

INDEPENDENT HIGHER EDUCATION

IHE response to the OfS consultation on the approach to publication of results of the National Student Survey

May 2023

Proposal 1: Our overall approach to publication of the NSS will remain broadly similar to previous years, with publication at provider level and sector level, thresholds and aggregation.

Questions for proposal 1

1. To what extent do you agree with our proposals to publish NSS results at a sector and provider level?

1. IHE supports the Office for Students' (OfS') intention for the National Student Survey (NSS) to continue to be a trusted data source which informs prospective students' choices, supports universities and colleges to improve the student experience and aids public accountability.
2. It is difficult for IHE to answer the question about the extent to which we agree with the proposals to publish NSS results at a sector and provider level without member providers having had the opportunity to see data first. The changes proposed the publication of the NSS are significant, and our members often have challenges with the survey matching student experience in their unique courses. Assumptions are very difficult to make from the user testing available. When previous iterations of the NSS were changed, there was sufficient time to review and evaluate changes proposed. This has not been enabled for the 2023 survey.
3. Future exercises should also endeavour to enable the sector to assess the impact of new questions, collection methods or publication on students that may potentially be disadvantaged such as international students or students with protected characteristics. Feedback from practitioners in this area is critical to the

success of new survey questions or methods and they should be supported to engage with access to relevant data.

4. Additionally, the consultation period has been a challenging time for providers, especially HE data professionals, to consider and respond whilst in the final phases of the new Student return for Data Futures (31 May submission deadline). Many IHE members have said they will be unable to respond to the consultation despite the wish to do so.

5. IHE is broadly supportive of the principles of sector publishing outlined in the consultation. Importantly, data on students' personal backgrounds at sector level will inform and inform sector's ability to deliver on access, diversity and widening participation targets.

6. However, whilst we agree with the principle of enhanced provider level publishing, there are caveats to our support which are detailed in our consultation response.

7. For the publication of NSS results beyond 2023, when given a hypothetical choice between publishing in July or August, a significant majority of IHE members felt that publication of results should take place in July. This would ensure that data was released before the August student recruitment activity occurs and allow providers to analyse data ahead of their largest cohorts enrolled in September/October.

2. Do you agree with our general approach to determining publication thresholds?

8. We agree with the proposals to continue the current approach to setting publication thresholds. The current thresholds are important for protecting students, and ensuring that the response from students is representative. It is particularly important to our members, many of whom have very small NSS populations, that their students feel confident responding to NSS questions and protecting student identities plays a significant factor.

9. We support the proposal in paragraph 41, that seeks to boost anonymity of respondents by suppressing responses that are unanimous or close to unanimous. We would however caution that this has a higher likelihood of suppressing responses from smaller providers where the experience of the student is more likely to be shared by their peers. We would welcome the opportunity to explore with the OfS what steps could be taken to support a greater publication of small population results.

10. Further to this we urge the OfS to consider setting additional risk parameters where results are 'close to unanimous'. Where the results are close to unanimous we propose OfS set the existing threshold of 10 students for the responses that differ from the majority. For example if 98% of students respond positively to a question, but the 2% who do not respond positively include more than 10 students, the publication would not be suppressed. If the population who do not respond positively include less than 10 students, the unit would be suppressed. OfS could also consider publishing responses which combine the responses deemed 'positive' and 'negative' as per the proposals further in this consultation, to enable data that is more comparable, but still protects students, to be published.

11. IHE welcomes the proposal for the OfS to consider exceptional suppressions (para 36f). For smaller providers exceptional circumstances during the survey period

are likely to have institution-wide impacts and this would ensure that the risk that the data is not representative is evaluated and action taken where necessary.

12. We support OfS's broad approach to setting thresholds beyond 2023 however we encourage OfS to engage with the sector, through formal or informal consultation, or through the NSS external advisory group, once the data has been released to providers and the public. As we have mentioned previously, IHE members are concerned that they cannot fully understand the potential implications of these proposals without access to their specific data.

