

Office for
Students



Consultation on the general approach to publication of the National Student Survey

Analysis of responses and decisions



Department for the
Economy



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Summary

The National Student Survey (NSS) is a UK-wide survey undertaken by final year higher education students to give feedback on their courses. The survey is managed by the Office for Students (OfS) on behalf of the four UK funding and regulatory bodies: the OfS; Scottish Funding Council (SFC); Higher Education Funding Council for Wales (HECFW); and Department for the Economy, Northern Ireland (DfENI).

What we consulted on and why

1. In March 2023, the Office for Students (OfS) published a consultation seeking views on proposals for our approach to publishing the data received from students' responses from the National Student Survey (NSS). Following a public consultation in 2022, the 2023 NSS survey has revised questions to gain more in-depth data about students' perceptions of their academic experience. These updates, in addition to wider updates to statistical, definitions and methodology used across higher education datasets, suggest that we need to make changes to our general approach to publishing the NSS results, which was the subject of this consultation.
2. In reaching these decisions, we are seeking to ensure that the survey continues to provide high quality information on student perceptions of their academic experience for the survey purposes of student information, enhancement of learning and teaching, and public and regulatory accountability.

Our proposals were as follows:

We proposed to continue to publish NSS results at sector and provider levels but with some changes to the approach to question scores and grouping, the student characteristics the results are broken down by, and definitions we use in benchmarking measures.

Proposal 1: We proposed that our overall approach to publication of the NSS would remain broadly similar to previous years, with publication at provider level and sector level, making use of publication thresholds and aggregation. We also proposed that changes from the previous approach would be made where they have been necessitated by a change in questionnaire or wider statistical work (these changes were covered in detail in proposals 2-6).

Proposal 2 (positivity measure): We proposed to replace the current agreement rate with a 'positivity' measure – drawing on the proportion of students who respond positively to each of the core questions and the questions on mental wellbeing and freedom of expression.

Proposal 3 (summary measures for question groups): We have previously published summary measures (sometimes known as 'scale scores') which summarised responses to groups of questions. We proposed to continue publishing these summary measures, provided that our review of the NSS 2023 results confirms that they continue to be robust and helpful in interpreting the data. We proposed that the summary measures would be published in autumn 2023.

Proposal 4 (splits of data presented): In publishing NSS results we have previously used student and course characteristics, both to calculate the benchmarks and to break down the results. We proposed to update the definitions of these characteristics and how they are used in the presentation of NSS results. At a provider level, we proposed reporting the results to split by mode of study, which would now include apprenticeships as a separate mode, level of study, and subject. At a sector level, we proposed to add personal characteristics to inform understanding of risks to equality of opportunity by providing insight as to the extent of variations in the student experience for different student groups. The proposal included that data about student characteristics would be available on both a UK-wide and country-specific basis, to meet the needs of data users across the UK.

Proposal 5 (benchmarks): We proposed to continue to use benchmarking as an important tool for interpreting the performance of providers, by taking into account the mix of courses and students at a provider and indicating how well that provider has performed compared with performance for similar types of students on similar types of courses in the higher education sector as a whole. While benchmarks have previously been published only for sector-level and provider-level NSS results, we proposed extending our approach so that benchmarks are included at every level of aggregation. We also proposed, as a provisional approach, changes to the factors used to calculate the benchmarks, and that this provisional approach would be reviewed once the full NSS 2023 results are available, with further changes to the approach (either for the 2023 publication or subsequently) if there is evidence to support this.

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

Conducting the consultation

3. Respondents were asked to share their views on the consultation by submitting written responses to an online survey containing 22 questions. The questions are listed in Annex A. Before the consultation, we held discussions with sector representatives, students and providers and the NSS review external advisory group; we used these to inform the consultation proposals.
4. We received 109 responses to the consultation. We did not receive any responses to the Welsh survey. Most responses were submitted using the online survey tool, with some submitted in emails. A small number of responses were submitted after the deadline. All responses received were considered.
5. The responses came mainly from higher education providers in England, Scotland, Wales, and Northern Ireland.
6. In this document, we identify and discuss the most significant issues raised in response to the consultation and whether these have led to changes to the proposals. External

consultants Pye Tait have undertaken a qualitative analysis of the responses we received which is published alongside this document.¹

7. In Annex E of the consultation, we discuss the matters to which we had regard in designing our proposals. We have considered these matters again in light of consultation responses as we have reached our decisions (see Annex B).

Summary of decisions

8. Overall, we have decided to implement the proposals set out in the consultation, with some specific changes which are described below.

Proposal	Decision
Proposal 1: Publishing NSS results broadly in line with our previous approach to publication	To proceed with the general approach as set out in the consultation with one change Change to proposed approach – suppressions: replacing results for providers/subjects where everyone has responded negatively with just a flag to show the results were very low rather than positive and negative
Proposal 2: positivity measure	To adopt the positivity measure as set out in the consultation.
Proposal 3: summary measures for question groups	Change to proposed approach: experimental theme measures, as defined by the question groups in the questionnaire to students will be published on the OfS website and provider portal with the main publication of results. Tested groupings for 2024 onwards Discover Uni – individual questions will continue to be presented under question groups. Themes scores will not be published. * We will add notes / caveats to the publication, and the theme measures would be presented as experimental
Proposal 4: splits of data	To go ahead as proposed
Proposal 5: benchmarks	To go ahead as proposed

¹ Available at: [Publication approach to the results of the NSS: independent analysis of consultation responses - Office for Students](#)

Proposal	Decision
Proposal 6: healthcare, allied health and clinical practice placement questions	To go ahead as proposed

9. The reasoning for these decisions is set out in each section of this document.

Proposal 1: Publishing NSS results broadly in line with our previous approach to publication

Consultation questions

1. To what extent do you agree with our proposals to continue to publish NSS results at a sector and provider level?
2. Do you agree with our general approach to determining publication thresholds, as described in paragraph 33 of the consultation document?
3. Are there any other considerations that we should take into account when determining publication thresholds, either now or in the future?
4. Do you agree with our general approach to determining whether we aggregate across years, as described in paragraph 44 of the consultation document?
5. Are there any other considerations that we should take into account when determining whether to aggregate across years?
6. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

Responses relating to proposal 1, question 1

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

10. Over 80 per cent of respondents agreed with our proposals to continue to publish NSS results at a sector and provider level. Respondents commented that the proposals seemed logical and appropriate. Many supported the current approach to publication and valued publication of the NSS results in this way. Respondents said that the results provide insight and context that providers use for enhancement, quality and business planning activities. The results also allow providers to determine their own performance against competitor groups and sector benchmarks.
11. Some respondents thought that the proposed approach was essential at provider and sector level for applicants to compare courses at different providers and for course teams to compare how they are doing compared with other providers.
12. One respondent, while supportive of publishing data at a sector level, suggested that publishing more detail at provider level could give a misleading impression of the student cohort, because of the potential for feedback to be from small numbers of students and therefore potentially not representative.

Individualised data

13. Around 5 per cent of respondents thought that the approach to publication of the data in summarised form, rather than by publication of individual responses, makes it difficult to work with. In their view, this reduces the scope for a provider to undertake its own analysis. Respondents wanted access to the individualised data to enable them to improve their ability to manipulate and scrutinise the data. Other respondents, however, said that they understood the reasons for not providing this more detailed data, while agreeing that it would be useful.
14. Some respondents wanted access to their own course-level data with less than 10 responses.

Guidance for users

15. One respondent requested guidance and full explanatory text to accompany all data releases and publications, to include more information about whether data accessed via the provider portal is publishable externally, for example in marketing materials. Others asked for any changes to the approach to publication of the NSS to be communicated in an effective way to help those within providers analysing the data understand how these might affect internal reporting and systems. A couple of responses wanted more information about reporting units, i.e. what constitutes a 'course' when it could have multiple permutations particularly in relation to Discover Uni. Others thought the aggregation of data on Discover Uni was misleading and confusing for users and course teams.

Data pre-release to providers

16. Some respondents asked the OfS to consider releasing the provider-level data under embargo to providers before public release to assist providers in preparing for the public data release in the same way as data is made available for the Graduate Outcomes survey. Some thought this was important to provide additional quality assurance of the data.

Provider portal

17. There were comments on the usefulness of the data tables provided by Texuna (which were not covered as part of the consultation proposals) and a lack of statistical detail in the data tables. Respondents explained that this meant that providers had to use both the OfS tables and Texuna tables which increased burden. They would also like to see development of some easier means of cross tabulating or regressing data by subject and various student characteristics.

Summative question

18. One provider commented that the removal of the overall positivity measure meant that providers might create their own measure which would be likely to be inconsistent across providers. Another thought that the removal of the summative question for England would make sector comparison less meaningful.

Additional splits or groupings

19. There were requests for additional information or groupings within the responses. These included adding the mission groups to which a provider belongs, to help students compare similar types of providers as well as to providing an additional benchmark for providers.

However, one response from a sector body said its members suggested it would be beneficial to review the volume of information published for prospective students to ensure it remains proportionate and useful.

20. One provider made particular comments in relation to delivery of courses to students in different parts of the UK. Specifically, they were concerned that students on courses delivered in Scotland, Northern Ireland and Wales were not asked the summative question. They thought this compromised the information available to prospective students in these nations, with less information available for them to base their choices on. They were also concerned how the country-specific splits would apply to this provision for example the multiple indices of deprivation which are country-specific.

Publication timelines

21. A small number of responses sought information about future publication dates and possible changes to the questionnaire for 2023 and 2024. Some were concerned about the impact that the consultation could have on publication timelines and expressed a desire for publication in July each year for planning and reporting activities within providers. Others requested data files in order to prepare for any forthcoming changes.

Our response, proposal 1, question 1

22. We welcome the support shown in the responses to our proposals to continue to publish the NSS results at sector and provider level. We recognise a consistent approach helps users of the NSS results in a way that delivers the survey's three main aims: public accountability, student information and enhancement.

Individualised data

23. We recognise the value that sharing individual survey responses (individualised data) could provide for researchers and providers in the analysis of their own results and sector results. However, we explored the release of individualised data as part of the NSS review conducted in 2020-21. As part of the review, students in particular said that the ability to give an anonymous response meant they felt able to give full and frank feedback without fear of repercussions. This was an important factor in their engagement with the survey. Furthermore, feedback from student and providers suggested that this also contributed to the trust in the robustness of the survey results. Release of individualised data would mean that survey results were no longer anonymous. Some respondents pointed out that by the time the survey was released most student will have left. However it is entirely feasible that students may be continuing their studies at the provider, repeating a year or may require references in the future. Therefore we do not consider the risk of detriment to the respondent to be nil. Consequently, in order to protect student anonymity and trust in the integrity of the survey we do not intend to release individualised data to providers.
24. We recognise the number of students in some cohorts and particularly those delivered by small specialist providers and those who deliver higher education in further education fall below the respondent reporting threshold of 10. In 2017, when the current threshold was introduced this was deemed to be the absolute lowest cut off which maximised the availability of data whilst also protecting student anonymity. For the reasons set out above, anonymity is important for student engagement with the survey and for the robustness of the

survey results. We recognise the value of results from small cohorts to providers for the purposes of internal enhancement. However, the risk of detriment to students and integrity of the quality of results more widely outweigh this value. Particularly, given these students' results already form part of the wider provider or potentially subject reporting units. Therefore, we do not intend to make survey results for cohorts of less than 10 available to providers.

Guidance for users

25. We recognise the importance of a transparent approach to data publication and to ensure that all users can access guidance to assist in their use and interpretation of results. Guidance was also seen as important in the first phase of the NSS review. We published indicative tables alongside this consultation to help providers plan and make changes to their reporting systems.² The reporting units used by Discover Uni and course mapping based on the provider's Unistats return is released to the provider as part of their COMMIT file generated on successful submission of the Unistats dataset to Jisc. For the purposes of Discover Uni, a course is defined as a single programme of study to which a student can apply, either through UCAS or directly to the provider.³ Furthermore, Discover Uni includes clear labels for users where data has been aggregated either across years or at subject level.⁴

Data pre-release to providers

26. Prior to the OfS becoming a producer of Official Statistics NSS results were released to providers in advance of the main publication date. This change came into effect in 2018. Providers are given access to their Graduate Outcomes results, but this is due to the perpetual nature of the survey: it allows providers to see how earlier cohorts are doing before waiting for the survey year to close. It also allows providers to participate in the quality assurance of standard industrial and standard occupational (SIC/SOC) coding. The NSS is currently published as soon as it is ready. Separating the release to providers and the publication would mean delaying the publication schedule. This would not be in the interest of data users, particularly prospective students – who would not have up-to-date NSS information in time for Clearing and the start of the new recruitment cycle in the early autumn. Given the difference in the nature of the survey collection, and that there is no response coding to quality assure, we will not be releasing results under embargo to providers, in line with the Code for Statistics, Value 2, Accessibility.⁵

Provider portal

27. The proposals included within the consultation related to the information we publish externally via the OfS website and Discover Uni. The information included within the provider portal (provided by Texuna) was included within the information we would not usually expect to publish within the consultation document. However, we recognise that this is often the principal way providers engage with the results. In phase one of the NSS review we found

² See [National Student Survey - NSS - Office for Students](#).

³ See [Unistats record 2022/23 | HESA](#).

⁴ See [About our data | Discover Uni](#).

⁵ See <https://code.statisticsauthority.gov.uk/wp-content/uploads/2022/05/Code-of-Practice-for-Statistics-REVISED.pdf> [PDF].

that improvements were required to the provider dissemination portal to improve its usability and functionality and consequently assist providers with the analysis of their data. While there are no significant changes planned for the portal in 2023 due to the prioritisation of the timely release of the new survey results to providers, we do plan to improve the portal for 2024 onwards and will continue to engage with users as we do so over the next 12 months.

Summative question

28. The summative question on overall satisfaction continues to be asked of students in Scotland, Wales and Northern Ireland, but was removed for students at English registered providers following the summer 2022 NSS consultation.⁶ In our response we set out our reasoning for removing this question, acknowledging the impact this could have on the ability of users to make cross-UK comparisons. However, balancing a number of factors, the OfS took the view that the benefits in maintaining the same summative question across the UK are outweighed in England by the need to ensure clear links between the information provided by the NSS and the aspects of quality that are subject to regulation in English providers. The different approach to the summative question in different UK nations will ensure that the questions asked of students studying in a particular nation properly reflect that nation's approach to quality. At the same time, retaining the same questions across the UK for the rest of the questionnaire will continue to offer substantial opportunities for benchmarking and comparison.

Additional splits or groupings

29. We recognise that additional splits of data would be of value to some users, for example by provider type as suggested within the responses. There will continue to be many ways of splitting and analysing the data. Our current proposals would expand the splits to include those used in wider regulatory activity and are based on data we hold. Mission groups and similar are self-selecting groups, and we group providers (where appropriate) using our typology.⁷ We also need to consider the burden, as one sector body suggests in their response, of publishing extraneous information and to consider the additional burden this places both on users and providers. Where we proposed additional grouping or splits as part of proposal 4, we justified their inclusion, weighing up the additional data load this produces. This is covered in greater detail in our response to proposal 4.

Publication timelines

30. We recognise that confirmation of the anticipated publication date is important for providers' planning. The preliminary publication dates were published in advance of the Code for Statistics recommendations of one calendar month when they were released to providers on 27 June.⁸ The results are made available as soon as possible following this consultation, and to allow for the rigorous testing and quality assurance of the new survey results to take place. Significant changes to the NSS were introduced in 2023, which included new questions, new response scales and country-specific routing of the questionnaire. In order to formulate proposals, we needed to carry out preliminary analysis of the results collected as part of the

⁶ See [Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students](#).

⁷ See [Provider typologies 2022: Methodology for grouping OfS-registered providers - Office for Students](#).

⁸ See [National Student Survey 2023: Publication of data - Office for Students](#).

survey which runs from January until the end of April. We then needed to conduct an open consultation on our approach to publication based on this analysis. The outcomes of the consultation could have led to changes to our approach which would have necessitated further analysis and work, delaying publication further. We therefore could not confirm an anticipated NSS publication date until the responses to the consultation were known. Furthermore, thorough quality assurance checks of the new data are important to ensure the four UK higher education funding councils and regulators, and users, can have confidence in the rigour and robustness of the results of the new survey. This analysis was done on the pilot data for the new survey, but subsequent minor changes to the questionnaire meant this analysis needed to be done on the 2023 results also. This has led to a delay of approximately one month to the anticipated publication date for 2023. It is anticipated publication in subsequent years will follow the usual July publication schedule.

31. In order to prioritise the publication of provider-level results, we have delayed the publication of results across the sector for different student characteristics, which is now planned for the autumn. We will publish a preliminary publication date in advance of publication.

Responses relating to proposal 1, question 2

Do you agree with our general approach to determining publication thresholds, as described in paragraph 33 of the consultation document?

32. Just over half of respondents agreed with the proposed general approach to determining publication thresholds and the rationale underpinning it. Many respondents thought the current thresholds appropriately balance response bias and respondent confidentiality with data availability. Many welcomed the opportunity to review these once the 2023 survey results were known and thought that it was good statistical practice to do so periodically.

Providers' access to their own data

33. A small number of respondents would like to have access to their course-level data where the number of respondents was below 10. Some smaller providers commented that this would be useful and, while it might compromise their ability to draw robust conclusions, providers would be aware of this in their interpretation of the data. Another respondent suggested lowering the number to eight, which was the minimum cohort size for their courses.

Future changes to thresholds

34. Around 20 per cent of those commenting would not want to see the respondent number go below 10 but questioned the use of a response rate threshold because, for example, 40 per cent of a very large cohort may represent a large proportion of respondents and there was therefore no risk of identification of a respondent.
35. One response suggested that if the OfS were minded to reduce thresholds in the future, this could increase the amount of available results but results could be skewed due to the low number of respondents.

