

Our response to the Office for Students consultation on the National Student Survey

The NSS plays a key role within the sector. It is greatly valued by institutions for the intelligence it brings to drive enhancement. The survey also supports student voice and engagement to ensure accountability and provide independent information for prospective students. From a UK-wide perspective, the survey enables benchmarking across the whole of the UK. This is important for ensuring UK higher education remains world-leading and continues to challenge itself to improve its offer and value to students. Given this, we do not believe it creates a disproportionate or unacceptable burden on the sector.

1. Do you agree we should retain the current criteria for NSS core questions?

Yes

We support retaining the current criteria and believe it is still fit for purpose. We agree that the National Student Survey (NSS) should focus on the academic experience and those areas clearly within the provider's control. As described in the criteria it is also right that UK-wide interests drive the NSS development.

When the UK funders and regulators introduce new survey questions, they must set out how each question meets the agreed criteria. We do not believe this consultation achieves this with the proposed two new questions. We have expanded on this point in our response to questions five and six.

2. What are the consequences – both positive and negative – of changing to the use of direct questions for the NSS?

It is right that the NSS reflects the latest survey design best practice and can evolve. More direct questions are welcome, and most of the questions are improvements. Positively this approach removes some double-barrelled questions which were confusing for respondents. We also welcome not counting 'neither agree nor

disagree' as a negative option within the Likert scale. Receiving affirmative answers from students (whether positive or negative) is useful. But it may obscure where students do not genuinely hold strong views on issues.

While generally supportive, the final proposals will need to address the following:

- **Not all questions are well suited to the change:** For example, 'How often do teaching staff make the subject engaging?', is asked to gain insight into engaging teaching. However, the question focuses on frequency not the quality of subject engagement. There are several other examples where the survey question needs to refocus to impact over the frequency of an occurrence.
- **Longitudinal change:** A benefit of the NSS is the ability for providers to track progress and benchmark their performance over time. Widespread change without a strong justification would disrupt this unnecessarily. If the OfS make question changes they should issue advice on appropriately communicating NSS scores over different methodologies.
- **Grouping questions:** Introducing direct questions will make grouping questions harder due to varying response scales. For providers, the data will be harder to analyse and for wider stakeholders it will be less accessible. The future technical consultation should set out how to group questions. Without set groups, institutions are likely to develop their own approaches that would likely vary.
- **Onward use:** In England, the next TEF cycle will draw from a different set of NSS questions, the OfS should communicate these to providers as early as possible. We would expect the technical consultation to set out how the proposed four-point rating will aggregate to form an indicator within the TEF.

Below are some specific points related to the proposed questions as outlined in Annex D.

Learning opportunities

- 'When working with other students as part of your course, how helpful was this for your learning?'. This question has changed in focus from the 'right opportunities' for group learning to whether it was helpful. As raised in the consultation, there is a risk that negative feedback sees providers remove

rather than improve group work elements. This question could instead focus on a 'variety of learning opportunities' to work with other students.

- 'To what extent does your course have the right balance of directed and independent study?'. It is unclear how the response item 'To a very small extent' would be used, is this a negative, neutral or positive response? We recommend removing this response item.
- 'How well has your course developed your knowledge and skills that you think you'll need for your future?'. It is unclear the extent to which students will be able to judge how effectively their course has prepared them for the future. There is repetition here with HESA's Graduate Outcomes survey which covers graduate reflections. We suggest HESA's statistics are more appropriate here, as there is a risk we are asking respondents to reflect on something not yet experienced.

Assessment and feedback

- 'How often have assessments allowed you to demonstrate what you have learnt?' For this question, the frequency may not be the most effective measuring tool. We would recommend removing 'often' with 'effectively'. For some students, this question may imply assessment should cover all learnt content. However, assessments will only ever cover part of a course's content, although all the learning outcomes.
- 'How clear were the marking criteria used to assess your work?' It is unclear if this question refers to the accessibility, advertisement and availability of the marking criteria or comprehension of the criteria itself.
- 'How fair has the marking and assessment been on your course?' Marking and assessment are two distinct things. For example, whether staff mark consistently against a criteria or whether assessment is designed inclusively and there are fair opportunities to demonstrate knowledge. We note the OfS have attempted to remove confusing questions like this from the survey itself.

Academic support

- 'How easy was it to contact teaching staff when you needed to?' There is a challenge here with the expectation of students, for example, that staff are reachable on the weekends or evenings. The question does not provide insight on the interaction or resolution. It may be preferable to ask how helpful or useful they were.
- 'How well have teaching staff supported your learning?' Students may interpret this to only apply to academic staff, whereas the academic support

section intended to include a wider group of staff that support learning including librarians and other academic support staff.

- 'How often were you able to get good advice about study choices?' The term 'study choices' may be too broad. It could focus on pre-study, on-course or post-course study advice. The question could be reworded to be more specific, for example, 'How often were you able to get good advice about study choices on your course?'

Open text question

- 'Looking back on the experience, are there any particularly positive or negative aspects you would like to highlight?' If a summative question is removed, then the open text question may need greater context. For example, 'Looking back on the whole academic experience'.