13. In considering lowering the 50% response rate threshold beyond 2023, we welcome the examination of non-response bias. We feel strongly however that any future decisions to publish responses where the response rate is below 50% allow for providers to be notified of this intent and to submit contextual evidence which could help support a greater understanding of risk in publication, especially where it may indicate bias in the group that has responded. For example, members who have had low response rates in the past have seen specific groups of students such as those on placement or those with caring responsibilities not respond due to the timing of the survey. This was particularly evident during the pandemic when students with caring responsibilities were less able to respond. In IHE members where 90-100% of students are mature, there would be higher risk that this would create a bias response.

14. IHE members were strongly in favour of publishing data over suppressing data where possible as prospective students were less likely to respond positively to the absence of data than where data might represent smaller numbers. To this end, IHE supports the use of aggregated data where thresholds are not met. We outline our thoughts and suggestions on aggregated data in question 4.

3. Are there any other considerations that we should take into account when determining publication thresholds, either now or in the future?

15. IHE acknowledges that the OfS will need to make changes to the way NSS results are published based on shifting external circumstances and data sources. IHE and IHE members welcome the opportunity to return to the question of publication thresholds once the data is released. With new questions and a new approach to responses, it is important for members to see their data, begin to understand why their unique students may have reacted to the change in the way they did, and provide further information on risks to publication.

16. We accept that the time series of the NSS will not remain intact indefinitely. Creating more reliable data for such an integral data set should be supported. IHE supports holding a review every four years, with an impact analysis undertaken to ascertain the extent to which any new questions might reduce the entire NSS cohort of potential responders, with special consideration given to how any new questions might reduce responses to fewer than 10 in certain modes and subject types (with attention paid to whether independent providers could be disproportionately affected). We encourage the OfS to use the opportunity for review to come back to some of the proposals and questions in this consultation.

17. Future exercises should also endeavour to assess the impact of new questions, collection methods or publication on students that may potentially be disadvantaged such as international students or students with protected characteristics, including where these students are concentrated in specific delivery

models such as online delivery, or levels of study such as the “other undergraduate” category.

4. Do you agree with our general approach to determining whether we aggregate across years?

18. IHE agrees with the general approach to determining aggregating across years. There is a strong preference amongst IHE members to aggregate across years, with many feeling this gives a clearer picture of provider institutions rather data than individual cohorts.

19. IHE supports the intention, stated in Paragraph 71, to review the data each year in order to decide whether or not to aggregate.

20. IHE suggests the OfS seek to aggregate three or more years of data as this is more likely to meaningfully show patterns of improvement or deterioration over time – useful for students, prospective students, providers and the public good – than a two year aggregation where a 0% score one year followed by a 100% score then next year (or vice versa) would be averaged out to 50% result. Further, IHE would suggest that the OfS develop an aggregation threshold where it would not aggregate data where there is significant statistical difference between NSS scores over years or between categories such as course. This would ensure prospective students have a more representative data set, and motivate universities and colleges to improve the student experience.

5. Are there any other considerations that we should take into account when determining whether to aggregate across years?

21. IHE believes that there is merit in aggregating further than across two years, and would instead suggest aggregating across three years to a maximum of four years. This would have the benefit of mirroring Teaching Excellence Framework timescales as well as giving a stronger indicative picture of the student experience.

22. The OfS should seek to aggregate three or more years of data as this is more likely to meaningfully show patterns of improvement or deterioration over time – useful for students, prospective students, providers and the public good – than a two year aggregation where a 0% score one year followed by a 100% score then next year (or vice versa) would be averaged out to 50% result.

6. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

23. Extending aggregation to three years would have the benefit of giving a stronger indicative picture of the student experience yet not aggregating at or beyond the TEF timescales. Small NSS populations often mean high degrees of fluctuation. Aggregating over a higher number of years does not just even out those fluctuations and help providers meet a publication threshold target; importantly it gives them an additional the impetus to make positive changes to the student experience.