36. Some respondents were supportive of the proposed general approach to publication thresholds but would want to see any further changes subject to consultation. Some providers thought the proposed future approach to thresholds was not aligned with the principles of a devolved approach through which the OfS administers the NSS on behalf of the other nations but that this partnership working did not extend to making decision without their input.

Data protection suppressions

37. Around 13 per cent of respondents did not agree with our proposals to suppress units of the data (i.e. course, or subject or a split) with a high response rate which have unanimous or near unanimous results. They questioned the rationale for this proposal and how it would work in practice. They considered the risk of students being identified was minimal and therefore the approach was too risk adverse with no evidence put forward in the consultation for this happening previously. They therefore considered the proposal to be disproportionate and thought it would negatively affect providers, particularly those with smaller cohorts, by not having this data published. Conversely, some took the view that suppression of positive results would often happen with some of their data units/courses, and they were therefore not in favour. They questioned the impact on student anonymity and the consequences for this, given the students would likely have left their course by the time results were published. Others were also concerned about how the terms 'high' and 'low' would work in practical terms, for example, with their Tableau dashboards. They asked whether the terms high or low would be any better than publishing the positivity measure in terms of student anonymity.
38. One respondent commented that feedback consistently showed that users do not routinely review explanatory statements, and the result would perhaps need to be shown as >95 per cent, or <5 per cent rather than high or low. They also questioned how this might work for a course that had 10 students and 100 per cent response rate; they suggested that the only genuine risk of identification is if 100 per cent of students gave a unanimous answer; and they suggested that this risk is very low, and should not outweigh the importance of providing accurate data. Some providers considered this would be a punitive action for a positive result and a suppression of the student voice. There was also a concern raised about how onward users such as league tables would manage this missing information and calculate potentially misleading composite measures where different results from the same source are published.
39. However, there was also some limited support for the proposal to suppress results when the response rate was very high and results are unanimous.

Improving response rates

40. One respondent suggested that the OfS should work with providers and student groups to ensure they all reached a 50 per cent response rate and that efforts should be made so that all providers had some publishable data at provider level.

Transparency

41. Some respondents wished to see further technical detail about the response rate thresholds and suppression methodology and wished to see this alongside worked examples with the published results.

Responses relating to proposal 1, question 3

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

42. Overall, many respondents were generally supportive of approaches to protect students' anonymity.

Small cohorts

43. There were a significant number of comments relating to smaller providers and smaller cohorts for this question. They commented that they often did not meet thresholds but some could see no alternative. Another commented they are seeing increasingly smaller cohort sizes so would not wish to see the future respondent number go above 10 and would welcome further lowering of the number where possible. Others requested that they be given access to their own individualised data, with one provider suggesting a respondent threshold of smaller than 10 or greater than five within the provider results dissemination site. Other suggestions included further provider input into the definition of some reporting units, for example courses where naming conventions differ across the sector and where results could be aggregated together to produce results which would meet the threshold.
44. It was suggested that the removal of the 'This does not apply to me' option from the publication thresholds should be monitored to ensure this did not detrimentally affect smaller cohorts.
45. Others asked that the OfS should not restrict the volume of data unless absolutely necessary, including because data from small cohorts is as important for enhancement and planning as data from larger cohorts.

Future approaches to thresholds

46. One respondent took the view that the current response rate threshold of 50 per cent makes the data very robust so they would not wish to see this lowered. Some providers were concerned that having a lower response rate threshold could disincentivise promotion of the survey within providers, which would have a negative impact on response rates. Others commented that the OfS should ensure publication thresholds are set at a relevant level to ensure the results are meaningful. There was also concern that if publication thresholds were to decrease that this would create issues with the reliability of the data.
47. One respondent suggested publishing the previous year's results where they met the threshold if the current year's threshold was not met. Other respondents welcomed consistency across years to enable comparison to be made over time.
48. There were also comments from providers with larger cohorts. One provider suggested that the size of the target population should be taken into account when determining publication thresholds. Others suggested implementing a secondary threshold for larger cohorts, increasing the respondent number and lowering the response rate threshold. Others suggested having different thresholds across different reporting units (i.e. provider, subject, course etc.). They pointed out other sector-wide surveys such as Graduate Outcomes,

Postgraduate Taught Experience Survey (PTES) and Postgraduate Research Experience Survey (PRES) do not have such high publication thresholds and asked whether it would be possible to have data at a lower threshold shared with providers for them to make a decision about its reliability. Others also suggested that consistency across other sector level surveys would be useful.

49. Some respondents requested further consultation on any future changes to publication thresholds in addition to technical detail and examples being published alongside the publication of the data. One respondent would welcome guidance on 'reverse engineering' results from smaller cohorts in order to protect student anonymity.

Data protection suppressions

50. There were further comments from respondents about suppression for unanimous or near unanimous results and the impact this could have on providers and staff promoting the survey to students. They suggested that it could also undermine providers' internal reporting processes. They took the view that the survey could never be completely isolated from the context of academic relationships between staff and students and therefore this would always compromise the anonymity of students' responses and the proposed suppression approach did not fully ameliorate that. Others were concerned about the impact this could have on providers' internal reporting tools and thought it could compromise student choice by hindering a like-for-like comparison.

Our response, proposal 1, question 2

Do you agree with our general approach to determining publication thresholds, as described in paragraph 33 of the consultation document?

51. We welcome the support for our proposal to retain the current thresholds for the 2023 survey and our plans to review the thresholds once the 2023 survey results are known. We understand from our previous consultation and engagement with the sector that the current thresholds provide a good balance between response bias, respondent confidentiality and data availability but also recognise that it is good practice to periodically review these for the reasons set out in the consultation document.

Providers' access to their own data

52. We recognise some cohorts, particularly those delivered by small providers and those who deliver higher education in a further education setting, can fall below the respondent reporting threshold of 10. In these cases, the results will be suppressed in both the publication and the provider portal. The number and range of splits of the results that are published, or can be produced through the provider portal, in addition to more aggregate data in different modes and levels of study, for different views of a provider's student population, provides overlapping and intersecting information about various student characteristics. Without a comprehensive and conservative approach to suppression of small student populations, the opportunities to deduce information about individuals by comparing different breakdowns of the same student populations would represent a risk to the anonymity of student responses. For the NSS publication and dissemination through the provider portal, we take the view that a threshold of 10 students is necessary and sufficient to

mitigate the risk of disclosing information about individuals. While lower thresholds might mitigate this risk if we were only reporting a small number of non-overlapping data points, we take the view that they would not mitigate this risk effectively within the proposed extent of the data involved here.

53. For the reasons set out above, anonymity is important for student engagement with the survey and for the robustness of the survey results. We recognise the value of results from small cohorts to providers for the purposes of their work on enhancement. However, on the balance of the risk to students and integrity of the quality of results more widely, and that the responses from these students form part of the wider provider or potentially subject reporting units we do not intend to make survey results for cohorts of less than 10 available to providers.

Possible future changes to thresholds

54. As responses to the consultation indicate, there may be alternative publication thresholds which would allow us to publish more results, while maintaining their reliability. We are interested in exploring this further, because we think it would meet the needs of data users. In previous years of the survey, we have suppressed some or all results for several large providers because their response rate has been below 50 per cent, despite interest from prospective students and the general public in these results. Following the 2023 NSS publication, we will therefore analyse the results to determine whether the response rate threshold could be lowered, while ensuring that the data does not become unrepresentative. This will involve examining the extent to which non-response bias – which occurs when respondents are different from non-respondents in a way that affects their responses – is present in the survey.
55. As part of our proposals, we set out a general approach to setting publication thresholds that could be used in future years. We indicated that we did not intend to consult on any further changes to the thresholds where these were in line with the general approach. This was to help reduce the burden of consultation on respondents – a point that has previously been made about OfS consultations. We take our consultation obligations seriously, not least because consulting allows us to benefit from the expertise and perspectives of others. We will continue to consider on a case-by-case basis whether consultation is appropriate in relation to any changes we are minded to make in future.

Data protection suppressions

56. Respondent anonymity is important to ensure students can answer questions candidly and consequently for the integrity of the survey. There are some instances where all students on a course have responded in the same way. That is, there is a 100 per cent response rate for the course, and either all respondents have answered positively, or all respondents have answered negatively. This data could constitute personal data, by signifying that all students on a course have answered positively or negatively to a question, it identifies individuals indirectly, and relates to them in terms of their views on their course. Therefore, publishing this data unsuppressed could be in conflict with the previous NSS privacy notice, which assured respondents that they would not be identifiable in any published data. However, we do acknowledge concerns from providers that our proposed approach to suppression could cause them issues both in terms of perceptions of the results externally but also cause technical issues practically in terms of how these fields are able to be imported into internal

reporting tools. The instances of potential suppressions is lower than responses to the consultation would suggest, at around 0.5 per cent. As such, we sought to explore workable alternatives balancing the risk to students and the risk of suppression.

57. In light of the responses to the consultation, we have changed some of our proposed approach. We will suppress results where everyone, or all except one student, responded negatively, but not where everyone responded positively. Our reasons for no longer suppressing the very positive results are as follows; for individuals to be identified and attributed to the positive response, a reasonably motivated individual would need to already know the course that the individual was enrolled on. The number of such courses is currently low, reducing the chance that a motivated individual would be able to find a case in a provider they have knowledge about. The data itself relates to positive responses to courses and is not of a sensitive nature. The publication of unsuppressed positive responses would not have a significant impact on individuals. We have updated the NSS privacy notice to this effect.
58. However, we will implement the proposal to suppress the currently very rare cases where everyone responds negatively. In cases where the response rate is 100 per cent and all, or all but one, of the responses are negative, we would continue with the proposal to replace the positivity measure with an indicator that the course had a very low positivity rate. Our reasons for continuing to suppress these results are as follows; the data relates to negative responses to courses, which could be sensitive for some individuals and could lead to detriment to that individual through recourse by the provider or members of staff. This could have an impact on propensity to answer honestly for some respondents. The data will not be hidden, although there will be some ambiguity about exactly how low the rate is.
59. To help illustrate the effect of this suppression, Table 1 shows some hypothetical cases and whether or not data would be suppressed under the new proposals.

Table 1: Illustrative examples of suppression thresholds

Number in population	Number of responses	Number of positive responses	Number of negative responses	Suppressed?	Reason
100	100	0	100	Yes	Everyone in the population responded negatively
100	100	1	99	Yes	Response rate was 100% and only one student was positive
100	99	0	99	No	Only suppressed if response rate is 100%
100	100	100	0	No	Very positive cases will not be suppressed

60. To mitigate the risk that unsuppressed results can be reverse-engineered using other published results, where one or more questions in a group is suppressed the theme measure relating to that group would also be suppressed.

Improving response rates

61. In 2021 the OfS removed the requirement for providers in England to promote the survey to their students to reduce the burden on providers. In Scotland, Wales and Northern Ireland it remains a requirement. We know that many providers in England choose to continue to promote the survey to their students and use the prepared materials/media provided by the OfS to do so. In 2021, we also made the 'booster' phase automatic for all providers at risk of failing to meet publication thresholds. This involves a targeted campaign of contact with students by the survey contractor to maximise response rates. The survey fieldwork, contact timetable and booster phase is made available to providers in the November prior to the survey launch so that providers are able to plan their own activities to maximise response rates. The NSS consistently achieves very high response rates for surveys of this kind, achieving around 70 per cent annually. Furthermore, the removal of the requirement to promote the survey to students has not had a detrimental impact on response rates across the sector in England. As such, we do not intend to change our approach to promotion of the survey to students at the current time.

Transparency of approach

62. In accordance with previous years, we intend to publish technical guidance alongside the main publication to include our methodology for suppression and thresholds. We will aim to provide worked examples where possible to aid users in their understanding.

Our response, proposal 1, question 3

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

Small cohorts

63. In line with our response to the previous questions, we recognise that some cohorts, particularly those delivered by small providers and those who deliver higher education in further education settings, fall below the respondent reporting threshold of 10. In 2017, when the current threshold was introduced, this was deemed to be the absolute lowest cut-off which maximised the availability of data while also protecting student anonymity. For that reason, we deem five to be too low. For the reasons set out above, anonymity is important for student engagement with the survey and for the robustness of the survey results. While we recognise the value of results from small cohorts to providers for the purposes of internal enhancement, on the balance of the risk to students and integrity of the quality of results more widely – and given these students' results already form part of the wider provider or potentially subject reporting units – we do not intend to make survey results for cohorts of less than 10 available to providers.
64. The reporting units for the NSS are currently consistent with the definitions used across higher education datasets collected by the OfS and Jisc. Therefore in the interests of

consistency, we do not intend to review these for the NSS at the current time. However, the NSS target list (the information providers return to us so we can set up the survey) does offer providers scope to define their own units (with a choice of two), and these are often used by providers to define groups of courses such as by department. These fields are added to the provider's own data released through the portal (subject to the usual publication thresholds) enabling it to analyse data in units which aid internal analysis and distribution of results and to aggregate courses which may fall below the publication threshold.

'Does not apply to me' monitoring

65. As part of our regular quality assurance of the survey and its results we monitor patterns of response which includes monitoring the use of the 'does not apply to me' option.⁹ This was also assessed as part of the large-scale pilot in 2022 which did not identify any specific issue with any student group or type of provision that would be a cause for concern. We will continue to monitor this in line with good practice. We will also monitor whether our approach has a detrimental impact on the quantity of available data.

Future changes to thresholds

66. As before, responses to the consultation indicate there may be alternative publication thresholds which would allow us to publish more results, while maintaining their reliability. We are interested in exploring this, because we believe it would meet the needs of data users. In the past years of the survey, we have suppressed some or all results for several large providers because their response rate has been below 50 per cent, despite interest from prospective students and the general public in these results. Following the 2023 NSS publication, we will therefore analyse the results to determine whether the response rate threshold could be lowered, while managing the risk that the data becomes unrepresentative. This will involve examining the extent to which non-response bias – which occurs when respondents are different from non-respondents in a way that affects their responses – is present in the survey.
67. We note the point made about other sector surveys, and we will seek to take a similar approach to the setting of thresholds to those applied to the Graduate Outcomes survey. Some non-OfS sector surveys have a much lower response rate than the NSS and, in the case of PTES and PRES, are not published at such a granular level.
68. Our approach to aggregation was included within the consultation document where we proposed that aggregation over previous years would be considered.
69. As part of our proposals we set out a general approach to the setting of publication thresholds that could be used in the setting on these thresholds in future years. We indicated that we did not intend to consult on any further changes to the thresholds where these are in line with the general approach. This was to help reduce the burden of consultation on respondents. We take our consultation obligations seriously, not least because consulting allows us to benefit from the expertise and perspectives of others. We will continue to consider on a case-by-case basis whether consultation is appropriate in relation to any changes we are minded to make in future.

⁹ See the NSS 2023 Quality report for initial monitoring of this option in the 2023 results, available at: [NSS data quality report - Office for Students](#).

70. In accordance with previous years, we intend to publish technical guidance alongside the main publication to include our methodology for suppression and thresholds. We will aim to provide worked examples where possible to aid users in their understanding.

Responses to proposal 1, question 4

Do you agree with our general approach to determining whether we aggregate across years, as described in paragraph 44 of the consultation document?

71. The majority of respondents agreed with our proposed general approach to determining aggregation across years. Aggregation was seen by some as helpful to ensure publishable data for smaller providers and cohorts.
72. However, a number of respondents did not agree with our proposed approach. They thought that aggregation risks masking changes to student sentiment year on year. There was a concern that this could detrimentally affect the reputation of small providers where there has been significant improvement year on year. Conversely, another respondent thought this could be used to mask poor performance in an individual year. Some took the view that it would be more appropriate to aggregate across subject or mode rather than year. Others thought that the majority of users do not recognise that data has been aggregated and do not engage with explanations about this. Some respondents considered that the impact of the COVID-19 pandemic on education and higher education more specifically were still present and this would make the reintroduction of aggregation across years problematic.
73. One respondent thought that the challenges with aggregation were acknowledged in the consultation but that the assurances provided in relation to the general approach lacked detail.
74. Some respondents pointed out that due to the changes to the questionnaire in 2023 it would not be possible to aggregate over years for 2023 data. Other respondents would welcome guidance from the OfS to help providers explain to colleagues why it was not appropriate to compare the 2023 survey with previous results.
75. In relation to the use of aggregation on Discover Uni, respondents understood the reasoning for this but thought it would be important to clearly label this to avoid confusion. Other respondents would also welcome publication of the aggregation methodology alongside the data.
76. A number of respondents commented that a consistent approach to aggregation year-on-year would be welcome.
77. Once again, a small number of respondents would welcome further consultation if any further changes were considered.

