

Publication approach to the results of the National Student Survey: Analysis of consultation responses

**A report by Pye Tait Consulting for the
Office for Students**

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Executive summary

Background

The Office for Students (OfS) is the independent regulator for higher education (HE) in England.

As part of this, every year the OfS commissions the National Student Survey (NSS) on behalf of the UK funding and regulatory bodies – the Higher Education Funding Council for Wales (HEFCW), the Department for Economy Northern Ireland (DfENI), and the Scottish Funding Council (SFC).

The NSS is issued for completion by final year undergraduate students at UK universities. It has been conducted annually since 2005 and attracts a response rate of around 70 per cent each year – approximately 330,000 students.

A consultation by the OfS took place in 2022 on changes to the NSS which resulted in revised questions seeking greater depth about students' perceptions of their academic experiences. As a next step, in 2023 the OfS published an open consultation setting out six proposals about the publication of the NSS survey results. An overview of each proposal is provided at the start of each subsection in Key findings (section 2), and the detailed proposals are set out in Appendix 1. Taking into account the feedback received to this 2023 consultation, the OfS will publish the consultation analysis and its decisions, alongside the NSS 2023 public data, on 10 August 2023.

This report provides an analysis of 109 unique responses received on the OfS's proposals relating to the presentation of results of the revised National Student Survey (NSS).

Key findings

Broadly supported proposals

Almost all the proposals are supported by most respondents. For example, 78 of the 94 (83 per cent) responding to the first proposal agree that the NSS results should be published at a sector and provider level. An even greater proportion at 93 per cent (87 of the 94 respondents) agrees with the second proposal to use a positivity measure to present the NSS results. Some 71 per cent (65 of the 92 respondents) agree with the fourth proposal to expand the current splits of data at sector level and nearly two thirds (56 of 87 respondents, 64 per cent) agree with the suggested benchmarking factors (proposal 5). The majority (59 of the 86 respondents, 69 per cent) also agree with the OfS proposed approach for the publication of questions relating to healthcare, allied health, and clinical practice placements (proposal 6).

The most noteworthy disagreements are raised about the following points within the six proposals. For proposal 1, there is a view (12 of the 94 respondents, 13 per cent) that aggregating data across years could be misleading and hard to interpret. For proposal 3, concern is noted that delaying publication of question grouping to the autumn could impact institutional use of data – that is, planning for the following academic year, and student support and recruitment activities (51 of the 95 respondents, 54 per cent). For proposal 5 there is an element of disagreement with the factors used in the proposal for benchmarking,

particularly protected characteristics (for example, sex and ethnicity) or the location of certain providers (seven of the 87 respondents, 8 per cent). For proposal 6, there is some disagreement with the proposal to not publish the data relating to healthcare, allied health, and clinical practice placement questions with the initial NSS 2023 results (10 of the 86 respondents, 12 per cent).

Proposal 1: Publishing NSS results broadly in line with the OfS's previous approach to publication – at a sector and provider level

Respondents most commonly note that the proposal allows for comparison of provider results with those of their competitors; however, the data could be too detailed and potentially misleading for the student cohort. They think the approach has been robust and consistent over the years and as a result does not warrant many changes. Respondents would, however, welcome clarity, including methodological considerations, on the changes that will be implemented. Some disagree with the proposal for the suppression of the results when there is a 100 per cent response rate and results are close to unanimous. They also feel that aggregation might hinder comparison across providers.

Proposal 2: Positivity measure for each question

Respondents most frequently say that a positivity measure to present NSS results aligns with the previous agreement rate, which allows for sector comparisons and is the most favourable method to report results for each question. The new four-point scale will increase the accuracy of responses through removing the option to neither agree nor disagree and introducing the 'this does not apply to me' option. Respondents elaborate on their agreement with the proposal by noting it will help institutions to interpret and disseminate the results more easily to their members of staff, emphasising that this is the most sensible approach owing to its similarity to the agreement rate used in previous years.

Proposal 3: Publication of theme measures

Overall, the delay is welcome, to allow time for the careful completion of statistical analysis. However, respondents mention that it could impact the students who use the NSS results to inform their decision about which institution they would like to attend. Additionally, they note that the delay might cause a duplication of work for higher education providers who will undertake time-consuming analysis to respond to results. They highlight that it could impact the provider planning that usually happens in the summer. Finally, respondents would like more clarity around the timings of the publication of results.

Proposal 4: Splits of data presented on the OfS website

Respondents most commonly find the proposed splits both at sector and provider level useful as they bring NSS results into alignment with other OfS frameworks. Additionally, they note that increasing demographic data and greater granularity help to boost insight by, for instance, improving the ability to contextualise results, identify trends, compare institutional performance, and identify areas for improvement. Suggestions for improvements relate mostly to factors of study, particularly mode of study.

Proposal 5: Benchmarks

While most respondents agree with the proposal, the majority do not provide further comments. However, those who disagree most commonly refer to protected characteristics,

especially the factors of sex or ethnicity, or their disagreements relate to provider types and location. Suggestions for improvements are most frequently about factor groupings, particularly in relation to disputing protected characteristics groupings.

Proposal 6: Healthcare, allied health, and clinical practice placement questions

Respondents most commonly think that waiting to publish results relating to healthcare, allied health, and clinical practice placements is sensible, that the delay is reasonable, and a review of how the changes have affected results is a good choice to make. Further, some note it will enrich the current data, while several are in favour of publishing the data regardless.

General comments

Overall, respondents would welcome more clarity across the proposals, especially relating to those around suppression of data, key aspects of data delivery, methodology, and timings. In terms of consultation effectiveness, respondents note it would have been better if the consultation was published earlier in the year. Additionally, they suggest a shorter consultation document enhanced by the use of visual elements. Finally, respondents most commonly feel that the proposals have no negative effects on the Welsh language.

1. Introduction

1.1 Background

The Office for Students (OfS) is the independent regulator for higher education in England. It aims to ensure that every student, whatever their background, has a fulfilling experience of higher education that enriches their lives and careers.

As part of this, every year the OfS commissions the National Student Survey (NSS) on behalf of the UK funding and regulatory bodies – the Higher Education Funding Council for Wales (HEFCW), the Department for Economy Northern Ireland (DfENI), and the Scottish Funding Council (SFC).

The NSS gathers students’ views on the quality of their courses which helps to:

- inform prospective students’ choices,
- support universities and colleges to improve the student experience, and
- support public accountability.

The NSS is for final year undergraduate students at UK universities. It has been conducted since 2005 and attracts a response rate of around 70 per cent each year – approximately 330,000 students. The survey is conducted between January and April. NSS results are publicly available on the Discover Uni undergraduate course search and the OfS website.

A consultation¹ by the OfS took place in 2022 on changes to the NSS which resulted in revised questions seeking greater depth about students’ perceptions of their academic experiences, to ensure the NSS remains fit for purpose. Prior to the consultation, the OfS held discussions with sector representatives, students, and providers, which were used to develop seven proposals relating to the changes to the questions. These proposals, along with the decisions taken following the consultation, are outlined below.

Table 1. Proposals and decisions from the 2022 consultation on the NSS changes

Proposals	Decisions
Proposal 1: The criteria for the core NSS should remain as agreed in 2017	The current criteria remain fit for purpose and should be retained.
Proposal 2: Changes to the survey questions to include a move to direct questions	The survey should use direct questions with a four-point scale from 2023.
Proposal 3: A new summative question for Scotland, Wales, and Northern Ireland and the removal of the summative question for England	The summative question should be removed for England. The summative question should continue with the existing summative question for Scotland, Wales, and Northern Ireland.

¹ OfS, 2022. Consultation on changes to the National Student Survey: Analysis of responses and decisions.

Proposals	Decisions
Proposal 4: A new additional question on freedom of expression	The new question should be adopted as an additional question from 2023 for England.
Proposal 5: A new additional question on mental wellbeing provision	The new question should be adopted as an additional question from 2023.
Proposal 6: A four-year review cycle should be established to ensure the NSS continues to meet demands	There should normally be a review of the NSS every four years with scope for additional reviews as appropriate.
Proposal 7: Shortening the main survey period	The survey period will be shortened from 2025 onwards.

Following on from the 2022 consultation on the NSS changes, the OfS published a further open consultation setting out the OfS proposals for the NSS survey results publication. The consultation was launched on 29 March 2023 and closed on 26 May 2023. It was open to anyone interested in responding, either as an individual, organisation, or group.

It outlines six proposals for the publication of the revised NSS results arising from a review conducted by the UK higher education funding and regulatory bodies between 2020 and 2022. The six proposals centre on:

1. Overall approach to publication of the NSS results
2. Replacing the current agreement rate with a 'positivity' measure
3. Summary measures for question groups
4. Splits of data presented
5. Benchmarks
6. Healthcare, allied health, and clinical practice placement questions

In May 2023, Pye Tait Consulting, an independent research agency, was commissioned to undertake an analysis of the consultation responses. This report presents the findings from the analysis of all responses received to the consultation.

