

**Office for
Students**



NSS review

Phase one report

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NSS review: Phase one report

The report summarises the findings of the first phase of the 2020 National Student Survey (NSS) review and makes recommendations for the second phase of the review.

Executive summary

1. The National Student Survey is an annual census of all final year undergraduate students at UK universities. It has been conducted since 2005 and attracts a response rate of around 70 per cent each year. The survey is conducted between January and April each year, before most students have completed their final exams or assessments. The NSS currently asks 27 questions covering various aspects of the student academic experience. It also has the potential to ask additional topical questions.
2. In September 2020, the Office for Students (OfS) chair and the Secretary of State agreed that there should be a review of the NSS to investigate the extent to which the survey was adversely impacting on the quality of higher education and to develop practical ways to mitigate and eliminate them. The first phase of the review, which this report covers, ran from September to December 2020.
3. These concerns on the part of the Department for Education (DfE) included the extent to which the NSS may be contributing to a 'reduction in of quality and standards. The NSS has also been considered by the DfE alongside wider data collections as part of a drive to reduce regulatory burden on providers, as set out in the 'Reducing bureaucratic burden in research, innovation and higher education' paper.¹
4. The OfS conducted a rigorous review of the NSS, drawing substantial evidence from academics, students, higher education providers and relevant experts such as the Royal Statistical Society and sector bodies, in addition to undertaking analysis of historical NSS results and modelling options for possible sampling approaches.
5. The evidence included:
 - A poll of over 1,000 current, prospective and recent students
 - An open consultation page on the OfS website. This had 1,185 responses from academics (40 per cent), other staff of universities and colleges, and other stakeholders such as those with roles in information, advice and guidance
 - Structured interviews with stakeholders
 - Five round tables with students, university leaders and academics; and engaging with academic experts
 - Discussions with our student panel and information, advice and guidance advisory group.

¹ See <https://www.gov.uk/government/publications/reducing-bureaucratic-burdens-higher-education/reducing-bureaucratic-burdens-on-research-innovation-and-higher-education>.

6. We also conducted new analysis to test any correlation between the NSS and grade inflation. Full details of our methodology can be seen from paragraph 27.

Evidence and findings

7. Clarify the purpose of the NSS in the current higher education landscape.

- a. Over its lifetime most of those to whom we spoke valued the NSS as an independent survey of student perception of their academic experience across the UK.
- b. We found in our discussions with stakeholders that the survey is widely used to enhance the student experience by providers. This was seen by them as the main purpose of the survey. They value the ability to make comparisons and benchmark their performance. It is often used a starting point for staff-student partnership.
- c. However, there was also concern that the survey can be used as blunt tool within providers to hold individual departments, and in some cases individual academics, to account.
- d. It is also used for student information by prospective students, though this is not seen as a primary purpose by providers. Applicants we spoke to found the NSS and other metrics useful for sifting down options rather than making final decisions. This is supported by the poll findings and student information research.
- e. The survey is an important mechanism by which students and student unions hold their universities and colleges to account. Given the public investment in higher education, on the whole it was seen that transparent, official information should be in the public domain.

8. Assess the bureaucratic burden the NSS places on providers and how this could be reduced.

- a. Overall, we heard that the benefits of the NSS outweigh the burden. The NSS is well established and embedded into universities and colleges. They do not see listening to the student voice as a burden.
- b. Many universities and colleges would run their own surveys if the NSS did not exist, which we heard would likely place more burden and cost on providers.
- c. However, this was not a universal picture. Academic staff were much more likely to report burden, in particular in relation to chasing improvements in NSS scores, which they felt could be a distraction from teaching.
- d. While improvements to the student experience and internal dissemination of results were generally seen as the biggest burden for universities and colleges and student unions, for some promotion was also a significant burden.
- e. The biggest burden for students was survey fatigue, with the NSS being just one of multiple surveys they are sent to complete.

9. **Explore the unintended and unanticipated consequences of the NSS for provider behaviour, and how these could be prevented, including whether the NSS drives the lowering of academic standards and grade inflation.**
- a. We did not find any evidence of a systemic issue of grade inflation or a lowering of standards from providers or students, but anecdotal comments from academics suggest this could be happening at a local level.
 - b. We conducted new analysis for this review to investigate the extent to which the NSS is linked with the lowering of standards and grade inflation.
 - c. We found that grade inflation existed before the introduction of the NSS, and that the marked increase in grade inflation occurred around five years after the first year of the survey. This makes it unlikely that the NSS is the sole cause of grade inflation.
 - d. At a provider level, we found no correlation between grade inflation and increases in overall satisfaction. For a provider, awarding more first class degrees is not a simple route to getting better NSS results.
 - e. Reported intellectual stimulation, as measured by the NSS, also remains high in the face of grade inflation. This provides some challenge to the theory that students are getting better grades because, due to pressures related to the NSS, courses have become easier.
 - f. Students who get better degrees are more likely to say that they are satisfied, even when other factors are taken into account. We do not believe that these two factors are directly causally linked. For example, we heard from providers and students it cannot simply be the case that students respond positively to the NSS because they have received a good degree: the timing of the survey means that many students are unaware of their final grade when they respond, although due to variations in semesters and assessment patterns between providers this may not be universally true. There may be an indirect causal link between the two factors, or they may be linked by a third factor (for example, students who are more engaged with their course may tend to get better degrees and tend to be more satisfied).
10. **Examine the appropriate level at which the NSS could continue to provide reliable data on the student perspective on their subjects, their providers and the wider system, and what could be done without depending on a universal annual sample.**
- a. Six survey designs were compared with the current NSS (annual census of final year, undergraduate students, about 300,000 annually). We have focused on the designs below because each has at least one clear benefit, and because together they illustrate the tensions between sample size, burden, cost and reliability:
 - A:** Small sample survey of final year students (about 30,000 students)
 - B:** Large sample survey of final year students (about 250,000 students)
 - C:** Biennial census survey of final year students (around 450,000 students, every two years)
 - D:** Sample survey of all undergraduates (about 450,000 students)

E: Volunteer survey (about 90,000 students)

F: Opinion poll (about 10,000 students).

- b. The clear preference of most of those to whom we spoke is to continue with the existing annual census, but with changes to the questions to improve their usefulness. Some also favoured extending the census to other undergraduate year groups, though this would have significant extra cost. The OfS board had supported trialling this option when it discussed the NSS in 2019.
- c. Two other options could achieve some of the benefits of the current NSS while potentially reducing burden and cost – the large, stratified sample and the biennial survey. Neither design meets users’ needs as well as the current NSS, but both might be regarded as ‘good enough’. For example, a sample survey of all undergraduates would provide estimates close to those from an annual census survey for 98 to 99 per cent of providers. The biennial survey introduces no sampling error at all because it remains a full census survey. Unlike the large sample survey, however, it introduces a time-lag that grows to two years by the end of the survey cycle. Further research is needed to understand the impact of this, and the extent to which it would cause problems for users.

11. Examine the extent to which data from the NSS should be made public, including the implications of Freedom of Information legislation.

- a. It would be highly unusual for a UK-regulated sector, with significant opportunities for consumer choice, for a consumer feedback mechanism not to be published. In most cases this is done at least at provider level.
- b. There is a concern from providers that non-publication would not remove the issues around league tables but would deny them valuable comparative information. Indeed, there is a risk that non-publication could compound concerns about league tables, with league table compilers likely to rely on less robust datasets.
- c. Providers were keen for us to review the current reporting thresholds – at present we publish at course level with a minimum response rate of 50 per cent and at least 10 respondents.
- d. It is likely results would be subject to Freedom of Information legislation. Good practice suggests that if this is the case the information should be published anyway.

12. Ensure the OfS has the data it needs to regulate quality effectively.

- a. For the OfS and other UK funding bodies, the NSS is an increasingly important regulatory tool.
- b. It provides valuable independent evidence about poorly rated providers or courses, that can lead to further investigation.
- c. In the OfS’s drive to improve quality and standards, having robust data at provider level on the student experience is particularly important. It has the potential (subject to consultation) to provide a number of key indicators that would be a part of a set of regulatory indicators to determine where further monitoring and intervention might be required.

- d. Some of those we interviewed raised concerns that the NSS may have been used historically as a proxy measure for teaching quality rather than a measure of student perceptions of their academic experience. However, the Royal Statistical Society recognised that using the NSS as a survey of students' perceptions of their academic experience and as part of a wider set of measures could be a valid approach.

13. Ensure the NSS will stand the test of time and can be adapted and refined periodically to prevent gaming.

- a. We did not find any evidence of widespread gaming of the survey.
- b. We did hear about isolated incidents of inappropriate influence; this is in line with the type of allegations of inappropriate influence received by the OfS over the past three years.
- c. The majority of allegations relate to staff instructing respondents not to respond neutrally, of the reasons given being the use of the five-point Likert scale (agree and mostly agree) responses in the calculation of percentage agreement or the linking of the survey with reputation of the provider.
- d. Providers generally valued the fact the NSS had remained relatively unchanged, which meant they could monitor long-term trends. However, some felt this might have led to a slowing-down of enhancement impact and that the aspects of the student experience had changed over time.

14. Ensure the UK-wide role of the survey is considered in any recommendations.

- a. The review heard from providers and students across all four nations of the UK, as well as from the Department for the Economy in Northern Ireland (DfENI), the Scottish Funding Council (SFC) and the Higher Education Funding Council for Wales (HEFCW).
- b. The NSS has a defined role in the regulation of quality in Northern Ireland, Scotland and Wales, with the student voice forming a key part of their higher education strategies. There is strong support for the continuation of the annual census survey in the other UK nations, though some could be open to a biennial census.

Recommendations

15. The recommendations arising from phase one of the review are:

- **Recommendation one** – Examine the two possible alternatives to a universal annual census of final year students; large stratified sample or biennial survey, against the current annual census, ensuring the survey remains statistically robust at least at provider level.
- **Recommendation two** – Review the core survey questions to ensure they remain fit for purpose and stand the test of time. This will include the removal of the term 'satisfaction' from the summative question or aggregate score to replace Question 27.
- **Recommendation three** – Continue to publish the NSS at a level that is statistically robust.
- **Recommendation four** – Improve user guidance to providers and students' unions on responsible statistical use of NSS results, in addition to improvements to the data dissemination site to help remove burden on providers. Raise student and students' union

awareness of the allegation of inappropriate influence process, including what may constitute inappropriate influence.

Background

16. The NSS has provided a voice to over 4 million students since it was launched in 2005. Its introduction coincided with providers being able to charge students up to £3,000 per year to study. The survey was designed to capture students' views on the quality of their courses in this context. More than 300,000 students respond each year. In 2020, it had a response rate of 69 per cent and has typically exceeded 70 per cent. The equivalent survey in the USA has an overall response rate of 28 per cent.
17. NSS data provides information for prospective students and stakeholders to support improved learning outcomes. It does so by gathering students' perceptions about key aspects of the academic experience. Its main objectives are to:
 - inform prospective students' choices
 - provide data that supports providers in improving the quality of students' academic experience
 - support public accountability.
18. Additionally, the NSS has an increasingly important role in regulation, providing insights through course, subject and provider-level results. The results inform Teaching Excellence and Student Outcome Framework (TEF) metrics. They are used routinely to help identify potential regulatory issues in Scotland, Northern Ireland and Wales. As the OfS consults on its requirements for quality in English providers, it has proposed that the NSS play an increasingly important regulatory role in providing insights that can be considered alongside other data sources. Student engagement in wider regulatory activity, such as TEF and access and participation plans, usually relies on smaller groups of students, making the NSS the principal mechanism the OfS has for engaging with the views of the majority of the undergraduate student population.
19. The NSS results at sector, provider and subject-within-provider level are published annually on the OfS website and by many other independent student information providers, including UCAS. Results are also published on the Discover Uni website to help inform prospective students' decisions.² Individual providers and student representative organisations can access a more detailed breakdown of the NSS results through a dissemination portal.
20. The NSS currently has 27 questions across eight broad areas covering the academic experience, with opportunities for students to make open-ended comments on positive and negative aspects of their higher education experience. The current survey reflects revisions made following a comprehensive review by the National Centre for Social Research in 2014. In 2017 a new NSS was introduced following extensive research. In addition to the 27 core questions, there are six questions for nursing, midwifery and allied health placement students, and all students in the final year of a degree apprenticeship programme are asked questions about the workplace element of their training. The open-ended questions are anonymised and

² See <https://discoveruni.gov.uk/>.

given to providers to help them identify their strengths and how they can improve their students' experience. Several optional questions, for the information of participating providers only, follow the main questionnaire. Providers also have the option of including up to two of their own questions.