Responses to proposal 1, question 5

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

78. Many of the responses to this question repeated points made in responses to question four or offered no further comment. Other considerations raised by respondents include how aggregation across years would work for new courses. Another suggested aggregating only at subject level rather than across years. One respondent questioned combining two years of results for a unit into a single result where the original results did not meet the publication threshold and suggested that this would raise concerns about the validity of the single result, particularly where the student experience (learning environment, peer cohort, lecturer etc) could be different across the two years.
79. Some respondents favoured only aggregating across two years while some favoured aggregating over more than two years, suggesting between three and five years, to help reduce the volatility of scores. One respondent suggested producing an indicator of 'direction of travel' to help guide prospective students when aggregation is used. Other respondents suggested user testing would be helpful given that aggregation predominantly affects information on Discover Uni. A respondent suggested that with the move to direct questions, results could be subject to greater volatility year-on-year and the effect of this was still unknown. One respondent suggested aggregation across scales or question groups as happens for the indicators used in the Teaching Excellence Framework (TEF).
80. A respondent suggested we should consider any major changes to the HECoS system and the Common Aggregation Hierarchy (CAH) subject codes standard (which provide a standardise grouping of subjects and terminology); it was not clear if this referred to a local level or nationally. However, another respondent suggested providers often change HECoS/CAH as a course or set of courses grow in size because it allows for the extraction of more specific information; which we take to mean in this context granularity of NSS results.
81. Many respondents said external factors such as the pandemic or strike action should continue to be considered for their impact. However, one respondent disagreed saying that they do not necessarily provide a misleading comparison but offer a valuable insight into the sector's performance. One respondent suggested that demographic changes to the cohort year-on-year should also be taken into account as they could result in differences of opinion and therefore make aggregation inappropriate. Others thought that aggregating to overcome suppression should be used only for numerical reasons and not because of external factors such as a result of strike action.
82. Another respondent said that, when determining our approach to aggregation, consideration should be given to the impact across all the sector not just the majority of the sector. They questioned, in particular, whether the approach might disadvantage some providers with no right of appeal.

83. Some respondents welcomed no further consultation on changes to aggregation proposals because this would reduce the burden on providers. However, they suggested a feedback survey for key users could be used to obtain feedback on future approaches.

Responses to proposal 1, question 6

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

84. Less than half of respondents provided further comment or explanation for this question. Of those who did provide a response, some commented that they would have preferred the general approach to have been implemented rather than consulted on, particularly given the tight timeline for consultation and publication of NSS 2023 results. Others said they had confidence in the OfS to determine the statistical reliability of aggregating across years and whether that might need to change year-on-year depending on the results.
85. Many respondents reiterated points made in their responses to other questions as set out above.
86. Some respondents suggested a rationale or explanation for their support of the current approach. One provider thought it was important to ensure the general approach did not increase burden on providers and maximised data availability particularly for those providing higher education in a further education setting. Others thought the proposals represented a good balance between providing necessary information and protecting student anonymity and that the previous approach had worked well in the past. Others welcomed the consistency in presentation with other OfS dashboards and, in particular, the presentation of statistical uncertainty.
87. One respondent asked the OfS to publish the Jeffreys priors (statistical methodology) that are used in the calculations and possibly some code so that they could replicate the results.

Our response, proposal 1, questions 4 and 6)

Do you agree with our general approach to determining whether we aggregate across years, as described in paragraph 44 of the consultation document?

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

88. We welcome support for our proposed general approach to determining whether we aggregate across years. It helps ensure that small cohorts are able to meet publication thresholds and it is important for student choice.

Small cohorts

89. We recognise that NSS results for smaller cohorts can be subject to greater volatility year on year; this can lead to large increases or decreases which are due to a relatively small

number of responses. This is why we publish confidence intervals for the NSS results so users can see the extent to which the score can be attributed to provider performance and what is due to a lower number of responses. As such, aggregation can smooth out the effect a large increase or decrease can have in a single year. The rationale for aggregating over years, and not for example by subject in the first instance, is that this approach maximises publishable data. Furthermore, the student experience is likely to be more representative for students on the same courses. Course-level data is important for student choice. We know that users, particularly those not familiar with data, can struggle to engage with explanations or labels. This is why we extensively user test our data presentation on Discover Uni; this includes the labelling to show data aggregation. While there are some drawbacks to this approach, with a choice of having publishable data available for students or no data at all, aggregation provides some benefits particularly for small cohorts. As part of our annual quality assurance processes, we continue to bear in mind external factors which may or may not have influenced NSS results year on year (the COVID-19 pandemic being an example of this), and take a decision on whether or not to aggregate in a particular year in line with our general approach. As outlined in the consultation document, we will continue to do this.

Lack of detail in proposals

90. We intend to retain the current publication thresholds for 2023. In setting out the general principles for the ongoing setting of thresholds we sought to lessen consultation burden on providers while providing a set of clear guidelines we would follow. It would not be practical to prescribe a fixed rules-based approach because the balance of factors would likely need to be weighted up on a case-by-case basis; for example, external factors in a single year may vary in their impact on results.

Aggregation for the 2023 results

91. As stated within the consultation document, we do not intend to aggregate for 2023 because of the changes made to the questionnaire which breaks the time series of results.

Discover Uni

92. Data presentation on Discover Uni is subject to rigorous user testing to ensure that prospective students and their advisers can easily understand and interpret results. This includes labelling of the data.

Consistency of approach year on year

93. By introducing a general approach to publication we hope to provide where appropriate a consistency of approach to the publication of the NSS year on year. There may be instances as stated in our general approach outlined in the consultation document where we may need to change our approach to aggregation, for example due to external factors like the pandemic.

Further consultation

94. There is no statutory requirement to consult, and indeed we did not carry out a formal consultation when making the decision not to aggregate results during recent years when the COVID-19 pandemic seemed to be having a marked impact on results. However, we recognise the concern raised by some respondents about no further consultation when making future decisions about our approach to aggregation.

95. We take our consultation obligations seriously, not least because consulting allows us to benefit from the expertise and perspectives of others. We will continue to consider on a case-by-case basis whether consultation is appropriate in relation to any changes we are minded to make in future.

Our response, proposal 1 question 5

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

Alternatives to our proposed approach

96. Aggregation is principally used for results at course level. Course-level information is important for student choice – when determining our approach to student information we aim to make information as clear as possible. Aggregation over years is clearly understood by users whereas, higher aggregated subject data is not as easily understood. For this reason, we are not using subject aggregation.
97. We acknowledge that external factors can influence survey results which may make results less comparable year on year. These are reflected in our general approach as outlined in the consultation document. Point F on page 14 of the consultation document (below) is particularly relevant here:
- “...to consider whether exceptional suppressions might be required. This could happen, for example, if we were to judge that a provider experienced exceptional circumstances during the survey period which means that students’ responses are unlikely to give an accurate picture of the student experience. It could also happen if we consider that students’ responses have been subject to ‘inappropriate influence’, meaning that they are unreliable.”
98. As outlined in the consultation document, there are benefits and drawbacks to any aggregation approach, and in particular when deciding how many years of data to aggregate. We know timeliness of data is important for student choice. However, as before, we also recognise that smaller cohorts can be subject to greater volatility year-on-year as a consequence of their size. This is why, in 2021, we introduced a new three-year average measure which was published alongside the main results. Once there are three years of new survey data, we will review whether it would be appropriate and helpful to publish a three-year aggregation alongside the main NSS publication, or to combine three years where needed to increase the availability of course-level data.
99. We are always looking at new and innovative ways to present data on Discover Uni; data presentation is extensively user tested prior to release. Simplicity is key: too much information can be confusing and there is a risk this leads to misinformation. Direction of travel or trends over time, for example, could be misinterpreted as being a positive flag or indicator, or a negative flag or indicator, rather than a trend overtime; a course may have improved its NSS score over time but this may still be below the national average. Instead, we present factual information, with advice and guidance, which explains that the results represent a moment in time.

100. The new questionnaire was launched in 2023; therefore it is too early to speculate if results will be subject to greater volatility year-on-year, as one respondent suggests. However, the questionnaire has been extensively tested to ensure reliability. The NSS results are subject to quality assurance testing each year. As such, we will continue to monitor patterns of results year on year and whether or not these can be attributed to external factors or attributable to the survey instrument itself. As outlined in the general approach in the consultation, this will be factored into any decision to aggregate data.
101. The TEF has used the NSS question scales for the previous questionnaire, but this was never aggregated; so if a group of five questions each had 50 responses, the score would be the average of those 50 responses across the five questions – not a score as a multiple of the 5 responses (250).
102. The HECoS system and the Common Aggregation Hierarchy (CAH) have been used in our general approach to the publication of the NSS since they were introduced to standardise grouping of subjects and terminology. The HECoS system is operated by HESA/Jisc and they publish details on how stakeholders can feed into the system.¹⁰ At a local level, these are for the provider to determine; a mapping document is provided for course-level data as part of the Discover Uni collection output files shared with a provider on a successful submission of the dataset.
103. In recent years, we have not aggregated NSS results due to the possible impact of the pandemic on results. We continue to monitor NSS results year-on-year and assess whether or not external factors may have had an impact on results; scope for this is included within our general approach. As we previously outlined, as a consequence of our rigorous development process, we are confident that the questionnaire is consistently understood across different groups of students.¹¹ In terms of aggregating in order to meet publication thresholds, with an average of number of responses between five and nine it is hard to determine if there is a genuine change in the demographic or just random differences year-to-year. In response to the suggestion that we do not suppress results in response to some external factors, such as strike action, it can be difficult to attribute the cause of low numbers of responses even when there is intelligence at a local level – causation is difficult to prove definitively. Furthermore, suppressions are used to protect student anonymity and are therefore a data protection requirement.

¹⁰ The Higher Education Classification of Subjects (HECoS) was created as a sector standard for the classification of subject information, for higher education data collectors. HECoS comprises a vocabulary of subject terms and their descriptions. HECoS has an associated Common Aggregation Hierarchy (CAH), designed to provide standard analytical groupings. See https://www.hesa.ac.uk/files/HECoS_and_CAH_Management_guide%20v.2.0.2.pdf [PDF].

¹¹ See [Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students](#) and [National Student Survey 2022 pilot - Office for Students](#).

Our response, proposal 1 question 6

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

104. In setting our general approach to NSS publication we have considered the impact on small cohorts, specifically through aiming to maximise data availability wherever possible and through our approach to thresholds and aggregation. We have modified our approach to suppressions in response to comments that this could impact providers with smaller cohorts.
105. We welcome support for our proposals and in particular that the proposals provided a good balance between data availability and student anonymity. We recognise the importance of consistency across data sources and the reduction in burden for providers.
106. We will provide more information about the calculation of uncertainty and the Jeffreys priors alongside the publication of the data.

Proposal 2: Positivity measure for each question

Consultation questions:

7. Do you agree with proposals to use a positivity measure to present the NSS results? By positivity measure we mean the proportion of respondents who answered the question using the first or second response option – that is, the more positive options.
8. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Responses relating to proposal 2

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

107. Over three-quarters of respondents were supportive of our proposals to use a positivity measure to present the results. Of the alternatives presented within the consultation document, respondents considered this was the best method; being clear, uncomplicated and therefore easy for users to understand.

Question scales

108. There were some concerns about comparability across questions and different response scales, in particular the spacing between response options, for example the difference between 'to some extent' and 'to a small extent'. Despite this, the positivity measure was still seen as the better approach. One respondent suggested weighting the positivity measure depending on the proportions opting for each of the two positive response scale options.

Inclusion of 'does not apply to me' option

109. One response felt we should use all responses. However, it was not possible to infer whether this referred to the inclusion of all response options in the publication of a summary measure for the question scale or something else.
110. Most respondents agreed with the exclusion of 'this does not apply to me' from the positivity measure. One respondent felt that sufficient explanation either as part of the survey or by providers should be given to respondents to prevent students inadvertently selecting this option. In addition, they felt the option 'this does not apply to me' should also be removed from the overall satisfaction question for Wales. One respondent commented that the exclusion of the 'does not apply to me' option would mean that providers would be looking at different data thresholds in relation to data suppression which would be both burdensome and potentially confusing for users. Other respondents considered the 'does not apply' response data to offer some measure of importance of the variable being tested.

Binary measure

111. Another respondent questioned why the questionnaire included four response options if its output was converted to a binary measure. They felt that the positivity measure was an attempt to address an issue which should have been anticipated by the OfS during the development of the questionnaire and the move to direct questions. This respondent also considered not enough attention was given to the net score as an alternative within the consultation document. Other respondents wanted to see further research and guidance provided or the analysis on the results published to support this proposal with the final survey.
112. There was some concern that the move to a four-point scale and this positivity measure could lead to bunching of scores at the top end, which might undermine one of the three key functions of publishing NSS data (which are public accountability, student information and enhancement of the student experience). They considered of the use of the 'most positive' response option for a positivity measure could be more useful.

Four- and five-point response scales

113. Some respondents pointed out that, while the majority of the core survey uses a four-point question-specific scale, some questions use the old five-point Likert scale; the summative question for Scotland, Northern Ireland and Wales for example. They were concerned about the read-across between the percentage agree and positivity measure. There was also concern from English providers that the absence of the 'overall satisfaction' question would lead to providers creating their own overall measure from one or a combination of questions.

Break from previous approach

114. Some respondents felt the new positivity measure provided a useful break in terms of its name and methodology from the previous approach, helping to ensure users did not compare previous years' responses with the new survey. However, some felt that the break in trend data would need to be made explicit within the publication to avoid users comparing historic results from the old survey with the new survey. Others commented that the four-point scale would mean that it would disrupt the long-term historic trends of the survey – meaning that the 2023 survey could not be compared with results from previous years. Some respondents questioned the use of the term 'positivity' and what that means, with some feeling the term 'satisfaction' rather than 'positivity' was clearer and easier to communicate to an external audience.

Alternative or future approaches

115. Other users suggested a mean score, or high proportionality score, could be published alongside the positivity measure. Others considered that a mean score should not be used for ordered categories (such as the response scale used in the NSS). Other respondents suggested a grade point average (GPA) score of four be adopted. The negativity alternative was not popular amongst respondents, given its potential impact on marketing and recruitment and the move from the old methodology which was based on positive responses.
116. Some respondents wanted to know how the NSS positivity measure would be used in TEF in the future.

117. A few respondents welcomed a further review of the positivity measure against other alternatives for future years, once the NSS results are known and they can be more comprehensively tested across results from multiple years.

Responses relating to proposal 2, question 8

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

118. Around half of respondents did not respond or referred to their previous response.
119. Many respondents considered a positivity measure was the most logical option and the summary measure they had been planning for. Most respondents felt the positivity measure was the best of the options given within the consultation document. Others commented this was the most straightforward option which would be easy for users to understand and would aid interpretation of the data. Others felt the absence of a summary measure would cause additional burden on providers and data users. One respondent felt that, despite the fact the 2022 pilot showed the scale option spacing was not evenly spread across each response scale – particularly between positive and negative responses – that this was not a significant problem and, as such, supported our approach.¹² However, one respondent felt that the direct question approach did not fit with the positivity measure proposal as the response scale varies across questions.

Direct questions

120. Respondents felt the move away from the old Likert scale and to the new direct question, four-point scale would improve data quality despite causing a break in the time series of results. However, as before, some were concerned that the old scale had been retained for the overall satisfaction question; meaning scores using a four-point scale are not comparable with the summative question (which uses a five-point scale).

Alternative options

121. One respondent felt that not enough consideration had been given to a net score option. They suggested that consideration should be given to not publishing the NSS this year and to use the results this year as an opportunity to fully understand the data and make evidenced informed decisions. Another respondent felt that the mean score was the better option, but they conceded this would be problematic for students and other users of the data to interpret. Another suggested a GPA would be a better alternative as similar scores are common place in education both domestically and internationally; furthermore, it would prevent the temptation by some users to compare the new survey and the old survey scores.

Number of respondents

122. Responses showed a strong desire to retain the numbers of respondents alongside the positivity measure.

¹² See [National Student Survey 2022 pilot - Office for Students](#).

Guidance

123. Once again there was a desire to see some guidance published alongside the results, in particular to explain the potential jump in score due to the introduction of the four- point scale in 2023. One respondent felt that the general and technical guidance was lacking in the consultation document and that the previous score system should be retained until further guidance and research is published in this area.

Ongoing monitoring

124. One respondent suggested the OfS monitor the use of the 'does not apply to me' response option across student groups and modes of study to ensure the questions in the survey are inclusive.

125. One respondent suggested monitoring patterns of sector-wide responses to particular questions following the publication of the 2023 results.

126. One respondent was concerned that there was not enough justification given for the use of the four-point scale and that this should be evaluated to help with interpretation and evaluation of the four-point scale. Other respondents felt the review of the NSS had been too rushed, with not enough opportunity to correct issues with the survey, such as the extent scale, and that issues with the survey remain.

Small cohorts

127. One respondent felt the positivity options risks unfairly persecuting smaller institutions with a smaller number of negative responses; it would have a far greater impact which will lead to negative comparison being made with much larger institutions.

Our response, proposal 2, question 7

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

128. We welcome support for our proposal to use a positivity measure to present the NSS results. Of the options considered this was the most widely supported by respondents, who reinforced our stated rationale; that the positivity measure was the most straightforward, and would be clearer for users. Furthermore, the consistency with the previous percentage agree measure (using only the two positive response scale options) was seen as welcome, reducing burden on providers.

Question scales

129. As part of the consultation document we published detail on the response scale from our pilot and testing work.¹³ Although this showed some issues with the spacing of the options of the 'extent scale' (which was amended prior to the 2023 survey), overall there was a clear break between 'positive' responses and 'negative' responses for all scales, including the 'extent

¹³ See [National Student Survey 2022 pilot - Office for Students](#).

scale' – although to a lesser extent. This supported our proposal for use of the positivity measure. However, the spacing between the two positive responses and between the two negative responses was not always so consistent across the different question scales, and as such there is less evidence to support the use of a 'very positive' or 'very negative' measure.

130. We do not propose weighting the most positive responses. One of the main benefits of the proposed positivity measure is its simplicity and clarity, which was supported by respondents. Weighting is often misunderstood by users. Furthermore, any weighting applied would be arbitrary because it would be difficult to attribute the weight placed by the respondent themselves in how they respond very positively or just positively – this is likely to be down to the individual. Therefore, we do not propose to give a weighting to responses in our general approach to publication.