In Annex D there are several places where work is ongoing for a particular question or group of questions. The finalised questions should undergo cognitive testing as a whole. Testing individual questions is key but there is often an interplay between the questions and the wording of one question can impact how a respondent replies to a later question.

3. What are the consequences – both positive and negative – of removing the summative question for England only?

We disagree with the proposal to remove the summative question in England. Providers place a high value on this question, and we do not foresee any significant benefit to justify its removal.

The summative question's regulatory function

The consultation notes that the question is not necessary for England because it does not serve a regulatory role. While the OfS does not use the summative question in the TEF or ongoing conditions of registration this does not mean it should be removed. We believe the summative question has a role in all key functions of the NSS to inform student choice, drive enhancement and demonstrate public accountability.

On public accountability, the OfS adopts a narrow definition with reference only to its regulatory role – in effect that the summative question's value is only where it fulfils regulatory activity of the OfS. Conceiving public accountability in predominantly regulatory terms was not explicit in the agreement of these principles in 2017 by the

Higher Education Public Information Steering Group (HEPISG). We believe the summative question is a marker for wider public accountability whether related to students, parents, the public or the media. Removing the summative question would weaken accountability and the accessibility of information from these stakeholders.

UK-wide consistency

The NSS is one of the few remaining policy instruments which has UK-wide consistency. Removing the summative question from England risks unnecessarily diverging practice. This change would make it more difficult for providers to benchmark. It would also be unhelpful for students reviewing their options across the four nations.

Provider insight

The existence of a summative question allows students to reflect on their whole experience – potentially drawing in areas not covered within the individual questions. It also allows providers to analyse the weighted importance students place on discrete elements. For example, a student may respond negatively to many questions, positively to a few questions and then overall provide a positive account of their higher education experience. This would demonstrate to providers the importance this student places on particular elements within the survey – an insight that would be lost without the summative question. In turn this could point to missing factors that are beyond the survey.

The summative question also holds an important place as a Key Performance Indicator for many institutions. This allows for longitudinal accountability and informs progress over time of both individual providers and the whole sector. While many institutions will focus on the individual questions, the summative question provides a valuable insight into the whole experience – something not gained elsewhere.

Onward use

We recognise that the summative question's use in league tables risks detracting from the more nuanced detail in the survey and overall focus on enhancement. However, removing the summative question would not solve this. There is a risk league tables may develop other measures based on equal weightings which would create less robust information for students.

We do not believe that this question generates significant burden for the sector to engage with. Rather it cuts the burden through giving an overall comparison that is UK-wide.

4. Should we retain the current summative question for Scotland, Northern Ireland and Wales or move to the revised question with a focus on quality not satisfaction?

A resounding priority across institutions in all four nations is for a consistent singular summative question. Whether this means retaining the original question or moving towards a focus on quality is secondary to this. The benefit of the original question is that it would keep a time series. However, we would also be comfortable with a wording change that focuses on quality. If done, the OfS will need to ensure the term 'quality' is cognitively tested with students.

5. Should a question on freedom of expression be offered as an additional question after the core questionnaire?

UK universities are committed to promoting and protecting free speech and expression, which we see as critical to the success of this country's higher education system. However, we do not believe the proposed question on 'freedom of expression' meets the NSS's core criteria to 'Address issues of enduring importance in UK higher education rather than transient policy interests'.

UUK will be working closely with the forthcoming Freedom of Speech Champion and will shortly be publishing a strong sector commitment – endorsed by our Board – which reaffirms our collective commitment to promoting academic freedom and free speech. This will include a clear statement on staff and students not feeling the need to self-censor lawful views, and we will be promoting this statement widely and encouraging our members to make similar public commitments. Given this activity there is a risk that including this question may make it harder for students to navigate where to direct their concerns, whether that is to the OfS, OIA, their own institution or to report it through the NSS.

The pilot's cognitive testing showed a high number of 'don't knows', impacting on the usefulness of the data. The proposed question itself is also susceptible to different readings. Respondents may interpret 'expression' as able to express their beliefs (even if controversial), alternatively students may take it to mean they feel able to express themselves (potentially due to an institution taking a strong stance against things such as hate speech). Based on this, we do not believe the response scale is clearly 'measurable'. The result is that this question is unlikely to offer providers meaningful information to enhance their practice.

If the wider consideration of student freedoms is to be included, we suggest this is framed around belonging and identity. We note with disappointment the removal of questions on 'Learning Community'. Students frequently frame freedom of expression as a matter of belonging, of the freedom to be themselves while at university. We encourage OfS to reinstate a question to the effect of 'To what extent do you feel part of a community of staff and students'.

6. Should a question on mental wellbeing provision be offered as an additional question after the core questionnaire?

The accessibility and impact of mental health and wellbeing provision is a top priority for our members. It is unarguable that the communication, availability and quality of mental wellbeing provision will impact on the academic experience of students. However, we do not believe the question in the current form meets the core criteria for the NSS.