21. The survey uses a Likert scale designed to measure collective student responses to a concept – for example 'learning community'. As concepts are multifaceted, multiple questions are asked to measure each concept. Students respond to each question by choosing from five points on the scale, ranging from 'Definitely agree' to 'Definitely disagree', or by choosing 'Not applicable'.

Governance and funding

22. The UK higher education funding and regulatory bodies, who jointly fund the survey, work in partnership on the NSS to provide information to students and other stakeholders about learning, teaching and the student academic experience. This is covered by a memorandum of understanding between the UK funding councils and regulators. Students from across the whole of the UK are therefore eligible to complete the survey and provide feedback on their experiences of higher education. The OfS runs and manages the survey on behalf of the four UK nations.

Concerns about the NSS

23. There are concerns about the NSS. The DfE has argued that the NSS is "exerting a downward pressure on quality and standards" through contributing to grade inflation. They believe that the NSS gives academics an incentive to mark students more favourably, to improve their course scores in the survey; particularly because NSS results are used in league tables. The DfE also considers the NSS, alongside wider data collections, to be part of the regulatory burden on providers. Their concerns are explained in the government's paper, 'Reducing bureaucratic burden in research, innovation and higher education':

'Since its inception in 2005, the NSS has exerted a downwards pressure on standards within our higher education system, and there have been consistent calls for it to be reformed. There is valid concern from some in the sector that good scores can more easily be achieved through dumbing down and spoon-feeding students, rather than pursuing high standards and embedding the subject knowledge and intellectual skills needed to succeed in the modern workplace. These concerns have been driven by both the survey's current structure and its usage in developing sector league tables and rankings. While government acknowledges that the NSS can be a helpful tool for providers and regulators, we believe its benefits are currently outweighed by these concerns. Further, its results do not correlate well with other more robust measures of quality, with some of the worst courses in the country, in terms of drop-out rates and progression to highly skilled employment, receiving high NSS scores. Accordingly, the extensive use of the NSS in league tables may cause some students to choose courses that are easy and entertaining, rather than robust and rigorous.

'The Government shares concerns raised by some in the sector that, in its current form, the NSS is open to gaming, with reports of some institutions deliberately encouraging their final year students to answer positively with incentives/messaging about their future career

prospects. Academics have also criticised the cost and bureaucracy the NSS creates, arguing that the level of activity it generates can be a distraction from more important teaching and research activities. There is a sense that the level of activity it drives in universities and colleges has become excessive and inefficient. For example, we are aware that some providers employ analysts to drill down into NSS performance, in some cases at module level, and investigate any sub-par performance.³

24. In recognition of such concerns, the OfS chair and the Secretary of State have agreed that there should be a review of the NSS to investigate the extent of such adverse impacts and to develop practical ways to mitigate and eliminate them. The first phase of the review, which this report covers, ran from September to December 2020.
25. We have actively been seeking evidence of such concerns during phase one of the review, and we will address them in this report.

Terms of reference

26. The terms of reference for this review, which include those agreed between the OfS chair and the Secretary of State, are to:
- a. Clarify the purpose of the NSS in the current higher education landscape.
 - b. Assess the bureaucratic burden the NSS places on providers and how this could be reduced.
 - c. Explore the unintended and unanticipated consequences of the NSS for provider behaviour, and how these could be prevented, including whether the NSS drives the lowering of academic standards and grade inflation.
 - d. Examine the appropriate level at which the NSS could continue to provide reliable data on the student perspective on their subject, provider and the wider system, and what could be done without depending on a universal annual sample.
 - e. Examine the extent to which data from the NSS should be made public, including the implications of Freedom of Information legislation.
 - f. Ensure the OfS has the data it needs to regulate quality effectively.
 - g. Ensure the NSS will stand the test of time and can be adapted and refined periodically to prevent gaming.
 - h. Ensure the UK-wide role of the survey is considered in any recommendations.

Working group

27. The role of the working group was to advise the OfS on its approach to the review and any recommendations arising. The group was made up of members from a range of provider types and colleagues with a variety of roles including leadership, learning and teaching, and those

³ See <https://www.gov.uk/government/publications/reducing-bureaucratic-burdens-higher-education/reducing-bureaucratic-burdens-on-research-innovation-and-higher-education>.

who work on the survey in administrative roles and academic roles. The review was led by Conor Ryan, OfS Director of External Relations, with Richard Puttock, Director of Data, Foresight and Analysis as deputy chair. The NSS review working group members were:

- Chair – Conor Ryan, Director of External Relations, OfS
- Deputy chair – Richard Puttock, Director of Data, Foresight and Analysis, OfS
- Georgina Ager, Vice-Principal, the Bedford College Group
- Wendy Appleby, Registrar, University College London
- Ramy Badrie, University of Brighton, OfS student panel member
- Jane Fawkes, Deputy Principal, the University College of Estate Management
- Hillary Gyebi-Ababio, Vice-President for Higher Education, National Union of Students
- Nicholas Holland, Competition and Registration Manager, OfS
- Sarah Howls, Head of Access and Participation, OfS
- Martha Longdon, Independent, postgraduate research student, OfS board member and chair of the OfS student panel
- Emma Maskell, Head of Student Engagement and Information, OfS
- Cliona O'Neil, Head of Student Experience, Higher Education Funding Council for Wales
- Susan Orr, Pro Vice-Chancellor (Learning and Teaching), York St John University
- Graeme Rosenberg, Head of TEF and Skills, OfS
- Imran Sheikh, Data Manager, Conservatoire for Dance and Drama
- Anna Sherratt, Principal Analyst, OfS
- Gill Wyness, Deputy Director of the Centre for Education Policy and Equalising Opportunities, University College London Institute of Education.

Methodology

28. In this review, we sought to gain the views of a wide range of stakeholders. These include students at different stages of their studies, those in leadership and academic roles within universities, colleges and other providers, sector stakeholder groups and others with an interest in the results, including publishers of student information.

Student engagement

29. Five student focus groups were held for the NSS review, with:

- applicants

- current students
- students' union representatives
- students' union staff.

There were a total of 51 attendees.

30. Of these focus groups:

- One of these focus groups was attended by representatives of small and specialist unions through GuildHE's student panel. Another was coordinated with and chaired by the National Union of Students.
- Two other focus groups were attended by current students or recent graduates, some of whom were academic representatives, with some sabbatical officers in attendance.
- One workshop was undertaken with a mix of applicants and first year students with less knowledge of the NSS.
- A large number of students involved in the workshops had significant knowledge of the NSS, particularly those in the students' union focus groups.
- In the focus groups with current students and recent graduates, there was a good representation from distanced and part-time learners.
- The topic guides for this research were designed collaboratively with students and their representatives. Questions for the students' union focus groups were shaped by feedback from the National Union of Students. For the current student workshops, a pilot exercise was undertaken with members of the OfS student panel and questions were reformed and refined from this.

OfS student panel engagement

31. The OfS student panel has been involved with the review throughout. These engagements included:

- participating in a workshop
- two members of the student panel being appointed to the working group
- co-creating the student engagement strand of the review
- individual members of the panel contributing to the other strands of the review and advising on specific aspects, such as student information and chairing student workshops
- reviewing findings and recommendations.

Student poll

32. We used a student poll as YouthSight holds a ready sample, and students were less likely to respond individually to a website consultation.

33. YouthSight used an online survey to poll a broadly representative sample of 1,022 people across three different audience groups: applicants (303), undergraduate students (319) and graduates (400) who had graduated within the last three years. The breakdown of the sample is shown in Table 1.

Table 1: Sample breakdown

Characteristic	Number of people
Age	
16-17	260
18-19	181
20-21	181
22-25	310
26+	90
Gender	
Female	638
Male	384
Ethnicity	
Black and minority ethnic	248
White	774
Disability	
Disabled	169
Not disabled	816
Home nation	
England	826
Northern Ireland	31
Scotland	45
Wales	48

34. The 10-minute online survey explored four topics regarding students' academic experience:

- The importance of using information during university decision-making at undergraduate level
- Where, how and how often they would like to receive information
- Their usage of and participation in the NSS
- Their motivations to participate in the NSS.

Provider survey

35. We facilitated an open survey on the OfS website from 23 October to 13 November 2020, which allowed anyone to provide their feedback on the NSS. This included staff in universities,

colleges and other providers, and anyone else with an interest in the NSS such as information, advice and guidance professionals, teachers and employers across the UK.

36. We received 1,185 responses from individuals at 230 different providers, including both colleges and universities. Of these responses, 885 were offered in a personal capacity and 155 offered as an official provider response (145 did not provide this information). The respondents spanned administrative and academic roles. 573 (48 per cent) held an administrative, support or managerial position. A further 479 (40 per cent) of respondents had a role that was primarily academic or research-related.
37. Around 10 per cent of the responses were submitted from staff at a small number of providers. As this could potentially impact on the overall responses to each question, a weighting has been applied to minimise the impact of overrepresentation from a single provider. Effectively each provider has been given an equal weighting, so the weighting of each individual response from that provider is divided by the number of responses from that provider. For instance, if there were 20 responses from one provider, each response will have 1/20 of the weighting of a whole response.

Provider roundtables

38. We invited a number of organisations to nominate members from across the UK. These were:

- the Association of Colleges
- GuildHE
- Independent HE
- Million Plus
- the Russell Group
- Universities UK
- the University Alliance.

39. Each organisation was asked to nominate one person in a senior leadership post, and another who works on the NSS as an administrative member of staff or as a teaching member of staff, to participate in a roundtable discussion. As a result of this exercise, people from the following universities, colleges and other providers took part in the roundtables:

- University of Aberdeen
- Abertay University
- University of Brighton
- De Montfort University
- University of Greenwich
- Harper Adams University
- Leeds Beckett University
- London School of Economics
- Met Film School

- Newcastle College Group
- Reaseheath College
- Royal Academy of Dance
- Royal Central School of Speech and Drama
- Solent University
- University of Warwick.

40. In addition, we also conducted a volunteer workshop of academics promoted through Advance HE. Twelve academics from the following providers took part:

- University of the Arts London
- Buckinghamshire New University
- College of Business, Technology and Engineering
- University of Bedfordshire
- University of Bradford
- University of Lincoln
- University of Northampton
- Northumbria University
- School of Law
- University of the West of England, Bristol

Stakeholder sessions

41. We also conducted a number of individual evidence sessions with stakeholder organisations and individuals with an interest in the NSS and its future. At these sessions, we spoke to:

- Professor Dame Janet Beer, Vice-Chancellor, University of Liverpool
- Professor Sir David Bell, Vice-Chancellor, University of Sunderland
- Dr Hollie Chandler, the Russell Group
- Rob Copeland, Head of Higher Education Policy, University and College Union
- Royal Statistical Society, Professor Jon Forster, University of Warwick
- Alistair Jarvis, Universities UK
- Gordon Mackenzie, GuildHE
- Professor Simon Marginson, Director of the ESRC/OFSRE Centre for Global Higher Education, University of Oxford
- Ben Page and Kelly Beaver, Ipsos Mori
- Alex Proudfoot, Independent HE
- Arti Sarawat, Association of Colleges
- Greg Walker and Alan Palmer, Million Plus

- Professor Alison Wolf, Baroness of Dulwich; Sir Roy Griffiths, Professor of Public Sector Management, Kings College London.

42. Additionally, we accepted invitations to discuss the review with the Russell Group Pro-Vice-Chancellor learning and teaching group and the Higher Education Data Insight Group. The review was also discussed at the OfS Information, Advice and Guidance Advisory Group, which includes UCAS, the Careers and Enterprise Company, league table providers, and other organisations with a role in widening access to higher education and information, advice and guidance.

Written evidence considered

43. We also considered written evidence sent to us by a number of organisations and individuals:

- Higher Education Funding Council for Wales
- Mixed Economy Group
- Open University
- Scottish Funding Council
- Universities Scotland
- Professor Sir Chris Husbands, TEF Chair
- Alastair McCall, editor of The Times and The Sunday Times Good University Guide.

44. The review has also drawn on other research findings and previous reviews of the NSS.

Sampling analysis

45. In addition to our stakeholder engagement, we conducted extensive modelling of alternatives to the current NSS census to test the extent to which they could meet the different objectives of the survey, as well as the cost and burden of different options. We also conducted analysis to test for any quantitative evidence that the NSS leads to grade inflation – a correlation between significant increases in higher degree classifications and positive NSS scores.

46. The annual NSS census has been run every year since 2005, and all students who are in the target population are given the opportunity to respond.