Inclusion of 'does not apply to me' option

131. As part of the testing and piloting of the questionnaire, we ensured that the questions asked were comprehended by and applied to the broadest range of students including those studying part time, different subjects, by distance learning and many more variables. One of the ways we did this was through cognitive testing, but also by including the 'does not apply to me' option of the response scale. We analysed results to see if patterns of response may indicate an issue with the questionnaire and its relevance to all students. We did not find anything to suggest a systemic issue or that the questionnaire did not operate as expected for certain groups of students. Guidance within questionnaires, while sometimes necessary, increases the cognitive load on respondents (they have to read through additional information to get to the question) and is not generally considered good practice in survey design. We will continue to monitor this as part of our routine quality assurance analysis of the data each year. The removal of the 'does not apply to me' option means this option is treated as a neutral option; this was also the case for the previous five-point Likert scale. However, the exclusion of the 'does not apply to me' option from the positivity measure does not have an impact on publication thresholds. For example, on a course with 10 responses, if four of those were positive and four negative and the remaining two answered 'does not apply to me', the positivity measure would be 50 per cent – but because the respondent threshold of 10 had been reached, the data would be publishable. The 'does not apply to me' option is also excluded as part of the percentage agree calculation for the overall satisfaction question in Scotland, Northern Ireland and Wales but, as before, this does not affect publication thresholds.

Binary measure

132. The survey utilises a four-point question-specific response scale. As outlined above, previous analysis – as part of our published, rigorous research-based approach to the development and testing of the new questionnaire – supports a clear delineation between a positive response and a negative response across questions. This supports the use of a positivity measure: it shows that to a certain extent students are responding in a binary way – in so far as 'negative' is different from 'positive' but that 'somewhat positive' and 'very positive' may depend on the individual to some extent. The previous survey also utilised a binary approach through the use of the percentage agree but, in this case, neutral responses were included within the binary measure; this was not popular with providers. We did, however, base our proposals on a preliminary sample of the new data. Furthermore, the questionnaire was

extensively tested through a large-scale pilot, subsequent follow-up pilot and thorough cognitive testing. As such we had confidence that the statistical evidence supports our proposed approach without relying on the final dataset. Analysis of the full dataset has confirmed that this is a reasonable approach to take. The net score option was considered as part of our proposals, but it was discounted due to its complexity – this is supported by responses to the consultation where respondents considered the positivity measure to be the most straightforward method out of the alternatives considered in the consultation document.

133. Results from our pilot in 2022 do suggest that respondents who may have previously selected a 'neutral option' in a five-point scale tend towards responding positively in a four-point scale. This is further supported by the consistently high sector-level NSS scores since its inception; the majority of students are positive about their high education experience. Numbers of responses to each of the question scale options will continue to be available, which allows for further nuanced analysis if required.

Four- and five-point scales

134. For Scotland, Northern Ireland and Wales, the summative question retains the previous five-point Likert scale. As part of the consultation in summer 2023, one of the options put forward was to move to a four-point question-specific scale for this question. However, the majority of respondents in the devolved nations wished to retain the current question and its five-point scale. The higher education funding bodies in the devolved nations chose to retain the current summative question, highlighting its central role in their quality assurance monitoring. In their consideration of responses to this consultation, SFC, HEFCW and DfENI looked at possible alternatives – which included the exclusion of the middle option (neutral) in the calculation of percentage agree. However, this would not be consistent with previous years, which was the main benefit respondents to the previous consultation cited to support retaining the current question format. In the 2022 consultation on changes to the survey, and the subsequent published response, the OfS acknowledged the risk that providers and other onward users would create their own summative scores. However, on the balance of risk, in particular of the risk to our published approach to the monitoring of quality and standards, the summative question was too reductive for use with English providers and does not reflect the many facets of quality as defined by the B conditions.¹⁴

Break from previous approach

135. We welcome support for the new positivity measure. With the introduction of the new questionnaire in 2023 the time series of results will be broken meaning that the 2023 survey cannot be compared with previous year's results. The time series or trend data was also interrupted in 2017, despite similarities in questions and retention of the five-point Likert scale; because of changes made to the wider survey, the questions were not directly comparable. This is the case for the 2023 survey despite similarities across some of the questions. We will make clear as part of the NSS publication that 2023 results should not be compared with previous versions of the questionnaire. We appreciate some respondents consider the previous term 'satisfaction' to be more widely understood than positivity and therefore a more appropriate term to adopt for the summary measure. However, with the exception of one question for Scotland, Northern Ireland and Wales, the survey does not

¹⁴ See [Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students](#).

seek to measure 'satisfaction'; indeed the previous survey did not have a satisfaction summary measure (the summary measure was referred to as 'percentage agree'). While providing a useful break in terminology, positivity also reflects the sentiments of students in relation to the multiple, discrete facets of the student academic experience across the question-specific scales, providing a more granular picture of the student experience. This was also supported by some respondents to our consultation. Therefore, we do not propose changing the name of the positivity measure and we continue to discourage comparison between the current survey and its previous iterations as part of the guidance published alongside the results.

Alternative approaches

136. When considering any additional splits or categories of published data, we need to be cognisant of the impact this has on users and in particular that it does not undermine other published data and does not increase the data burden on users. Throughout the consultation document we sought to rationalise where we propose to expand our current approach, the benefits we consider this would bring to users. and where it aligns with wider approaches to publication and or its use in regulation. The risk of producing multiple summary scores means that there are several versions of the truth – which could be potentially misleading for users, particularly prospective student when comparing provision. As such, given the strong support for the positivity measure from respondents and the risk of misleading users, we do not currently plan to publish mean score, net score or GPA alongside the positivity measure.
137. In the consultation document, we outlined where our proposals would apply to the TEF interim indicators for providers in England, published each year. However, the date and details of the next TEF exercise has yet to be finalised; current TEF awards are valid for up to four years.
138. As stated in the consultation, we will review the positivity measure over the next few years and we welcome support for this.

Our response, proposal 2, question 8

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

Direct questions

139. We consulted on the move to direct questions in 2022. As part of this we outlined the benefits of moving to direct scale questions and we welcome further support for this change. As part of the proposals for the summative question in Scotland, Northern Ireland and Wales, we offered options of the summative question to use a four-point direct question scale or a five-point Likert scale, acknowledging the drawbacks of having differential scales. Respondents to the consultation indicated a preference for retaining the five-point scale. As such, the relevant UK funding bodies chose to retain the previous five-point Likert scale to retain consistency over time – recognising the role this question plays in their relative monitoring and quality assurance activities. We have committed to minimising any changes

to the questionnaire between review periods wherever possible; therefore we will not be making changes to the core questions or summative question at this time.¹⁵

Alternative options

140. The positivity measure was supported by the majority of respondents and, as stated above, in their view it is clear, easy to understand and broadly follows the previous approach. There was very limited support for the net score, mean score or GPA. We considered publishing these alongside the positivity measure and the effect on users. We consider that, through publishing multiple summary measures, there is a risk this creates differences in the way the NSS is reported; this could confuse users and affect the clarity of student information. Therefore, on balance, we will not publish the alternative summary measures (GPA, mean score or net score) as part of our general approach to publication.
141. The NSS survey has been comprehensively tested and piloted prior to its introduction in 2023. We have confidence in the robustness of the survey, though our processes for quality assurance (which are published alongside the results) and, given the benefits of publishing NSS results to students, prospective students and providers, we plan to publish the survey in August 2023.

Number of respondents

142. We will retain the number of respondents alongside the positivity measure as part of our general approach to publication.

Guidance

143. We will issue guidance alongside the publication of the data. Because of changes to the questionnaire, 2023 results are not comparable with 2022 results. We will publish a full methodology for the positivity measure and a worked example, together with additional supporting evidence from the pilot looking at the scales themselves. Because of the changes to the survey, it would not be possible to retain the previous score system for the 2023 survey.

Ongoing monitoring

144. We will continue to monitor NSS responses, and use of the scales by respondents to the NSS, as part of our ongoing monitoring and quality assurance.
145. The consultation in summer 2022 outlined the evidence and research underpinning the move to a four-point, question-specific scale.¹⁶ We were not consulting on changes to this scale as part of the 2023 consultation and therefore this was not included in the consultation document.

Small cohorts

146. Scores from smaller cohorts will naturally be subject to greater volatility year on year. However, these scores can go down as the response suggests but also go up subject to a few responses. The respondent number is always published alongside the positivity

¹⁵ See [Consultation on changes to the NSS - Responses and decisions \(officeforstudents.org.uk\)](https://officeforstudents.org.uk).

¹⁶ See [Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students](#).

measure, including on Discover Uni. Our user testing suggests that the majority of students are aware of the impact small numbers have on the confidence they can have in the data and this is also explained in the advice and guidance on the site. Furthermore, our proposals to improve the way we report confidence intervals should also improve interpretation of the data and the confidence users can have in it where there are small numbers of respondents.

Proposal 3: Publication of theme measures

Consultation questions

9. Do you agree with our proposal to delay publication to autumn of question grouping until we can undertake statistical testing of their integrity?
10. What will the impact of a delayed publication of question grouping have on users?

Responses relating to proposal 3, question 9

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

148. Around a third of respondents agreed with our proposal to publish thematic groups of questions once we have undertaken statistical testing of their integrity. It was seen as important to ensure the statistical integrity of the scores prior to publication, and, while the delay was inconvenient, it was the least worst option available. Many respondents were comfortable with delay if the wider NSS results were published in the summer. Others felt that this was the best approach because some of the questions within the survey did not seem to closely relate to others in the same group.

Burden on providers

149. Around two-thirds of respondents disagreed with our proposal. Of these, the principal reason given was related to the timing of the publication of the tested grouping in the autumn. A significant proportion of respondents felt this would cause additional burden for providers through the reporting and interpretation of results both internally and externally. Many commented that, in the absence of any grouping, they would look to create their own scores. They acknowledge that this could cause confusion for onward users and additional work because the groups would need to be calculated internally, distributed and then re-distributed once the official groupings were published. It was also commented that league table compilers would also be likely to create their own groupings. One respondent added that the NSS scores were used in marketing and recruitment and the delay to publication of question groupings would have a detrimental impact on providers.
150. Of the respondents who did not support our proposals, many, while supportive in principle of the need to undertake statistical testing, felt the tested groups should be published alongside the wider NSS results over the summer.
151. Of the respondents who disagreed with our proposals, many respondents felt that the reporting of groups as presented to students (i.e. untested scales) would be the preferred approach and could be labelled as experimental with caveats. This approach would assist with their own analysis and reduce burden on providers, and the testing could inform publication in future years. Some considered there was sufficient evidence to support the use of the thematic groupings (previous pilot activity and cognitive testing) and that the risk of

subsequent revisions was low. Others noted this approach was used for Graduate Outcomes in its formative years. However, one respondent added the caveat that the TEF should only use the tested groupings; but they accept these may vary from the originally published 2023 NSS metrics.

152. Some respondents asked for further clarity about the timing for the publication of question groupings and what constitutes 'autumn'. Others asked if the delay to publication was for 2023 only or would it happen in subsequent years.

Survey development

153. A small number of respondents felt this should have been thought of earlier and tested during the pilot. They questioned why the integrity of the thematic groups was in doubt at this stage in the review process. They suggested the survey should have been tested for construct validity prior to its introduction in 2023. They considered it was a failure on the part of the OfS for not developing and testing an approach to the NSS in a timely way.

Not publishing

154. Others felt we should not publish NSS results at all this year and use this as an opportunity to consider the risks and make a fully informed decision. There was also a concern that the outcomes of the statistical testing could potentially undermine the already published results from the survey, which would erode the survey's credibility. One group, representing providers in London, suggested that if the delay were to be short, it would be better to delay the publication of all the NSS results. However, others considered that the timely release of the results in the summer should be prioritised over publishing tested groupings.

Pre-release to providers

155. One respondent suggested giving providers access two weeks in advance to embargoed data, to enable them to undertake their own analysis. They felt that this would increase with staff confidence in the data and in the conclusions that can be drawn from it, also supporting more meaningful data being presented for students across all four nations.

Specific groupings

156. One respondent asked for more clarity on which questions would belong to each group: specifically students' union and the question on mental wellbeing provision.

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

157. The impact of a delay to the publication of question groups fell broadly into five themes: staff burden, internal staff reporting, student choice, user interpretation and potential confusion.
158. Those respondents who tended to support our approach to delay the publication were more likely to report little or no impact. Those who were opposed to the delay to publication were more likely to report a more significant impact.

User interpretation

159. In their responses many respondents highlighted the importance of question groups to help users, particularly lay audiences, digest and interpret the data in an accessible way. The groups were used as key performance indicators internally and used to monitor progress for

the TEF. However, a small number of respondents focused primarily on the individual questions, with the question groups a secondary consideration.

Burden on providers

160. The majority of responses to this question highlighted the additional work, and therefore burden, the delay would cause to providers. Many providers commented that it would mean they would need to conduct their own analysis in order to meet internal reporting deadlines and facilitate interpretation of the data to internal stakeholders. They also mention that reports would likely need to be rewritten if the question groups were subsequently to change once the official dataset was published; this would cause further additional burden. One respondent also commented that the delay would hamper their ability to benchmark their performance across the sector because of the inconsistency of the approach.
161. Other responding providers commented that they would not be able to provide the group scores to staff alongside the wider results, which would result in additional burden on academic staff. Some respondents suggested that they would not disseminate results at all until the group scores were available. This would cause additional burden to staff in the autumn, which is a particularly busy time of year within providers and would limit onward use of the results to inform improvements for the next academic year.

Reporting and governance

162. Other responses mentioned that their internal governance structures and internal annual provider quality reviews were scheduled around the NSS publication timelines and therefore it would be difficult to provide timely and meaningful analysis with the delay to the publication of groups.
163. There were several concerns which related to the impact of the delay on students. Some respondents felt the delay would have a detrimental impact on their ability to introduce improvements to the student experience prior to the start of the academic year. Others felt that the group scores would be too late to inform student choice with results being widely used in promotion and marketing activities. They suggested there was a danger that providers, and other onwards users of the data such as league tables, would create their own groupings. This would lead to inconsistency, therefore potentially causing confusion among applicants and greater burden for providers though the analysis of league table methodologies. There was also a concern that the groups would not be available for Clearing and worries about the knock-on effects this could have on recruitment.
164. Some providers felt, while a delay to publication of theme scores would have a detrimental effect, that the overall impact of the delay would be limited. This was due to the weight placed upon the theme scores in internal reporting. Moreover, in some instances, that further in-depth analysis – such as the theme scores for internal reporting mechanisms – came later in the academic year. Some providers felt the impact would be limited, as they would create the scores anyway, but did not report this as being particularly burdensome.
165. There was also a concern that a staggered release of the data would lessen the impact of the NSS and diminish its importance to the sector and the general public.

Objection to any question groupings

166. One respondent, who was against the principle of grouping questions at all, reiterated their view that while seeing the benefit of grouping for onward users of the data they did not believe this was a valid approach for a questionnaire that used direct questions.

Grouping and TEF

167. There was a desire for clarity by publishing publication dates, regardless of any delay for the NSS, including the subsequent update to TEF interim dashboards to be made, so that providers are able to plan their workloads. Respondents questioned what 'autumn' might mean in practice. Once again, a few respondents suggested delaying the publication date until all results could be produced – in their view this would reduce burden on providers.

168. There was support that the question groupings should be consistent across publication of the NSS and TEF for providers in England.

Summative question

169. In England, there was a concern the delay to publication of question groups could compound the issues caused by the removal of the summative question and hinder providers' ability to provide summary measures. The question groups were used to benchmark performance against other providers.

Survey development

170. As before, some respondents questioned why the groups had not been tested as part of the development and pilot process. They also were concerned what would happen if the theme groups were found not to work.

171. One provider expressed a hope that the revised NSS would improve the quality of information for students – this would lead to a reduction in the use of league tables, which in their opinion offered an overly simplistic view of information.

Our response, proposal 3 question 9

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

172. We welcome support from respondents on our proposals to undertake statistical testing of the thematic groups of questions prior to their publication. As outlined in the consultation document, this represents good statistical practice and requires a number of tests of the data which would not be feasible with the survey for a summer publication.

173. However, we recognise that the delay to publication would cause considerable additional analysis and work for many providers. We know analysis of the NSS results represents the greatest burden of the survey on providers; this was supported by the responses from providers to this consultation. We acknowledge that providers use question groupings to benchmark their performance both internally and externally. We also recognise the risk of having multiple versions of groupings being produced in the absence of OfS produced

groupings, and the potential for confusion, as well as the impact this could have on students and, in particular, prospective students.