Taking into account the feedback received, the OfS will publish the consultation analysis and decisions alongside the NSS 2023 public data, on 10 August 2023.

1.2 Aim and objectives

The overarching aim of this research was to analyse all responses received to the consultation and to report the outcomes to the OfS. Specific objectives were to:

- conduct an objective and comprehensive quantitative and qualitative analysis of all responses to the consultation,
- identify and categorise themes, focus areas, or questions, and
- report on the findings.

1.3 Methodology

1.3.1 Consultation approach

The OfS developed the consultation questionnaire which comprised eight core sections on different aspects of the proposals: an 'about you' section, one section for each of the six OfS proposals, and a final section capturing general comments. The final consultation questions can be found in Appendix 1, and the structure of this report mirrors that of the consultation.

The consultation window was open from 29 March to 26 May 2023. The main route through which to submit responses was the OfS online 'smart survey' portal. In total, 109 responses were received, of which 104 were received through the online portal, while five offline responses were received by email/letter.

The OfS shared all responses with Pye Tait Consulting, having first removed any personal data from responses where consent had not been granted in line with OfS's privacy policy and data sharing agreement. Pye Tait Consulting then undertook onward analysis of all responses.

1.3.2 Approach to the analysis

Before undertaking a detailed analysis, responses were first reviewed and cleaned. This process involved checking for campaign responses, errors, blank, or duplicate responses. A total of 121 responses were received, of which 116 were online and five offline. Twelve blank responses were found and removed, leaving 109 unique, valid responses for onward analysis.

Responses were analysed at an overall level, and subsequently subgroup analysis was undertaken to explore any notable differences by:

- organisation type,
- respondent type, and
- country/region.

Qualitative analysis of responses received to the open-ended questions was undertaken by Pye Tait Consulting in three successive stages:

1. High-level review of all responses to identify broad themes and sentiment.
2. Identify key themes arising to each question. Based on this, a coding framework was developed by Pye Tait Consulting, with checks for inter- and intra-coding consistency, and finalised in collaboration with the OfS.
3. A comprehensive review to code each response according to the coding framework, to identify frequency of themes overall and by respondent subgroup.

On completion of each of the above stages, outcomes were discussed with the OfS before moving forward to the next phase.

1.3.3 Interpretations and limitations

An open consultation of this nature does not seek to be a representative sample of the whole population. The implication of self-selection bias is that an assessment of views can be made only for the respondents who choose to participate and will not represent the entire

target population, but rather a small subset. As such, the findings should be interpreted with that caveat in mind.

It should be noted that some responses were received from representative bodies reflecting the views of their community. Organisational responses, including those from representative bodies, have not been weighted in the analysis – in effect, this means each response has an equal weight, although trends by organisation type are drawn out in the report. Trends by country are also highlighted in the report, where notable differences between the countries have been found. However, as the majority of responses to the consultation came from England, we indicate only where there are exceptions to this. The reader is advised to bear these points in mind when interpreting the report.

Each subsection outlines the number of respondents providing views in response to that question. The numbers and percentages quoted relate to each consultation question being discussed, not to the overall total number of consultation respondents.

Some respondents provided comments that covered more than one of the themes identified as most commonly arising within each question and analysis. Further, some respondents provided comments which ‘agreed’ with one aspect of one proposal and ‘disagreed’ with a different aspect of the same proposal. Responses for each theme/code were counted, meaning some responses were counted more than once per question as more than one theme/code was covered. The result is that numbers in the report may not add up to 100 per cent.

The final coding book containing all coded responses for each question, developed by Pye Tait Consulting, has been provided to the OfS.

Note that some anonymised quotations from respondents are included in the report. These extracts are included to provide examples that reflect the most common points raised.

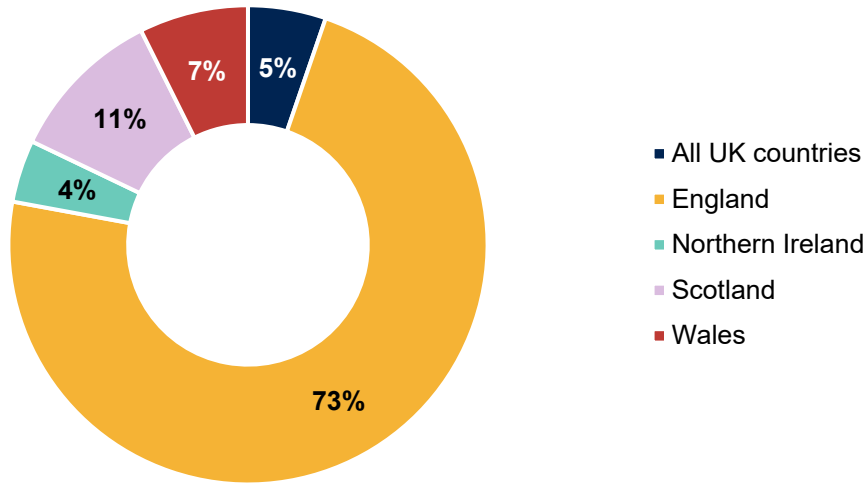
1.4 Respondent profile overview

Of the 109 valid responses received, three quarters (82 or 75 per cent) were submitted by organisations with 14 (13 per cent) from individuals. Remaining respondents did not consent to this information being provided.

Respondents representing views of an organisation were asked to select their organisation type from a pre-defined list of options. Of the 80 (two did not clarify) who answered this question, the vast majority (96 per cent) are higher education providers, while 3 per cent are sector representative bodies, and 1 per cent are private organisations.

Approximately three quarters (73 per cent) responded to the consultation with regard to the impact of the changes for England, around one in ten (11 per cent) responded with regard to Scotland, and a few with regard to Wales (7 per cent). The option for all UK countries was completed by 5 per cent and for Northern Ireland by 4 per cent.

Figure 1. National breakdown of consultation respondents



Base: 95 respondents

Source: OfS consultation, 2023

2. Key findings

2.1 Proposal 1: Publishing NSS results broadly in line with the OfS's previous approach to publication

Summary of proposal 1: Publishing NSS results broadly in line with the OfS's previous approach to publication

- The OfS proposes its approach to publication of the NSS will remain broadly similar to previous years, with publication at provider level and sector level, thresholds, and aggregation.
- The OfS proposes its approach to determining publication thresholds, where data might need to be suppressed to protect respondent confidentiality or to maintain the quality of the data. This proposed approach was developed bearing in mind considerations around data protection, the needs of data users, and the risk that results might be misrepresentative of the publication (for example, owing to a low response rate).
- The OfS proposes its approach to data aggregation, where the amount of publishable results is increased by allowing results to aggregate across years. This proposed approach was developed bearing in mind considerations about the needs of data users, the extent to which aggregation might be misleading, and the need for a simple publication.

2.1.1 Extent of agreement with proposal to publish NSS results at a sector and provider level

Of the 94 respondents answering this question, a large majority (78 or 83 per cent) agree with the proposals to publish NSS results at a sector and provider level. Almost half of these (35 or 37 per cent of all respondents) say they are pleased the approach is in line with previous years.

This has been extremely useful in the past for comparative and benchmarking processes and so we would support continuing with this approach. – organisation, England

Some (15 or 16 per cent of all respondents) – almost all of which (14 or 15 per cent) are collective responses from higher education providers or representative bodies – explain how this approach allows for a broad comparison of results with those of direct competitors and the wider sector.

Strongly agree, this is essential for understanding sector trends/performance and how individual providers compare. Transparency for prospective students is essential. – organisation, Wales

Four (4 per cent) discuss the merits of provider level data saying it is a useful tool for prospective students, and three (3 per cent) point to the value in benchmark data. One (1 per cent) explicitly welcomes the publication of results on the OfS website and Discover Uni, as well as making results available as data visualisations and data downloads to provide ready access to data in different formats that can be used for different purposes.

Around one in ten (11 or 12 per cent of all respondents to this question) partly agree with the proposal. Five (5 per cent) would like provider-only access to the data – namely, access to raw data. Of these, three say it would enable them to undertake comprehensive analysis, explaining that aggregated data could be restrictive. One wishes to receive provider-only data prior to the public release, commenting further that it would assist with provider preparations for the NSS data publishing, similar to the OfS approach to Graduate Outcomes. Another sees value in having access to course-level data where there are fewer than ten responses.

In contrast, one is supportive of publishing data at a sector level; however, they raise concern that publishing more detail at provider level could give a misleading impression of the student cohort because of the potential for feedback from small numbers to be misleading and not representative. Another believes the removal of the summative question for England (decided following the 2022 consultation on NSS changes) will result in an information gap for applicants when comparing providers across the UK.

Four (4 per cent of all respondents to this question) provide further suggestions. Two would encourage the OfS to confirm a publication date as soon as possible.² Another would like clarity on where data is held and at which levels across the OfS website and Discover Uni, and the other would welcome the OfS providing detailed methodology documents to aid understanding.