Proposal 2: Positivity measure – we propose to replace the current agreement rate with a 'positivity' measure – drawing on the proportion of students who respond positively to each of the core questions and the questions on mental wellbeing and freedom of expression

Questions for proposal 2

7. Do you agree with proposals to use a positivity measure to present the NSS results? By 'positivity measure' we mean the proportion of respondents who answered the question using the first or second response option – that is, the more positive options.

24. IHE is in broad support both of the change from using Lickert scales to direct questions and the proposal to use a positivity measure, which shows the proportion of responders who answered the question using the first or second response option as a percentage figure, to present NSS results.

25. However, IHE has concerns that the positivity measure response format may not lead to an accurate representation of the data for students, providers and other stakeholders across all the new NSS questions.

8. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

26. IHE members believe that the OfS needs to make a clearer distinction between single, positive responses to individual questions and the 'positivity measures'. The similarity in terms is likely to lead to confusion for students, providers and the wider sector.

27. IHE members have expressed concerns about the pairing and equivalence of questions to create positivity measures. Indeed, this risk is highlighted within the consultation in Paragraph 80, where two questions are combined even though they have different responses options: one has "very good" and "good" for as a response for how good teaching staff are at explaining things, the other has "very often" and "fairly often" for the question on how often teaching staff make the subject engaging.

28. IHE would agree since the two positivity measures summarise different response options, they cannot be regarded as equivalent and that a percentage positivity proportion for one question may express something different from the same proportion for another question.

29. Additionally, if we look to a pairing that is suggested under Proposal 3, Summary scales for Academic Support, How easy was it to contact teaching staff? and How well have teaching staff supported your learning? IHE members observed that responses would not map easily to their internal and Teaching Excellence Framework data.

30. IHE considers that further work should be done to ensure that all student types are able to understand and respond to the new questions on freedom of expression and mental health support. For example, IHE would suggest that some international students, especially those from countries who do not have universal access to expressing freedom of belief, may struggle when answering: "During your studies, how free did you feel to express your ideas, opinions and beliefs?" We urge the Office for Students to engage with IHE and our members so that we can share a greater understanding of this issue, and more broadly IHE would encourage the OfS

to further examine what different students consider to be a positive response across all NSS questions.

Proposal 3: Summary measures for question groups – we have previously published summary measures (sometimes known as “scale scores”) which summarise responses to groups of questions. We propose to continue publishing these summary measures, provided that our review of the results confirms that they continue to be robust and helpful in interpreting the data. The summary measures would be published in autumn 2023.

Questions for proposal 3

9. Do you agree with our proposal to delay publication to autumn of question grouping until we can undertake statistical testing of their integrity?

31. It is difficult for IHE to answer the question in more detail without member providers having had the opportunity to see original data first. The changes proposed to the publication of the NSS are significant. When previous iterations of the NSS were changed, there was sufficient time to review and evaluate changes proposed.

32. IHE strongly agrees with the proposal to delay publication to autumn of question grouping, when statistical testing of the integrity of the question grouping can be undertaken.

33. For 2023 NSS data, IHE would encourage the OfS to publish the theme measures for privately for providers only within the NSS Information Portal. This would allow for providers to review their data and provide better feedback into the OfS analysis of the suitability of the pairings.

34. IHE would welcome further discussion on the groupings as whilst it is acknowledged that that individual questions may usefully map on to Teaching Excellence Framework data, many members have advised us that the groupings work less well. For example, IHE members observed that responses would not map easily to their internal and TEF data for a pairing suggested under Proposal 3, Summary scales for Academic Support: “How easy was it to contact teaching staff?” to be paired with “How well have teaching staff supported your learning?”

35. IHE providers would welcome further guidance from the Office for Students on collecting and publishing Q27 “Overall I am satisfied with the quality of the course”, the summative question which is the optional question in England, including how it should be presented on providers’ digital platforms.

36. We note that student unions are excluded from the student voice thematic grouping. Whilst many independent providers do not have student unions, members report that those who do have student unions that are an integral part of the student voice; they aren’t run independently to the provider, they are a service for students that the provider supports. IHE would therefore encourage the OFS to review the status of student unions amongst independent providers before decoupling this question from the student voice thematic question set.

