25.4		'On an internship'
25.4.a		Very high
25.5		Other
25.5.a		Very high
25.a	If you selected Other, please specify	As suggested in [17] above, future career goal and the extent to which their present job/ course will help them achieve this.

#### 26 Please offer any CHEAD's members place the general comments or strongest emphasis on the argument observations that a range of metrics is needed to capture the full value of creative education and the wider contribution of HE ADM to culture in society. Development of a wellbeing framework which includes the sense of individual self-realisation / self-actualisation / fulfilment should add to the DLHE a measurement of importance of creative education for communities, for democracy, for public health and wellbeing, for urban life and regional growth. See the AHRC report cited above Understanding the Value of Arts & Culture

Please indicate your level of support for the following:

27.1	Please indicate your level of support for the outline proposal to derive basic further study information from linked education data sources	
27.1.a		Moderate
27.a	Please explain your answer	There are legal implications to sharing HESA (or other educational) data and our members might find the sharing of what may be becoming commercially sensitive data in a competitive market environment.

28	Please indicate your	level of support for the following:
28.1		level of support for the collection ate motivations for further study
28.1.a		Moderate
28.a	Please explain your answer. We would be especially grateful for suggestions for 'categories' of motivation.	We feel this data would need to be gathered at the point of entry to undergraduate study rather than 6-12 months post graduation to avoid post hoc rationalisation by students now embarking on graduate careers. It is difficult to speculate on categories of motivation which would not 'lead' the graduate's responses but categories should include vocational, non-vocational, social, personal, creative, experiential, and ethical motivations for their choices. It would be interesting to see a free-text commentary on their expectations of HE prior to study.

29 Please share any comments you wish to make about these basic data.

Our impression from our member HEIs is that the opt out rate would certainly increase. Many graduates are reluctant to take part in DLHE even in its current form because of worries about how the data would be used or shared. Non-technical graduates will be ill-equipped to understand the ramifications - or benefits to themselves - of unknown and unforeseeable future uses of linked data and we do not have sufficient information ourselves to comment in any detail on this aspect of the proposals. Recent experience in attempting to centralise NHS databases, public memory of the fate of child benefit data in 2007, and controversy regarding data sharing of health records with global corporations should be noted. Any proposed legal framework should clearly and robustly exclude sharing of educational data beyond relevant governmental agencies and educational institutions or any mode of alienation from the UK jurisdiction even on server locations covered by international data handling treaties and that all transfer of data is encrypted end-to-end.

Please indicate your level of agreement for the following:	30
Please indicate your level of agreement with the working proposal that 'overall HE experience' questions should be discontinued	30.1

30.1.a		Moderate
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Please share any further comments you wish to make about overall HE experience questions

CHEAD broadly supports the replacement of experience questions with alternative approaches.

32	Please indicate your level of support for the following:	•
32.1	Please indicate your level of support for the development of an approach to measuring outcomes of graduates based on student engagement data	F
32.1.a	Very high	

Please share any comments you wish to make about linking to or using student engagement data or survey questions as part of a data product measuring student destinations and outcomes

We have already stated concerns in our response to the TEF Technical Implementation for Year II that the current NSS may bias responses and results relating to practice-based and other ADM pedagogies and strongly argue that there should be an adjustment in the data to correct this distortion which has been evidenced in the research of Susan Orr. Mantz Yorke, and Bernadette Blair [https://is.gd/3s96iE]. We strongly agree that engagement questions such as those included in UKES offers a more accurate indicator of effective stimulation and challenge in teaching and learning for the HE ADM sector. Cost could also be reduced by linking to an independent UKES administered by HEA.

Learning gain measurement for Art and Design is at a highly speculative stage in terms of research on the best methods to achieve measurement that takes in not just cognitive reasoning skills but also maker and process attributes. Whilst we welcome the HEFCE funded project looking specifically at Learning Gain in Art and Design, we note that we are being asked to assume this project will deliver outcomes that can be standardised and used to provide comparison of outcomes across our sector. Without either the outcomes of this project or robust piloting of any instrument designed from the project's outcomes, we are very concerned that we are being asked to consent to an approach for which we have no details.