2.1.2 Extent of agreement with the approach to determining publication thresholds

Of the 94 respondents who provided comments to this question, over half (53 or 56 per cent) agree with the general approach to determining publication thresholds. Almost a fifth of all respondents (17 or 18 per cent) welcome the proposal because it is consistent with the approach used in previous years.

We support maintaining the existing publication threshold of a minimum of 10 responses and 50 per cent response rate for any publication unit. This has worked well within the NSS to date and is clear and transparent for all stakeholders. – organisation, Wales

One in ten (nine or 10 per cent of all respondents to this question) comment that maintaining current thresholds is important for protecting student confidentiality, so that students feel confident in responding to the NSS questions because of this guarantee. It is also noted that this approach is appropriately based on statistical validity.

² The publication date was confirmed as 10 August 2023 after this consultation closed.

Three (3 per cent) request further clarity on how the thresholds and suppression will be applied, including a suggestion of having worked examples.

One (1 per cent) highlights how the proposed approach will provide users with meaningful data and will aid publication for small cohorts. There is further comment (one or 1 per cent) that only minor changes should be undertaken without further consultation and, if changes are to be made in 2024, they should be clearly communicated to the sector. While there is a suggestion that the requirement for a response rate of at least 50 per cent may be high, it is acknowledged that the OfS has shown a commitment to investigate and to lower this figure if the non-participation bias suggests a need (one or 1 per cent).

Over a quarter (26 or 28 per cent) of all respondents partly agree with the approach to determining publication thresholds, expressing agreement with some aspects but raising concerns with others. For example, around one in five (21 or 22 per cent) are supportive of the general approach of publishing results where there have been ten or more respondents. The response rate of at least 50 per cent per 'unit', such as provider, or a subject group within a provider should be followed as proposed as it ensures confidentiality and prevents unreliable data from small data sets being misinterpreted. An additional comment states that non-publication could penalise an institution for high quality delivery and conversely deprive those of data that would highlight areas where improvements need to be made.

Twelve (13 per cent of all respondents to this question), on the other hand, do not agree with the proposal relating to suppression of data. Around one in ten (ten or 11 per cent) disagree with the proposal to suppress results when there is a 100 per cent response rate and results are close to unanimous. Five argue that suppression impacts the quality of data, noting that very high (or low) scoring units would not have their results fully understood by the provider. A further five (5 per cent) are concerned about aspects of the proposal – for instance, one comments that the suppression of data is likely to have an adverse effect on the publication of data for small cohorts who need it most – and they are unclear as to how the 'this does not apply to me' option will be used in data analysis.

Finally, simply categorising their results as 'high' or 'low' could cause difficulties in dealing with data internally and for performance monitoring and is seen to contradict one of the survey aims 'To provide data that supports universities and colleges to improve the student experience'.

The proposal to suppress results where there are 100 per cent response rates and a unanimous (or near-unanimous) response to the question is unwelcome. This risks negatively affecting those institutions with small subject cohorts, where unanimous responses and high response rate are more likely. – organisation, Scotland

Seven respondents (7 per cent of all respondents to this question) disagree with the approach to determining publication thresholds. One notes it would be disappointing if a 100 per cent positivity score returned on a 100 per cent response reporting entity were not to be visible, arguing that this risks overshadowing the good work undertaken to enhance student

satisfaction. Another states that the thresholds are more arbitrarily symbolic than statistically precise, and that the proposed approach is too broad.

Other comments raised by one respondent each include:

- Fewer than ten responses would remain unacceptable but feels that 40 per cent of a very large cohort may still represent a sufficiently large number of students for there to be no risk of identification.
- It is important that the survey is genuinely a sector-wide exercise and that all providers receive their survey results.

2.1.3 Other considerations when determining publication thresholds

Of the 75 respondents, around a quarter (19 or 25 per cent) say there are no other considerations to take into account.

Some (six or 8 per cent of all respondents to this question) are supportive of lower response rate thresholds for large providers, arguing that the results would still be statistically significant. One points out that, if a lower threshold is introduced, this may have the unintended consequence of generally lowering response rates, as some institutions may perceive this to become the new target; however, this would not necessarily be problematic.

It may be useful to consider publishing data for large cohorts that fall below
50 per cent. – organisation, Northern Ireland

A handful (four or 5 per cent) would like provider-only access to data for small cohorts, saying this would enable providers to act on feedback for smaller courses and to better understand the student experience.

A similar proportion (four or 5 per cent) say it is important to continue to consider the overt suppression of data from small cohorts, explaining that the data is as meaningful and important for enhancement and planning processes as for larger cohorts.

There are various other comments each raised by three or fewer respondents and reiterated from the previous question. For example, there is a concern that those providers with smaller group sizes will have less data published. Another comment is that there will be an impact on areas that have smaller cohorts owing to discounting the ‘this does not apply to me’ answer in the publication thresholds. Additionally, one respondent voices that any further changes should require further consultation.

The suppression of results in instances of a 100 per cent response rate and where responses are either all positive or all negative is mentioned by six (8 per cent). They highlight that even one suppression can greatly impact aggregates and suggest that suppression is not necessary where different responses are included such as ‘definitely agree’ or ‘mostly agree’. They also mention that, when data is published on other dashboards, suppressions can easily be missed by users.

One respondent queries whether suppressed results can be reverse-engineered by data users, and another notes that many providers do not meet the threshold.

2.1.4 Extent of agreement with general approach to determining whether to aggregate across years

Of the 90 respondents who provided comments to this question, almost two thirds (59 or 66 per cent) agree with the approach to determine whether the OfS aggregates across years.

Some (ten or 11 per cent of all respondents commenting) explicitly state they are supportive of not aggregating in 2023. Seven (8 per cent) agree future attempts by the OfS to aggregate across years from 2023 onwards are welcome, believing that it makes sense as it allows a greater level of publication should the analysis suggest that the approach is robust.

We agree with the general approach to determining whether to aggregate across years. We appreciate that the time series has necessarily been broken due to the significant changes to the questionnaire and that aggregation across years is not possible in 2023. – organisation, England

Almost a fifth (17 or 19 per cent) of all respondents partly agree with some (seven or 8 per cent) stating that the use of aggregation does not show true performance. Concerns are raised that providers may use this to hide poor performance, while others argue that aggregated data would be less insightful and make it more difficult for providers to spot trends across years.

Whilst aggregation can be useful it can also be misleading and can help to mask trends / direction of travel (such as a couple of positive years outcomes, then a couple of negative years outcomes). In addition, if aggregation is used, it should be very clear that this is what is being presented. – organisation, England

Meanwhile, a handful (five or 6 per cent of all respondents to this question) are supportive as it ensures that data is available for smaller subject areas which may struggle to reach the necessary threshold in a single year.

A similar proportion (five or 6 per cent) suggest that it should be made clear in publications that data has been aggregated, to aid correct interpretation of the data by all relevant stakeholders.

Other comments, each mentioned by one or two respondents, include the following points.

- It is in the interests of prospective students and providers to have sufficient data from which to create a representative score that has not been hindered by external factors or significant sector differences between years.
- When the make-up of a course changes in terms of The Higher Education Classification of Subjects (HECOS) and Common Aggregation Hierarchy (CAH) codes from one year to the next, then aggregating two years' worth of data across different cohorts runs the risk of not comparing like-for-like.
- Clearly outline the methodology used to aggregate as it will aid interpretation of the data.

- Supportive of no further consultation.
- It is important to take into consideration any external factors that may have influenced a particular year's data, such as strikes or the COVID-19 pandemic.
- Clarity on when aggregation happens in Discover Uni and so on is vital.
- It would be beneficial if the choice to aggregate lies with the provider as one year's results could impact results for three years.
- A more streamlined aggregation at programme level, rather than at subject level, particularly for Discover Uni.

2.1.5 Other considerations for determining whether to aggregate across years

Of the 70 respondents who answered this question, around one third (25 or 36 per cent) say there are no other considerations to take into account when determining whether to aggregate across years.

Several (16 or 23 per cent of all respondents to this question) believe aggregation across years is misleading as it does not allow for real comparisons across providers. Concern is also raised that this does not show true performance, can mask good years and exacerbate poor years, and that short-term issues can have a lasting impact. There is a suggestion that a direction of travel indicator be added to show how a provider's performance has changed. One also raises concern that a sector-level decision may result in a minority of providers being disadvantaged.

As aggregation across years is very problematic in guiding applicants as to the 'current' level of satisfaction we suggest that an indication of the direction of travel could also be added. E.g., provide the aggregated score of x with a positive trajectory if the score is going in an upward direction across the years. – organisation, England

Around one in ten (six or 9 per cent of all respondents to this question) suggest it must be made clear to users of the NSS data where data has been aggregated across years – for instance, to include notes on the OfS website and Discover Uni.

A further six (9 per cent) reiterate the importance of considering any external factors that may have influenced a particular year's data, such as strikes or the COVID-19 pandemic, as this can greatly impact the overall score when aggregating responses.

A handful (four or 6 per cent) highlight the importance of consistency of data when considering changes to aggregation, to ensure data sets across multiple years are comparable. A few (three or 4 per cent) comment on small cohorts, highlighting that aggregation will lead to a greater chance of publication, although they question the usefulness of the data.