47. We identified six alternative survey designs. We then asked the following questions of each of these designs:

- a. Will it cost less to deliver than an annual census?
- b. Will it reduce respondent burden?
- c. Will it reduce compliance costs – that is, the time and money that providers are required to spend in order to participate in the survey?
- d. Will it meet the needs of students, including prospective students?
- e. Will it meet the needs of providers?

f. Will it meet the needs of the funders and regulators of higher education?

48. This process sought to determine whether the alternative designs are feasible, and if so whether they have any clear advantages over the annual census approach.

Alternatives to an annual census

49. We have focused on the following six alternatives to an annual census:

A: Small sample survey of final year students (about 30,000 students)

B: Large sample survey of final year students (about 250,000 students)

C: Biennial census survey of final year students (around 450,000 students, every two years)

D: Sample survey of all undergraduates (about 450,000 students)

E: Volunteer survey (about 90,000 students)

F: Opinion poll (about 10,000 students).

A: Small sample survey of final year students (about 30,000 students)

50. Rather than giving every student in the target population the opportunity to respond to the survey, a sample survey would target a subset of eligible students. Sample surveys are necessarily imperfect, because there is always a risk that the respondents included in the sample might have different views from the rest of the population. However, good sample design will aim to allow inferences to be made about the target population that are as accurate and as precise as possible.

51. Following experimentation, we found it effective to use stratified sampling, with providers as strata and high-level subjects as sub-strata. We used a floor of 50 at provider level, which means that at least 50 students will be sampled from each provider. Once the floor is reached, sampling became proportionate. With an overall survey size of 30,000 the probability of selection per eligible student ranged from 6 per cent to 100 per cent.

52. An implication of the provider floor is that some providers would find all their eligible students included in the survey. For these providers, the sample becomes a census. This applies to around 10 per cent of providers.

B: Large sample survey of final year students (about 250,000 students)

53. Design B uses the same approach as design A, but with a much larger sample size. This sample size was selected to maximise the accuracy of the estimates generated from the sample. With this larger sample size, the probability of selection per eligible student ranges from 60 per cent to 100 per cent. In fact, we found that this to be the minimum sample size required to generate fit-for-purpose estimates about the student academic experience at a provider level.⁴ As with design A, around 10 per cent of providers would find all their eligible students included in the sample.

⁴ For more information on fit-for-purpose estimates, see the technical report, available at www.officeforstudents.org.uk/publications/nss-review-phase-one-report/.

C: Biennial census survey of final year students (about 450,00 students, every two years)

54. Option C is the current census survey, but run every two years. We have included this design in the assessment because it has many of the benefits of a census survey, while reducing costs and burden. This option would allow users of the data to do everything they do at present – for example, publish course level data and carry out highly granular analysis – but with the data becoming increasingly dated at provider and course level as we moved into second year of the biennial survey cycle.
55. A version of option C would run every year, but with each provider selected biennially. This is a form of cluster sampling. A benefit of this approach would be that a careful selection of each yearly sample would support annual estimates of the student academic experience at a national level. A disadvantage is that one-off disruptive events – such as the COVID-19 pandemic – would impact on the results for some providers, but not for others. The other advantages and disadvantages of this version are very similar to those of a pure biennial survey, so we have assessed both versions as a single alternative.

D: Sample survey of all undergraduates (about 450,000 students)

56. During the review, a number of data users mentioned their preference for collecting data from all undergraduate students, rather than simply those in their final year of study. This would allow users to understand the experience of all undergraduate students, including those who leave their course before reaching the final year. It would also help providers to understand more about high and low points in the student academic experience, and to target interventions accordingly.
57. For design D we explored whether a sampling approach would allow us to run a survey covering all years of study without increasing burden and cost. This approach takes the current NSS size – roughly 450,000 respondents – and uses sampling to stretch these numbers over a much wider pool of students. For simplicity, we grouped together first year students, final year students, and students in all other years. We again used stratified sampling. We took providers as strata and year groups as sub-strata. We placed a floor of 50 at sub-stratum level. When this floor is reached, we began proportional sampling. The probability of selection for each student in the eligible population ranged from 30 per cent to 100 per cent.
58. This design is a simplification, intended to explore some of the advantages and disadvantages of running a sample of all undergraduate students. If we took forward this option, we would need to refine the survey design. In particular, we would need to account more sensitively for courses that run for more than three years.

E: Volunteer survey (about 90,000 students)

59. All of the approaches above involve designing a sample so as to maximise accuracy and precision. Alternatively, we could allow the sample to select itself, by students choosing to complete the survey. Students could take part via a web-based survey portal, which checks that they are eligible using their personal details. A web-based survey portal is part of the current NSS apparatus, rather than using an approach via email or phone from the survey contractor. To raise awareness and encourage students to respond, the survey portal would need to be accompanied by a promotion campaign supported by providers.

60. We cannot directly control how many students would respond to a volunteer survey which could introduce significant bias. To allow us to evaluate this option, we have assumed that around 90,000 students (around 20 per cent of the target population) would respond. This assumption is not a prediction: the response rate could be much higher or lower depending on the effectiveness of the promotion.

F: Opinion poll (about 10,000 students)

61. We could collect data about the student academic experience by conducting an opinion poll. This would involve asking a polling company to survey students to whom they have access – for example, through a standing panel that they maintain or contact details that they have purchased. Monetary incentives are sometimes used to encourage participation. This sort of poll is a form of convenience sample, as students are selected because they are easy to access, rather than through random or statistical mechanism.

62. An opinion poll could generate samples of varying sizes, but with a fairly low maximum. We have chosen to evaluate an opinion poll which reaches 10,000 students. This is relatively large by polling standards, but nonetheless gives us the smallest sample size of all our options.

What about other alternatives?

63. We have focused on the designs above because each one of them has at least one clear benefit, and because together they illustrate the tensions between sample size, burden, cost and reliability.

64. There are many variations on the six designs we have selected. For example, we could conduct a medium-sized stratified sample of 100,000 students, or commission an opinion poll with only 2,000 students. The advantages and disadvantages of these variations can generally be inferred from our assessment of the six selected options. For example, a medium-sized stratified sample would fall between a small and a large stratified sample (options A and B) with regard to cost, burden, and reliability of data.

65. Finally, the options we have considered could be combined or merged. For example, we could supplement a biennial census survey with a stratified sample within the fallow year of the survey cycle. Or we could run a stratified sample alongside a volunteer survey, to give all students the opportunity to participate in the NSS, regardless of whether or not they are selected as part of the sample. We comment on the possibility of combining options in our suggested actions.

Key points about method

66. Detailed notes on how we have evaluated each design are available in the technical report,⁵ but two points need to be made here.

67. Throughout, we consider alternative ways of sampling **full-time** undergraduate students. We have not extended our evaluation to the part-time student population. This is because full-time students present the easier challenge. There are more of them, and as a result it is easier to arrive at a sample design that supports reliable estimates without surveying the whole population. If we decide to proceed with further exploration of any of the options, we will need

⁵ The technical report is available at www.officeforstudents.org.uk/publications/nss-review-phase-one-report/.

to consider whether or not the method will work for part-time students, or whether an alternative approach is needed (for example, it would be possible to run a stratified sample for full-time students alongside a full census survey for part-time students).

68. To evaluate the options compared with the current, annual census NSS, we assumed that everything else remains unchanged. For example, we assumed that the questionnaire has the same length and format as the current NSS. We assumed that the target population remained the same (unless, as for option D, changing this population is specified as part of the design). These are only working assumptions, made to allow us to understand the advantages and disadvantages of each survey design without distraction. In reality, many other elements of the survey will be considered as part of the NSS review. These decisions will also affect the costs and burdens of the survey, and the accuracy of the data it provides.

Analysis: NSS and degree outcomes

69. As part of the wider review, the OfS was asked to ensure that the NSS ‘does not drive the lowering of standards or grade inflation’. We therefore undertook analysis to investigate the extent to which the NSS is linked with the lowering of standards and grade inflation.

70. We began this work by acknowledging that it is not usually possible to prove causal hypotheses using data alone. The data will show us whether two phenomena are correlated, but it is a further judgment whether one causes the other. Data can be used, however, to rule out causal hypotheses. For example, if event B often occurs in the absence of event A, we cannot claim that A is the sole cause of B. Our approach, therefore, has been to explore whether the data we hold is consistent with the hypothesis that the NSS causes grade inflation.

71. Causation requires a mechanism. If the NSS causes grade inflation, there must be a mechanism through which this is achieved. We understand the most likely mechanism to be as follows: pressure to improve NSS results causes academics to make their courses easier, to award higher marks to students, or both. This could be through pressure on individual academics to make things easier through awarding better marks, or through pressure at an institutional level, for example through the changing of degree algorithms. This in turn could lead to more satisfied students and better NSS results; and it could also lead to more first class degrees. Our aim, then, is to assess whether the data is consistent with this hypothesis.

Discussion of each of the terms of reference

72. In this section of the review, we address each of the terms of reference for phase one in turn and consider potential actions arising from the evidence we received.

Clarify the purpose of the NSS in the current higher education landscape

73. The NSS has had three main purposes since its inception:

- informing prospective students’ choices
- providing data that supports providers in improving the quality of the student’s academic experience

- supporting public accountability.

74. During the review, the survey was frequently referred to by those we spoke to as a satisfaction survey despite only having a single question, Question 27, that asks about students' overall satisfaction with the quality of their course. The term 'satisfaction' has been criticised as being too consumerist in nature and not reflecting the two-way relationship effective learning requires. The NSS is a survey of student perceptions of their academic experience. The NSS has been primarily intended to allow comparison between subjects at different providers rather than between providers overall. Our engagement with stakeholders and students, and our research on how students access information, show that prospective students tend to compare courses and subjects between and within providers rather than comparing provider-level information. Those in leadership positions at providers told us that one of the most valuable aspects of the NSS is that it is published at subject level, enabling them to make comparisons.
75. There is a long tradition in the UK, the USA and Australia of higher education survey research. The best known surveys are the National Survey of Student Engagement (NSSE) in the USA, the Student Experience Survey (SES) in Australia and the NSS.
76. The NSSE was conceived in 1998 and was founded on three core purposes: primarily, to provide quality, actionable data for institutions to improve the student experience, with student engagement being used as a proxy measure for student teaching; secondly, for public advocacy; and finally, and for documenting good practice.⁶ In 2019, institutional response rates for the NSSE ranged from 5 per cent to 81 per cent, with an average of 28 per cent.⁷ The opt-in UK Engagement Survey run by Advance HE is based on the NSSE. In 2019, it surveyed 30,000 students across all undergraduate years. 31 providers took part, an average of 960 responses per provider.⁸
77. In Australia, the SES runs alongside a suite of other surveys as quality indicators for learning and teaching that also include graduate satisfaction, graduate employment and graduate satisfaction surveys. The SES is closer to the NSS than NSSE in its questions and how it is published.
78. The purposes of the NSS were last reviewed in 2015. We wished to test the extent to which these purposes of the NSS remained valid in the current higher education landscape. Headline figures from the provider survey for this review suggested widespread agreement with the notion that the NSS is useful for supporting a range of purposes within providers. These include helping to understand the perspectives of students (77 per cent agreed that it was either helpful or very helpful), and for identification of areas for improvement (79 per cent agreed).
79. Some academics we heard from have suggested that the NSS is not a valid approach because it is a census based on a 70 per cent response rate rather than a full population, and this is particularly an issue with small courses. The Royal Statistical Society has previously had

⁶ See <https://doi.org/10.1002/ir.283>.

⁷ See <https://nsse.indiana.edu/nsse/psychometric-portfolio/responserate-faq.html#:~:text=In%202019%2C%20institutional%20response%20rates,senior%20institutional%20estimate%20are%20reliable>.

⁸ See https://s3.eu-west-2.amazonaws.com/assets.creode.advancehe-document-manager/documents/advance-he/Advance%20HE%20UKES%202019_1572367661.pdf

concerns with the use of the NSS as a singular proxy measure of quality. We tested these concerns with them. The Society confirmed that their main concern is the use of surveys like the NSS as a proxy measure of quality. The Society told us that it has no specific statistical concerns with the NSS itself as a survey of student perceptions on aspects of their academic experience or its use for student information concerning that. As with all surveys, proper consideration needs to be given to non-response and quantification of uncertainty/variability. They also recognised that the NSS data on student perceptions could be used as part of a wider basket of measures.