34	Please indicate your	level of support for the following:
34.1	_	vel of support for the inclusion of question in a survey of graduates
34.1.a		Very low

35	What precise wording of the	We cannot provide precise wording appropriate to all of our member
	question would you favour?	institutions, most of whom do not support the introduction of NPS.

#### 36 Please explain your answers

We have found very little enthusiasm for this kind of approach among our member HEIs who do not feel that marketing techniques such as NPS can be successfully transferred to the HE ADM sector where choices, expectations, and experience are so complex. Students are not buying a consumer item or hiring a car and the fields are not sufficiently comparable for such techniques to offer any value to the HE ADM sector. It is likely to gain unrepresentative prominence whilst giving little useful information to future graduates.

## 37 Do you have any further comments to make about the Net Promoter Score?

Net Promoter Scoring (NPS) has its detractors in the corporate sector, its popularity has been declining recently due to drawbacks which, in our opinion, are likely to be magnified in a transfer to the HE 'market'. It's a poor indicator of what actually needs to be changed to improve scores and is thus difficult to action effectively. Most experts feel it needs to be supplemented by additional questions which expose the drivers of the response and indicate potential areas of improvement. There are also concerns that it may not be right for some customer sets and different 'customers' may also have different concepts of what constitutes a basis for a positive recommendation. HEIs have many issues to contend with besides growth and profit. Students

cannot be simply equated with 'customers' either - they do not repurchase (except possibly in the sense of post-graduate study) [see Raphael Schmatz, Gerald Wolf, Mareike Landmann "The Net Promoter Score as a measure of satisfaction and loyalty in higher education", EAIR 37 th Annual Forum in Krems, Austria, 2015]. Given the specificity of the oneoff HE 'customer journey' and the highly interactive nature of the 'service' being offered, NPS may not offer either the insights needed to action negative scores or fairly reflect the complex nature of the interaction between students and HEIs unless care is taken to design the NPS solicitation process with sufficient regard to context. If used, the sliding scale should be supplemented with a free-text field where graduates can explain their rating.

38	Please indicate your level of support for the following:
38.1	Please indicate your level of support for the development of an approach based around measuring subjective wellbeing in a future survey of graduates
38.1.a	Very high

39 Do you have any further comments to make about Subjective Wellbeing?

We believe that a wellbeing framework will reveal important aspects of the value added by creative HE teaching and learning, information about which is not currently solicited successfully elsewhere. We refer, once again, to the findings of the AHRC Report "Understand the Value of Arts & Culture" which calls for a more varied range of metric methodologies in order to transcend arguments opposing 'instrumentalisation' and 'intrinsic value' to reveal the widest possible range of benefits to society as well as to individuals of which earnings are a part and by no means the whole. We also strongly believe that lower earnings for art, design and creative media graduates in the creative industries are offset by highly motivated individuals pursuing more personally satisfying life choices and often also an investment in the importance of arts and culture as a wider social benefit.

40	Please indicate your	level of support for the following:
40.1	development of a m	cate your level of support for the easure of attribute or skill usage, employment context, in a future survey
40.1.a		Very high

Please share any further comments you wish to make about measuring attributes or skill usage

Art and Design education inculcates a wide range of higher order skills and attributes ranging from independent and critical thinking through entrepreneurship and problem solving to digital skills and working well in diverse teams. Many art, design and creative media graduates will transfer these skills successfully into the wider economy creating significant social and cultural benefits to the nation as a whole as well as to local communities, and internationally. ADM graduates also contribute significantly to community and regional development and cultural activities in their communities.

42	Please indicate your level of support for the following:
42.1	Please indicate your level of support for the development of a synchronised approach between a replacement for DLHE, and earlier surveys or activities
42.1.a	Moderate

43	Does your	No
	organisation survey students at the start of their courses?	

44 Please share any further comments you wish to make about linking back to previous surveys

CHEAD is a representative body and this question is best answered by individual HEIs.

45 Please share any suggestions or comments you wish to make about alternative measures of outcomes

We would welcome a measure of social capital gain for reasons already expanded in previous replies.

46	Please indicate your	level of support for the following:
46.1	_	vel of support for the inclusion of n graduate entrepreneurship, in a future survey
46.1.a		Very high

47 Please share any further comments you wish to make about graduate entrepreneurship

CHEAD believes the 10% estimated uplift to compensate for under-representation of micro-businesses in proposed in the 2016 Creative Industries Economic Estimates is, again, a serious under-estimation impacting negatively on the reliability of the Estimates. It would also be of great benefit to HEIs in terms of graduate support to have more reliable and nuanced information about the patterns of self-employment, entrepreneurialism and micro-business in the cultural and creative industries.