There are a range of other comments, each made by one respondent.

- Aggregation should be limited to two years of data in the future as it is now.
- A suggestion for an alternative approach, such as following the Teaching Excellence Framework (TEF) student experience metrics, which contains aggregated years of NSS data for groups of questions rather than individual questions.
- The impact of CAH/HECoS code changes when aggregating data as significant changes in demographics may mean averaging over years is not appropriate.
- How providers use the NSS results should be taken into consideration when determining whether to aggregate across years.
- The feedback survey that key contacts are given following each NSS cycle could include an opportunity to comment on any issues that arise once providers have had time to assess their publicly available aggregated data.

2.1.6 Further comments on proposal 1

Of the 63 respondents answering this question, almost half (31 or 49 per cent) state they have no further comments.

Around one in three (20 or 32 per cent of all respondents to this question) are supportive of the proposed approach. Four restate how this approach to publication has worked well in previous years and how users are familiar with it. The presentation of the NSS dashboard is highlighted as a positive development which aligns with other OfS dashboards such as Access and Participation Plan (APP), the TEF, and B3/Outcomes. While confidence is expressed in the OfS to determine the statistical reliability of aggregating across years, it is recognised that this might need to change each year depending on the data. One added they would prefer it had just been implemented rather than undertaking another consultation as the summer publication date is so close.

Four (6 per cent) state they do not support aggregation of data as it can be misleading and hard to interpret.

A couple (two or 3 per cent of all respondents to this question) note that the summarised data is more difficult to work with in terms of the analysis that providers would like to do and, to enable this, they suggest publishing individualised data.

There are a variety of other comments mentioned individually by single respondents.

- A more streamlined aggregation at programme level, rather than at subject level.
- Extending aggregation to three years, as this would give a stronger indicative picture of the student experience while not aggregating at or beyond TEF timescales.
- Ensuring that small providers are not disadvantaged through publication of their results, whether or not aggregation is used.
- The OfS should factor in the number of responses received and the effort required to collect them when setting response rates.

- A reservation about the use of data suppression indicators that may undermine the usefulness of the NSS results to institutions as a source for identifying issues.
- Regarding the change of approach to calculating confidence intervals, the OfS should publish the Jeffrey's priors³ that are used in the calculations and possibly some codes so that the results can be replicated.

2.2 Proposal 2: Positivity measure for each question

Summary of proposal 2: Positivity measure for each question

- Previously, the NSS results included an 'agreement rate' for all core questions: 'strongly agree', 'mostly agree', 'neither agree nor disagree', 'mostly disagree', and 'strongly disagree'. The agreement rate was calculated as the proportion of respondents who answered the question with the response options 'definitely agree' or 'mostly agree'.
- The OfS proposes to replace the current agreement rate with a 'positivity' measure. This would be created for all core questions, as well as for the two new questions on freedom of expression and mental wellbeing provision. The positivity measure would be calculated as the proportion of respondents who answered the question using the first or second response option (the more positive options).
- The OfS also proposes that students who do not answer the question, or who answer 'this does not apply to me' would be excluded from the calculation, which would shift the analysis from a five- to a four-point scale.

2.2.1 Extent of agreement with proposal to use a positivity measure to present the NSS results

Of the 94 respondents who provided comments to this question, the large majority (87 or 93 per cent) agree with all or parts of the proposal. A handful disagree (six or 6 per cent), one is unsure, and another did not specify.

Over half (49 or 52 per cent) of all respondents to this question provide reasons why they agree with the proposal to use a positivity measure to present the NSS results. They note that the measure aligns with the previous agreement rate which allows for sector comparisons and is the most favourable method to report results for each question.

Some (12 or 13 per cent) suggest that the new four-point scale will increase the accuracy of responses through removing the option to neither agree nor disagree and excluding the 'this

³ Jeffreys prior (also called Jeffreys-Rule Prior), named after English mathematician Sir Harold Jeffreys, is used in Bayesian parameter estimation. It is an uninformative prior, which means that it gives you vague information about probabilities. It is usually used when there is no suitable prior distribution available.

does not apply to me' option from the calculation is a fairer method to handle responses rather than excluding them from the positive numerator.

The proposal is considered necessary by a handful of respondents (five or 5 per cent) who feel it is the clearest method of presenting the results of the NSS.

Those who disagree with the proposal (six or 6 per cent of all respondents to this question) do so for a multitude of reasons, including:

- Believing that all responses should be reported, including those that are negative,
- The positivity scale is complicated owing to converting a linear scale (a scale of multiple options) to a binary measure (positivity measure),
- A lack of clarity between the positive and negative options, and
- The removal of the 'overall stratification' score which will create a gap in a single overall figure to indicate how students feel overall about their experiences.

The ability to compare the 2023 NSS results when considering individual questions and with previous years is discussed by 18 (19 per cent) respondents. They raise concerns about how the 'positivity scale' might be interpreted owing to varying Likert options across different questions by students completing the survey, and higher education providers receiving the results. Some suggest introducing weighting to the scale as the positivity measures are considered more closely aligned than the two negative measures. In addition to this, they note that the change from a five-point to a four-point Likert scale might report a higher overall student experience rating, even if there has been no improvement.

A positivity measure represents the best way of ensuring all data users best understand the results, given the previous 18 years of data has been presented in essentially this way. We would however note that the change from a five-point Likert scale to specific four-point response scales is likely to affect the results of the 2023 survey and as such all comparisons with previous years' data should be avoided. – organisation, Scotland

Furthering this, eight (9 per cent of all respondents to this question) feel that the new positivity scale will increase the likelihood of a reduced differentiation between scores owing to 'bunching' at the top end, especially when comparing results as previously neutral responses were treated as negative. A higher education provider in England notes that this could impact the usefulness of NSS data for prospective students and action planning if scores are perceived as high/positive.

Higher education providers praise the summary measure (six or 6 per cent of all respondents to this question) because it allows for sector comparisons and comparisons across questions. One notes that a comparison of summary measures across questions will be challenging because of the use of different scales (wording) across questions.

A handful (five or 5 per cent of all respondents to this question) discuss the new 'this does not apply to me' option, noting that the exclusion of the option from analysis will impact on higher education providers meeting thresholds for publication. They do, however, agree that this is necessary for producing accurate positivity data. Another notes that there is a risk that

students might select this option owing to misunderstanding the question, so the OfS should ensure that all questions in the NSS are clear or are accompanied by explanations.

Further guidance is requested by four (4 per cent) higher education providers, including:

- Guidance for staff on how to interpret positivity results,
- How the use of data will be managed by the OfS in the TEF, and
- Clear communications of the change in terminology to users and prospective users.

2.2.2 Further comments on proposal 2

Of the 77 respondents who answered this question, around one fifth (17 or 22 per cent) have no further comment.

Of the 60 who did provide comment, 27 (35 per cent of all respondents to this question) reiterate that they agree with the proposal and support the use of the positivity measure within the NSS. They emphasise that this will help institutions to interpret and disseminate the results more easily to their members of staff.

Some of those who agree (13 or 17 per cent of all respondents to this question) point out that this is the simplest approach and measure and provides clarity to the results. They note that this is also the most sensible approach owing to its similarity to the agreement rate used in previous years. As well as this, a few (four or 5 per cent) note that the positivity measure also increases the comparative value of the NSS results and will be more reflective when student views are compared to the previous approach. It will also allow institutions to report and track their NSS results consistently.

A considerable proportion (27 or 35 per cent of all respondents to this question) discuss the reporting of the NSS results, with the majority discussing the use of summary measures (14 or 18 per cent). Both institutions and individuals confirm that the summary measure allows institutions to provide general overviews of how individual courses, departments, or the institution itself is performing in different areas. There is a view that higher education providers might be likely to calculate their own summary measures if they were not provided in the report, resulting in inconsistent approaches and removing comparative values across institutions.

Of those discussing the reporting of the NSS results, five (6 per cent of all respondents to this question) refer to specific data outputs:

- The OfS should consider undertaking a Grade Point Average (GPA) approach, commonly used in education, to highlight areas of concern,
- There should be more attention towards the net score,
- Base numbers should be presented alongside each question,
- The OfS should continue to use ranges similar to those of the previous version, and
- The positivity score should be presented alongside a mean score.

The use of scales within the NSS survey are referenced by around a quarter (18 or 23 per cent) of all respondents to this question. As earlier (see section 2.2.1), half of these (nine or 12 per cent of all respondents to this question) refer to the range of positivity and the removal of the middle neutral option, stating that this will increase the positivity of results. As

well as this, they are concerned about the pairing and equivalence of positivity measures – for example, grouping both ‘to a large extent’ and ‘to some extent’, when the former is significantly more positive.

Higher education providers (six or 8 per cent of all respondents to this question) emphasise a need for a consistent scale across all survey questions. They query why some questions use a four-point scale while others use five, noting that a comparable positivity measure therefore cannot be uniformly applied.