80. Moreover, it is worth noting that the NSS has a significantly high response rate and coverage for a survey of its type, and this is in some cases higher than other robust student or graduate surveys that are also published at course level. Graduate Outcomes, which surveys students on their employment or other outcomes 15 months after graduation, has a 50 per cent response rate but does include postgraduate students.⁹ Longitudinal Educational Outcomes only has data for UK-domiciled students.
81. We found that providers and students saw the principal role of the NSS as a dataset that supports providers in improving the quality of students' academic experience. There was wide evidence of its use for this purpose within providers, with individual examples of how this focus had led to tangible improvements in their students' academic and learning experience. Crucial to making these improvements was the ability to compare across courses and look at results by student characteristics within a provider, as well as the ability to compare performance across the sector.

LSE case study – Professor Dilly Fung

'We used the NSS as a lever for authentic discussion, as a tool for enhancement. Through better engagement with the NSS data and collaboration with students we were able to improve their experience, which in turn saw an improvement in our overall student satisfaction by 12 per cent in just two years.' Prof Dilly Fung, Pro-Director for Education, London School of Economics and Political Science

82. However, the NSS is not the only survey used to improve the academic experience. Many universities and some students' unions run their own surveys in addition to the NSS. Smaller providers are generally less likely to run surveys of their own. Many of these internal surveys use aspects of the NSS questionnaire. The NSS is conducted in the final year of undergraduate study. It is not uncommon for universities and colleges to conduct these surveys across other years of study or after individual modules. An advantage of such surveys, identified by some academics and students' unions, is that they allow greater scope for customisation; They reflect their own learning environments and can address issues through more granular questions, which could make them more useful for informing enhancement of learning and teaching. Some academics also felt that internal data enabled them to be more responsive to student concerns. However, some, including the University and College Union (UCU), expressed concerns with issues of equality and diversity of staff and the impact this can have on responses from students. While this is also felt to be an issue with the NSS, the problem is magnified when students are feeding back on individual members of staff through

⁹ See <https://www.hesa.ac.uk/news/18-06-2020/sb257-higher-education-graduate-outcomes-statistics>.

things like module evaluation. We suggest this issue should be examined in more detail as part of phase two.

83. Two significant problems were identified by university leaders with relying solely on internal surveys. The first was that internal surveys generally have much lower response rates than the NSS. One advantage of the NSS is that its status and the follow-up work done by the survey provider mean that students are more inclined to respond. The second – and more significant in the eyes of virtually all those in leadership positions in universities and colleges to whom we spoke – is that the NSS allows comparison not just at provider level (both between and within providers) but at subject level too. Some academics argued that a smaller national survey could equally allow for such comparison. However, many other stakeholders felt that such a survey would not allow for the granularity of current benchmarking that has, according to many providers, enabled them to identify and implement improvements that benefit the students' academic experience.
84. The NSS has led to improved interactions between staff and students.¹⁰ According to feedback we received from providers, academic staff, students' unions and students as part of the review, the NSS acts as a conversation starter between students and their provider. This leads to greater partnership working and improvements in aspects of the student academic experience important to learning.

School of Art and Design, Cardiff Metropolitan University

'The NSS data and open comments have been instrumental in informing quality assurance and enhancement with a view to the values and experiences of the student in those engaging in our curriculum design. Running this data as a part of a larger user-centred design approach to our learning and teaching, the NSS categories and open comments have allowed us to identify often un-recognised tensions between how students value education, learning experiences and opportunities and the values that staff [and] programme design may assume are important. Students are aware that this is what we are doing, and understand why, and this have given graduating students a sense of contribution to a legacy that will continue after they leave. Bolstered with student focus groups, this inclusive approach to curriculum design enables the school to align quality assurance and quality enhancement to the student voice and provide opportunities to develop both staff and programme design in meaningful and responsive way.'

85. However, academic staff and students' unions were concerned at how the NSS is being used as a 'blunt tool' for performance management in some providers. Others reported that they felt penalised for poor NSS scores for services outside their direct control or those services managed centrally. The NSS is a large enough sample to allow potential issues to be identified and conversations to take place with students and staff. However, at a course level, it inevitably often relies on relatively small numbers of respondents (though there is a 50 per cent or 10 person threshold for publication) and such cohorts may be too small to be used on their own for

¹⁰ Oxley, A, and Flint, A, 'Placing student voices at the heart of institutional dialogue', Educational developments, 2008, pages 14-16; Brown, 'Bringing about positive change in the higher education student experience'; Flint, Abbi, Oxley, Anne, Helm, Paul, and Bradley, Sally, 'Preparing for success: One institution's aspirational and student-focused response to the National Student Survey', Teaching in Higher Education, 2009, pages 607-618.

performance management purposes. It is not within the powers of the OfS to determine the onward use of data within autonomous providers, but this suggests more could be done to assist providers with their statistical interpretation of the data. However, it is important that the statistical limitations of course-level data are properly understood; there may be an opportunity for the OfS to work with providers and students' unions to produce user guidance for the statistical validity of NSS scores.

86. Nevertheless, there was a very clear view that the NSS had an important role in enhancing the student academic experience, and the ability to compare with courses at other providers and between courses internally was seen as an essential part of that process. One practical way that the NSS could support this is by improving the NSS data dissemination site to make the results easier to use for those with limited statistical awareness, to assist with responsible use of the data within providers.
87. The NSS data is published on websites including Discover Uni, UCAS and a number of commercial websites. Some of the data is also used in league tables such as the Sunday Times and Times Good University Guide, the Guardian University Guide and the Complete University Guide. While the data is sourced on these websites and tables, it is not prominently branded and the source is often given in the small print, so it can be hard to gauge the extent to which those who use those sources understand that the data comes from the NSS.
88. The UCAS site is used by 86 per cent of all students, and around one in three say they use sites such as Which? University, the Good University Guide, Complete University and the Guardian University Guide.
89. Despite a strong desire to access the type of data that the NSS provides, only one in five students say they have used the NSS data itself. Over three-quarters of this sample either had not used the NSS (52 per cent) or did not know whether they had used it or not (27 per cent). But where it is used for information, it is clearly valued. Among those who said they had used it, 93 per cent said it had influenced their decision making. Feedback from applicants suggests that decisions and comparisons are made at course level not provider level; this is supported by user research for Discover Uni.
90. Information on students' academic experience is most trusted when it is published by an official government body (31 per cent). But there is also growing reliance on informal sources too: 27 per cent of respondents valued anecdotes from student websites. There is, however, a clear desire for official independent sources of information. Information about students' academic experience was said to be least trusted when published by their university or college (17 per cent) or a market research company (13 per cent).
91. Moreover, the vast majority of students want to access information about past students' academic experience when choosing which course to study. 85 per cent of all those polled said this was important to have, rising to 93 per cent of those currently applying for higher education courses. Applicants told us that, while final decisions were not generally made on the basis of data and statistics including the NSS, they did provide a useful and objective filter in the initial stages of decision making. Applicants primarily base key decisions on personal views of family, friends and advisers. Increasingly, decisions are also based on the advice of social media influencers. Our research shows these sources are often inaccurate, based on personal bias

and experience. This view is supported by previous user research findings for Discover Uni.¹¹ Therefore it is important that applicants and advisers can access clear, impartial and unbiased views from students. It also points to the importance of such data being made public and increasingly accessible in a way that explains its strengths and limitations.

92. Post-1992 providers, smaller and alternative providers thought the survey's use for student information was important because it avoids student decisions or employers' perceptions being based simply on provider brand or presence in league tables, which not all providers could participate in. As a result of an increasingly globalised high education sector, a world-wide system of stratification has emerged in recent years. Professor Simon Marginson, an expert in international higher education, told us that internationally, reputation drives much student choice, which makes objective public data about student academic experience important. This is one reason why student surveys are also published in other English-speaking countries with tuition fees and other course costs: examples are Australia (whose survey was the basis for the NSS), the USA and Ireland. Gibbons et al investigated the effect of published NSS results on applications.¹² They found a small but statistically significant effect on application rates, concentrated among students with higher entry qualifications and providers that were oversubscribed. However, other studies have found that overall satisfaction has a limited effect on student recruitment as measured through teaching income, with research having the greatest influence on perceptions of reputation and the greatest effect on recruitment. Domestic rankings through league tables with multiple indicators, including the NSS, were found to have no such impact.¹³
93. While the evidence suggests that the NSS has a limited direct impact on student decision making, it does have a role in widening student choice, which is a central part of the OfS's role. It is also clear that students want to have access to independent unbiased information about the student academic experience. This suggests that more needs to be done to raise applicants' awareness of the NSS. So, when a new NSS has been developed, more should be done to publicise its brand to students as an independent source of information on students' academic experience.

The NSS as a tool for accountability

94. While tuition fees are an important source of income for higher education, they are only a part of the funding of university and college courses. Fees rely on publicly subsidised loans in England, Wales and Northern Ireland. In effect, through these loans, the taxpayer pays 45 per cent of the cost of loan-funded tuition,¹⁴ in addition to funds provided directly for individual courses, and in Scotland the full cost of tuition.
95. There has been an increasing tendency since the 1980s to provide published data to support accountability of services with significant public funding, and to complement regulation.

¹¹ See <https://www.officeforstudents.org.uk/media/b409d527-7e32-4085-a55a-61b934ee8bfb/cfe-research-2018-student-information-use-and-behaviour.pdf> [PDF].

¹² See http://eprints.lse.ac.uk/62875/1/lse.ac.uk_storage_LIBRARY_Secondary_libfile_shared_repository_Content_Gibbons_per%20cent20S_Studentper%20cent20satisfaction_Gibbons_Studentper%20cent20satisfaction_2015.pdf [PDF].

¹³ See <https://onlinelibrary.wiley.com/doi/abs/10.1111/hequ.12162>.

¹⁴ See <https://www.gov.uk/government/news/government-reveals-student-loan-contribution>.

740,000 patients each year respond to the GP Patient Survey, which has been run since 2007. The National Rail Passenger Survey has 50,000 responses a year, a level sufficiently high to assess the performance of all individual rail providers. Nearly 350,000 learners complete the FE Choices survey each year in further education colleges. Ofsted gains the views of parents through its Parent View which has over 200,000 responses a year.¹⁵ The inspectorate also gains the views of students, children and parents in its individual inspections.

96. Providers and students saw value in the NSS as a tool for accountability within their institutions. On the question of using the NSS as a tool for provider accountability, 50 per cent agreed that it is useful. However, as is often the case with user accountability, there is broadly a difference in views between those leading universities and colleges, and individual academics (not dissimilar to differences in schools between headteachers and classroom teachers). Of the managerial and administrative respondents, 56 per cent saw the NSS as a useful tool for provider accountability, but only 29 per cent of academic respondents did so. The UCU was concerned by how the uses of the survey had evolved overtime, particularly regarding public accountability and its use within TEF; however, they felt these issues were wider than the survey itself and more to do with the marketised system in which the survey is used. They argued that league tables for example are a feature of a marketised higher education system. Students and students' unions said that they did use the results to hold their providers to account. It was also frequently mentioned that the NSS was the main survey to which senior managers and governing bodies paid attention. Many saw the value of the NSS as a national, independent, official source of information, and this gave it more currency than internal surveys.
97. Without the NSS, there is no objective dataset on students' views of their academic experiences at course and subject level. It would be highly unusual not to have a published metric like this in a public-facing regulated sector. Other UK regulated sectors all have ways of engaging with consumers, and the majority of these are through large-scale user surveys. Graduate Outcomes and Longitudinal Educational Outcomes provide some data on employment outcomes. Other undergraduate surveys are too limited in size or lack the statistical rigour to provide meaningful data that allows for accountability within as well as between providers. In any changes to the NSS questions, it will be important to align those questions with information useful for regulatory purposes in all four UK nations.
98. Many respondents felt that relying only on employment outcomes data for information at course or subject level had significant limitations. By looking at a combination of graduate outcomes, potential value added data and NSS ratings, providers can take a holistic view, something discussed in more detail in relation to the regulation of quality and standards below.

Assess the bureaucratic burden the NSS places on providers and how this could be reduced

99. The NSS is delivered by an independent survey provider, currently Ipsos MORI. Working with the OfS, acting on behalf of the four UK nations, Ipsos MORI develops questions and designs and disseminates the survey. To facilitate its work, providers are required to provide email addresses and phone numbers for all eligible students by the end of November each year. Until 2020, all providers were also required actively to promote the survey to their students. In 2020,

¹⁵ See <https://www.gov.uk/government/statistical-data-sets/ofsted-parent-view-management-information#publications-from-2020-onwards>.

this requirement was lifted in England – with more follow-ups by Ipsos MORI instead – but remains in place in Scotland, Wales and Northern Ireland. Providers receive their individual results in July each year. Many choose to analyse the results in some detail, to assess where improvements may be needed in the student academic experience, though they are not required to do this.