10. What will the impact of a delayed publication of question grouping have on users?

37. NSS is an annual survey and the publication of this data plays a considerable role in driving improvements. Delaying the publication of question grouping could also delay providers approaches to addressing concerns, given the interplay between internal resources and the way NSS data is published and presented. However, IHE members would prefer this data is properly analysed and decisions made based on as much evidence as possible rather than the question groupings rushed to publication.

Proposal 4: splits of data presented – in publishing NSS results we use student and course characteristics, both to calculate the benchmarks and to break down the results. We propose to update the definitions of these characteristics and how they are used in the presentation of NSS results. At a provider level, we propose allowing the results to be split by mode, which would now include apprenticeships as a separate mode, level of study, and subject. At a sector level, we propose to add personal characteristics to help identify students who are not benefitting as much from their educational experience as others. Data drawing on personal characteristics would be available both UK-wide and country-specific, to meet the needs of data users across the UK.

Questions for proposal 4

11. Do you agree with the proposal to expand the current splits at sector level?

38. IHE supports the proposed introduction of sector level splits for personal characteristics to help identify students who are not benefitting as much from their educational experience as others. However, further clarification is required on how this data will be published and how it might be used by providers.

39. As we have noted in the original TEF consultation, IHE disagrees with splits that combine Level 4 and Level 5 in to the “other undergraduate” category. Several IHE providers teach only level 4 courses and find they are not comparable in experience with level 5. This will increasingly be an issue as the government rolls out its flagship Higher Technical Qualifications (HTQs) and the Lifelong loan entitlement expands provision below degree level. We urge the OfS to commit to an evaluation of the ‘other undergraduate category.’

12. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

40. IHE members support the split that separates apprenticeships from other modes of study. This would create a more transparent data set for prospective students, allowing them to compare what are very different models of study.

41. There is some concern where splits might create differentiated data sets. For example, IHE members with provision across nations were particularly interested in how UK splits vs England splits will be published, and would welcome further guidance on how they might present this to prospective students and other stakeholders.

42. Additionally, IHE members would benefit from further insight and guidance on how data showing that students are living locally to providers will be published in

the NSS results and what reflect on the impact for courses which are designed specifically for commuter students or entirely online programmes.

43. For future NSS surveys, it could be beneficial to reviewing opportunities to refine collection further so that, for example, accelerated degrees, or degrees that operate exclusively online, are a separate mode. IHE would welcome the opportunity to work with the Office for Students on this.

13. Do you agree with the proposal to expand the current splits at provider level?

44. IHE agrees with expanding some splits proposed at provider level. Given the complexity of defining taught and registered provider, we agree with proposal not to split for NSS 2023 as outlined in Paragraph 115.

45. IHE encourages the OfS to undertake work to better understand academic partnerships before reviewing potential NSS 2024 splits on teaching and registering providers.

46. We agree with the proposal to split the '25 and above' age group category into two age groups: '25-29' and '30 and above' to allow comparison with other OfS and DDB publications. Over time, as LLE opportunities are pursued, it may be useful to re-examine these age categories to better understand mature students.

14. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

47. Without access to NSS results data ahead of publication, it is difficult for IHE members to make a nuanced assessment for this consultation of the impact of separating out "standard" undergraduate student responses from, for example, responses for undergraduate courses that contain postgraduate elements. Suppression of data evidencing useful student experience data may occur in smaller providers where it hadn't when the courses were combined. The OfS should seek to reflect on this both when considering splits and when considering aggregation. This may also have an impact on courses such as MEng and BEng degrees, RIBA Diploma in Architecture (Part 2) and integrated accelerated MMus degrees.

48. Splits in traditional university setting are likely to be different to splits in small and specialist settings, and changes such as that proposed for ITT could have a different impact. For example, some IHE members teach a creative subject alongside ITT study, and this encompasses all their students. To split this data out may not make sense to prospective students. We encourage the OfS to review this in the next review of NSS with the current data available.

