Consultation

Office for Students OfS

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

This consultation runs from 29 March to 26 May 2023.

Contents

About this consultation

This consultation sets out proposals for the approach to publication of the revised National Student Survey from 2023 onwards.

Timing	Start: **29 March 2023** End: **26 May 2023**
Who should respond?	Anyone with an interest in quality and student information in higher education in England, Northern Ireland, Scotland and Wales. We are particularly (but not only) interested in hearing from **students, staff, academics and leaders at higher education providers** that will be engaging in the new arrangements resulting from the review. We welcome the views of all types and size of provider. We are interested in the views of **schools and further education colleges, employers, third sector organisations, policy bodies**, and others with an interest in quality and student information.
How to respond	Please respond by **26 May 2023**. Please use the online response form available at https://survey.officeforstudents.org.uk/s/consultation-on-NSS-results/
How we will treat your response	We will summarise and/or publish the responses to this consultation on the OfS website (and in alternative formats on request). This may include a list of the providers and organisations that respond, but not personal data such as individuals' names, addresses or other contact details. If you want the information that you provide to be treated as confidential, please tell us but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request. The OfS will process any personal data received in accordance with all applicable data protection laws (see our privacy policy).[1]

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[1] Available at www.officeforstudents.org.uk/ofs-privacy/.

We may need to disclose or publish information that you provide in the performance of our functions, or disclose it to other organisations for the purposes of their functions. Information (including personal data) may also need to be disclosed in accordance with UK legislation (such as the Freedom of Information Act 2000, Data Protection Act 2018 and Environmental Information Regulations 2004).

Next steps

We will publish a summary of responses to this consultation in summer 2023. We will explain how and why we have arrived at our decisions. We will then set out next steps in the policy and implementation process. We are currently expecting to publish NSS results in late summer 2023.

Enquiries

Email NSS@officeforstudents.org.uk.

Alternatively, call our public enquiry line on 0117 931 7317.

If you require this document in an **alternative format**, or you need assistance with the online form, contact NSS@officeforstudents.org.uk. (**Please note:** this email address should **not** be used for submitting your consultation response.)

For more information about our work to date on the NSS, please see the OfS website: National Student Survey - NSS

Executive summary

1. This consultation on the National Student Survey (NSS) sets out proposals for our approach to publishing the data received from students' responses. Following a public consultation in 2022, the 2023 NSS survey has revised questions to gain more in-depth data about students' perceptions of their academic experience.[2] These updates in addition to wider updates to statistical, definitions and methodology[3] used across higher education datasets suggest that we will need to make changes to our general approach to publishing the NSS results, which is what we are consulting on here.

2. The NSS is managed by the Office for Students (OfS) on behalf of the regulatory and funding bodies in the UK, which are the OfS, the Scottish Funding Council, the Higher Education Funding Council for Wales, and the Department for the Economy in Northern Ireland.

Capturing the views of students

3. The NSS is one of the largest student voice surveys in the world, receiving around 330,000 responses each year. The survey asks students about their academic experience, including teaching, support from teaching staff, learning resources and student voice. To ensure the survey captures the most relevant and accurate data – and remains fit for purpose – it is regularly reviewed. After the 2022 consultation, the 2023 survey – open to students from 11 January until 30 April – includes additional questions on mental wellbeing and, for students in England, freedom of expression.

A change of focus

4. NSS results were previously measured by an 'agreement' rate using the Likert scale. The 2022 consultation described how approaches to survey methodology had moved on since the NSS started in 2005. A single response scale was no longer seen as appropriate for a survey of this kind. The revised questionnaire has moved to more direct questions to improve accuracy and validity, while maintaining a focus on the core topics. It means we can be more confident the NSS is measuring what it is intended to measure.

5. We set out the factors to which we have regard in making publication decisions in Annex D.

Our key proposals

6. This consultation sets out proposals for our general approach to publication of the results from the revised NSS from 2023 onwards. We propose to continue to publish the NSS at a sector and provider level (proposal 1). We propose to publish further information not currently published and publish information in a different way to prior NSS results (proposals 2-6, as further detailed in the summary of our proposals). A summary of our general policy can be found in Annex H which also sets out where this has changed from previous years.

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[2] The 2022 consultation and its outcomes are available at Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students.

[3] See Outcome and experience data - Office for Students.

7. We propose to replace the 'agreement rate' that has previously been published with a 'positivity' measure for all the core questions and the new mental wellbeing and freedom of expression questions. Students responding to the NSS are given five options for each of these questions – two positive, two negative, and a 'This does not apply to me' option. We propose to publish a 'positivity measure' for each question, calculated as the proportion of respondents who chose a positive option out of those who chose a positive or negative option. The positivity measure would be used as a key measure in NSS publications. The OfS would also expect to use it in the regulation of English providers, and proposes to use it in the Teaching Excellence Framework (TEF) indicators, which we intend to publish annually for all registered providers.[4] It would also inform monitoring activity for providers in Scotland, Wales and Northern Ireland. In addition to the positivity measure, we propose to continue to publish the number of students who used each response option.

8. The NSS questionnaire has historically been split into thematic groups of questions or scales covering areas such as 'teaching on my course' and 'academic support'. We propose to continue to group questions as part of our general policy for publication. The OfS has produced indicators constructed from the NSS to rate providers in the TEF and these indicators are split into thematic groups. The OfS intends to publish TEF indicators annually for all registered providers and proposes that TEF indicators produced using the NSS would be constructed using the new question groupings.