In principle yes, but confused by Paragraph 7 which refers to the five-point scale and there is no additional justification/consultation on the new four-point scale with no neutral option. How you ask the questions and how you process/interpret them need not be identical. There is literature about student perceptions of NSS questions and their alignment with what is being surveyed, so it would be very good to include evaluation of the new questions to help with interpreting; and, in particular, evaluation of the four-point scale, since such scales are well-known to distort results. –
organisation, England

Guidance is requested for data users by a few higher education providers across the UK, specifically on:

- More general and technical guidance for the use and analysis of the scale,
- Definitions of ‘positivity’, and
- Caveats for making simple comparisons between questions for audiences (including institutions and the media).

2.3 Proposal 3: Publication of theme measures

Summary of proposal 3: Publication of theme measures

- The OfS has previously published summary measures (sometimes known as ‘scale scores’) which summarise responses to groups/themes of questions.
- The OfS proposes to continue publishing these summary measures, provided that their 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.

2.3.1 Extent of agreement to delaying publication of question grouping to autumn

Of the 95 respondents answering this question, a slightly higher proportion of respondents disagreed (51 or 54 per cent) with all or parts of the proposal compared to those who agreed (47 or 49 per cent).

The larger proportion of respondents who disagree with all or parts of the proposal provide reasons (44 or 46 per cent of all respondents). Of these, half (22 or 23 per cent of all

respondents to this question) note that the delay in the publication of question grouping will impact institutional use of data; this is reported by both higher education providers and sector bodies across the UK. They highlight that the NSS data is used to support planning for the following academic year, alongside being used as a recruitment and marketing tool. This, in their opinion, will cause an additional workload for staff who analyse and report on the institution NSS results and will hinder institutions' ability to respond to the results in a timely manner.

As a result of this, higher education providers and sector bodies believe (ten or 11 per cent of all respondents to this question) that institutions will be likely to calculate their own groupings for reporting purposes, which will create inconsistencies across institutions and limit comparative value.

A handful (four or 4 per cent) feel that the delay is overly cautious as question sets and related groupings have already been consulted, tested, and confirmed and are similar to groups given previously. One expands on this, referring to cognitive testing carried out during survey development:

The OfS has already carried out cognitive testing during survey development that found that 'students understood the questions as relating to the appropriate themes', and also statistical analysis on pilot data that found 'the patterns of responses supported the proposed themes', so there does not appear to be any advantage or clear rationale for delaying the full set of results. – organisation, England

Of those who agreed with all or parts of the proposal, 29 provided further comments. The majority (24 or 25 per cent of all respondents to this question) feel that the delay is necessary as it is valuable for the OfS to take extra time and care in completing the statistical analysis.

Yes - as the survey has had some major changes we believe it would be valuable to take the extra time to undertake this work. As institutions will have the results from all the individual questions that will be the key information. – organisation, Scotland

Two others (2 per cent) discuss the potential for using groupings from other questions and publications, noting that they do not inherently relate and would be hard to compare if published without further analysis.

Proposed publication dates were discussed by over a third of respondents (34 or 36 per cent), most of whom request all data to be released in summer 2023 with disclaimers outlining its caveats (23 or 24 per cent of all respondents to this question). They report that this approach will reduce the risk of institutions conducting their own analysis that may not be accurate or consistent. As well as this, they note that publishing the report in two tranches does not demonstrate good practice and might cause more confusion.

Some provide other suggestions:

- Do not publish the report in 2023 (three or 3 per cent),

- Confirm the autumn date of publication so institutions can prepare and inform stakeholders (two or 2 per cent), and
- Ensure that all other data is published in summer 2023, even without the grouping analysis (one or 1 per cent).

2.3.2 The impact of a delayed publication of question grouping

A total of 92 respondents discuss the impact a delayed publication of question grouping will have on users.

Over two fifths (39 or 42 per cent) refer to specific impacts upon different groups that use the NSS data, with the overall message of the delay being that it will negatively impact the students who use the NSS results to inform their decisions for which institution they would like to study at. They point out that institutions use the data to inform marketing and recruitment campaigns, and the delay of its publication would also have a knock-on effect. The impact of data use on sector league tables is discussed by higher education providers (11 or 12 per cent), highlighting that a delay may cause different league tables to use different approaches for analysis, and thus create a complex comparison environment for prospective students looking to compare institutions.

Several providers (seven or 8 per cent) note that NSS grouping data is used to inform the TEF, and raise concerns that the delay of publishing such data will impact its publication and institutions' use of it. They emphasise that publication dates should be clearly set out to enable the sector to allocate resources to review, analyse, and communicate results appropriately.

Over a third (33 or 35 per cent) of all respondents to this question discuss the impact of the delay upon higher education providers. They (21 or 23 per cent) note that this will impact their planning for the academic year, which is usually developed over the summer period when the results are published to ensure they address specific themes.

This will have a significant impact on the amount of work that higher education providers will undertake to analyse and respond to the results (16 or 17 per cent), resulting in a duplication of work when the NSS is published in the summer, and then in the autumn.

Around a tenth of all respondents (ten or 11 per cent) report that they use the NSS grouping data to inform improvements to the student experience, and the delay of such will impact improvements made for the following academic year.

The timing of the NSS results coincides with informing applicant understanding of student experience for final decision making (e.g. clearing). The summative 'overall satisfaction' question has already been removed from the survey, so a further delay in publishing thematic scores could result in scores being less useful and clear for the purpose of informing student choice. The groupings enable easier comparability of institutions. – organisation, England

A third (30 or 33 per cent) report that the delayed publication of question grouping will create inconsistencies across the sector. The predominant reason for this is that higher education

providers are likely to create their own thematic groups from the NSS data for their own analysis and comparisons. This will cause inconsistencies across the sector and will limit the comparative value of the data.

Four (4 per cent of all respondents to this question) request the results are published before the 2024 academic year so that institutions can 'hit the ground running' with necessary improvements and enhancements prior to the start of the academic year.

A further two (2 per cent) respondents state that the impact upon their institutions will be dependent on the length of the delay.

A tenth of respondents (12 or 13 per cent) report that the delay would have no or only a minimal impact on their institution. They note that they do not tend to undertake complex analysis of the NSS grouping data until later in the year; they also highlight that the second publication of results will be used for benchmarking, rather than planning and enhancing.

2.4 Proposal 4: Splits of data presented on the OfS website

Summary of proposal 4: Splits of data presented on the OfS website

- In publishing the NSS results the OfS uses student and course characteristics, both to calculate the benchmarks and to break down the results.
- The OfS proposes to update the definitions of these characteristics and how they are used in the presentation of NSS results.
- At a provider level, the OfS proposes 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, the OfS proposes 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 across the UK and specific to each country within the UK to meet the needs of data users.

2.4.1 Extent of agreement with the proposal to expand the current splits at sector level

The majority (65 or 71 per cent) of the 92 respondents agree with the proposal to expand the current splits at sector level. Around one sixth (15 or 16 per cent) specify that this would be useful and would add value. Ten (11 per cent) elaborate on the usefulness of specific splits:

- Six acknowledge the benefit of additional protected characteristics splits. Three of them feel that this will allow providers to tackle problems faced by underrepresented groups of students more effectively.
- Two believe it is beneficial that subjects with teaching courses will no longer be grouped under Initial Teacher Training only.

- Two feel that the mode of study split, in particular, adds value.

We believe that adding results by personal characteristics will allow for greater contextualisation of the results and support widening access activities. – organisation, Scotland

Some (eight or 9 per cent of all respondents to this question) expand on their agreement by stating support for the alignment of data to be consistent with other OfS frameworks, such as those used for Student Outcomes, APP, and the TEF. They feel that creating consistency between the NSS and other OfS frameworks is a sensible and helpful approach.

Additionally, one agrees with the proposal as it would allow them to compare and highlight areas of best practice across the sector. One particularly welcomes the proposal to split the data on whether students are living locally to their provider.

A quarter (23 or 25 per cent) of respondents partially agree with the proposal. They highlight that additional clarifications are needed, and some of them provide additional suggestions. For instance, seven (8 per cent) refer to the proposed personal characteristics splits; of these, three would like further clarification on how protected characteristics data will be published and reported. One feels that where there are notable differences on the basis of these additional personal characteristics at sector level, there will also have to be sector-level accountability. Another states that further thought might need to be given to categories such as local students and disability. One recommends that a full equality impact assessment (EIA) is completed and published before the results with the proposed splits are disseminated. Finally, one suggests the inclusion of gender identity, which they feel would be beneficial for addressing imbalance or attainment gaps across the sector.

A handful (five or 5 per cent) have queries regarding factors of study:

- Two feel that it is not useful to define study characteristics based on students' earliest rather than latest information. Furthermore, one seeks clarity on the proposed split in the level of study to understand at which point this would apply to students.
- One disagrees with the splits that combine study level 4 and level 5, as some providers teach only level 4 which may not be comparable in experience with level 5.
- One seeks clarity on whether 'online' was considered a separate mode of study.