48	Please share any
	comments you wish
	to make about Job
	title, main thing done
	in the job, or the
	SOC-coding frame or
	process

CHEAD strongly welcomes the changes outlined for a more dynamic approach to SOC coding.

49	Please indicate your	level of support for the following:
49.1	Please indicate your	level of support for continuing to collect employer information
49.1.a		Very high

50	Please indicate your	level of support for the following:
50.1	_	our level of support for removing the DLHE, if equivalent data were available from linked data
50.1.a		Moderate

51	Do you believe that the Standard Industrial Classification offers a sufficient level of detail for your purposes?	Yes
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Do you have any other comments or observations to share regarding employer information?

There is value in collecting data about the types of employer that graduates are working for, the industry the belong to and actual company names. If this information can be gained from a source other than DLHE then there is no need for DLHE to gather this information also. SIC may offer sufficient detail but we are not aware of any other classification system that could replace it. However, it is crucial that graduate services have access to this data in order to action it in developing their relationships with employers.

Would you, in principle, support the development of suitable legal arrangements for the sharing of linked

data?

Yes

#### 55 Further comments

CHEAD feels that the open data 'privacy paradox' applies - that is, whilst this will probably result in more available, accurate and comprehensive data for prospective students and other stakeholders to use, it will also open out wide avenues for invasion of privacy in this area of considerable sensitivity in UK culture (personal earnings and educational performance) - and which implications will probably be poorly understood by graduates at the outset. CHEAD considers it paramount that graduates are given as much clarity as possible on the privacy implications of such a move if it is to go ahead and that graduates' privacy is a legally enshrined priority.

Do you agree in principle that we should cease to

should cease to seek salary data by consent for UK resident graduates, and that salaries should instead be derived from linked data? Yes

<b>57</b>	Do you have any	
	further comments to	
	make about this	
	proposal?	

CHEAD welcomes greater clarity and comprehensiveness in measuring art and design graduate incomes as long as this is offset by other measures including SWB and skills and attributes. CHEAD is concerned that a crude comparison based purely on graduate income taken so soon after graduation will provide an erroneous and perversely negative impression of the benefits of art and design Higher Education and of the economic importance and high levels of personal satisfaction characteristic of careers in the Creative Industries.

58	Please indicate your level of agreement for the following:	
58.1	Please indicate to what level you agree that a question about employment basis should continue to be collected	
58.1.a	High	

59	Do you agree with the proposal that "Starting-up own business" should be removed from this question, to the question about 'activity'?	No
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60	Do you agree with the proposal that "Voluntary work" should be removed from this question, to the question about 'activity'?	No	
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61 Do you agree with the proposal that "On an internship/placement" should be removed from this question, to the question about 'activity'?

62 Do you agree with the proposal that "Developing a professional portfolio/creative practice" should be removed from this question, to the question about 'activity'?

63 Do you have any further comments to make about the collection of employment basis data for graduates?

Given the issues relating to the characteristic portfolio careers of recent art and design graduates, it is important that this kind of separation not be made between activities associated with career and 'additional' activities. For art and design graduates, it is likely that all these activities relate to career development in a far more direct relationship than exists in other career structures where voluntary work may be desirable to employers but not integral to self-motivated career development as it frequently is for art, design and those in related fields for their personal career development. This data should be solicited and related to career development at some point in the survey.

64	Please indicate your level of support for the following:
64.1	Please indicate your level of support for retaining a question that asks: "Approximately how many hours a week will you be working for your main employment?"
64.1.a	Very low

65	Please indicate your le	evel of support for the following:
65.1	questions about hours of	evel of support for removing any f work (and relying only on part-time splits gathered elsewhere)
65.1.a		High

66 Please share any further comments you wish to make about the collection of hours of work data for graduates

Again, due to the portfolio structure of early cultural and creative industries career development, it makes no sense to ask graduates how many hours they work at their 'main' job. It might very well be impossible to define 'main' employment. However, with a portfolio career, a graduate may work more hours in unassociated industries (such as hospitality, catering etc) in order to support important freelance career development in the area of their specialism. Therefore, the employment with the most hours or most earnings in the early stages of their career may not truly reflect what the graduate considers to be their 'main' employment.