174. One respondent suggested that by releasing the results two weeks early to providers, they could undertake their own analysis and quality assurance of results. There is a limit to how much detailed quality assurance analysis could be done without individual-level data. Given this and our official statistics requirement to publish statistics in a timely fashion, and to facilitate equal access to statistics, we have decided not to delay the publication for the sake of giving providers early access. For the reason outlined in our response to proposal 1, we do not intend to release individualised data to providers.
175. We considered not publishing theme measures at all, which was a suggestion from some respondents who had concerns that the approach did not fit well with the move to direct questions within the revised questionnaire. Given the weight of respondents who wanted to have theme measures published and the rationale provided – that they help with internal dissemination and interpretation of data and their importance for helping students interpret the data – and given the confidence we have from the testing done to date, we intend to publish theme measures for 2023.
176. Given the possible impact on providers and students highlighted in the consultation responses, we sought to explore an interim solution which would enable the timely release of the theme measures while providing a satisfactory level of assurance of the groupings' statistical integrity. The consultation document outlines the development process of the questionnaire through comprehensive cognitive testing and piloting. This testing meant we had some confidence in the question groupings as presented to students and this was considered as part of the questionnaire development process. We have carried out initial analysis on the 2023 results. This suggests that, on the whole, the construction of theme measures using the existing question grouping is supported by the correlations between the responses to the survey. We acknowledge, however, that we may be able to improve the theme measures in the future, following further research. We are therefore publishing the theme measures as experimental statistics, which may be subject to change in the future.
177. On the balance of the statistical evidence available to us and the negative impact on providers, students and other onward users of the data of delaying the publication of the question grouping, we have changed our approach. We will now publish theme measures as presented to respondents alongside the main publication on 10 August 2023 (subject to the relevant decision making) via the OfS website. The questions making up each theme measure can be found in Annex E. The measures will be published as experimental official statistics:¹⁷ they are useful for users alongside the results for individual questions, and will enable users to understand the strengths and potential limitations of the data. Users will then be able to make informed judgements about whether and how they can be used to meet their needs, and provide feedback on their use. We will make it clear that these are experimental statistics and issue guidance that the theme measures should not be used in isolation from the questions which are used to create them.
178. We plan to undertake further analysis and publish the fully tested groupings for the 2024 survey onwards. We recognise the value of consistency of question groupings for all users

¹⁷ See [Guide to experimental statistics - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk).

across the NSS and TEF publications and would seek to align these in any future approach wherever possible.

179. However, we will not publish the theme measures via Discover Uni. This is because we consider this audience would be less likely to engage with and understand the experimental approach taken and therefore the weight to place on the scores for decision making. For the Discover Uni summary statistics on the course pages and widget, we will instead use individual question scores which correlate well with other questions and which score highly for usefulness for decision making in our user testing.

Our response, proposal 3, question 10

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

180. We acknowledge the impact described by providers that the delay to the publication of question groups would have on users, in particular the impact on: staff burden, internal staff reporting, user interpretation, and the potential for confusion. Moreover, we recognise that the delay could have a knock-on impact on student choice due to the potential for multiple versions of the truth.
181. On the balance of the statistical evidence available to us, and the negative impact on providers, students and other onward users of the data with delaying the publication of the question grouping, we have changed our approach. We will now publish question groupings as presented to respondents alongside the main publication on 10 August 2023 (subject to the relevant decision making). The grouping will have the necessary caveats explaining the experimental approach taken. The questions making up each theme measure can be found in Annex E. We plan to undertake further analysis and publish the fully tested groupings for the 2024 survey onwards. We recognise the value of consistency of question groupings for all users across the NSS and TEF publications and would seek to align these in any future approach wherever possible.

Proposal 4: Splits of data presented on the OfS website

Consultation questions

11. Do you agree with the proposal to expand the current splits at sector level?
12. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.
13. Do you agree with the proposal to expand the current splits at provider level?
14. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

Responses relating to proposal 4, question 11

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

182. More than three-quarters of respondents agreed with our proposal to expand the current splits at sector level.
183. There were a small number of respondents, who were broadly in agreement with the proposals, but who had specific concerns. One respondent would have preferred this data to be made available in the data dissemination portal and for the portal to be more usable. Other wanted to see these categories made available at provider level, particularly for larger providers.
184. A small number of respondents did not agree with our proposals. One respondent noted that the overall sample was so small that it meant that the splits were not statistically meaningful; it was not clear from the response whether they meant at provider level, sector level or both. Another respondent had a specific concerns relating to Initial Teacher Training (ITT) provision and the proposal to split this between the subject and teaching. They commented that this does not reflect the way ITT courses are taught and delivered.

Responses relating to proposal 4, question 12

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

185. Many respondents did not provide any further explanation to their answer.
186. Those in support of the proposals felt the splits would be beneficial for access and participation activity and to benchmark provider performance against the sector. They were

also supportive of an approach that aligned with the TEF and wider regulatory activities and felt this was missing from the previous approach to publication.

187. One respondent suggested further disaggregation of different ethnicities to reflect the range of opinions within this category.
188. Two respondents reiterated concerns made in a previous OfS consultation on the student outcome indicators. They commented that it was not useful to define study characteristics based on a student's earliest rather than latest information; they considered this gives a false representation of a student's study profile.
189. While broadly supportive of the proposal and the aim to align the splits with those used across regulatory activities elsewhere, there was concern that some of these definitions were different from those used by Jisc as the designated data body for the OfS. They suggested that this adds to the confusion and burden within providers trying to explain the differences between the two.
190. A small number of respondents questioned the change in categories for the split for sex; in particular that changing from 'Female'/'Male'/'Other' to 'Female or Other'/'Male' would provide data that is not as useful, and not particularly appropriate for those in the 'Other' category, especially if they no longer identify as female.
191. One respondent wanted more information on the layout and functionality of the dashboard.
192. One respondent commented that the proposals did not address the growing call for intersectionality.
193. One respondent suggested that an additional split for student with dependants and/or non-traditional entrants would be particularly useful at sector level where provider results often fail to reach reporting thresholds.
194. A couple of respondents questioned how 'local' would be defined.
195. A provider in Scotland commented on the proposal to split undergraduate programmes and undergraduate programmes with an integrated masters' based on length of study, suggesting this could cause issues in Scotland. In Scotland, the standard undergraduate degree is four years not three, and therefore five for courses with an integrated masters'. They suggested that it would be helpful to identify the student's final year of study, rather than simply length of study.
196. Some respondents wanted to see the additional splits replicated in the provider portal. There were also a couple of further requests that individualised data be made available to providers, to support further analysis and their ability to add broader fields from Jisc/OfS datasets. They considered this would improve the transparency of the data.
197. One respondent – while supportive of the expansion of splits where these are in line with the General Data Protection Regulation (GDPR) principle of lawfulness, fairness and transparency – cautioned against any element of a student's background limiting their options. We took this to mean through its use for student choice.

198. A provider in Scotland suggested that the proposed new split for mode and apprenticeships could lead to misleading comparisons with the different types of degree apprenticeships offered across the different countries of the UK. They considered either this split should not be published or explanatory notes should be provided.
199. A provider in Scotland highlighted the lack of consistency of splits across the UK nations. They considered it was important to have access to the same breadth of results throughout the UK, and were concerned about the impact of having missing data – and therefore unavailable results for some categories for Scotland.

Responses relating to proposal 4, question 13

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

200. Around three-quarters of respondents agreed with our proposal to expand splits at provider level.
201. Providers with smaller cohorts were on the whole supportive of the proposals, but commented that the change would not provide any additional data for them due to the publication thresholds.
202. Some respondents commented that the split by mode, and in particular degree apprenticeships, was welcome. However, others wanted to see how this would work in practice for their provision.
203. Some providers asked if the splits could be made below provider level. One Welsh provider requested a further split on the provider portal by country.
204. One respondent had a concern that further granularisation of NSS data will extend the chance of certain metrics being highlighted as statistically uncertain due to low numbers and/or differing concentrations of split metrics across a course.
205. One provider suggested that the retrospective application of new definitions on existing data and this onwards use would not have been foreseen at the data input stage.
206. Respondents who had commented on the recategorisation of Initial Teacher Training provision reiterated their concerns in their response to this question.
207. One respondent commented that the change would be helpful for prospective students and would allow for greater targeted intervention within providers.
208. One respondent welcomed access to subject data broken down using the Common Aggregation Hierarchy (CAH) levels 1, 2, and 3 – as data relating to both the overarching discipline and individual courses allows for both a general and granular review. However, they highlighted that this approach may risk impacting on the ability to reach the publication threshold for those smaller programmes. They also suggested that, because the emphasis is on providers to place their courses into the higher level HECoS subject groups, which from the CAH levels are drawn, then there is a risk of classing courses differently to other

providers, even if they are similar. This would make comparisons more difficult, as the range of courses in a group could be quite wide-ranging.

209. One Scottish provider considered the expansion of splits to be helpful but said it would cause significant additional work to analyse. They also had questions about how the splits would work in practice. Will Scottish apprenticeships go into the separate apprenticeship category; how the suppression rules would work at provider level for splits; what will constitute undergraduate courses with taught postgraduate components; would these be identified as integrated masters'; and what was the definition of local and how would this be calculated.

Responses relating to proposal 4, question 14

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

210. Many respondents reiterated their previous comments in relation to sector-level splits and provider-level splits.
211. Of the respondents who agreed with our proposal to expand the splits at sector level, the majority commented it would assist with their monitoring of access and participation; some commented this had been lacking in the previous approach to publication. They supported the alignment of splits across wider regulatory activity and the reduction in burden this would mean for providers. Many considered it would improve transparency and accountability. Another commented that it would also help with their Race Equality Charter and Athena Swan activities. One respondent, while supportive of the proposal, considered this would increase burden on providers to modify their reporting accordingly.
212. There was specific support by a small number of providers to have degree apprenticeships as a separate mode of study given the unique way this provision is delivered. However, a provider in Scotland was concerned that the new apprenticeship split could lead to misleading comparison being made across different types of degree apprenticeship provision, specifically degree apprenticeships in England and Wales, graduate apprenticeships in Scotland and Higher Level apprenticeships in Northern Ireland. They commented that explanatory notes should be provided or that this split should not be published at all.
213. More widely on mode of study, one respondent questioned the use of first year data. While consistent with other surveys, it would not be beneficial if a student were to move from full time to part time early on in their course: the results would not reflect the majority of the student experience.
214. Several respondents commented on the impact the addition of specific groups would have on them and their provider. The addition of splits for free school meals and care experienced students was welcome by respondents in England. The Care Leaver/Experienced and Estranged Students in Higher Education Group (CLEESHE), strongly supported the inclusion of the care experience split. They explained this would provide valuable insight into the student experience for these underrepresented groups, informing targeted interventions, research and the evaluation of current practice. They would, however, advocate for the

separation of this category in line with the new data flag categories used by Jisc, as the designated data body, and the inclusion of estranged students as a future category.

215. Two respondents reiterated concerns made in a previous OfS consultation on the student outcome indicators. They commented that it was not useful to define study characteristics based on a student's earliest rather than latest information; they considered this presents a false representation of a student's study profile.
216. While respondents were broadly supportive of the proposal and the aim to align the splits with those used across regulatory activities elsewhere, there was concern that some of these definitions were different from those used by Jisc as the OfS's designated data body. They considered this would add to the confusion and burden within providers trying to explain the differences between the two. Respondents were broadly supportive of the proposal to further separate age categories, but one respondent noted that the 30+ category did not align with the definition used in access and participation plans (which starts at 29).
217. A small number of respondents commented that the proposed dashboard did not address the need to explore intersectionality, and that this would support the understanding of risks to equality of opportunity. Some felt this would be better supported through the release of individualised data to providers.
218. A few providers commented that while useful the additional splits would fail to meet publication thresholds at their provider. One provider suggested that providers could choose their own aggregations for smaller cohorts that fail to reach the threshold for categories like mode of study, for example by department.
219. A provider in Scotland commented on the proposal to split undergraduate programmes and undergraduate programmes with an integrated masters' based on length of study, suggesting this could cause issues in Scotland. In Scotland, the standard undergraduate degree is four years not three, and therefore five for courses with an integrated masters'. They suggested that it would be helpful to identify the students' final year of study rather than simply length of study.
220. Another respondent, who disagreed with the approach to reporting integrated masters', explained that any observed difference in scores would likely be due to students having achieved entry onto the masters' component of the course, rather than from structural differences to the student experience.
221. One respondent suggested that TUNDRA should be included, rather than POLAR, as the latter is no longer used in access and participation plans. Furthermore they questioned the use of socioeconomic classification given the concerns with the validity of this information. This respondent also questioned the inclusion of sexual orientation; they commented that declaration rates were not 100 per cent because it was seen by some as being overly intrusive. They suggested making clearer how sexual orientation is linked to educational outcomes to encourage disclosure and justify its collection. A Scottish provider pointed out that this field was optional in Scotland and therefore the coverage of this data was inconsistent; they recommended this split was not made public.
222. One respondent suggested that student characteristics data at sector level should be weighted as necessary for provider and subject effects. They would also support the

commissioning of further research and analysis to assess the interaction of these factors with access to the dataset.

223. Some respondents asked if the sector-wide splits would also be made available at provider level.
224. One respondent asked how will commuter students, or those living in campus accommodation, be determined.
225. One respondent suggested that the splits should be user tested to reduce the risk of information overload and to ensure the information is used.

Our response, proposal 4, question 11

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

226. We welcome support for our proposals to expand the splits of the NSS data at sector level, and to update the definitions of the splits to increase the coherence and comparability of UK statistics. The definitions move closer to those used by the designated data body (DDB) and by the OfS in TEF, monitoring of student outcomes and access and participation in England. This will reduce the burden on providers and other users because it reduces the need to understand and explain slightly different figures for the same statistic presented in different places. This would also make it easier for users to compare NSS results published on the OfS website to statistics used in other places, to gain a more holistic understanding of outcomes for different groups of students.
227. Note that in order to prioritise the publication of provider-level results, we have delayed the publication of the sector dashboard, which is now planned for the autumn. We will publish a preliminary publication date on our official statistics release schedule¹⁸ in advance of this publication.
228. We acknowledge the specific issues raised by respondents in relation to the definitions being used for some of the splits, and these are discussed in more detail below.
229. In addition to the sector-level information using these splits, providers will be able to access their own data through the provider portal using the splits, where data availability allows and publication thresholds are met. The table in Annex B shows the splits which we intend to publish on the OfS website and make available through the portal for the NSS 2023 results. We intend that providers will be able to see the 'taught or registered' population view of their data, but this functionality will not be available in the initial release of 2023 results.
230. As stated in the consultation document, providers have previously suggested that student experience as measured in the NSS should be an important factor in understanding the access and participation of students in a more holistic way. We expect to explore in future whether and how it would be helpful to publish NSS results at provider-level splits by personal characteristics, as an indicator of possible risks to equality of opportunity. The

¹⁸ See [Official statistics - Office for Students](#).

recent changes in the NSS mean that our exploration will be conducted over the coming years, because we will likely need to build up enough data for a new time series before this can be published in support of access and participation. For the OfS, this could mean publishing it within our access and participation dataset alongside data on the other lifecycle stages, or publishing it in a different but comparable NSS-focused dashboard. Prior to publication of additional student characteristics becoming feasible at provider level, we consider that publishing sector-level data on a wider range of student characteristics could inform understanding of risks to equality of opportunity. This would be by providing insight as to the extent of variations in the student experience for different student groups. Public accountability is a key aim for the survey, and can lead to improvements being made at a sector level and more locally. As such, we do not intend to make the sector-level results only available through the provider portal.

231. The NSS is one of the largest surveys of its kind in the UK: it consistently achieves response rates of around 70 per cent, with around 300,000 responses annually. It provides the most comprehensive view of student perceptions of their academic experience. We acknowledge that some combinations of splits (mode/level/student characteristic) will be relatively small. However, confidence intervals will be published around the values so users can make their own judgements.

Our response, proposal 4 question 12

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

232. We recognise the benefits the publication of additional splits for the NSS and the impact this will have on providers and wider work on equality of opportunity across the sector. We further recognise that alignment across wider regulatory datasets is welcomed by providers.
233. When considering expanding or adding any additional splits for the NSS we consider the demand and benefit of doing so, in addition to availability of data. At sector level it would be possible to disaggregate some ethnicity groups. However, this was only suggested by one respondent. Furthermore we need to consider the benefits of deviating from the wider definitions used across various datasets. In this case, the rationale put forward was not supported by our pilot analysis at sector level and therefore did not outweigh the benefits of having consistency across wider datasets (which respondents highlighted was important to them). We will continue to keep this under review for subsequent years.
234. It is only Mode which is defined using a student's earliest information. This is so that we can maintain a consistent population across all metrics – rather than having, for example, a student appear as full-time, when they are an entrant but part-time when they are a graduate. Everything else is based on the most recent data. Wherever possible we have sought to align our approach with wider regulatory activities and publications. We recognise that in some cases there are inconsistencies in approach across definitions used by Jisc and those used within our proposals. In considering our approach to publication of the NSS we considered the benefits of adopting a different approach to wider datasets. Changing wider definitions is beyond the scope of this consultation. Given the support demonstrated in

response to the consultation, and the benefits that consistency with wider regulatory datasets brings to providers, on balance we do not propose to change any of the definitions used in the general approach to the publication of the NSS.

235. The groupings for sex only apply to the factors used in benchmarking and not for the published splits. We recognise the importance of reporting all categories wherever possible and where reporting thresholds have been met.
236. Alongside the consultation we published indicative sample templates to help onward users of the data prepare for publication. Texuna provides information to providers on the portal in advance of publication each year.
237. We recognise that intersectionality is important when looking at multiple measures of disadvantage. However, when creating intersectional reporting by student characteristics for the NSS, even at sector level the grouping would be very small. Furthermore, in developing our approach we considered the potential risk of overwhelming users with data before we had fully established the value of showing the data in this way. If we were to combine factors, we could either combine all of them or select particular factors: if we combine only a selection, we need to justify why these factors were chosen over others. We welcome feedback through the website on whether intersectional splits would be useful and will judge each year whether providing this extra data outweighs the extra burden on users to understand it.
238. There will always be additional splits that could be added to the dataset. In considering the splits for the NSS we have sought to align these with wider splits used across the regulatory landscape, subject to data availability. Where possible we seek to publish UK-wide splits and where this is not possible those which are equivalent across the four nations. 'Students with dependants' is only collected for providers in Scotland and Northern Ireland. 'Non-traditional entrants' is not a characteristic formally collected in any UK nation. Sub-categories defined as underrepresented groups are included as part of the splits.
239. 'Local' is defined as part of the technical algorithms for student experience outcome and experience measures.¹⁹ It defines local as: 'UK-domiciled, not a distance learner and their location of study is in the same travel to work area as their address prior to entry'. Travel to work areas are defined by the Office for National Statistics (ONS) such that at least 75 per cent of the area's resident workforce work in the area and at least 75 per cent of the people who work in the area also live in the area. The area must also have an economically active population of at least 3,500.²⁰
240. We recognise the difference in delivery of provision in Scotland compared with the rest of the UK. As such we determine integrated masters' by level (i.e. Level 7) of study rather than year of study for this reason.
241. As mentioned previously, the majority of splits published at sector level will also be made available at provider level via the provider portal, subject to data availability and publication

¹⁹ See page 61 of <https://www.officeforstudents.org.uk/media/ff3c49ce-ccb5-4bfc-9ee0-086550a64664/technical-algorithms-for-student-outcome-and-experience-measures-march-2023.pdf> [PDF].