100. To assess the burden on providers, we examined the work required to participate in the survey by providers and students: through the return of the target list, survey options and promotion of the survey. This included looking at the number and nature of the queries received by the NSS helpdesk each year. We also looked more widely at the ancillary work that goes into analysing the results and making improvements to the student academic experience. This included work such as action planning for improvements to the student academic experience, internal analysis and dissemination of results within providers. It is important to note that such work is optional and not a requirement of the OfS, but it is important for the NSS's role in informing improvements to the student academic experience. Many of the providers we spoke to, and results from the survey, suggest this work would continue whether or not the NSS existed. While this was seen as where most of the burden comes from, it was also widely seen by providers, students and academics as the greatest benefit of the NSS. This is due to the coverage of the NSS, its response rates and the ability to compare performance across courses both internally and externally. Academics felt that the profile of the NSS contributed to the burden associated with improving the student experience, but this was not necessarily seen by all as a negative consequence because of the resulting increased investment in and attention to the quality of learning and teaching.

'Administering the NSS is not overly burdensome and is often undertaken as part of colleges' regular cycle of student, employer and other stakeholders' perception surveys. In many cases, the same questions from NSS are used for students [and] groups which are not in NSS scope and the results evaluated within colleges for comparison alongside the national survey results. This allows individual colleges to compare feedback and avoid administering burdensome parallel surveys'.

Feedback from Mixed Economy Group members

'The NSS is light on burden and the work involved is worthwhile given the outcomes we receive. Without it we would have to replace it with our own more burdensome alternatives adding a layer of bureaucracy.'

Maureen McLaughlin, Director of Education Policy and Quality, University of Warwick

101. The majority of providers and students felt the benefits of the NSS outweighed the burden it placed on providers and saw the NSS as significantly less burdensome than other regulatory requirements, such as the TEF or the Research Excellence Framework. Given the longevity of the survey, larger providers told us they have well established processes that keep burden to a minimum. However, smaller providers and larger students' unions were more likely to feel that promotion of the survey was a burden. This was also true of providers that had large numbers of distance learners.

102. It is important to note, however, that there was a significant difference in view between those in leadership and management roles, including department heads at universities and colleges, and academic staff. The former saw the NSS as limited in its burden compared with the benefits it delivers, and any significant burden comes from work to improve the student academic experience – something they choose to do, and often do alongside internal surveys – and not from participating in the survey itself. However, a significant number of academic respondents to the provider survey felt the NSS distracted them from teaching, and felt pressurised to encourage students to complete the survey.
103. Some academics felt there was too much emphasis on improving scores, leading to undesirable changes to course design rather than sound pedagogical practice. The UCU told us that staff can feel under pressure to improve NSS scores because of the high stakes of the survey – and that the work done within providers to improve NSS scores increases staff workloads, which leads to stress. The UCU also told us that providers often chase ‘quick wins’ such as feedback turnaround times which can lead to additional burden on academic staff.

‘The statistics are used verbatim at my [institution], yet how much of this tiny percentage of change is meaningful? I am required to make changes and defend my course based on a small percentage of change, on the ground the student experience remains largely the same. Measuring extrinsic outcomes which are not directly under the individual’s control (e.g. many students might love the course yet some do not, often the aggrieved students are those who complete the survey to express this) causes long term stress.’

Comment from NSS review provider survey from an academic

104. Such challenge from those at the frontline is not uncommon with user surveys. We therefore sought to examine whether the burden outweighs the benefits. At a national level, the NSS has seen significant improvements in the quality of feedback that students say they receive, which evidence shows is an important part of effective teaching and learning.¹⁶ At the level of individual universities, we were told that it is widely used to identify areas for improvement in how courses are delivered and the wider academic experience. In 2020, in response to the pandemic, we removed the requirement for English providers to promote the survey from March onwards and ensured additional follow-up by Ipsos MORI with students who had yet to complete the survey. For the 2020-21 survey, we intend to do the same. Analysing the change to response rates will allow us to test its impact and could allow the removal of the requirement to promote the survey in England in the future, though individual providers would not be prohibited from doing so – provided they do not promote the survey in a way that attempts to influence the results. As a suggested action, the OfS should examine ways in which required promotional activity could be shifted away from providers, while maintaining a robust response rate to the survey.
105. The analytical capacity of large universities is significantly greater than that of smaller course providers. There is potentially more that could be done to assist smaller providers and

¹⁶ Sally Brown, Phil Race (2013), ‘Chapter 5: Using effective assessment to promote learning’ in *University teaching in focus: A learning centred approach*. Routledge.

students' unions with the analysis of their data through the portal used for data dissemination, in a way that reduces the work they need to do to understand their data.

106. Some students and students' unions worried about the overuse of surveys within providers and survey fatigue among students. Examples included mid-module surveys, end of module feedback, course evaluation and students'-union-run questionnaires. They did not see the NSS as being the biggest problem here, but there is perhaps a need for providers to look at the range of surveys in the round to avoid duplication and survey overload.
107. Overall, however, providers and students felt that removing the NSS would not remove the burden placed on providers. In the absence of the NSS, providers and third-party organisations would likely fill the gap with their own surveys. This could potentially generate more burden for academics; increase the cost for providers from driving high response rates and analysis of the data; result in greater survey fatigue for students; and risk producing less robust information. 96 per cent of respondents to the provider survey indicated they would run their own surveys if the NSS did not exist. As one provider put it in one of our roundtables: 'If we didn't have the NSS, we'd have to invent it.' As the NSS develops, there may be opportunities to explore ways to create greater customisation of the NSS for providers, to reduce survey fatigue, and to make improvements to the data dissemination site to assist providers with the analysis of their results.

Explore the unintended and unanticipated consequences of the NSS for provider behaviour, and how these could be prevented, including whether the NSS drives the lowering of academic standards and grade inflation

108. Our analysis of degree classifications over time showed that the proportion of UK-domiciled, full-time first degree graduates attaining a first class honours degree from an English higher education provider increased by 14 percentage points, from 16 per cent in 2010-11 to 30 per cent in 2018-19. For the same graduate population, the proportion attaining a first or an upper second class degree increased from 67 per cent in 2010-11 to 79 per cent in 2018-19.¹⁷
109. In 2018-19, across the 147 providers considered, 14.3 percentage points of first class degree attainment change since 2010-11 are unexplained by changes in the graduate population. This is an increase of 0.4 percentage points from the unexplained attainment in 2017-18, which is the smallest increase observed since 2010-11.¹⁸
110. The UK Standing Committee for Quality Assessment published an analysis investigating the issue of grade inflation in November 2018.¹⁹ Both this and the OfS report concluded that the growing proportion of first and upper second class degrees awarded cannot be fully explained by factors linked with degree attainment, whether graduate or higher education

¹⁷ See www.officeforstudents.org.uk/publications/analysis-of-degree-classifications-over-time-changes-in-graduate-attainment-from-2010-11-to-2018-19/.

¹⁸ See www.officeforstudents.org.uk/publications/analysis-of-degree-classifications-over-time-changes-in-graduate-attainment-from-2010-11-to-2018-19/.

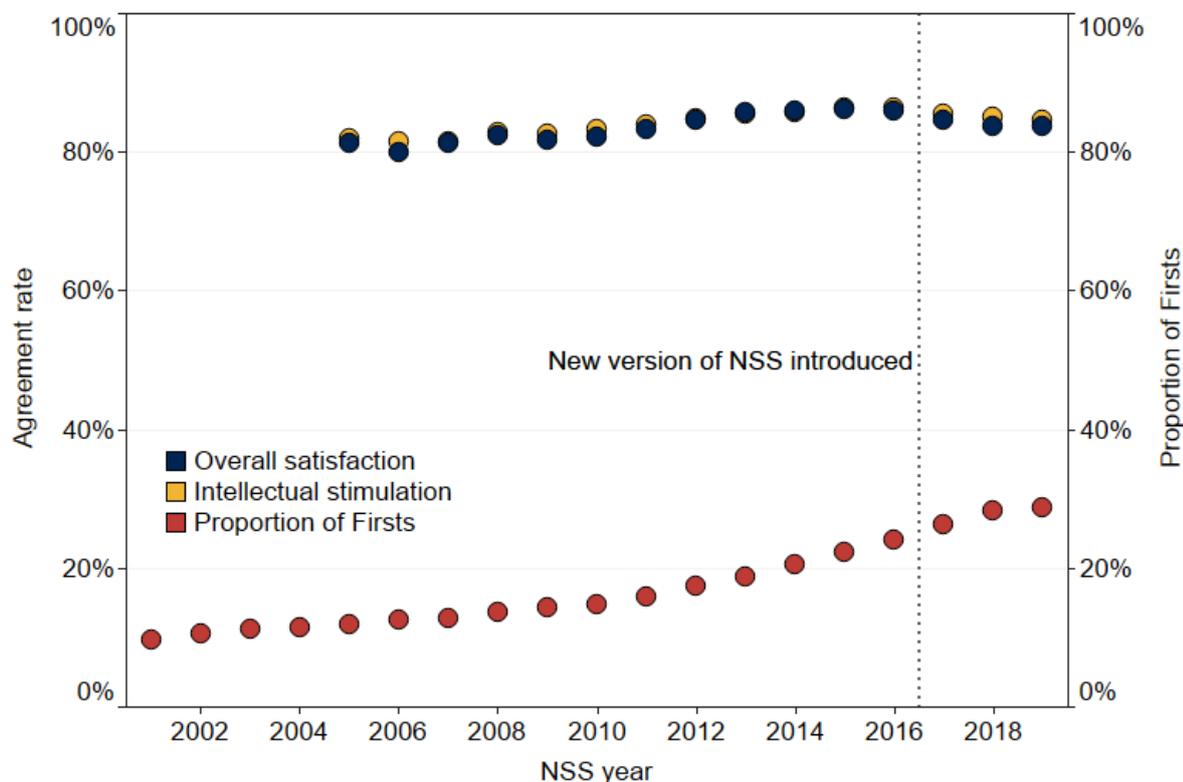
¹⁹ See <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2018/degree-classification-academic-standards.pdf> [PDF].

provider characteristics. Similar trends have been observed in similarly marketised higher education sectors such as the USA and Australia.

111. Previous analysis conducted in the USA attributes grade inflation to the consumerisation of higher education. It suggests that course satisfaction surveys may be contributing to the phenomenon,²⁰ and that teaching staff may have incentives to inflate grades. This could be because of the use of student evaluation scores in promotion, tenure and merit evaluations for teaching staff, who suggest such evaluation should be based on a wider set of metrics.
112. However, we were unable to find any data that supported the view that this is widespread in the UK. We heard anecdotal suggestions from some academics critical of the NSS that colleagues were trading better grades for favourable NSS scores, though this was strongly disputed by those in leadership positions in providers and by student respondents to our survey.
113. The period prior to the introduction of the NSS in 2005 saw a slow but steady increase in the proportion of first class degrees awarded. The sharper rise in first class degrees occurred in the academic years 2010-11 and was largely maintained in the following years. This timing makes it implausible that the NSS is the **sole** cause of grade inflation. It is possible that changes that took place around the start of the previous decade – such as the policy of increased competition between providers – altered the way that providers interacted with the NSS, thereby transforming it into a cause of grade inflation. But on the basis of the data we hold, it is equally possible that these changes themselves are directly responsible for the changes in degree classifications.