Oo you agree that we should continue to seek salary data by consent for graduates resident overseas?

Yes

If we were to continue collecting salary data by consent for graduates working overseas, would you prefer to see actual salary and currency of payment collected through an enhanced survey tool?

Yes

If we were to continue collecting salary data by consent for graduates working overseas, would you favour continuing to collect details of hours worked and payment periods?

No

70 Do you have any further comments to make about the collection of salary data for graduates resident overseas?

This is an important area of measurement for our members in order to understand the impact and developmental needs of art and design higher education in an international context. We would suggest that it would follow the formula used to gather data about UK graduates where practicable.

71 Please indicate your level of support for the following:

71.1	Please indicate your level of support for the continued collection of employment location information	
71.1.a		Very High

72	Please indicate your	level of support for the following:
72.1	Please indicate your level of support for the additional collection of domicile location information	
72.1.a		Very High

<b>73</b>	Do you have any	
	further comments to	
	make about the	
	collection of location	
	information?	

CHEAD strongly endorses collection of location information from graduates. We do not believe that linked property data is key given that, again, it introduces unnecessary privacy issues as granularity of precise address seems of little relevance.

74	Please indicat	e your level of agreement for the following:
74.1		your level of agreement with the skills-based approach in a future survey of graduates
74.1.a		Very High

75	What advice would
	you give us to help
	maximise the value
	and minimise the
	costs of our
	approach?

This can be more usefully answered by our individual member HEIs.

students at 6 or 18 months distance from graduation may not be able to assess the use of what are often higher-order skills acquired through study in art, design and the related fields in what are likely to be entry-level positions. Nevertheless, given the level of entrepreneurialism in the creative sector, there may be a significant proportion of graduates who will be able to answer meaningfully.	76	Further comments	from graduation may not be able to assess the use of what are often higher-order skills acquired through study in art, design and the related fields in what are likely to be entry-level positions. Nevertheless, given the level of entrepreneurialism in the creative sector, there may be a significant proportion of graduates who will be
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77	Please indicate your level of support for the following:	
77.1	Please indicate your level of support for the continued collection of information about how a job was located	
77.1.a		Very High

78	Please indicate your level of support for the following:	
78.1	Please indicate your level of support for the addition of new categories	
78.1.a		Very High

81	Please indicate your level of support for the following:
81.1	Please indicate your level of support for retaining a question about the reasons for taking a job, in the current format

81.1.a		Very High	
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82	Would you
	recommend any
	changes to the
	question about
	reasons for taking a
	job? Please explain

This should connect with elucidation of portfolio career choices.

83	Please indicate your level of support for the following:	
83.1	Please indicate your level of support for a separate question that asks the graduate to self-assess whether their work plans are "on-track"	
83.1.a		Very High

84	What wording would
	you suggest for this
	question?

How does your current occupation(s) relate to your overall career development plan?

### Please explain your reasoning

Again, this relates to the prevalence of portfolio career development characteristic of the ADM sector and delayed achievement of key career aims. Asking about how their current occupation fits into their overall career development plan is a clearer question than 'are you on track' - a graduate might find this latter type of question far too ambiguous and their responses lack clarity.

87	How would you define work-based learning? How would you delineate the difference between work-based and work-related learning, if at all?	This should be answered in detail by individual HEIs.
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88	Please indicate your level of support for the following:	
88.1	Please indicate your level of support for collecting data about placements and other work-based learning in a future data product	
88.1.a	Very High	
88.a	Please explain your answer	Again, this will vary and will be taken up by individual HEI responses.

Work-based learning in the forms of placements, apprenticeships, sandwich placement and internships would need clear definitions. What definitions would you offer?	up by individual HEI responses.
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90	Is there anything else that should be	Again, this will vary and will be taken up by individual HEI responses.
	included in data on work-based learning?	

91	Is there anything that should be excluded from data on work-based learning?	Again, this will vary and will be taken up by individual HEI responses.
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92	Please indicate your level of support for the following:	
92.1	Please indicate your level of support for collecting data about work-related learning in a future data product	
92.1.a		High
92.a	Please explain your answer	Again, this will vary and will be taken up by individual HEI responses.