²⁰ See section 4 of [Travel to work area analysis in Great Britain - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/methods/geography/travel-to-work-areas).

thresholds. For the reasons stated in our response to proposal 1, and the importance of respondent anonymity, we have no plans to release individualised data to providers.

242. When developing our proposals, we sought to justify their inclusion in line with lawfulness, fairness and transparency principles. We welcome feedback that our proposals are perceived to fulfil these principles. The publication of sector-level splits applies to the OfS website; it does not apply to Discover Uni. The NSS use for student choice, a key aim for the four UK funding councils and regulators, is to increase equality of opportunity. Prospective students using historical patterns of access and participation by student characteristic to base decisions on what and where to study can be overly reductive and perpetuate current recruitment trends. Therefore, we are not proposing to include these splits on Discover Uni.
243. We recognise the difference in apprenticeship provision across the four nations of the UK. We will provide an explanatory note explaining that provision differs across the UK and as such caution should be exercised when comparing provision in different countries.
244. Higher education and education more widely are devolved to each of the UK nations. As such, data definitions and availability does differ across England, Scotland, Northern Ireland and Wales. Wherever possible, the four UK funding bodies and regulators have sought through our proposals to provide similar or equivalent country-specific splits where UK-wide measures do not exist. For example, the indices of multiple deprivation across each of the four countries, while not directly comparable, are similar measures.

Our response, proposal 4 question 13

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

245. We welcome support for our plans to expand splits at provider level and the positive impact this will have on providers' ability to benchmark their own performance and monitor equality of opportunity. We recognise that, due to small cohort sizes, not all splits would be available to all providers; we nevertheless welcome support for the wider benefits to the sector from these providers too.
246. We welcome support for our proposals to introduce a split for apprenticeship provision. Further detail on the definitions can be found in the guidance below.
247. Country-specific splits are available for a provider's own country via the provider portal.
248. The addition of splits will increase the likelihood of some data having lower confidence intervals. However, we consider that our revised approach to reporting confidence intervals will aid users in determining the level of confidence they can have in the splits.
249. The proposed definitions for the splits reflect those currently in use across wider datasets. Administrative data submitted by providers should reflect what is going on at that particular moment in time, it should not be affected or influenced by current or future approaches to the publication of the NSS or any other dataset.

250. We acknowledge points made by respondents around the categorisation of ITT provision. In determining the splits, we considered the benefits of having an approach which would vary from those used in wider datasets. Given the strong support and the reduction in burden for having consistent definitions across datasets, and the lack of argument put forward for why the NSS should differ, we do not propose to deviate from the wider definitions used across regulatory datasets.
251. We do not intend to publish the provider level splits via Discover Uni but we recognise that this information will be useful for equality of opportunity activities and monitoring within and between providers.
252. The categorisation of provider provision into CAH or HECoS should be done using the relevant guidance – this should assist in a consistency of approach across the sector.
253. We welcome support for the additional splits but recognise this may represent some additional burden. As discussed previously, we consider the burden is worth the benefit. Scottish apprenticeships will be categorised in a single UK-wide apprenticeship category. However, we will supply an explanatory note to outline the differences in this type of provision across the UK. The splits would also have the same revised suppression methodology as outlined as part of proposal 1. ‘Local’ is defined as above in paragraph 239. Taught postgraduate components are identified through level of study.

Our response, proposal 4, question 14

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

254. We welcome support for our proposal to increase the splits available at provider level and the benefits this will bring to providers’ approaches to equality of opportunity, transparency and accountability. We also note the individual benefits for providers participating in specific schemes and initiatives. We appreciate this may be seen as a burden for some respondents but consider that the benefits will outweigh any potential burden, both for students and providers alike.
255. We welcome support for our proposal to disaggregate apprenticeships as a mode of study, reflecting the growth in this type of provision in recent years and the differences in delivery of this provision. As before, we will provide an explanatory note to highlight the difference in apprenticeship provision across the UK.
256. We gladly note the potential beneficial impact reporting of specific groups will have on providers and consequently on equality of opportunity. We also welcome support from organisations supporting these groups. We will continue to monitor new and emerging categories, such as estranged students, used across educational datasets and we will consider whether or not to include them in any future splits once they are established.
257. We have wherever possible in our proposals sought to align the splits with wider datasets. We acknowledge there are some differences between the definitions used in the general approach to NSS publication and regulatory datasets, and those used by Jisc. In determining

the definition to use, we aimed to use the definition most widely used across publication and regulatory datasets.

258. We acknowledge that due to reporting thresholds, for smaller providers not all splits will be available, but welcome wider support for their inclusion. It is possible for providers to add their own fields (such as department or mode of study) to the target list population. This would allow providers to access this data through the provider portal.
259. We acknowledge the point made by one respondent regarding the approach to integrated masters' programmes. To a lesser extent this is also true of standard undergraduate provision, with those continuing into their final year potentially more likely to report a positive experience. Given the difference in response, we consider it a fairer representation of student views; phase one of the NSS review found that students were not generally influenced by marks or grades when responding to the NSS despite, popular opinion in the sector to the contrary.
260. Results will be available via the provider portal using both POLAR and TUNDRA. The TUNDRA measure will be part of the sector-level data published on the OfS website. The POLAR measure forms part of the access and participation dashboard and therefore will also be in the sector level publication.
261. Wherever possible, we have sought to create consistent UK-wide splits, including for sexual orientation; however, we recognise that not all of the fields are mandatory across the UK. As stated in the consultation document, the splits have been determined in part due to their wider use in regulatory activity. Further information on specific student characteristics and their risk to equality of opportunity can be found on the OfS website.²¹
262. From 2023, benchmarked data will be published for each split and available via the OfS website. As outlined below, the benchmarks take into account factors such as subject.
263. Sector level splits are available at provider level via the provider dissemination portal for providers to access their own data.
264. In considering any additional splits, as outlined in the proposal, we would consider the benefits of publishing additional data and the risk of information overload and the burden this places on users. We will continue to monitor and review the current range of splits to ensure that the benefit outweighs any potential burden on users.

²¹ See [Risks by student characteristics - Office for Students](#).

Proposal 5: Benchmarks

Consultation questions:

15. Do you agree with the factors used in our proposals for benchmarking?
16. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Responses relating to proposal 5, question 15

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

265. Just over half of respondents agreed with the factors we proposed for benchmarking. A further 10 per cent were broadly supportive of the factors but with concerns about one or more of the factors used. Just under 10 per cent did not agree with the proposed factors for benchmarking. Around a fifth did not respond to the question.

Responses relating to proposal 5, question 16

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

266. Of the responses which agreed with the factors for benchmarking most did not offer any further explanation. Those who did emphasised the importance of benchmarking to enable more accurate comparison across the sector. Many were also supportive of alignment of approach with the TEF. Others considered it was an opportune time to review the factors, with the move to the new questionnaire. Some respondents welcomed the ability to view benchmarks for more splits of the data, with some also welcoming the inclusion of the provider contribution to their own benchmark.
267. Of the providers who were generally supportive with some reservations, some wanted to see other factors considered for inclusion as benchmarking factors, such as parental experience of high education and measures of advantage.
268. Some respondents had specific concerns with how the factors had been constructed, in particular how some categories had appeared to have been combined. They commented that combining disparate groups is problematic and counter to inclusivity, (for example the merging of Female + Other and White + Unknown). Combining 'Female' with 'Other' was seen as inappropriate as it alludes to an assumption that 'Other' should be like Female or Male, when it is not – there is a reason 'Other' was included, so disregarding it for benchmark purposes as a separate group is not appropriate: insights on a particularly underrepresented group will be lost. This was a view echoed by a number of respondents in regard to this particular benchmarking factor. Similarly for 'White' – for ethnicity, some

respondents suggest that Unknown should be excluded for comparison. It cannot be assumed that 'White' is correct, nor that sex 'Other' is the same as sex 'Female'. Similarly, age should not combine 'Unknown' with under 21. Others suggested that all 'unknown' data points be excluded from benchmarking factors; the proposed merging of small groups for statistical reasons may mask meaningful differences between them. Other respondents who made similar points felt there was insufficient justification for the groupings within the consultation document.

269. One provider in Wales was broadly in agreement but commented it was important that the individual funding bodies are in agreement with the benchmarks.
270. There was general support for a UK-wide approach to benchmarking; however one respondent felt this was odd when other aspects of the survey are now nation specific. There was concern from providers in the devolved nations about how the benchmarking would work for the summative question with the removal of the question for England. They questioned how useful the benchmarking would be at country level with a limited number of providers to benchmark against. They considered it was important to provide contextualisation when reporting benchmarking performance for this question.
271. Some providers wanted greater clarification on the relationship between the benchmarked results and TEF outputs.
272. One provider of higher education in a further education setting, while supportive of the approach, pointed out that benchmarks can be difficult for some users to engage with, particularly within their context. They felt it was important to ensure that data can be readily interpreted and disseminated to an audience with a variable knowledge of higher education reporting. A further respondent also highlighted the need for training and guidance from the OfS on benchmarking which would be accessible and written for a lay audience.
273. A provider suggested that the use of broader groups for part-time students would result in some issues with analysis and interpretation of the data; they wanted to see changes made to the Common Aggregation Hierarchy. They would also like to see more benchmarking groups being used for part-time students with regards to previous educational qualifications to be addressed. They argued using fewer groups becomes an issue when performance is measured against providers that have a minimum entry requirement. So, they wanted to see a group specific for those students with low or no prior educational attainment. There was further support from another respondent for the inclusion of prior educational attainment.
274. A provider in England, made the point, that while it is acceptable that benchmarking factors are chosen to align with use in the TEF data, it appeared that there was not a consistent approach between student outcome measures and student experience measures: whereby Associations between characteristic of students (ABCS) and entry qualifications are not used to construct benchmarks for the NSS. They would welcome transparency around this decision and access to the analysis which showed no clear link between student experience and these factors.
275. One provider requested that the benchmarking data be made available in the same format as other NSS data to help remove burden on providers. Another also wanted to see the

benchmarks made available via the provider dissemination portal in addition to the OfS website.

276. A couple of providers had concerns with the proposed approach to reporting confidence intervals and expressed a preference for the previous approach in terms of clarity for users of the data.
277. There was support for a further review of benchmarking factors, but some respondents felt that any changes introduced as a result would need to be consulted upon.
278. One group of providers suggested that location of provider be considered for inclusion as a benchmarking factor suggesting that factors like costs of living would be disproportionately felt by students studying in London compared with other parts of the UK. A further respondent also supported adding London location as a factor or indices of multiple deprivation.

Our response, proposal 5, question 15

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

279. We welcome support for our proposed factors for benchmarking. We recognise there is some concern by a minority of respondents with some of the factors being considered.

Our response, proposal 5, question 16

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

280. We recognise the importance of benchmarking to providers which enables users to make comparisons across the sector. Where possible we have sought to align our approach with wider regulatory and published datasets to reduce confusion and burden on providers and we were pleased to see support for this approach from respondents.
281. There will always be additional or alternative factors which could be used in benchmarking. In formulating the factors, we have considered their wider use in published datasets and regulatory activities and data availability. Furthermore, in our wider review of selection and grouping of benchmarking factors we describe our approach to identifying the benchmarking factors per indicator and mode of study, ²² as set out in the data indicators consultation.²³ This included consideration of results of the statistical models and the consideration of best fit with the wider range of principles. In identifying the proposed benchmarking factors, we primarily considered the principle that the number and definition of the factors should not compromise the statistical integrity of the broader benchmarking approach. When evaluating

²² See [Guiding principles for benchmarking factors - Office for Students](#).

²³ See [Outcome and experience data - Office for Students](#).

potential sets of factors at this stage, we considered to what extent this principle may be breached. To assess this, we considered:

- a. How many distinct benchmarking groups could theoretically be created?
- b. How many distinct benchmarking groups with at least one student would be created?
- c. How many students would be allocated to small benchmarking groups (i.e. those with five or fewer students, or 20 or fewer students)?
- d. What would the contribution to the benchmark be for each provider?

282. For example, parental education was not considered on the longlist of benchmark factors when they were last reviewed for TEF.²⁴ This was due to partial data coverage; it is only available for providers that submitted to the HESA Student record in 2021-22 and earlier, and will only be available for some of the providers submitting to the HESA Student record from 2022-23 onwards.

283. We acknowledge the points made by respondents on the grouping of some of the benchmarking factors. Some of the evidence we are considering in response to these concerns comes from a wider review of selection and grouping of benchmarking factors we carried out in 2021 based on the previous NSS survey. We expect that much of that evidence will be resilient to the changes in the survey, and our brief review of benchmarking factors has not found any evidence to the contrary.²⁵ However, the brief review has by necessity been a streamlined approach and this means we cannot yet be sure that we have optimised the combination of benchmarking factors for use with the new survey. We intend to carry out a more comprehensive review of benchmarking factors, following the same principles and methodology used in the 2021 review, which we expect to inform any proposed changes for the 2024 NSS publication.

284. Through the previous wider benchmarking factors review it was identified that some groups needed to be combined. In the case of sex and ethnicity, in identifying the benchmarking factors, we primarily considered the principle that the number and definition of the factors should not compromise the statistical integrity of the broader benchmarking approach. When reviewing potential sets of factors, we considered to what extent this principle may be breached. To assess this, we considered how many students would be allocated to small benchmarking groups (i.e. those with five or fewer students, or 20 or fewer students). This led to the grouping as described in the consultation document. While we recognise that there are some drawbacks with this approach, we consider it paramount that the statistical integrity of the benchmarking approach is protected and note that the consequence of not doing so is the risk that the resulting benchmarks are ineffective for the sector comparison purpose they are intended to serve (because the phenomenon of self-benchmarking – driven by small benchmarking group sizes – means that benchmark values tend to be towards a provider's own observed value). We also considered the impact of having a different approach for the NSS publication compared with wider data publications where, on balance and given the

²⁴ See page 19 of <https://www.officeforstudents.org.uk/media/d7aa1913-6cd0-44eb-bc6c-b2783a63d548/review-of-selection-and-grouping-of-benchmarking-factors.pdf> [PDF].

²⁵ See Annex A of 'Benchmarking in the NSS', available at [NSS technical documentation and definitions](#).

support expressed by respondents to a consistent approach, we consider there to be greater benefits to interpretation of the data and reduction in burden on providers. As such, we intend to retain the proposed approach.

285. The NSS is jointly owned and operated by the four UK higher education funders and regulators and managed on their behalf by the OfS. These proposals have been developed in conjunction with the NSS external advisory group which has representatives from each of the four funders and regulators, as well as student and provider representatives from across the UK. Furthermore, the UK Student Information Group oversees the NSS and discusses and agrees unless stated on the proposals and conclusions within this document.
286. We welcome support for our UK-wide approach; we recognise this is important for providers to be able to make comparison across the four nations. The survey has 25 questions in common, but there is a difference of one question between England and the rest of the UK which recognises country-specific priorities. In England the summative question is not asked. In Scotland, Northern Ireland and Wales the freedom of expression question is not asked. Benchmarking the summative question necessitates a slightly different approach, recognising the smaller population for this question. To benchmark effectively we need to explain the differences caused by the characteristics of the students taught at different providers, but not to over-explain such that genuine differences are missed. Therefore, for the summative question we intend to remove Disability and Ethnicity from the benchmarks for part-time students (leaving as factors Mode, Level, Subject, and Age). This removes factors which are mostly not significant while keeping Age, which is mostly significant. This has the effect of reducing the level of providers' contributions to their own benchmarks to a more reasonable level, making it less likely that genuine differences between providers and the rest of the sector will be hidden. However, this will mean that differences in disability and ethnicity factors between providers will no longer be accounted for. Table 2 shows the benchmarking factors and groups to be used for the summative question.

Table 2: New benchmarking factors for the summative question

Factor	Current NSS	Factors for the summative question
Mode of study	Full-time, Part-time	Full-time, Part-time, Apprenticeship
Level of study	Not used in benchmarking	First degree, Other undergraduate, Undergraduate with postgraduate components
Subject of study	CAH level 1	For full-time students: CAH level 2 (with CAH19-02 Celtic studies combined with CAH19-04 Languages and area studies) For part-time students and apprenticeships: Broadly defined subject groups (see Annex C)
Age on entry	Under 21, 21 to 24, 25 and over	Under 21 or unknown, 21 to 30, 31 and over

Factor	Current NSS	Factors for the summative question
Ethnicity	Asian, Black, Other, White, Unknown	Asian, Black, Other, Unknown or White, Mixed, non-UK domiciled (only used for full-time students)
Disability	Declared, None known	Declared, None known (only used for full-time students)
Sex	Male, Female, Other	Female or Other, Male (only used for full-time students)

287. The approach to benchmarking is currently consistent across the NSS and TEF, with the exception that for the NSS this draws on the pool of all respondents and is consequently UK-wide, whereas for the TEF the benchmarks for English providers are created by comparing only with other registered English providers. We expect to retain and prioritise this consistency between the NSS and TEF indicators, and anticipate that any proposed changes identified through our ongoing monitoring and review of benchmarking factors would apply for both the 2024 NSS publication and for future publications of TEF indicators.