Three (3 per cent) have suggestions based on provider location:

- One would like the OfS to confirm that the new format for publication of results will still allow them to see a nation-specific set of splits for students in each of the nations.
- One suggests consideration of how scores by split characteristics are presented, as certain characteristics may represent a low proportion of the population for certain providers. They propose that aggregate results are always shown in the first instance with the option for a further detailed query if necessary.
- One would like to understand the rationale for the inclusion or exclusion of certain characteristics between countries – such as, the exclusion of Scotland from category 'estranged learners'.

Other suggestions include:

- Three indicate that they would like to see this expanded into the data from the NSS results portal.
- Two advocate that additional splits are mirrored at provider level.
- One proposes that thorough testing is carried out to determine whether this level of detail is useful to prospective students.
- One believes that the extended splits are helpful, although the significant extension will result in considerable additional work to modify reporting.
- One has concerns about how easily certain splits will be communicated to various audiences, and how these splits will align with the TEF.

Two (2 per cent) state that they disagree, with one explaining that this is owing to the weighting of subject of study suggestions of Initial Teacher Training courses. A further two (2 per cent) have no comment, and one believes that owing to the very small overall sample size the splits are not statistically meaningful.

2.4.2 Further comments on the proposal to expand the current splits at sector level

Half (38 or 50 per cent) of the 76 respondents believe that the proposed splits are useful as reasoning for their answers, with many of them reiterating their reasoning from the previous question. Generally, although they may have small concerns or suggestions, the respondents see great value in the additional splits for a variety of reasons.

Fourteen (18 per cent) feel that the proposed splits allow for better insight – for instance, improving the ability to contextualise results, identify trends, compare institutional performance, and identify areas for improvement. A fifth (15 or 20 per cent) of all respondents reiterate that the proposed splits are useful as they bring NSS results into alignment with other OfS frameworks. Seven state that they will aid substantially in APP work, while seven believe the approach to mirror the outputs used in the TEF will bring a greater level of consistency – for example, by simplifying the process of making performance assessments.

The introduction of sector level personal characteristics (to help identify students who are not benefitting as much from their educational experience as others) will provide useful contextual data for a variety of projects, including Access and Participation Plan work. – organisation, England

Additionally, a fifth (15 or 20 per cent) of all respondents believe the increased demographic data is useful. They feel that the proposal would allow providers to identify methods of improving experiences for certain demographics – such as, for groups who may be more vulnerable or underrepresented in higher education. Eight (11 per cent of all respondents to this question) also show enthusiasm for the proposal to have apprenticeships reported separately, as they believe this allows for more accuracy in catering to groups with potentially specific needs. Six (8 per cent) reference protected characteristics and two further specify that it allows for a more intersectional approach in evaluating student experience.

Almost two fifths (28 or 37 per cent) of respondents suggest areas for improvement regarding the proposed splits at sector level. Ten (13 per cent of all respondents to this question) raise considerations based on provider context. Seven of these, four of which are based in Scotland, refer to the location of a given provider. A handful (five or 7 per cent) feel that there might be consistency issues with the proposed country-specific data, creating differentiated data sets – as a result, one proposes that country-specific splits should be accessible through the dissemination portal. Two more raise that there may be problems in analysing course data consistently as Scottish degrees take longer to complete.

We do not agree with the inconsistent approach in each of the devolved nations and discourage disparities in publication of different personal characteristics dependent on location. It is important for institutions, and indeed prospective students, to have access to the same breadth of results throughout the UK. – organisation, Scotland

A few (three or 4 per cent) refer to provider size. One notes anonymity concerns for respondents within small sample sizes. One suggests that the pace of introducing these changes might result in a burden for smaller providers who might have less data capability than larger providers.

Around one in ten (eight or 11 per cent) would like increased clarity or guidance, such as:

- Justification for the inclusion of sexual orientation by linking it to educational outcomes, which could otherwise be regarded as intrusive.
- Guidance on how data showing that students are living locally to providers will be published in the NSS results and the potential impact that would have on courses that are designed specifically for commuter students or entirely online programmes.
- In line with GDPR principle: Lawfulness, Fairness and Transparency, greater clarity and transparency on why and for what purpose the expansion of splits at sector level are being proposed.
- Clarity on the definition of 'living locally', and whether it is based on distance or time to commute.
- Clarity on the proposed split in the level of study to understand the reference point for when this would apply to students.

A similar proportion (seven or 9 per cent) raise points relating to personal characteristics, including:

- Concerns regarding the proposed Sexual Orientation split – as the relevant field is optional, the inconsistency of the coverage of this data could be misinterpreted.
- Whether it is useful to define study characteristics based on students' earliest rather than latest information, as this presents a false representation.
- The belief that changing Sex categories to Female or Other/Male is not useful or appropriate, particularly for those in the 'Other' category, regarding gender identification.
- How far sector data on a split such as disability will have a positive impact.
- The expansion of the splits applying to the data from the dissemination portal.

Two raise concerns relating to alignment with other data. One suggests that 30 be used as the upper bound for that particular age bracket instead of 20, to align with the equivalent APP group. Another notes the differences between the structure of splits used by Joint Information Systems Committee (Jisc) and the OfS data outputs, which they feel adds to confusion and provider burden.

A further two raise the need for consideration of the separation of undergraduate courses with postgraduate components, as observed differences may come from such students having achieved entry to the Masters component of the programme, as well as this applying to only a small subset of subject areas for some universities.

Two state that the proposed dashboard does not sufficiently allow for, or address a growing call for, intersectionality. Finally, two recommend testing to see whether additional information is useful or viable.

2.4.3 Extent of agreement with the proposal to expand the current splits at provider level

Nearly three quarters (66 or 74 per cent) of the 89 respondents agree with the proposal to expand the current splits at provider level. Six of these (7 per cent of all respondents to this question) agree on the basis of alignment with other OfS dashboards. Five (6 per cent) believe expanding to provider level adds value, allowing for further analysis and comparison. Four (4 per cent) are particularly in favour of the split for 'mode of study'. One feels that prospective students and providers would benefit from seeing consistent data across the sector for the specific area they are interested in.

Yes, we welcome the expanded current splits at provider level, to mirror other areas of the OfS regulatory data picture. – organisation, England

Around one in six (15 or 17 per cent) agree with the proposal while having some reservations. Four have queries regarding specific factors:

- 'Mode', 'level', and 'subject' of study – one would like to have seen how the change to these splits works in practice, as it is not clear to them how they will be presented to allow for cross-referencing. One welcomes these splits, but has concerns around the change in definition of 'subject' of study.

One would welcome clarification of the rationale for splitting the '25 and above' age range category. Five (6 per cent) raise considerations relating to HE providers. Most of these are directed at the relevance of some splits to smaller providers, as some changes may have an adverse effect on reporting accuracy for them. One respondent based in Scotland questions whether specific differences in Scottish levels of study will have separate categories. Another respondent based in Wales requests that the dissemination portal provides results splitting out responses in English and Welsh to see if there is a difference in student experience.

Additionally, one recommends testing with users, while another has a suggestion for accessibility in the Internal Data download sheet:

In the Internal Data download sheet it would be more helpful for the data to be all on one tab with a 'splits' column, as is provided in the external template. This would help loading into internal databases rather than having to copy from each individual tab. – organisation, England

Two disagree with the proposed splits at provider level, with one explaining that greater granularity of certain metrics increases the chance of statistical uncertainty owing to low numbers and/or differing concentrations of split metrics. Finally, one would like clarification on the effect that the retrospective application of new definitions may have on data accuracy.

2.4.4 Further comments

Nearly half (32 or 47 per cent) of the 68 respondents reiterate that the extra splits are useful at provider level. Seven (10 per cent) think so in terms of alignment with other OfS outputs, such as the TEF. A similar proportion (seven or 10 per cent) note it provides more insight for deeper analysis and contextualisation. Five (7 per cent) refer to the increased granularity of data making it more useful. A further five (7 per cent) point out, in particular, that the splits to factors of study – 'mode', 'level', and 'subject' – are helpful or sensible. An additional five (7 per cent) describe how increased demographic data is valuable in understanding and tackling issues related to underrepresented groups of students.

The additional splits in mode of study (full-time, part-time, apprenticeship, all modes of study), Level of study (undergraduate with postgraduate components, first degree, other undergraduate, all undergraduate) and subject of study will allow for greater insights across our provision and more targeted solutions. – organisation, England

Just over one fifth (15 or 22 per cent) raise concerns, mostly relating to factors of study or protected characteristics.

Of those referring to factors of study:

- Two agree with including mode of study, but using first-year data to be consistent with other surveys would not necessarily be beneficial.
- One shows concern that the proposed split for mode of study could lead to misleading comparisons being made for different types of degree apprenticeship across the devolved nations.
- One suggests the ability to combine some of the splits for factors of study, to offset separate modes and levels of study not available at some providers, in addition to lower population thresholds.
- One shows concern about the suppression of data which may apply to mode of study.
- One is unconvinced of the case for the 'undergraduate with postgraduate components' split.
- One disagrees with the split for subject of study, as they have some teacher training specialisms which are not separate by degree.