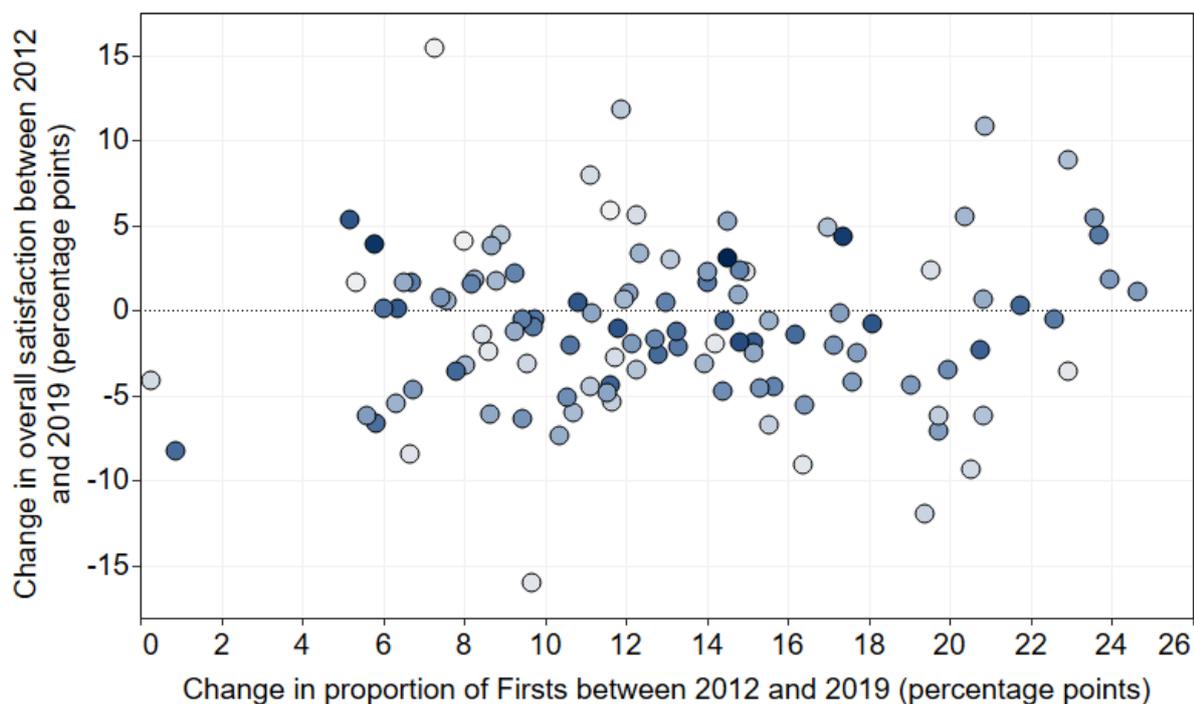
²⁰ See <http://www.econ.unt.edu/~mcperson/Papers/AE.2013.pdf> [PDF].

Figure 1: NSS review – long time series of overall satisfaction, intellectual stimulation and the proportion of firsts awarded



114. Figure 1 shows that, over time, reported intellectual stimulation scores (NSS Question 3) have remained stable. This would suggest that the hypothesis that academics have made their courses easier in order to gain better NSS scores is not borne out.
115. However, there was some correlation between first class and upper second class degrees and individual levels of satisfaction. There could be two reasons for this: it could be an indicator that students complete the NSS positively and get better grades as a result. Equally, it could reflect a correlation between students being engaged with their courses, rating them highly and gaining good grades. The former hypothesis is the case that some academics would make and reflects previous findings in the USA that their student survey could be affecting grade inflation at a local level, with individual lecturers feeling pressurised to adjust marks or lower standards and that this arise from how results are used by providers internally. However, we heard no evidence to suggest this was widespread or that it was happening at a provider level. There may be room for further research here in the UK which could be looked at as part of phase two of the NSS review.
116. Moreover, there is no correlation between grade inflation and changes in overall satisfaction within providers. Awarding more firsts does not alone lead to an improvement in NSS results; see Figure 2.

Figure 2: Change in proportion of first class degrees and change in overall satisfaction between 2012 and 2019



Note: Each dot represents one provider. The colour of each dot is proportional to the number of responses received by the provider in 2019: darker colours indicate more responses.

117. In summary, the data does not provide evidence that the NSS causes grade inflation. Neither does it prove the contrary. But it does suggest that, if there is a causal relationship between the two, it is complex and that multiple factors are involved. While we heard no evidence to suggest the mechanism is through provider-level behaviour, feedback from some individual academics suggest there could potentially be some effect at an individual level.
118. We have always been alive to the risk of inappropriate influence on students' responses to the survey. While providers have been required to promote the survey, the rules state they must not influence how students respond to the survey.²¹ Students who feel that they have been encouraged to provide favourable responses by their lecturer can complain and each complaint is investigated. Where there is evidence of undue influence, the relevant course data is suppressed. Universities and colleges are also expected to tighten their processes. Over the last three years we have had 31 complaints in total, 24 of them upheld. The details are in Table 2.
119. While the complaints process is publicised on the survey website, and a staff guide produced for providers, we recognise that not all students might be aware of it. We wanted to test independently the extent to which students felt they had been pressurised in completing the survey. 96 per cent of students who had completed the NSS in our poll said they felt free to answer questions honestly. This was further supported through the student and students' unions workshops which found that students saw the NSS as a positive opportunity to feed back on their experience, and that student opinions were not likely to be swayed by staff

²¹ See www.officeforstudents.org.uk/publications/nss-allegations-procedure/.

influence or incentives like free pizza or coffee. Students also told us that in answering the specific questions about the fairness of marking and assessment they were reflecting on the infrastructure surrounding exams and assessment rather than the actual grades they received. However, the OfS could do more to make clear to students what constitutes inappropriate influence and how to report it; this could be linked to other OfS student engagement work.

120. There is some concern from both staff and students on the timing of the survey for final year students; this often coming at a time when students are busy writing up their final projects or preparing for exams. There were suggestions from providers, particularly from some in the Russell Group, that a post-graduation survey might enable students to give a more holistic view of their whole academic experience. While we understand the argument for this, we are concerned that this could significantly reduce response rates and could lead to a link between good grades and favourable response rates. NSS data is currently available by the start of the new academic year, and it would be less timely if it were collected after graduation. But a more important concern is that the potential for student reflections on their experience to be coloured by their degree classification would be significantly increased. We therefore believe that the current timeline should remain unchanged.
121. We found anecdotal evidence of isolated cases of inappropriate influence; this is supported through historical analysis of allegations of inappropriate influence in recent years.

Table 2: Historical cases of allegation of inappropriate influence

	2018	2019	2020
Number of providers with allegations reported	10	12	9
Nature of allegations	<ul style="list-style-type: none"> Linking of NSS results to league tables and value of students' degrees Students told how to answer the survey Discouragement of neutral responses Explanation of scales Compulsory sessions for completing the survey Concerns on incentives for students to complete the survey Staff influencing students to give 100% positive feedback Staff members given a bonus for completion of the most surveys 	<ul style="list-style-type: none"> Students told how to answer survey Staff explaining the scales Staff arranging compulsory sessions for students to complete the NSS Students told a bad score on their degree would affect their future careers and employment Concerns around financial incentives to complete the survey 	<ul style="list-style-type: none"> Students told how to answer the survey Students told a bad score on their degree would affect their future careers and employment Incentives to complete the survey, of food or clothing Response rate shared on open social media

	2018	2019	2020
	Staff standing over students completing the survey		
Evidence of breach of guidance found	9	9	6
No evidence of breach of guidance found	1	3	3

122. Just three providers had two incidences of inappropriate influence within the period. This indicates there is little evidence of any systematic attempts to influence the results unduly; it is also possible it could be partially due to low awareness of how to report such incidents. There is a strong belief among some academics, based on anecdotal evidence, that levels of inappropriate influence are greater than the polling or complaints would suggest. Students told us that we could make the complaints process clearer for students, so they are aware of what constitutes inappropriate influence and how to report it.
123. There was one particular issue related to how the questions are framed that some providers suggested could be used to encourage more positive responses. The NSS answers are on a five-point scale, with the mid-point being a broadly neutral response. We heard examples of students being told that the midpoint is considered a negative response because it is not included when calculating the percentage of those agreeing with the propositions in the survey. While there are good arguments for allowing students to plump for a neutral response, there are also good arguments to require students to express a clearer positive or negative view. Some of our respondents noted that the Irish student survey uses only four options, and there were suggestions that a four- or six-point scale could be trialled and this might provide a more nuanced approach. During the second phase of this review, as part of a review of the questions, the use of different response scales and how these are used in publication (for example, percentage agree), should be explored.

Examine the appropriate level at which the NSS could continue to provide reliable data on the student perspective on their subject, provider and the wider system, and what could be done without depending on a universal annual sample

124. Table 3 evaluates the six survey designs laid out above against the current NSS, with blue indicating that the survey design is an improvement, and red indicating the opposite.

Table 3: Assessment of alternative survey designs

		Financial costs	Compliance costs for providers	Respondent burden	Data needs of users		
					Students	Providers	Funders/regulators
A	Small stratified sample	Dark Blue	Light Blue	Dark Blue	Red	Red	Red
B	Large stratified sample	Light Blue	Light Blue	Light Blue	Red	Light Red	Light Red
C	Biennial census	Dark Blue	Dark Blue	Dark Blue	Light Red	Light Red	Light Red
D	Undergraduate sample	White	Light Red	White	Dark Red	Dark Red	Dark Red
E	Volunteer survey	Dark Blue	Light Blue	Dark Blue	Dark Red	Dark Red	Dark Red
F	Opinion poll	Dark Blue	Dark Blue	Dark Blue	Red	Red	Red

Key to Table 3

Much better than the present design	Dark Blue
Slightly better than the present design	Light Blue
Roughly the same as the present design	White
Slightly worse than the present design	Light Red
Much worse than the present NSS design	Dark Red
The evaluation is highly tentative	Diagonal Hatching

125. The data supporting these evaluations is available in the technical report.²²

Discussion and suggested actions

126. We can see from Table 3 that almost all the alternative designs would save money and reduce both compliance costs (that is, the requirements placed on providers as a result of the survey) and respondent burden. We can also see that no alternative sample design meets users’ needs as comprehensively as the current NSS. In general, this is no surprise. Most of the designs involve smaller samples. Smaller samples, in general, are cheaper to implement, but provide less powerful data. The question is: do any of the sample designs do a ‘good enough’ job of meeting the needs of users? And if so, are the benefits on the left hand side of the table enough to justify the compromises on the right?

127. Table 3 shows that designs A and F fare much worse than the current NSS in meeting the needs of data users. In short, they do not provide the data that users need to make decisions. For example, we compared the estimates generated by design A with those

²² See www.officeforstudents.org.uk/publications/nss-review-phase-one-report/.

generated by a full-census survey, to understand the amount of error introduced by the sample design. We found that the design A estimates were close to the full census estimates for 69 to 75 per cent of providers. The rest of the time, they were significantly different. Thus, in these cases our understanding of the student academic experience has been affected by the sample selection. This is of great concern because it reduces our confidence in the estimates: it is hard to use data to make decisions when there is a fairly high probability that the estimates are skewed by the sample choice. Despite the lower cost and reduced burden, we have therefore rejected designs A and F.

128. Design E, the volunteer survey, also fared poorly in our evaluation against the needs of users. This evaluation is marked as tentative because we have needed to make assumptions about the number of students who would respond to a volunteer survey, and whether they would be relevantly similar to the broader student population. We have based these assumptions on the evidence available, but the assumed number of students may nonetheless be too high or too low. If this is the case, a volunteer survey could be more or less effective. Because of this uncertainty, we have ruled out the volunteer survey as a standalone option, at least without further piloting and investigation. A volunteer survey could be used in combination with another survey design. We return to this below.
129. Design D is the version of the NSS which covers undergraduates in most years using a sampling approach. Unfortunately, our analysis shows that an expanded target population and a sample-based design do not combine happily when it comes to costs and benefits. Our sample is roughly the size of the current NSS population, meaning that that there are no significant reductions in cost or burden (in fact, the compliance costs for providers would increase, because of complexities around creating target lists for first year students). Meanwhile, on the other side of the table, the design is not particularly effective in meeting the data needs of users. For example, we found that the sample design would produce results close to those from a full census survey for only 89 to 94 per cent of providers: for around one in 10 providers, skewed results would be introduced by the sample design. We judged that these limitations outweighed the benefits of gaining data about a wider population and therefore ruled out design D.
130. We are left with designs B (the large stratified sample) and C (the biennial survey). Both would reduce burden and cost. For example, we estimate that a large stratified sample would cost approximately 75 per cent of the cost of the current survey. Neither design meets users' needs as well as the current NSS, but both might be regarded as 'good enough'. For example, design D would provide estimates close to those from an annual census survey for 98 to 99 per cent of providers. Design C, the biennial survey, introduces no sampling error at all, because it remains a full census survey. Unlike design B, however, it introduces a time-lag that grows to two years by the end of the survey cycle. Further research is needed to understand the impact of this, and the extent to which it would cause problems for users.
131. Drawing on this thinking, our suggested actions are that the OfS should:
 - a. Carry out further work to assess the feasibility of a biennial survey or a large stratified sample survey.
 - b. Investigate whether any of the sample designs described could apply to part-time students, or whether a different approach is needed.