288. In publishing the NSS we aim to make the dataset as clear and transparent as possible. Alongside the main publication, we publish a quality report and guidance to the methodology used. We recognise that sometimes this can be necessarily technical. However, one of the recommendations of the first phase of the NSS review was guidance for providers to help them interpret the data in a user friendly way. We will include some elements of this guidance alongside the 2023 publication, and will work on a fuller set of guidance in conjunction with providers to be in place for the 2024 publication.

289. Wherever possible, we aim to create consistency between what is published on the OfS website and the data made available to providers through the portal. We recognise this reduces burden on providers, reducing the need to refer to two data sources. However, there are times when this is not possible. In the case of the new benchmarks for the data splits, this is complicated by the fact that portal users are able to split the data using factors which are not available in the published data, and can combine these factors to produce new tables. This means the published benchmarks only relate to a small proportion of the data available through the portal, so some splits would have benchmark data but most would not. We consider this situation could cause confusion for users, noting the concern by some respondents more widely about the interpretation and understanding of benchmarks. It is not possible at this stage to benchmark every possible split, due to the complexity of possible tables which could be constructed within the portal, and our desire to allow data to be released to providers as soon as feasible. However, we are planning to improve the reporting and functionality of the provider portal over the next couple of years. As part of this work we will explore the inclusion of the benchmarks into the provider portal in a clear way for the splits available, recognising the reduction in burden this would provide for portal users.

290. To clarify, the calculation of the confidence intervals for the difference from benchmark will continue to be produced using the Normal distribution. The change is that a range of

confidence intervals are published and, instead of a significance flag. The proportion of the statistical distribution materially above or below the benchmark is shown.

291. We recognise these changes may not appear to be as clear as the previous approach.

However, while the previous approach was clear, it had some serious limitations in terms of aiding responsible use of the data, which the new approach addresses:

- There was a 'cliff-edge' effect: very small changes in the benchmark or the positivity measure (for example, due to data amendments) could add or remove this flag, even though the change in the evidence was very slight. Our current approach instead presents a range of confidence intervals around the difference from benchmark, allowing data users to determine with varying degrees of confidence whether the positivity measure is different from benchmark.
- Previously, we made various adjustments for multiple comparisons. In effect, these widened the confidence intervals around the statistics, in order to reduce the risk that a data viewer looking at many items encountered a random effect that was reported as significant. A disadvantage of this approach is that it made the same adjustment for everyone, regardless of how they used the NSS statistics. This means that in some cases there was a risk of obscuring real evidence. A second disadvantage is that the approach complicated the calculation of the confidence intervals, making them harder to reproduce. Our current approach does not make an adjustment for multiple comparisons, and instead provides data users with the information they need to address risks presented by multiple comparisons.

292. We welcome support for our ongoing monitoring and review of benchmarking factors, and acknowledge a desire from some respondents for further consultation. As such, where there are substantive changes we would seek to consult on our proposals prior to their introduction.

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

Consultation questions:

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

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

Responses relating to proposal 6, question 17

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

294. The majority of respondents who replied to this question either fully or partly supported our proposed approach for the publication of questions relating to healthcare, allied health and clinical practice.
295. Around a third of respondents did not answer this question or replied that it was not applicable to them.
296. Of those who agreed or partly agreed with our approach, many were supportive of the publication in subsequent years for prospective students but felt the cautious approach to the publication of 2023 was prudent given concerns with coverage.
297. Others were supportive of the approach and the delay to publishing externally but wanted to have the data available to providers at the time of the main NSS publication. One respondent suggested that the results had been previously published alongside the main results and therefore they might be missed if published at a later date. However others commented that the data should not be published either internally or externally until the robustness of the data could be verified.
298. Of those that did not agree, some could not see the value these questions would bring to improving provision as placements were often fought over by providers and a close eye placed on their quality. Another respondent commented that placements were often influenced by factors outside the provider's control and highlighted the impact of the pandemic and industrial action on placement students in particular; therefore they believe the data should not be published externally. Others also did not support any external publication of these questions at all. A couple of respondents felt that contextualisation would be required if the results were to be made public to explain that the scores do not reflect the university experience but solely their placement experience.

Responses relating to proposal 6, question 18

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

299. As before, many respondents felt it was important to wait until the results can be verified and quality assured. Other felt that while the impact of the delay would not be as great for that of proposal 3, it would reduce the value of the data to inform ongoing improvements to clinical placement provision.
300. One respondent commented that their provider has two courses which are not NHS courses and have been asked this question when it is not relevant to them. This suggests that there may be some issues with the current methodology.
301. Two respondents suggest that it was strange that the OfS developed a survey mode which asks these questions to some respondents without being confident that their studies are relevant and asked why this would not have been addressed at an earlier stage.
302. One respondent suggested questions for wider placement provision should be considered for inclusion within the survey.
303. A few respondents felt we should wait until 2024 to publish this data.

Our response, proposal 6, question 17

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

304. We welcome support for our approach for the publication of questions relating to healthcare, allied health and clinical placements.
305. We judge that the benefits of assessing the coverage of these questions before publishing outweighs the benefits of publishing them sooner. We note that the results from these questions have not been published for a few years, and judge that some of the aims of these questions will be met by sharing the data with providers through the dissemination portal. They will be shared at the same time as the main NSS publication.
306. The majority of those who responded could see value in these questions and this is supported by our conversations with providers. Placement provision forms an integral part of these types of course and therefore the provider should be held appropriately accountable for clinical placements. In determining whether or not to publish we consider factors such as industrial action and the impact this may have had on results.

Our response, proposal 6, question 18

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

307. We note a respondent has highlighted an issue with their population. We would encourage anyone with specific concerns to get in touch with the team at nss@officeforstudents.org.uk. This will also help us fine-tune the methodology more widely. We have not received many notifications from providers that they have issues with their population. Therefore, we have some confidence in our methodology but this does support our cautious approach.
308. Historically, the placement question population was defined on the basis of their funding sources. Following changes to this field it necessitated an alternative approach to try to ensure that the relevant population was correctly identified. This used existing data fields to reduce the need to collect additional data fields from providers and hence reduce unnecessary burden. While we are confident in our approach, it is likely that some finetuning will be required to ensure full and accurate coverage.
309. We found questions on placement provision were a popular topic for inclusion in the survey as part of phase one of the NSS review. However, the questions would only be relevant to a subset of the population and it would be difficult to identify this population for routing without collecting additional data. Furthermore, some courses have formal assessed placements as part of their course; others have optional placements and or work-based learning. As such, as part of the wider review of the optional banks, we plan to continue to ask about placement provision so providers can opt in to these questions appropriate to their context and delivery.
310. We recognise that the information from these questions is useful for providers, we are sufficiently confident in the quality of the data to release it for providers for their own planning and enhancement purposes with the necessary caveats and limitations. On balance the usefulness of this data for providers outweighs the limitation of the data being released only to providers via the portal.
311. We will not publish a theme measure summarising the six healthcare questions as part of the 2023 release to providers. We have not yet reviewed whether it is appropriate and helpful to combine the questions in this way. We judge that there will be little impact on providers or the public through this omission and we choose to prioritise the timely release of the data. We intend to conduct a review before the 2024 survey which could lead to a summary measure being shared with providers and published for these questions.

Other questions in the consultation

Consultation questions:

19. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.
20. In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?
21. What effect will the proposals have on:
- a. opportunities for persons to use the Welsh language?
 - b. treating the Welsh language no less favourably than the English language?
22. How could the proposals be changed so that the policy decision would impact positively on, or not impact negatively on:
- a. opportunities for persons to use the Welsh language?
 - b. treating the Welsh language no less favourably than the English language?

Responses to question 19

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

312. Around a third of respondents found the proposals clear. Around 40 per cent of respondents left this blank or said that the question was not applicable.
313. Around a third of respondents had general or specific comments on the clarity of the proposals.

Publication timing and outputs

314. A number of respondents wanted greater clarity on timings for publication and commented that the references to the timing in the consultation document had been too vague. They highlighted the knock-on impact to workload planning within providers.
315. A number of respondents also wanted greater clarity on how the data would be presented and published, particularly via the provider portal. They requested similar reports to the ones provided for the external data publication.
316. There was also confusion from some respondents about what would be published via the OfS website and Discover Uni, and what would be provided via the provider portal. Furthermore, providers wanted clarity on how the absence of the summative question in England would be addressed through publication.

Consultation burden

317. A small number of respondents highlighted the burden that reading and responding to detailed consultations like this one has on providers, particularly on those that are smaller. They felt that the proposals could be more concise, particularly when referring to the continuation of the previous approach to publication.
318. One respondent felt that these proposals should have been consulted on as part of the previous NSS consultation (that dealt with changes to the questionnaire).

Future changes

319. Some respondent wanted greater clarity on future changes such as updates to the optional banks. One respondent commented that, due to recent changes in the questionnaire and the disruption to results as a result of the pandemic that the surveys consistency and stability was important in future years.
320. Other respondents reiterated previous comments regarding the OfS not consulting on any subsequent changes and wanting to be consulted on further changes.

Links to TEF

321. A small number of respondents wanted further clarity on how these changes would feed into the TEF.

Proposal 1

322. Of the specific concerns raised, the most common was in relation to the proposal around suppression of responses with unanimous high or low results.
323. One respondent found the proposal for aggregation unclear and questioned how this would apply to 2023 data and whether or not it would be aggregated with previous years.

Proposal 2

324. One respondent considered that the positivity measure could have been more clearly explained.

Responses to question 20

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

325. Around three-quarters of respondents did not answer this question or stated they had no further comment to make.
326. Of those who did comment, many of these commented on the timing of the consultation. Some felt the consultation period was too long and questioned if it was necessary at all. Some felt releasing the consultation so close to Easter was problematic while others felt the length of consultation and timings were more appropriate to that of the previous consultation.

327. Others commented that the consultation should have been carried out earlier in the year or alongside the 2022 consultation. Some respondents questioned what effect the timing of the consultation would have on the timing of the publication of data. Other reiterated the point that they wanted greater clarity on publication timelines.
328. There were a couple of comments suggesting a summary section at the beginning would have been helpful; others felt the executive summary was not as clear as it could be. Others felt the document was too long and too text heavy. Video or live sessions were suggested as a way of helping respondents understand the proposals. Consultation burden was once again mentioned, in particular given that many of the proposals were seeking to reduce burden but the consultation was contributing to it.

Our response, question 19

Publication timing and outputs

329. We recognise that confirmation of the publication date is important for provider planning. We aimed to give an indication of timing through the consultation document as late summer. Before reaching a provisional decision about publishing NSS results on 10 August, we discussed options with sector mission groups and bodies to understand the impact of publishing NSS data at a later date than the usual early July publication date. We understand the difficulties it might cause to providers if NSS results are published in August and we recognise that the later publication of NSS results this year is likely to have an impact on providers' ability to launch their usual cycles of drawing on the NSS for quality, equality and other decision-making activities. The reason for the delay is the interrelationship between the consultation and publication: in line with the Code of Statistics we should firstly ensure any publication date can be met: secondly that we should not pre-empt the outcomes of the consultation (which could have a bearing on when we are able to publish and when).
330. For the same reason it was not possible to provide more granular detail on the provider portal or dashboard. We did, however, publish templates alongside the publication which could be used to help providers prepare for publication of results.²⁶
331. Throughout the consultation document we sought to clarify where our general approach to publication would differ across the OfS website and Discover Uni, specifically in the splits and benchmarks which affect the OfS website only. Furthermore, we also highlighted where data published externally would not be made available through the provider portal. We also included detail on information we would not normally expect to publish but that would be made available. This was summarised in a table format in the annexes of the consultation document where there were differences across the platforms. However, we are always looking at ways of improving the clarity of our consultations and will consider ways of being clearer in future.

Consultation burden

332. We recognise that reading and responding to consultations places a burden on providers and we seek to ensure that our proposals are as clear as possible and that the burden is proportionate. The OfS minimises the regulatory burden it places on providers, while

²⁶ See [National Student Survey - NSS - Office for Students](#).

ensuring action is effective in meeting our goals and regulatory objectives. Details of our previous approach were included because they were material to our ongoing approach in their application to the new questionnaire. It was possible that respondents may not have been familiar with the previous approach and otherwise not have had sufficient information to make an informed response.

333. It was not possible to incorporate the proposals within this consultation into the previous (summer 2022) consultation for the following reasons. Firstly, the outcomes of the changes to the survey were unknown: both the format of the survey, the questions asked and the scales used. It would have necessitated pre-empting a series of hypothetical outcomes in order to meaningfully consult on how we publish the data. Furthermore, our approach to publication has been informed by analysis of the 2023 results. The survey runs from January to the end of April; the consultation was timed to ensure a full consideration of the proposals and to aim for a summer publication date if possible.

Future changes

334. Changes to the optional banks were not in scope for this consultation. We do plan to review these in advance of the next NSS review period. This will not interrupt the time series for the current questionnaire. In our response to the previous consultation we stated we would not normally expect to make changes to the core questionnaire between the four-year review periods.

Links to TEF

335. We consider that it is appropriate to take account of the proposed review of theme measures before proceeding with future annual publications of TEF NSS indicators. We consider this approach will minimise burden on providers by removing the possibility that TEF NSS indicators are constructed using different theme measures to the main NSS results. It also reduces the risk that users of the data take inappropriate actions on the basis of groupings that are subsequently shown to have issues.
336. In the decisions relating to our consultation on the TEF, we confirmed our intention that TEF exercises should be conducted every four years. Use of any new theme measures would in the first instance relate to forthcoming annual publications of TEF NSS indicators. We intend to evaluate the TEF exercise currently underway to understand how well it has delivered its intended purpose and consider whether improvements and efficiencies can be made to the TEF scheme for participating providers, students and the OfS. We would expect to consult on any substantive changes for future TEF exercises.

Proposal 1

337. We note that some respondents found the information regarding our intention to suppress unanimous high or low results not as clear as they could be. We have sought to provide further clarity in the inclusion of a worked example in explaining our change of approach under proposal 1.
338. We note one respondent had specific concerns about the clarity of our general approach to setting publication thresholds. For the 2023 survey, we will not aggregate across years in either the NSS publication or Discover Uni. This is because the questionnaire and the response options have changed between 2022 and 2023.

Proposal 2

339. When trying to describe or explain any technical calculation or proposal there are challenges in presenting this in a way all users can easily interpret. In this case we provided a worked example to help illustrate the proposal and detail on how the response scale would be used. We note it was only one respondent that found it unclear. We would encourage respondents to get in touch with the OfS if any aspects of the proposals are unclear.

Our response, question 20

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

340. As before, it was not possible to incorporate the proposals within this consultation into the previous summer 2022 consultation for the following reasons. Firstly, the outcomes of the changes to the survey were unknown: both the format of the survey, the questions asked and the scales used; this would have necessitated pre-empting a series of hypothetical outcomes in order to meaningfully consult on how we publish the data. Furthermore, our approach to publication has been informed by analysis of the 2023 results; the survey runs from January to the end of April. The consultation was timed to ensure a full consideration of the proposals and to ensure a summer publication date where possible.

341. As before, we recognise that reading and responding to consultations places a burden on providers and where possible we seek to ensure that our proposals are as clear as possible the that the burden is proportionate. The OfS minimises the regulatory burden it places on providers, while ensuring action is effective in meeting our goals and regulatory objectives.

Responses to question 21

What effect will the proposals have on:

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

342. The majority of respondents did not provide a response or responded no comment. Of those who did respond, all of them supported the survey being available in Welsh and English and that Welsh language was being treated no less favourably than English. One respondent highlighted it was important to ensure that the Welsh survey continued to perform in a similar way to the English survey, to ensure any nuance of language had been picked up. One respondent commented this was for HEFCW to determine.

Responses to question 22

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

a. opportunities for persons to use the Welsh language?

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

343. The majority of respondents did not provide a response to this question or commented that it was not applicable to them. Of those who did respond, one suggested the consultation document and online survey could be made available in Welsh. Another commented it would be useful to see the proportion of students who complete the survey in Welsh so that Welsh institutions can monitor Welsh language-use for the purposes of ensuring that their own policies provide equal access to the Welsh language.

Our response, questions 21 and 22

344. The survey was designed, cognitively tested and piloted in both Welsh and English to ensure parity of approach and consistent interpretation by students across both languages.

345. The online survey for the consultation was available in both Welsh and English with respondents able to respond in either language. We recognise that the consultation document was only available in English. We will explore in conjunction with HEFCW further opportunities to provide bi-lingual documents wherever possible in future.

Annex A: Consultation questions

Questions for proposal 1

1. To what extent do you agree with our proposals to publish NSS results at a sector and provider level?
2. Do you agree with our general approach to determining publication thresholds?
3. Are there any other considerations that we should take into account when determining publication thresholds, either now or in the future?
4. Do you agree with our general approach to determining whether we aggregate across years?
5. Are there any other considerations that we should take into account when determining whether to aggregate across years?
6. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

Questions for proposal 2

7. Do you agree with proposals to use a positivity measure to present the NSS results? By 'positivity measure' we mean the proportion of respondents who answered the question using the first or second response option – that is, the more positive options.
8. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Questions for proposal 3

9. Do you agree with our proposal to delay publication to autumn of question grouping until we can undertake statistical testing of their integrity?
1. What will the impact of a delayed publication of question grouping have on users?