Whilst we believe that expanding mode to separate out students studying apprenticeships would be beneficial, the way mode itself is derived may be an issue. As this now selects mode from a student's first year of engagement, this could present an issue where students have spent longer on a mode that does not match their original mode on entry and is not particularly reflective of their experience. – organisation, England

Of respondents whose concerns relate to protected characteristics:

- One notes that the ethnicity splits use fewer detail categories and suggests using the more detailed 12-way splits of ethnicity.
- One references the proposed Sexual Orientation split in relation to Scottish institutions acquiring this information from the Higher Education Statistics Agency (HESA) student return data. They feel that the inconsistency of data coverage could lead to misinterpretation and recommend that this split is not provided publicly.
- One stresses the importance of considering data protection issues regarding protected characteristics, particularly for small sample sizes.

Two would welcome more clarity – for example, for the rationale for splitting the '25 and above age range category'. One is requesting a clear example of how the data will look as soon as possible. Two more raise the issue of some data being misleading for smaller sample sizes, with one further suggesting that data is not published in these cases.

2.5 Proposal 5: Benchmarks

Summary of proposal 5: Benchmarks

- The OfS proposes to continue to use UK benchmarking as an important tool in comparing and measuring performance across similar higher education providers.
- The OfS proposes to continue to publish UK-wide benchmarks on the OfS website, both at provider level and at sector level.
- The OfS proposes to use guiding principles to review technical definitions of benchmarking factors and use updated factors for the initial NSS 2023 publication. For instance, how ages are split into groups for the purpose of benchmarking and whether to define the mode of study by reference to a student's first year of engagement instead of the most recent year of data.
- The OfS proposes to further review the benchmarking factors using data from the new NSS survey.

2.5.1 Extent of agreement with the factors used in the proposal for benchmarking

Nearly two thirds (56 or 64 per cent) of the 87 respondents agree with the factors used in the proposal for benchmarking; however, most do not elaborate on their agreement. Four (5 per cent) agree on the basis of alignment with other data publications such as the TEF. A further four (5 per cent) note that the additions to previously helpful benchmarks add value – such as, allowing for more in-depth contextualisation – with two pointing to additions in level and mode of study as particularly helpful additions. Additionally, one notes that this will help prospective students when making comparisons between providers.

The benchmarking results are very valuable to us as a provider and we agree that they should continue to be published. (...) We agree with the proposed changes to the benchmarking factors and in particular believe apprentices will be a valuable addition. – organisation, Scotland

Around one in three (28 or 32 per cent) express varying levels of agreement, either raising specific concerns or disagreements, or disagreeing with the proposal entirely.

In terms of reasons for disagreement with the proposals for benchmarking, seven (8 per cent) refer to protected characteristics, with most of these harbouring disagreements relating to the factor of 'Sex':

- Five disagree with the method used to group the factor of Sex, as they feel that two categories of 'Female or Other' and 'Male' are inappropriate. They feel that this needs revisiting or disaggregation. Two point out that 'Sex' and 'Gender' are different constructs, with one suggesting to look for advice and information from Stonewall⁴ pertaining to this.
- One questions why a student's sex is proposed to be considered only for full-time students.
- Two also have issues with ethnicity categorisations, with one elaborating that the factor seems to suggest that both 'White' and 'Unknown' are the same category.

Seven (8 per cent) express disagreements relating to provider type. Five of these (including two from Scotland and one from Wales) pertain to the location of certain providers:

- Three refer to complications arising from using mostly or only UK-wide benchmarks in the context of comparison within devolved nations, noting that there are clear contextual differences.
- A further three are unclear regarding the calculation of 'overall satisfaction' in devolved nations.

Additionally, two suggest further consideration of population differences between providers and how this would affect accuracy. One notes that UK-wide benchmarks are valuable, but they do not use split data owing to a small sample size.

⁴ Stonewall is a LGBTQ+ rights charity in the UK: <https://www.stonewall.org.uk/>

2.5.2 Further comments on proposal 5

A total of 66 respondents provided additional comments with themes similar to the previous question emerging and points being reiterated. Over two fifths (28 or 42 per cent) suggest areas for improvement. Around half of these (13 or 20 per cent of all respondents to this question) relate to factor groupings, with twelve disputing protected characteristics groupings. Eleven (17 per cent) believe that the grouping of 'Female' and 'Other' is problematic, and counter to inclusivity. One elaborates that:

This alludes to an assumption that 'Other' should be like Female or Male, when it is not – there is a reason 'Other' is included, so disregarding it for benchmark purposes as a separate group is not appropriate and insights on a particularly underrepresented group will be lost. – organisation, Scotland

Some (nine or 14 per cent of all respondents to this question) reiterate that the ethnic groupings are unnecessary or problematic, specifically the proposal to group 'Unknown' and 'White'. Additionally, seven (11 per cent) disagree with the age groupings of 'Under 21' and 'Unknown', as some providers have notably fewer younger students. They suggest keeping 'Unknown' as a separate group.

Nearly a third (20 or 30 per cent) of all respondents believe that the factors used for proposed benchmarking are useful. Ten of these feel that they would allow for greater insight and more accurate comparisons between providers. Five reiterate that they are useful as they enable consistency with other OfS benchmarks – such as, being helpful for APP work.

Six (9 per cent) raise provider considerations, reiterating concern for potential consistency issues between devolved nation-specific questionnaires and UK-wide benchmarking factors, and for the data potentially being misleading for smaller providers with lower response rates.

Three respondents mention issues relating to mode of study. Two find that splitting full time, part time, and apprenticeships but not using the same subject code groups for full time, as is the case with the others, is problematic. One disputes the use of broader groups for part-time students, which they feel would create inaccurate representations for some providers. They suggest separating out 'CAH23-01 Combined studies' as its own subject group. Additionally, one questions why the OfS has opted to use CAH level 2 rather than level 3 as a benchmarking factor.

Three believe there are missing factors which ought to be included in benchmarks:

- Parental experience of higher education
- Measures of advantage
- Prior educational achievements

Additional points raised include:

- Two suggest that the benchmarks are included in the dissemination portal, with one questioning why they would continue to be published on the OfS website but not the portal.

- One would like to see benchmarked data presented in the same format as the main results files.
- One would like the OfS to provide sector training on benchmarks, as some colleagues find these difficult to understand.
- One recommends that the OfS considers improving accessibility in data interpretation and dissemination, as potential audiences have varying knowledge of HE reporting.
- One believes it would have been useful if this analysis been carried out on historic data sets.
- One notes that it will be important that funding providers agree with the benchmarks.

2.6 Proposal 6: Healthcare, allied health, and clinical practice placement questions

Summary of proposal 6: Healthcare, allied health, and clinical practice placement questions

- There are six questions asked of students on courses with healthcare, allied health, or clinical placements. The responses to these questions have not been published in recent years. This is because the definition that identified this group of students was based on funding sources. As the approach to funding these courses has changed, the definition has become increasingly ineffective, serving to identify only a small subset of the students on relevant courses. While the data remained useful to some providers, the OfS considered it potentially misleading and has not included this in recent publications. However, the coverage for these questions has been reviewed and expanded for the 2023 survey.
- The OfS proposes to publish these questions on the OfS website and Discover Uni once it has 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.

2.6.1 Extent of agreement with proposed approach for the publication of questions relating to healthcare, allied health, and clinical practice placements

There were 86 responses received to this question. The majority of respondents (59 or 69 per cent) agree, and most of these (41 or 48 per cent) do not give further reasoning. Many (18 or 21 per cent) agree that waiting to ensure the validity of the placement questions and understanding how they have been responded to is a sensible decision.

We would also propose that the data are not provided to providers whilst the analysis is taking place as we would not want to be reporting (internally) scores that have not been confirmed as robust. We would also

appreciate clarification as to whether any past results should be deemed unreliable on this basis. – organisation, England

Two (2 per cent) wish for clarity on the timeline involved and to understand when results for these questions will be shared with providers; one (1 per cent) believes splitting the publication will create confusion and that publication of these questions in the past has not produced negative results so they do not see why it would this time. One (1 per cent) seeks clarity on whether past results were affected negatively by this issue.

Around one in eight (ten or 12 per cent) believe the data should be published regardless. This could be directly to providers, with a 'health warning', at the same time as the other data from NSS. These respondents state that prospective students should be able to see it; although, in an 'ideal world', the data would be validated first. They would be happy for it to be published on Discover Uni provided assurances of its validity could be made.

A minority (five or 6 per cent) mostly agree with proposal 6, with one indicating they want the data released to providers at the same time as other data, and another saying they believe it should be available to prospective students if it has been gathered.

Two (2 per cent) could see no gain from this proposal or were unconvinced that there would be any benefit. Delaying publication complicates an already competitive environment for health programmes.

A further two (2 per cent) do not agree with the proposal, and a handful (four or 5 per cent) have no comment to make. Around one in ten (11 or 13 per cent) note this question is not applicable to them.

2.6.2 Further comments on proposal 6

A total of 64 respondents answered this question, of whom 36 (56 per cent) gave some explanation of their views.