The core criteria states questions should 'concern the academic experience, and especially learning and teaching'. Including this question would stretch the scope of the survey beyond the academic experience. The existence of mental wellbeing provision may indeed impact on a student's academic experience. However, so too will other issues such as disability support, accessibility arrangements, hardship funding and accommodation provision. These are all complex and nuanced issues. We do not believe that NSS is the right place for the question, and would favour considering alternative means of capturing data on mental wellbeing issues that are more targeted and include more sophisticated questioning.

The core criteria states questions should 'be about something higher education providers can influence'. We agree that universities have a key role to play in student wellbeing, but there are wide ranging issues outside of higher education that will contribute to a student's wellbeing (such as NHS constraints) that cannot be measured or separated from this question. If it were included, it does raise the question of exactly what support the sector on its own has the responsibility to provide. There are challenges around delineating between what universities should provide and where statutory services should start. Therefore, mental wellbeing provision in general is not wholly within the control of the provider.

Universities work closely with local NHS provision but the service on offer and its organisation can differ based on local contexts. For example, many providers don't provide full-service wellbeing provision but they work closely with local NHS provision to meet the needs. Wellbeing as a term can be unclear and refer to different

interventions. This may create confusion around service provision and would impact the validity of the survey item.

The question

We note that the question focuses on communication of the mental wellbeing support services at the provider. It is important to acknowledge that while universities often have their own in-house support services joint working with external organisations is also key to their provision. It may be better to propose a question that measures signposting to appropriate support, rather than purely in-house services.

Another challenge with this question, is that the NSS is a population survey, but mental health is an issue that will only affect some students. We should not assume that students who have not accessed services will indicate 'not applicable'. Therefore, we question that it would be relevant for all learners.

If the OfS were to include a question related to student wellbeing we would suggest focusing on sense of belonging - which has been found to have a strong correlation with wellbeing and continuation (see an [OfS insight brief from 2019](#)). We recommend retaining questions on 'Learning Community'. For example, something to the effect of 'To what extent do you feel part of a community of staff and students'.

7. What are the unintended consequences of asking questions to students on the awareness of mental wellbeing services where no support to respondents can be offered?

The unintended consequences of asking this question without offering respondent support is significant. Asking this question in a vacuum, may escalate issues facing students most at risk. Relevant support should be signposted, if this isn't possible then we would object to the inclusion of this question on ethical and safeguarding grounds.

8. Do you agree that we develop a process where the NSS is reviewed on a four-year cycle? Is the proposed timing between reviews a sensible balance between developing insight and maintaining capacity to change?

It is appropriate for the NSS to have a transparent review process. While we don't have strong views, we feel that four years may be too short, given the need to undertake cognitive testing. However, we also recognise it is helpful for the NSS to link operationally to the TEF. A way through this may be to commit to only change minor elements of the NSS every four years – rather than a more comprehensive review.

There is a risk that too frequent reviews will lead to greater divergence across the UK overtime and the loss of longitudinal data. We would also suggest creating a sector-wide group – similar to the previous UK Public Information Steering Group – to bring together students, institutions, sector representatives, UK-wide funders and regulators to reflect on the survey on an ongoing basis and to ensure a four-nation collaborative approach informs the future of the NSS.

9. What would be the impact on students and providers of the fieldwork period running from mid February to the end of April for all providers?

We support this proposal. The introduction of Data Futures provides an opportunity to reuse data and reduce the data collection burden on providers. The OfS will need to monitor whether the response rate remains strong. It is worth noting the diversity within the sector when it comes to timetables and assessment periods. The current window enables providers to adapt to match their term dates. There may also be challenges for students starting a placement in their second term – under the current system providers can start their survey earlier to enable them to respond.

10. In relation to the design and use of the NSS in Wales, what effect (if any), positive or negative, will the proposals outlined in this document have on:

a. opportunities for persons to use the Welsh language?

N/A

b. treating the Welsh language no less favourably than the English language?

N/A

11. In relation to the use of the design and use of the NSS in Wales, how could the proposals be changed so that the policy decision would have positive effects, or increased positive effects, on:

a. opportunities for persons to use the Welsh language?

N/A

b. treating the Welsh language no less favourably than the English language?

N/A

12. Did you find any aspects of the proposals unclear? If so, please specify which, and tell us why.

The status of the two newly proposed questions within the survey is unclear. Are these intended to be permanent features of the NSS, or will new questions rotate after several cycles? Irrespective of the status and ordering of the questions we do not support new questions being added without consultation (as occurred with questions related to the pandemic).

From a survey design point of view, it is unclear why are they included after the other core questions. There is a lack of clarity about what this consultation and these proposals now mean for the optional bank. For example, will the optional bank questions undergo question changes, and will this happen in time for the next cycle?

13. In your view, are there ways in which the objectives of this consultation (see paragraph 7) could be delivered more efficiently or effectively than is proposed here?

The five-week timeline given to respond to this consultation will impact on the quality and quantity of responses. This is a theme we have raised in previous consultations. This has been made worse through the consultation period occurring over August, a time when staff take annual leave, boards typically do not sit, and many in the sector are busy with admissions activity.