- c. Investigate the possibility of combining sampling approaches. For example, a volunteer survey could be used to supplement a sampling approach, as an opt-in for eligible students who are not selected as part of the large stratified sample. Or a small stratified sample could be used during the fallow part of the biennial survey cycle to provide estimates at a national level.
 - d. As a longer-term project, continue to consider whether it is possible to collect information about a wider population of students, without an unacceptable escalation of costs and burden.
132. Throughout, the OfS will work with the other UK funding bodies, to maximise the chance of finding an approach to the survey that can be implemented across all four nations.
133. While we heard criticism of how the NSS is being used or promoted from some academics, we also heard strong evidence from university and college leaders, students and students' unions of the importance of being able to interrogate data at course and subject level. The uses of the survey as a tool for enhancement, as a source of course information for prospective students, and as a regulatory tool by the OfS, all depend on having this degree of granularity. This is not about relying on the NSS as the sole indicator for any of these purposes. But without it there would be no way to understand students' views of their academic experience properly at a course or subject level. Internal variation in quality is often greater than external variation. Simply looking at provider or national level data would not provide the right level of information to ask the right questions as a provider, student or regulator.

'If a sampled approach was taken then it would increase the burden as we'd have to survey our own students who weren't in the sample, as it is important to us to hear the views of all our students. It would also be hard to explain to students why they were being treated differently, some being given a national voice and others a local one'.

Liz Bacon, Deputy Principal and Deputy Vice-Chancellor, Abertay University

Examine the extent to which data from the NSS should be made public, including the implications of Freedom of Information legislation

134. The external publication of the NSS results was seen as important both for public accountability and as a means of comparing provider performance for the purposes of making improvements to teaching, learning and the student experience. The majority of staff and students felt it was important that results continue to be made public. A minority, however, felt that publication could be a distraction from other feedback activities in providers.
135. As part of the review, we looked at the consumer feedback mechanisms published in other sectors, such as health, and other international higher education sectors. Our findings suggest it would be highly unusual, particularly given the level of public investment in learning and teaching in the UK, not to have some form of published consumer feedback mechanism for public accountability. It would also cut across the transparency expectations that are an important part of any UK regulated sector.

136. Examples of other mechanisms that regulators use to collect consumer feedback:
- Consumer groups – consultations with consumers form part of Ofcom’s annual review
 - Complaints compared to compliments – Net Promoter Score – (Customer Measure of Experience in water sector, Ofwat) results published at provider level annually
 - Social media analysis – Financial Conduct Authority (FCA)
 - Calls to customer complaints and helplines – FCA
 - Care Quality Commission – multiple surveys, most sample based, results published by trust on regulatory dashboard.
137. Most of these methods will help to pick up the person ‘who shouts loudest’ and those groups most willing to engage with surveys. The same is true of opinion polls with self-selecting populations. The challenge for the OfS, given its regulatory objectives, is proactively to seek views from students less likely to engage, and in particular those from disadvantaged groups.
138. The NSS is currently used by all major league tables. How the NSS contributes to the league tables varies across each publication, with different weights given to different elements. While some use overall satisfaction, others do not. However, the NSS is always considered as one of several measures. It is possible to rank highly in the league table and have poor NSS scores. The reverse is also true. Likewise, high-ranking providers can have good NSS scores.
139. Without the NSS, league table compilers are clear that they would seek alternative surveys to gauge student voice. A growing number of forums are already used by students to provide views on courses, such as the Student Room, in addition to social media such as Instagram and YouTube. The challenge with such platforms is their self-selecting nature, and that they may not provide a rounded view for prospective students. In its analysis, the DfE cites concerns that the NSS is being used by league tables, but league tables are not dependent on the NSS. They existed before it, with many league tables, such as the Sunday Times, introduced in 1998 as a result of the introduction of tuition fees. Their compilers are clear that they would continue if the NSS did not exist. A bigger concern we heard with league tables is the possible distorting effect of using degree classifications and the use of entry qualifications data on the willingness of selective universities to use contextual data. The majority of league tables include a measure of ‘good honours’, which was felt to contribute more to the possible effect of league tables on issues like grade inflation than the NSS. Furthermore, non-publication would not remove the issues around league tables; indeed, there is a risk it could compound the issue with league table compilers relying on less robust datasets. Some league tables already use their own student surveys, which often rely on limited responses and are subject to less rigour on gaming than the NSS.²³ League table compilers told us that, because the NSS forms only part of several indicators, it does not exert undue influence on domestic university rankings, despite its prominence. Of the main league table providers, the Guardian University Guide score has the greatest reliance on the NSS, with a usual 25 per cent weighting between scores for assessment and feedback (10 per cent), teaching and

²³ For example, Times Higher Student Experience Survey and What Uni.

learning (10 per cent) and overall satisfaction (5 per cent).²⁴ The Complete University Guide gives a weighting of 1.5/10 to the NSS and The Times and Sunday Times less than this.²⁵

140. We examined the potential for the NSS to become an internal audit mechanism, similar to that used in Finland, with its contents not made public or only partially published. The data would continue to be used for enhancement and regulation. Those who use it for enhancement said an important part of its value over internal surveys is the ability to benchmark at subject level with other providers, particularly those with similar student profiles. Experts in international higher education noted that student surveys tend to be published at course level in all English-speaking countries, including Australia and Ireland. Moreover, the UK has a strong tradition of publishing public sector data at provider level, whether it is on schools, hospitals, rail operators or colleges. Higher education would be an outlier if we were not to publish NSS data. The Freedom of Information Act and General Data Protection Regulation (GDPR) could potentially require us to publish or release the data even if a decision had been made not to disclose it.
141. Where NSS data constitutes relevant evidence on which the OfS is relying for the use of any of our statutory functions, and where this has an effect on providers, they should be aware of what the data is and how it is to be used and have an opportunity to comment.
142. The Re-use of Public Sector Information Regulations 2015 covers information that we produce as part of our public task and to which we own the intellectual property rights. Generally speaking, if the information in scope is releasable under the Freedom of Information Act, the information must be permitted for re-use, and conditions for re-use must be as open and non-restrictive as possible.
143. If we moved to a sampling approach where we only surveyed a subset of the population, under the Higher Education and Research Act 2017 and GDPR legislation the first point to consider would be the necessity of collecting contact details of the population. If we can achieve our purpose by collecting contact details of only those who will be taking the survey, anything in addition to this would likely be unlawful under the GDPR. This might mean that a sampling approach would not lead to a reduction in gaming or inappropriate influence, as the provider would still know who was being sampled.
144. For these reasons, the NSS data should continue to be made public at whatever level it is statistically valid to publish the information. However, the current reporting thresholds should be reviewed by the OfS.

Ensure the OfS has the data it needs to regulate quality effectively

145. Feedback from providers and stakeholder suggests that there is limited awareness of how the NSS contributes to the regulation of quality in England other than through mechanisms such as the TEF. This is despite the OfS's regulatory framework being clear that national surveys of students' views for the provider will be used in the assessment and monitoring of

²⁴ See <https://www.theguardian.com/education/2019/jun/07/methodology-behind-the-guardian-university-guide-2020>.

²⁵ See <https://www.thecompleteuniversityguide.co.uk/sector/insights/university-and-subject-league-tables-methodology>.

conditions B1 and B2.²⁶ More recently, the OfS has published a consultation that makes proposals for how the monitoring approach set out in the regulatory framework should be implemented in practice in relation to the conditions for quality and standards.²⁷ The OfS considers that the survey continues to provide a necessary component of our approach to monitoring compliance with our quality and standards conditions for an individual provider, providing an important indicator of where further intervention may be required.

146. The OfS's consultation proposals take the view that the NSS should continue to make a valid and valuable contribution to the approach to indicator-based monitoring of quality. The intention would be to use information from the NSS in combination with other indicators, reportable events and third party notifications to identify where there might be a breach of, or increased risk of a breach of, baseline quality or standards requirements in a provider. The OfS would use these indicators to flag areas of potential concern and to help us frame further evidence-gathering in investigation of concerns.
147. The OfS is currently consulting on its future approach to the regulation of quality and standards in England and has not therefore considered in detail which NSS questions, or banks of questions, might be most valuable in implementing the detail of this approach.
148. Under the current proposals there are definitions of 'quality' and 'standards' that would represent the minimum baseline requirements for all providers. The current NSS provides relevant evidence in relation to the elements of these definitions that relate to course content, structure and delivery and to resources and academic support. The proposed definitions emphasise the needs of individual students and that students should be engaged with the quality of their educational experience.
149. More generally, the OfS would want to revise a number of the current NSS questions to align them more directly with these proposed definitions of quality. We would also want to update several of the questions to ensure that they are more generally relevant to higher education in the 2020s.
150. Subject to the outcomes of the current consultation, for the purpose of regulating the OfS baseline quality and standards requirements, we would consider reporting the outcomes of the NSS in a way that would allow us to identify those providers where performance in relation to particular questions, or blocks of questions, appeared to be noteworthy.
151. In terms of coverage, the NSS would continue to be necessary to have access to reliable data at the level of an individual provider. This could be on the basis of a statistically robust sampling of students in each provider rather than universal population coverage. The OfS would see it as more important to have robust data at provider level about every provider than to have subject-level coverage across the sector without coverage of individual providers. This is because the OfS needs to monitor compliance with its quality and standards conditions for each registered provider.

²⁶ See www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/.

²⁷ See www.officeforstudents.org.uk/advice-and-guidance/regulation/quality-and-standards-provider-guide/changes-to-quality-and-standards/.

Evidence from the Chair of the TEF, Professor Chris Husbands

‘The NSS has been a principal underpinning of the TEF. It is in many ways difficult, if not impossible, to envisage the TEF working without a strong NSS underpinning. There are several features of the NSS which make it particularly useful for the TEF. It is a comprehensive national database which has high levels of response and strong comparability across institutions. Given the richness of the dataset, it can be interrogated and benchmarked in ways which permit astringent judgements about institutions. It has strong buy-in from all parts of the sector. It is a respected dataset. It carries credibility. It is the only comparative source of data on student perceptions. The TEF (unlike league table providers) does not make use of the ‘overall satisfaction’ metric but it does make use of metrics on teaching quality, assessment and feedback and academic support.’

152. While the Royal Statistical Society had no specific concerns with the NSS as a survey in and of itself it did have concerns over its use as a singular proxy measure for things like teaching quality and specifically in relation to its previous use within the TEF. Concerns regarding the robustness of the current survey in its use in the TEF were raised by providers as part of the review. A small number of comments (29) in the provider survey questioned the construct validity of the use of the NSS as a proxy for teaching quality in the TEF. This was supported by comments made by some providers in the roundtables.
153. The NSS asks students for their views of various aspects of the academic student experience thought to be important for student success, therefore forming a facet of but not the sum total of teaching quality. For the effective regulation of quality and standards, it is necessary to have comparable independent data from students on their academic experiences, and for this to be most useful it needs to be at provider and subject level. So, any current or new NSS questions should be comprehensively tested to ensure they can provide the data needed to regulate quality and standards effectively in each of the UK nations.
154. The NSS is an essential part of the OfS’s approach to identifying and incentivising excellence above the baseline through the TEF, for broadly the same reasons we consider it necessary for baseline regulation – it is the mechanism we have for incorporating students’ perspectives on their academic experience. A forthcoming consultation on the TEF is due in 2021.
155. A recent OfS Insight brief found that, while there were consistently high overall levels of satisfaction nationally, there was considerable variation between different providers and students. Most providers have an overall satisfaction level of more than 81 per cent, while over 100 providers have overall satisfaction levels of 80 per cent or less, with 13 per cent point between those in the bottom 10 per cent and those in the top 90 per cent.²⁸
156. There are a small number of concerns in the comments of the provider survey, particularly from academics, that the NSS does not provide robust results, with some of this attributed to the boycott of the NSS by some students’ unions. However, even in 2017 when the boycott

²⁸ See www.officeforstudents.org.uk/publications/the-national-student-survey-consistency-controversy-and-change/.

was more widespread the NSS achieved a response rate of 68 per cent over 300,000 respondents and more than 500 providers, and thus provided a valuable and extensive source of information. A small minority of providers continue to be affected by low response rates which may be attributable to ongoing boycotts. Analysis of the 2020 to assess any impact of the COVID-19 pandemic on results found that while there were some variations across the data compared with previous years, there was no evidence that the results had been strongly affected by the pandemic.²⁹

157. The ONS and Royal Statistical Society have previously suggested that more be done to monitor and report the effect of non-response bias on the NSS, applying weighting where necessary.³⁰ HEFCE undertook analysis to this effect in 2016 and found that weighting would have little or no effect on indicators.³¹ However, it might be timely to introduce regular monitoring of non-response bias. As a suggested action, the OfS should periodically monitor NSS results for non-response bias, applying weightings where necessary.
158. There was widespread support from students and some providers for the NSS population to be expanded to include students from other years or all years. Students felt this would ensure that current students could feel the benefit of improvements to their course. Providers felt it would improve the survey's use for enhancement purposes. It would also ensure that students who leave their course before their final year are included. This would mean that groups of students less likely to complete their degrees would be more likely to have their voices heard through the NSS. An all-years survey may also help overcome issues of small cohorts, the effect of which are particularly felt within smaller providers. Comprehensive testing would need to be done to ensure responses could be comparable between different years of study.
159. Those that already conducted surveys in other years did not see all an all-years survey as an additional burden and welcomed the extra information it would provide. But others who did not conduct their own surveys were concerned about the scale and cost of such an exercise. One way to achieve the benefits of an all-years survey, while keeping costs in check and addressing the potential for providing a robust sample without a census, could be to survey a similar number of students each year, but to draw them from across the undergraduate study cycle. This is not without its challenges. We would need to ensure that respondents from across all years were interpreting the questions in the same way to enable aggregation across years. Furthermore, given the diversity of undergraduate provision, a first year student could also be a final year student and a third year student could be part way through a medical or veterinary degree. Degree length also varies across the UK, with four-year programmes being common in Scotland. Nevertheless, we believe this option should be further explored in phase two of this review.