Questions for proposal 4

2. Do you agree with the proposal to expand the current splits at sector level?
3. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.
4. Do you agree with the proposal to expand the current splits at provider level?
5. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.

Questions for proposal 5

6. Do you agree with the factors used in our proposals for benchmarking?
7. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Questions for proposal 6

8. Do you agree with our proposed approach for the publication of questions relating to healthcare, allied health and clinical practice placements?
9. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.

Other questions on the consultation

10. Are there aspects of the proposals you found unclear? If so, please specify which, and tell us why.
11. In your view, are there ways in which the objectives of this consultation could be delivered more efficiently or effectively than proposed here?
12. What effect will the proposals have on:
 - a. opportunities for persons to use the Welsh language?
 - b. treating the Welsh language no less favourably than the English language?
13. How could proposals be changed so that the policy decision would impact positively on, or not impact negatively on:
 - a. opportunities for persons to use the Welsh language?
 - b. treating the Welsh language no less favourably than the English language?

Annex B: Splits of data for NSS 2023 results

Split	Sector level	Provider level	Dissemination portal
Year	✓	✓	✓
Taught or registered		✓	✓
Country of provider	✓	✓	✓
Subject of study	✓	✓	✓
Level of study	✓	✓	✓
Mode of study	✓	✓	✓
Age	✓		✓
Disability status	✓		✓
Ethnicity	✓		✓
Sex	✓		✓
Domicile	✓		✓
Disability type	✓		✓
Local students	✓		✓
Parental higher education status	✓		✓
Sexual orientation	✓		✓
Care experienced students	✓		✓
Estranged learners	✓ (England, Wales, Northern Ireland)		
Free school meals eligibility	✓ (English providers only)		
Learners from military families	✓ (English providers only)		
TUNDRA (Tracking underrepresentation by area), an area-based measure identifying educational underrepresentation for young people ²⁷	✓ (English providers only)		✓

²⁷ See [About the TUNDRA area-based measures data - Office for Students](#).

Split	Sector level	Provider level	Dissemination portal
Index of multiple derivation	✓ (country-specific measure)		✓
Course			✓
Department			✓
Expected length of study			✓
Highest qualification on entry			✓
Socio-economic classification			✓
POLAR (Participation of local areas), a historical area-based measure identifying educational underrepresentation for young people ²⁸			✓

²⁸ See [Young participation by area - Office for Students](#).

Annex C: Broadly defined subject groups

Table C1: Broadly defined subject groups proposed for use in benchmarking for part-time and apprenticeship students

Subject group	Description	Definition
1	Business and management	IPSBJ_CAH2 = CAH17-01
2	Design, and creative and performing arts	IPSBJ_CAH2 = (CAH25-01, CAH25-02)
3	Education and teaching	IPSBJ_CAH2 = CAH22-01
4	Engineering, technology and computing	IPSBJ_CAH2 = (CAH10-01, CAH10-03, CAH11-01)
5	Humanities and languages	IPSBJ_CAH2 = (CAH19-01, CAH19-02, CAH19-04, CAH20-01, CAH20-02, CAH23-01, CAH24-01)
6	Law and social sciences	IPSBJ_CAH2 = (CAH15-01, CAH15-02, CAH15-03, CAH15-04, CAH16-01)
7	Medicine, dentistry and veterinary sciences	IPSBJ_CAH2 = (CAH01-01, CAH05-01)
8	Natural and built environment	IPSBJ_CAH2 = (CAH06-01, CAH13-01, CAH26-01)
9	Natural and mathematical sciences	IPSBJ_CAH2 = (CAH03-01, CAH03-02, CAH07-01, CAH07-02, CAH07-04, CAH09-01)
10	Nursing, allied health and psychology	IPSBJ_CAH2 = (CAH02-02, CAH02-04, CAH02-05, CAH02-06, CAH04-01)

Annex D: Matters to which we have had regard in reaching our decisions

The OfS's general duties

1. In reaching our decisions the OfS has had regard to its general duties as set out in section 2(1) of the Higher Education and Research Act 2017 (HERA).²⁹ We consider that the outcomes in this consultation are particularly relevant to general duties (b), (c) and (e), which relate to quality, choice and opportunities for students; competition where this is in the interests of students; equality of opportunity in connection with access to and participation in higher education.
2. NSS results' key role in promoting quality is achieved through their general approach to publication. Publication of the results gives the survey credibility and visibility; accordingly providers and the sector as a whole pay close attention to the results. Through the mechanism of student choice, and in particular competition, this in turn can lead to improvements being made to the quality of course provision. We have previously seen this with the assessment and feedback scores for the preceding survey.
3. In reaching our decisions, we have sought to align, wherever possible, development of the NSS with the recent changes we have made to our regulation of quality through the B conditions of registration and the revised Teaching Excellence Framework (TEF). This is in part to assist providers in monitoring their own performance. Responses to the consultation suggest that this will be the case. For proposals 4 and 5 where we have looked at alternative approaches or additional groups suggested through the consultation responses. We have considered the benefit a deviation in approach for the NSS against benefits of having a consistent approach across multiple datasets. This also is consistent with duty (g) and the principles of best regulatory practice. Engaging with fewer measures is more transparent and consistent.
4. In reaching our decisions the general approach will ensure parity in the way NSS results are published, in a way that continues to promote quality through public accountability and student choice.
5. A key aim of the survey is to provide information to individual providers to support their quality improvement or enhancement activities. We have therefore sought to ensure that our proposals reinforce the incentives for providers to continue to do so, for example by presenting the results in a way that minimises analytical burden on providers, and where appropriate aligning to definitions used in the TEF, the principal aim of which is to incentivise excellence above the regulatory baseline. Furthermore, we have changed our approach to the publication of question groupings. This is in response to the high proportion of responses which highlighted the negative impact our original proposal would have on users and their ability to interpret the data while trying to balance statistical integrity.

²⁹ 'Higher Education and Research Act 2017', available at <https://www.legislation.gov.uk/ukpga/2017/29/contents/enacted>.

6. Subject to appropriate decision making, we would normally expect NSS results to be published at sector level and in relation to individual providers. We see this as an important set of information that students and their advisers can use to decide what and where to study, this is supported by the responses to this consultation. Our use of the survey results as a tool to support informed student choice means that our approach to publication should be robust and transparent and to be of interest to future students in an accessible way. We take the view that our proposals achieve this by presenting results in a meaningful way. Presentation on Discover Uni has been thoroughly user tested to ensure the results are easy to understand and users can draw the correct conclusions from the results to make an informed choice.
7. The publication and public availability of the results gives the survey results greater prominence, incentivising providers to make improvements to the student experience which could lead to improvements in quality of outcomes.
8. Our general policy for publication of the survey results at sector level and provider level is designed to ensure greater reporting by student characteristics than the current approach and is in line with our wider approach to access and participation. This is important to ensure the NSS continues to support equality of opportunity for different groups of students; this is supported by responses to this consultation.

Factors in section 67A of HERA

9. In reaching our decisions we have had regard to section 67A of HERA. We consider the outcomes of this consultation are particularly relevant to 5a, i, ii, iii which refer to the interests of students on higher education courses provided by English higher education providers, people thinking about undertaking, or who have undertaken, such courses, and English higher education providers. In formulating our proposals, we listened to providers and students to ensure we understand their views. We have fully considered all responses to this consultation in reaching our decisions.
10. In reaching our decisions, we have considered the information that will be of use to students on higher education courses through the positivity measure, making the results easier to engage with and understand by non-statistical experts. Students' unions and student representatives often use the data in conjunction with staff to devise improvement plans or to hold providers to account through evidencing where there may be issues. We have also proposed to expand the groups or splits we provide in our sector-level and provider-level data, enabling the monitoring of equality of opportunity and TEF activities by students. Our benchmark proposals make it simpler for students to assess a provider's performance based on its profile in a meaningful way. We have changed our approach to the publication of question groupings, given the negative impact the initial absence of these groupings could have on users and particularly students' and providers' interpretation of the data.
11. Furthermore, publication of the NSS has an impact on current students through the improvements providers make in response. Phase one of the review found that, in the view of students and many providers, this is where the NSS had greatest impact. This was supported through the responses to proposal 3, citing the impact a delay to publication grouping would have on students, through reducing providers' ability to make informed changes to the student experience.

12. In reaching our decisions, we have considered the information provided to people considering undertaking English higher education courses. We addressed this specifically in relation to the publication of results via Discover Uni, and more generally through our approach to publication. The positivity measure makes the results easier to engage with and understood by non-statistical experts. We will not publish data by student groups or splits for the purposes of student information. This is because it can have the effect of reducing equality of opportunity. Students may base choices on historical recruitment patterns rather than what might be the best course for them. We will not use benchmarks for student information. This is because our research shows that this audience does not engage well with benchmarked data and therefore it could be potentially misleading.
13. In reaching our decisions, we have considered the information given to higher education providers, in particular through the accessibility of the positivity measure and through the widening of the splits of student groups – helping them achieve their equality of opportunity targets. Both options for the publication of question groups will assist with the understanding of the data within providers; the aggregation of information is in response to requests from providers. We also seek to align our approach wherever possible with the approach used by student outcomes data and TEF to assist providers in monitoring their own performance. The benchmarks will also enable English education providers to assess their performance and was cited as a principal use for the survey within providers. Furthermore we have changed our approach in response to the impact that a delay in the publication of question grouping would have on provider interpretation of the data.
14. In reaching our decisions we have also had regard to the public interest need (5c) within section 67A, specifically by increasing the publicly available data. But we have balanced that with section 5b and the interests of providers in making some provider-specific data available to them via the dissemination portal.
15. In reaching our proposals we have had regard to the need for excluding from publication, so far as practicable, any information which relates to the affairs of a particular body or individual, where publication of that information would or might, in the opinion of the OfS, seriously and prejudicially affect the interests of that body or individual. This relates in particular to the setting of a principle for thresholds to protect individuals, but also through our revised approach to suppression of unanimous results. We also have had regard through the general policy for publication of the information we would not usually expect to publish, including in relation to optional banks (whose response rates and generally much lower than the core survey) and the open text comments (where respondents or staff members could be inferred).

Public Sector Equality Duty

16. We have had regard to Schedule 1, paragraph 21 of HERA, which extends the Equality Act 2010, and therefore the Public Sector Equality Duty, to the OfS. This requires the OfS to have due regard to the need to eliminate unlawful discrimination, foster good relations between different groups and take steps to advance equality of opportunity.
17. More generally, we have considered whether there may be any interaction between our decisions in relation to the NSS and equality matters. We consider that publication of student characteristic splits is likely to advance equality of opportunity because it will increase the

incentive on providers to make improvements and the ability of students and others to engage with providers on an informed basis.

18. Through this consultation have sought views on any unintended consequences of our proposals for a general policy on publication, for example for particular types of provider or groups of students. The responses did not raise any concerns about any unintended consequences we had not already noted as part of the consultation.

The Regulators' Code

19. We have had regard to the Regulators' Code.³⁰ Section 1 of the code is particularly relevant: 'Regulators should carry out their activities in a way that supports those they regulate to comply and grow'.
20. The decisions outlined in this consultation for the general policy for publication of sector wide and provider level data of the NSS would give providers and the wider public with extensive reliable information about the views of students. This is likely to support growth for providers with good results through student recruitment.
21. The alignment where possible with TEF and student outcomes data supports compliance. We have had regard to this through the alignment of data definitions and approach with student outcomes and TEF. This means that a provider's NSS results provide with insights into areas in which the OfS may identify compliance concerns in future.
22. Our general policy for publication also includes the addition of further splits within the published datasets, allowing greater transparency and supporting OfS and sector-wide work on equality of opportunity. This will allow providers and third sector agencies to compare performance across providers for groups of students. Through its key aim of supporting informed student choice, the NSS provides a mechanism through which providers can improve and potentially grow through increased student recruitment.
23. Section 4 of the code is also relevant: regulators should share information about compliance and risk Regulators should collectively follow the principle of 'collect once, use many times' when requesting information from those they regulate. We have had regard to section four through an alignment of approach across student outcomes, TEF and its use in student information and public accountability through this general policy for publication. We are using a single data source which can easily be accessed from an open source by providers and others to help onward users target resources and activities and minimise duplication.

Guidance issued by the Secretary of State

24. We have had regard to all relevant guidance from the Secretary of State.³¹
25. We have had regard to strategic guidance of February 2021³² and the request for a review of the NSS. The publication matters in this consultation arise from the review of the NSS and the

³⁰ Available at [Regulators' Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk).

³¹ See [Guidance from government - Office for Students](#).

³² See [ofs-strategic-guidance-20210208.pdf \(officeforstudents.org.uk\) \[PDF\]](#).

changes made to the questionnaire. We have also sought, wherever possible, to reduce the burden of analysis for providers and to promote statistically responsible use of the NSS results. The review found that this was its greatest burden; we have sought to reduce this burden through our changed approach to the publication of question groupings.

26. We have also had regard to the matters set out in the Secretary of State's guidance dated March 2022. We consider that the points relating to quality are particularly relevant to our proposals.

'Where outcomes data is not below a threshold to trigger a regulatory intervention, it can still point to areas of concern that must be addressed. The OfS also receives information from students and others that may point to concerns about quality.'

27. Specifically the use of wider information beyond the student outcome thresholds that may point to concerns about quality as part of wider regulatory intelligence. The publication of wider information which informs the monitoring of providers enables providers and the wider public to see the data used for monitoring purposes. We had also had regard through the alignment of definitions and splits with those used in wider regulatory activity including student outcomes and TEF.

28. We have had regard to guidance on technical qualifications, degree apprenticeships and Institutes of Technology (IoTs): 'We would like the OfS to work with officials to help to grow the uptake of high-quality technical education and degree apprenticeships including, where possible, through the use of access and participation targets, information and guidance, as well as supporting the raising of the profile of IOTs.' Our proposal expands splits of the data to include apprenticeships to make this type of provision more viable to students, prospective students and the general public for accountability.

29. We have had regard to the access and participation priorities in the publication of splits outlined in the letter from the Secretary of State announcing the new Director for Fair Access and Participation.³³

Code of Practice for Statistics

30. We have had regard to the Code of Practice for Statistics in our general approach for the publication of the results from the NSS.

31. The following pillars are particularly relevant (we have summarised the principles for brevity):

- a. **Quality:** Principle Q2.1 Methods and processes should be based on national and international practice, scientific principle or established professional consensus. We have reflected this principle in how we have developed proposals for publication in line with wider robust statistical work undertaken by the OfS over the past few years particularly in relation to proposals relating to benchmarking and communicating statistical uncertainty.
- b. **Value:** V1.1 Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which

³³ See [Letter from the Department for Education announcing the appointment of the new director for access and participation \(officeforstudents.org.uk\)](https://www.officeforstudents.org.uk).

the statistics might be used and the nature of the decisions that are or could be informed by them. Our proposals seek to update the way we publish the data to address current issues including through harmonising the data definitions used across the assessment of quality and TEF wherever possible.

- c. **Value:** V4.1 Statistics producers should keep up to date with developments that can improve statistics and data. They should be transparent in conducting their development activities and be open about the outcomes and longer-term development plans. We have reflected this principle in how we have developed our proposals through a robust process of statistical analysis to ensure the presentation of data are well understood and interpreted consistently. This includes finalising plans for proposal 3 once we can undertake statistical analysis of the integrity of the question grouping.

32. We have also had regard to the following pillars:

- a. **Trustworthiness:** T4.1 Organisations should be transparent about their approach to public engagement with users, potential users, and other stakeholders with an interest in the public good served by the statistics.
- b. **Trustworthiness:** T4.2 A work programme should be established and regularly reviewed. Statistics producers should be open about progress towards meeting priorities and objectives. Users and other stakeholders should be involved to help prioritise statistical plans.
- c. **Trustworthiness** T3: Orderly release. Organisations should commit to releasing their statistics in an open and transparent manner that promotes public confidence.

33. We have had regard to these principles through our initial stakeholder engagement and this consultation process. Our NSS review group included a mix of staff from providers, students and other onward users of the data. We have also drawn on the advice from wider OfS groups on statistical good practice.

Annex E: Questions used in the creation of each theme measure

Teaching on my course
1. How good are teaching staff at explaining things?
2. How often do teaching staff make the subject engaging?
3. How often is the course intellectually stimulating?
4. How often does your course challenge you to achieve your best work?
Learning opportunities
5. To what extent have you had the chance to explore ideas and concepts in depth?
6. How well does your course introduce subjects and skills in a way that builds on what you have already learned?
7. To what extent have you had the chance to bring together information and ideas from different topics?
8. To what extent does your course have the right balance of directed and independent study?
9. How well has your course developed your knowledge and skills that you think you will need for your future?
Assessment and feedback
10. How clear were the marking criteria used to assess your work?
11. How fair has the marking and assessment been on your course?
12. How well have assessments allowed you to demonstrate what you have learned?
14. How often does feedback help you to improve your work?
Academic support
15. How easy was it to contact teaching staff when you needed to?
16. How well have teaching staff supported your learning?
Organisation and management
17. How well organised is your course?
18. How well were any changes to teaching on your course communicated?
Learning resources
19. How well have the IT resources and facilities supported your learning?
20. How well have the library resources (e.g. books, online services and learning spaces) supported your learning?
21. How easy is it to access subject specific resources (e.g. equipment, facilities, software) when you need them?

Student voice

22. To what extent do you get the right opportunities to give feedback on your course?

23. To what extent are students' opinions about the course valued by staff?

24 How clear is it that students' feedback on the course is acted on?



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www.nationalarchives.gov.uk/doc/open-government-licence/version/3/