93 Examples of types of work-related learning, if collected, would need clear definitions. What examples would you give, and what definitions would you offer?	Again, this will vary and will be taken up by individual HEI responses.
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94	Is there anything else that should be included in data on work-related learning?	Again, this will vary and will be taken up by individual HEI responses.
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95	Is there anything that should be excluded from data on work-related learning?	Again, this will vary and will be taken up by individual HEI responses.
96	Do you currently hold information about either students' work-based or work-related learning as structured data?	No
97	Would you be prepared to share details of how you structure these data, and if so, please let us know more about your system(s)	Again, this will vary and will be taken up by individual HEI responses.
98	Does your HE provider currently produce the HEAR?	No
100	Do you agree that, in principle, placement data would be better captured during study, rather than after a graduate has left?	Yes

101	Further comments	Again, this will vary and will be taken
		up by individual HEI responses.

102	Please indicate	your level of agreement for the following:
102.1	Please indicate the level to which you agree that collecting data about non-course-related employment would add value to national HE datasets	
102.1.a		Very High

<b>103 Further comments</b> ADM graduates are frequently employed in creative jobs outside of creative industries.
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When do you thin would be best to collect these data	
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105	We welcome	We do not believe this is a significant
	exploratory	issue for our sector.
	comments on any of	
	the above,	
	particularly from	
	professional,	
	statutory and	
	regulatory bodies.	

106	Where should we aim (On a scale from 1 to 10, where 1 indicates that minimising costs is the main imperative and 10 indicates that maximising the value of data obtained from the current cost base ought to be the approach)	
106.1	Where should we aim?	
106.1.a		10 (Maximising the value of data)

107	Further comments	Fine-grained and comprehensive data is extremely important in the ADM sector where graduate motivation and destinations are complex and underrepresented.
112	Further comments on survey timing	We have answered in detail but would welcome further discussion as we remain unsure.

113	Comments	CHEAD broadly welcomes a more natural narrative 'arc' to the Survey which we believe will make it easier for graduates to respond and thus improve participation.
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114	Please indicate your le	evel of support for the following:
114.1	Please indicate your level of support for the adoption of an appropriate externally-recognised standard for a future survey of graduates	
114.1.a		Moderate

115	Further comments	CHEAD would moderately welcome the credibility of an externally recognised standard on condition that these are academically rigorous and sufficient flexibility was offered by customisable sections or follow-on questions.
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116	Please indicate the	e level of value for the following:
116.1	Please indicate the level of value the DLHE contact process holds for your HE provider (separate to the collection of data)	
116.1.a		Very High
116.a	Please explain	As we have expanded in previous responses, DLHE plays a crucial and varied role not only in the provision of effective graduate services but also to the development of practice-based learning and teaching and workbased learning.

	Do you ask any additional questions supplementary to the main DLHE survey?	No
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121	What functionality or other added value would you like to see from a replacement for DLHE?	Again, this is a question best taken up by individual HEIs.
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122	Comments on	Again, CHEAD will leave this to
	implementation	individual HEIs

# Would you, in principle, support the development of suitable legal arrangements for the sharing of some individualised linked data?

Further comments  CHEAD would cautiously welcome better use of linked data but is unable to comment on whether this would be acceptable to its intended users or on suitable legal frameworks without consulting graduates as to their feelings and opinions on the matter - for which time has not been made available. We are unable to commit on behalf of future graduates whose opinions we have had no opportunity to consult. Furthermore, this is a complex field of regulatory law on which we do not feel competent to comment. We do, however, most strongly urge a thorough consultation process with future graduates before approaching this question.			
	124	Further comments	better use of linked data but is unable to comment on whether this would be acceptable to its intended users or on suitable legal frameworks without consulting graduates as to their feelings and opinions on the matter for which time has not been made available. We are unable to commit on behalf of future graduates whose opinions we have had no opportunity to consult. Furthermore, this is a complex field of regulatory law on which we do not feel competent to comment. We do, however, most strongly urge a thorough consultation process with future graduates before

127 Further comments	CHEAD cannot respond at this level of granularity.
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128 Suggestions Again, this is best left to individual HEIs.
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