²⁹ See www.officeforstudents.org.uk/publications/nss-2020-analysis-of-impact-of-coronavirus/.

³⁰ See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/556352/Teaching-Excellence-Framework-review-of-data-sources.pdf [PDF].

³¹ Higher Education Funding Council for England (HEFCE), 2016. 'Non-response and missing data in the Teaching Excellence Framework Metrics' TEF Working Group Paper. Unpublished.

Ensure the NSS will stand the test of time and can be adapted and refined periodically to prevent gaming

160. Since its inception 15 years ago, the NSS has featured in multiple quality assessment frameworks across all four nations of the UK. Therefore, it would be reasonable to assume it has been subject to Goodhart's Law, that any observed statistical regularity will tend to collapse once pressure is placed upon it for control purposes. The same, however, could be said of any metric used as a performance or accountability measure.
161. We have seen little evidence that the NSS has been subject to gaming, and we have noted the differential responses across subjects and providers, suggesting that it remains a valid measure of the student academic experience. With any such survey, it is important to adapt and refine the survey periodically to prevent gaming. The NSS has not been static over the last 15 years.
162. In 2017, a new National Student Survey was introduced following extensive research. The new survey included nine new questions on student engagement and updated questions on assessment and feedback and learning resources. In 2018 existing optional banks were supplemented with new banks of questions.
163. Many providers also saw the value in having a degree of consistency, with some comparable time series of results for the NSS. It will be important to balance such consistency with the need to adapt to change and avoiding gaming. There was also some concern that the effect the NSS has had on enhancement over its lifetime had plateaued in recent years and that this was due in part to too many questions remaining unchanged.
164. A few members of the Russell Group noted that student voice mechanisms have moved on since the inception of the NSS. There is now greater use of internal feedback mechanisms and the move towards 'live' student feedback mechanism in response to the COVID-19 pandemic. They felt it was difficult to see the value of the NSS as part of this landscape. This was a minority view but it highlights the importance of ensuring the survey remains fit for purpose. The pandemic has also seen a large number of courses moving to increased online delivery. The NSS needs to remain agile to changes and current issues in the sector in the same way as internal surveys are able to do.
165. There was a strong feeling from both providers and students that the core questions could be improved to reflect such changes. Some providers felt the questions were not well understood by their students, or that the questions did not reflect the diversity of the sector and, in particular, distance learners and part-time learners. Some Russell Group members felt measures of behavioural engagement (such as classroom and discussion engagement) would be more appropriate, particularly when used to inform enhancement. They felt this would place more emphasis on the role or responsibility of the student in the learning process. Questions could probe the extent to which students had participated in the learning process as well as how they rated what was being provided by their university or college.

Questions 26 and 27

26. The students' union (association or guild) effectively represents students' academic interests.

27. Overall, I am satisfied with the quality of the course.

166. Question 27 on overall satisfaction is the most commonly used metric in league tables, and its removal might make the results less susceptible to ranking. Not everyone supports this: some students felt this question enabled them to provide feedback on areas of the academic experience not included in the survey; some providers also found the summative measure helpful; others preferred an aggregate score for overall satisfaction.
167. Nevertheless, despite the perceived usefulness of the 'satisfaction' question by some respondents, most recognised that the question was unhelpful for the survey as a whole. Most questions ask students to rate their experience of different aspects of their academic experience, and no other question asks about satisfaction. Yet critics often derogatively dub the NSS as a 'satisfaction survey', which they regard as a passive, consumer-driven concept not suitable for a survey of this type. There was strong support for phase two of the review to look at alternatives to Question 27.
168. There was a strong feeling among students' unions that Question 26 was not well understood and did not reflect the diversity of provision offered by students' unions across providers, or the range of student representation outside universities. Students' unions and their critics argued that it is important to test student views about their role. There is clearly a case for asking about this aspect of the student academic experience in a way that properly tests that experience.
169. In the second phase of the review, it will be important to comprehensively review and revise the NSS questions, including replacing the students' union and 'satisfaction' questions. Phase two of the review should also explore the use of a mixture of core questions and periodic questions to ensure that NSS remains fit for purpose over time and prevents gaming.

Ensure the UK-wide role of the survey is considered in any recommendations

170. The review heard from providers and students across all four nations of the UK, as well as from DfENI, the SFC and HEFCW.
171. The NSS has a defined role in the regulation of quality in Northern Ireland, Scotland and Wales, with the student voice forming a key part of their higher education strategies. There is strong support for the continuation of the survey in the other UK nations.
172. In Wales, HEFCW considers a range of data, including NSS outcomes, in relation to its regulatory responsibilities. Analysis includes the identification of trends in data (at both provider and subject levels) together with providers' track records. It takes follow-up action with providers to assure itself that the quality of provision is adequate to meet the reasonable

needs of students. The data is considered by an internal Monitoring and Regulation Group, by its Quality Assessment Committee, and by the HEFCW Council, together with responses from providers. The NSS outcomes are also considered as part of an institutional risk review process and are included as one of the datasets in HEFCW's knowledge management system. HEFCW routinely addresses NSS outcomes as part of its regular catch-ups with providers. The governing bodies are required to give HEFCW annual assurance on a range of areas, including that they have scrutinised student survey outcomes (including the NSS) and confirmed that action plans had been put in place and implemented, in partnership with the student body. HEFCW would like the NSS to remain a census style survey, giving all students the opportunity to respond and feedback on their academic experience

173. In Northern Ireland, DfENI currently assesses the quality and standards of the higher education providers it funds through the annual provider review (APR) process. One of the key elements of the APR is the scrutiny of key pieces of data, which includes the results from the NSS. The process draws together a variety of data and other information about each provider and presents this in an 'APR dashboard', which then informs the overall judgement process.
174. In Scotland, participation in the NSS is a condition of SFC funding, and NSS outcomes inform all five elements of the Scottish Quality Enhancement Framework. They form a key dataset for discussion at the Quality Assurance Agency's Enhancement Led Institutional Reviews with providers. They are also used alongside other evidence to inform its judgment on how effectively providers are securing academic standards and improving the student academic experience. Providers are also required to reflect on the NSS outcomes as part of their own institutional-led reviews and annual statements of assurance to the SFC on their management of academic standards and the quality of the learning experience.
175. The NSS overall satisfaction question is used as a key performance indicator (variance from NSS benchmark) in the SFC's Outcome and Impact Framework, with providers required to commit to improvement against this measure in their annual Outcome and Impact Framework agreements. The SFC also uses analysis of NSS outcomes at provider and subject level to inform its Outcome Agreement Managers' discussion with providers on enhancing their performance, in its assessment of their risk and university engagement levels, and to inform its policy developments and interventions.
176. The SFC also uses NSS outcomes, alongside a range of other quantitative and qualitative evidence, to account to the Scottish Government for the effective use of public funding for undergraduate fees for Scottish-domiciled students, and in discharging its statutory responsibility to ensure the quality of higher education provision in Scotland. There is concern an all-years survey would be less valuable for student information purposes, given the differences between course lengths across the four nations, but the SFC could see its value for enhancement purposes.
177. Both providers and students across all nations saw value in the NSS remaining a UK-wide measure despite increasing divergence in the higher education policy landscape. As a suggested action, any proposed changes to questions need to ensure they reflect the different quality regulation regimes across all four nations.

Recommendations

178. The recommendations arising from phase one of the review are:

- **Recommendation one** – Examine the two possible alternatives to a universal annual census of final year students – large stratified sample or biennial survey – against the current annual census, ensuring the survey remains statistically robust at least at provider level.
- **Recommendation two** – Review the core survey questions to ensure they remain fit for purpose and stand the test of time. This will include the removal of the term ‘satisfaction’ for the summative question or using an aggregate score to replace Question 27.
- **Recommendation three** – Continue to publish the NSS at a level that is statistically robust.
- **Recommendation four** – Improve user guidance to providers and students’ unions on responsible statistical use of NSS results, and make improvements to the data dissemination site to help remove burden on providers. Raise student and students’ union awareness of the allegation of inappropriate influence process, including what may constitute inappropriate influence.

Next steps

179. From the findings we suggest the following actions which phase two of the review may wish to look at:

- a. Clarify the purpose of the NSS in the current higher education landscape:
 - i. The OfS should work with providers and students’ unions to produce user guidance on the appropriate statistical use of NSS scores.
 - ii. When a new NSS has been developed, more should be done to publicise its data to students as an independent source of data on students’ academic experience.
 - iii. In any changes to the NSS questions, it will be important to align those questions with information useful for regulatory understanding in all four UK nations.
- b. Assess the bureaucratic burden the NSS places on providers and how this could be reduced:
 - i. The OfS should examine ways in which required promotional activity could be shifted away from providers, while maintaining a robust response rate to the survey.
 - ii. Phase two should explore ways of creating greater customisation of the NSS for providers to reduce survey fatigue.
 - iii. The OfS should improve the NSS data dissemination site to make the results easier to use for those with limited statistical awareness, to assist with responsible use of the data within providers.

- c. Explore the unintended and unanticipated consequences of the NSS for provider behaviour, and how these could be prevented, including whether the NSS drives the lowering of academic standards and grade inflation:
 - i. The OfS should make clearer to students what constitutes inappropriate influence and how to report it.
 - ii. Phase two of the review should explore the use of different response scales, and use of scales in published results (e.g. percentage agree).
- d. Examine the appropriate level at which the NSS could continue to provide reliable data on students' perspectives on their subject, provider and the wider system, and what could be done without depending on a universal annual sample:
 - i. The OfS should carry out further work to assess the feasibility of a biennial survey or a large stratified sample survey.
 - ii. The OfS should investigate whether any of the sample designs described above could apply to part-time students, or whether a different approach is needed.
 - iii. The OfS should investigate the possibility of combining sampling approaches. For example, a volunteer survey could be used to supplement a sampling approach, as an opt-in for eligible students who are not selected as part of a large stratified sample. Or a small stratified sample could be used during the fallow part of the biennial survey cycle to provide estimates at a national level.
 - iv. As a longer term project, the OfS should continue to consider whether it is possible to collect information about a wider population of students, without an unacceptable escalation of costs and burden.
- e. Examine the extent to which data from the NSS should be made public, including the implications of Freedom of Information legislation:
 - i. The NSS data should continue to be made public at whatever level is statistically valid.
 - ii. The OfS should review the current reporting thresholds for the NSS.
- f. Ensure that the OfS has the data it needs to regulate quality effectively:
 - i. For the effective regulation of quality and standards, it is necessary to have comparable independent data from students on their academic experience, and for this to be most useful it needs to be at provider and subject level.
 - ii. Current and new NSS questions should be comprehensively tested to ensure they can provide the data needed to regulate quality and standards effectively in each of the UK nations.
 - iii. The OfS should periodically monitor the NSS results for non-response bias, applying weightings where necessary.

- iv. The OfS will explore options for an all-years NSS, to include sampling approach across all years.
- v. Phase two of the review will comprehensively review and revise the NSS questions.
- g. Ensure the NSS will stand the test of time and can be adapted and refined periodically to prevent gaming:
 - i. Phase two will work with relevant student representatives including the OfS student panel, to look at replacing the students' unions question (Question 26) with one or more questions that reflect the breadth and diversity of students' union activities across the sector.
 - ii. Phase two of the review will explore the use of a mixture of core questions and periodic questions to ensure that the NSS remains fit for purpose over time and that it prevents gaming.
 - iii. The term 'satisfaction' should be removed from any subsequent summative question or aggregate score that could replace Question 27.
- h. Ensure the UK-wide role of the survey is considered in any recommendations:
 - i. Any proposed changes to questions need to ensure they reflect the different quality regulation regimes across all four nations.



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