Twelve (19 per cent) reiterate that it makes sense to wait, that the delay is reasonable, and a review of how the changes have affected results is a good choice to make.

Nine (14 per cent) note the data will be useful if and when it is published, as it will help enrich current data. One (2 per cent) indicates they consider it useful for prospective students.

Around one in ten (seven or 11 per cent) do not object to the OfS approach to this proposal, but they wish the OfS to keep in mind that there are factors outside the providers' control in these questions:

The points raised in the consultation document are all valid. Further, we would note that the experiences captured in these questions have been massively impacted by the pandemic, in ways often outside of the control of HE providers. – organisation, England

Three (5 per cent) reiterate that data published from these questions should be done so, on student-facing portals, with a warning that the questions concern positivity in the placements, rather than the providers.

A further three (5 per cent) state that delay of publication reduces the value of the NSS 2023 data in contributing useful and timely information for enhancing student clinical practice experiences.

Two (3 per cent) restate that all data should be published. A further two (3 per cent) mention it is an unusual approach, that the OfS has developed a questionnaire for all respondents – not just those from the groups relevant to this set of questions.

Another two (3 per cent) are not convinced the data would be useful or that there would be much to be gained from the proposal, especially as healthcare programmes have multiple ways in which placements are required to be organised. One (2 per cent) disagrees that the questions are not to be included. They believe the OfS should already have the information necessary to determine coverage, and that delay will lead to this aspect of data being lost.

Finally, two (3 per cent) have other various comments:

- Should other sector placement questions be considered for the same approach?
- It is unclear whether questions will use a five-point Likert scale in future.

A total of 28 (44 per cent) have no comment or note that the question is not applicable to them.

2.7 General feedback

2.7.1 Unclear aspects of the proposals

Respondents were asked whether there were parts of the proposals they found unclear. A total of 75 answered the question and of those almost half (36 or 48 per cent) think the consultation proposals were clear.

Data suppression

Around one in eight (nine or 12 per cent) mention a lack of clarity around the data suppression proposal for proposal 1. They note it is unclear why those responses near 100 per cent response rate would be suppressed. Additionally, they feel it is uncertain whether the suppression used on unanimous or near-unanimous responses for a group would be applied to the data supplied to institutions for internal use. To that end, respondents would appreciate worked examples of how the data suppression will work.

Data delivery and presentation

A group of eight respondents (11 per cent) suggest that some of the key aspects of data delivery remain unclear, particularly around the presentation of data. One specifies that the data released through the provider portal and the OfS website should be aligned; others mentioned that it was not clear which data was to be received through the provider portal and what would be published to the sector.

The documents were lengthy and some proposals were unclear – specifically those related to suppressions of responses for 100 per cent response rates. The explanations of methodology were confusing. There were aspects in the technical document that differed from the main

document and I found myself having to regularly flip between them. –
individual, Scotland

Timings

Following on from the data delivery, seven respondents (9 per cent) highlight that the timings of the proposal were unclear. For example, the phrase ‘late summer’ for the publication date is deemed too vague and another comments that the benefits or reasoning behind delaying publication were unclear. The lack of clarity on when the data will be published is perceived to cause challenges internally for providers, especially as late summer can be when planning functions are supporting confirmation and clearing – a major event in the admissions calendar.

Comments on the consultation document

The overall clarity and length of the consultation document was commented on by six respondents (11 per cent). There were concerns about the wording of the methodology, how the technical document differed from the main document, and how there was repetition of content in places. The structure of some sections is described as not always linear, making it difficult to navigate the document. Two respondents believe the document could have been more concise. One (1 per cent) indicates that for a small team in a large HE provider, the amount of work taken to look at the proposals is disproportionate to the benefit.

Additionally, a handful (four or 5 per cent) believe it could have been clearer which data splits were being published on the OfS website but not on Discover Uni. More detailed guidance on the splits would be useful for providers.

Around one in ten (eight or 11 per cent) note that the question was not applicable or they have no further comments.

2.7.2 Comments on more effective consultation delivery

Respondents were also asked whether, in their view, there are ways in which the objectives of the consultation could have been delivered more efficiently or effectively than proposed; 68 respondents answered, and of those, around two fifths (28 or 41 per cent) have no suggestions for improvements.

Consultation timings

Around a fifth (14 or 21 per cent) mention the time involved. They believe it would have been advantageous if the OfS had published the consultation earlier, as this may have allowed exploration of issues not tackled in the document – such as, data structure and format. Additionally, if the consultation had been published and held earlier, there would have been time to implement changes to the format of the results before their release; the May deadline is too close to the publication of data. On the other hand, some respondents welcome the overall length of the consultation period but recommend not releasing a consultation so close to Easter or other major holiday period.

Consultation period is too long if necessary at all. Would rather this was conducted much earlier if it had to be done, but the proposals are modest enough that I think they could have been confirmed without consultation.

We need confirmation of the final data structure as soon as possible. –
individual, Scotland

Consultation format

Eleven (16 per cent) discuss the data format and structure, particularly in the need for confirmation of these elements before publication. Some in this group (six or 9 per cent) suggest that if the data had been gathered and statistically analysed before proposing changes, it would have been more efficient, as it has been difficult for some respondents to answer consultation questions without seeing the data first. Without that data, it is hard to consider the wider implications of the proposals. One (1 per cent) states that it would be useful to indicate what data is present on the other platform (the OfS website versus Discover Uni).

A group of eight (12 per cent) think the consultation was a complex document, with comprehensive changes proposed, leading to a document that is overly long and cumbersome. To overcome this, the respondents suggest summarising changes upfront and providing the rationale detail later. Additionally, the elements discussing what the OfS is proposing, why, and the possible effects were identified as repetitive and could have been consolidated into a single paragraph.

A few (three or 4 per cent) recommend the use of visual elements within the consultation documents, or video summaries, which have been offered in other OfS consultations. Additionally, two of these respondents suggest live Q&A sessions.

Additional comments

A further two (3 per cent) feel the consultation runs clearly and effectively; one using the word 'perfectly'.

The following points were raised by individual respondents.

- The technical consultation should have been run in tandem with a suitable pilot NSS exercise so the sector could see the proposed results and the changes could be assessed,
- Notification of the consultation should be circulated to key NSS contacts listed on the NSS portal,
- The four-point scale should remain under review and consideration of a return to the five-point scale given,
- The inclusion or exclusion of intercalators was raised by one respondent, which has caused some issues internally,
- One respondent is disappointed to see a reference to a general approach and then the suggestion 'no more consultation is required',
- The plans presented appear appropriate, but often do not account for the difference between small and large institutions,
- More consultation and collaboration with providers would have increased efficiency and effectiveness,
- If the overall satisfaction question had been kept, it would have provided an excellent overall summary output to use for benchmarking.

Around one in eight (eight or 12 per cent) report that the question was not applicable to them.

2.7.3 Effect of the proposals on the Welsh language

Respondents were asked their opinion on what effect these proposals will have on opportunities for the use of Welsh, and on treating the Welsh language no less favourably than the English language. There were 54 responses to this question, of which ten (19 per cent) respondents provide their comments.

Of those identified as being in Wales (seven or 13 per cent), six comment, five of which cannot see any negative effects of these proposals on the Welsh language. One (2 per cent) believes it is important to look carefully at responses made through the Welsh links to ensure there are no nuances of language that have contributed to students answering in a different way to the English language responses.

In addition to those Welsh respondents who cannot see a negative impact, two others share this view. One notes that continuing to provide opportunities to engage with the survey through the medium of Welsh will ensure that the Welsh language is treated no less favourably than English.

Another (one or 2 per cent) does not envisage a direct impact, but states that a breakdown of how many students completed the survey in Welsh would be helpful for providers to understand and explore any barriers.

One (2 per cent) advises that, to improve opportunities for Welsh, or the impact on the use of Welsh, the HEFCW (Higher Education Funding Council for Wales) should be asked about the consultation.

The remaining respondents (44 or 81 per cent) have no comment or note the question was not applicable to them.

2.7.4 Changes to proposals to impact positively on Welsh language opportunities

Additionally, respondents were asked how proposals might be changed so the policy decisions would impact positively on or not impact negatively on Welsh language opportunities. There were 52 responses to this question, and five (10 per cent) provide substantial comments.

One (2 per cent) reiterates that the HEFCW (Higher Education Funding Council for Wales) should be consulted. One English provider (2 per cent) suggests improving the use of Welsh for the consultation documents by publishing these in Welsh, including the online survey.

Two Welsh providers (4 per cent) note they are satisfied with the availability of options to participate in Welsh, and that the questions have been tested in English and in Welsh.

One respondent (2 per cent) reiterates the recommendation about providing data on how many students complete the NSS in Welsh.

The remaining respondents (47 or 90 per cent) have no comment or indicate the question was not applicable to them.

Appendix 1: Consultation questions

An embedded pdf file below includes proposals relating to NSS results publication and consultation questions.

‘Consultation on the approach to publication of results of the National Student Survey’:



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