Proposal 5: Benchmarks – we propose to continue to use UK benchmarking as an important tool in comparing and measuring performance across similar higher education providers. We propose a number of changes to our approach. While benchmarks are currently published only for sector-level and provider-level results, we propose extending our approach so that benchmarks are included at every level of aggregation. We propose, as a provisional approach, changes to the factors used to calculate the benchmarks. We further propose to review this provisional approach once the full NSS 2023 results are available, and to make further changes to the approach (either for the 2023 publication or subsequently) if there is evidence to support this.

Questions for proposal 5

15. Do you agree with the factors used in our proposals for benchmarking?

49. IHE supports the intention to continue to use UK benchmarking as an important tool in comparing and measuring performance across similar higher education providers. This is especially important where providers teach predominantly to mature students or other specific groups, to ensure that students have a clear point of comparison. We encourage the OfS to consider adding accelerated degrees and online delivery into their benchmarking considerations.

16. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Proposal 6: healthcare, allied health and clinical practice placement questions – we propose to publish these questions once we have been assured that the students targeted for these questions accurately reflect the intended recipients. This means they will not be published in the initial NSS 2023 publication but will be made available subsequently if there is evidence to support this.

Questions for proposal 6

17. Do you agree with our proposed approach for the publication of questions relating to healthcare, allied health and clinical practice placements?

50. IHE agrees with the proposed approach, not least because Members remain unclear how their applied health students responded to these questions when asked for the first time. Many expressed concern of the suitability of the questions for current and future cohorts. More work is recommended in this area to understand the applicability of these questions. Broadly members support additional questions for these students.

51. The Proposal has been discussed widely within the membership, not only by members with current AHP, healthcare and clinical practice placements but by those providers who may have these placements in the future.

52. Moreover, IHE would like to suggest that in future years, the OFS explore extending NHS placement questions to other disciplines.

18. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Other questions on the consultation

19. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.

53. It was unclear from the consultation how published data is likely to be used and presented, including how positivity measures should be displayed by providers.

54. IHE would like to work with the OfS so that there can be early notification for members of how data is likely to appear and how IHE members can incorporate NSS applications into their websites. This is particularly relevant to the publication of theme measures.

55. IHE providers would welcome further guidance from the Office for Students on collecting and publishing Q27 "Overall I am satisfied with the quality of the course", the summative question which is the optional question in England, including how it should be presented on providers' digital platforms.

56. IHE would welcome the opportunity to work with the OfS as Lifelong Learning Entitlement plans mature and the potential for the NSS being extended to shorter and more technical courses increases.

20. In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?

57. It has been difficult for IHE to answer questions in the consultation and consider the wider implications of the proposals without member providers having had the opportunity to see data first. The changes proposed the publication of the NSS are significant, and our members often have challenges with the survey matching student experience in their unique courses. Assumptions are very difficult to make from the user testing available. When previous iterations of the NSS were changed, there was sufficient time to review and evaluate changes proposed. This has not been enabled for the 2023 survey.

58. As indicated earlier in our response, the consultation period has been a challenging time for providers, especially HE data professionals, to consider and respond whilst in the final phases of the new Student return for Data Futures (31 May submission deadline).

59. The timing of the consultation period has also been difficult for HE representative bodies and agencies, and IHE would request that the Office for Students works with the NSS External Review Group and others to discuss potential changes ahead of any formal consultations.

60. Future exercises should also endeavour to assess the impact of new questions, collection methods or publication on students that may potentially be disadvantaged such as international students or students with protected characteristics.

21. What effect will the proposals have on:

- a. opportunities for persons to use the Welsh language?
- b. treating the Welsh language no less favourably than the English language?

61. No comment

22. How could proposals be changed so that the policy decision would impact positively on, or not impact negatively on:

- a. opportunities for persons to use the Welsh language?
- b. treating the Welsh language no less favourably than the English language

62. No comment