9. We have previously published NSS results broken down by student characteristics. We propose to update these definitions and how they are used in presenting NSS results. At provider level, we propose allowing users to see NSS results split by mode, which would now include apprenticeships, level of study, and subject. At sector level, we propose to add personal characteristics to help identify students who may not benefit as much from their educational experience as others. This is consistent with the approach the OfS has taken in other contexts, for example for the TEF.

10. We propose to continue publishing benchmarks so that they are available to users who want to use them to explore the NSS results. We propose to publish benchmarks for combinations of provider, level, subject and mode of study, and to review and update the benchmarking factors using the NSS 2023 data. To aid the use of benchmarks at provider level, we also propose to show the contribution a university or college makes to its own benchmark (that is, the extent to which the benchmark for that provider is made up of data specifically about that provider).

Maximising the potential of the NSS

11. These proposals aim to make publications of the NSS results more useful for prospective students, current students and for universities and colleges. For providers in England, the definitions of student groups would be the same as used in other OfS regulation, including the

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[4] In the decisions relating to our consultation on the TEF, we confirmed that TEF exercises will be conducted every four years. Alongside this we expect that the TEF indicators will normally be published annually as official statistics for all registered providers in England, whether they are required to (or choose to) participate in the TEF or not. The TEF indicators would not normally be published by the OfS on an annual basis for providers in the devolved administrations. For further information see paragraphs 73 to 86 of 'Consultation on the Teaching Excellence Framework (TEF): Analysis of consultation responses and decisions'; and paragraphs 54 to 58 of 'Addendum to TEF consultation: Publication of information decisions', both available at The TEF - Office for Students.

TEF and the OfS's approach to regulating student outcomes. The proposals aim to minimise burden and empower users to make appropriate interpretations of the NSS results. The more granular information we are proposing to publish would help universities and colleges to identify and make changes to improve students' academic experiences.

12. Since the survey's inception, we have improved how we benchmark different data splits. We think the proposed new benchmarks will be beneficial to higher education providers when they are tailoring their policies, particularly those aimed at improving equality of opportunity. The proposed approach set out in this consultation seeks to publish all splits currently in use across wider publications and regulatory activity across the UK. We welcome feedback from universities, colleges and others on whether they would like further splits to be made available to inform their internal reporting and quality enhancement arrangements.

We want to hear from you

13. We are keen to hear views on this consultation from universities, colleges, students, students' organisations and other organisations. The consultation closes at 1700 on 26 May 2023. We plan to publish final decisions following this consultation in late summer 2023, with any changes implemented for publication of the NSS 2023 survey.

Introduction

14. The National Student Survey (NSS) is an annual census survey of final year undergraduate students at UK universities. It has been conducted since 2005 and attracts a response rate of around 70 per cent each year – approximately 330,000 students. The survey is conducted between January and April. It currently asks 26 core questions covering various aspects of the student academic experience.

15. The NSS gathers students' views on the quality of their courses which helps to:

- inform prospective students' choices

- support universities and colleges to improve the student experience

- support public accountability.

16. This consultation sets out proposals for the publication of the revised NSS arising from a review conducted by the UK higher education funding and regulatory bodies between 2020 and 2022.

Why are we consulting

17. In summer 2022 the OfS, the Higher Education Funding Council for Wales (HEFCW), the Scottish Funding Council (SFC) and the Department for the Economy Northern Ireland (DfENI) consulted on changes to the NSS arising from a two-stage review of the survey.[5]

18. The proposals outlined in this consultation follow changes made to the questionnaire after that consultation, including changes to the wording of questions, response scales and questionnaire structure.

19. In formulating the proposals in this consultation, the OfS has had regard to our general duties under section 2 of the Higher Education and Research Act 2017 (HERA), the factors set out in section 67A of HERA, the Public Sector Equality Duty, guidance from the Secretary of State, the Regulators' Code and the Code of Practice for Statistics. These factors are set out in Annex D.

20. The consultation questions are listed in full in Annex A.

Summary of consultation proposals

21. This consultation sets out proposals for our general approach to publication of the NSS results from 2023 onwards. It explains the information at sector and provider level that we would normally expect to publish on the OfS website and Discover Uni website. In making publication decisions we would consider the factors set out in Annex D in the manner we consider appropriate.

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[5] The consultation analysis is available at: Consultation on changes to the National Student Survey: Analysis of responses and decisions - Office for Students.

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

23. **Proposal 1**: our overall approach to publication of the NSS will remain broadly similar to previous years, with publication at provider level and sector level, thresholds and aggregation. This is described in further detail as part of proposal 1 below and in Annex H.

24. **Changes to the previous approach**: where the change in questionnaire or wider statistical work has necessitated a review or change of approach, this is covered in detail in proposals 2-6.

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

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

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

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

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

Terms used in this consultation

25. We use a few technical words and phrases in this consultation. The table below lists some of these, and their meaning, to help readers unfamiliar with this terminology.

Term	Definition
Census	We use census in this context to mean a survey which engages with all the students in the target population (final year undergraduate students at UK universities and colleges).
Survey	The survey is the instrument or data gathering tool for research.
Questionnaire	We use questionnaire when we are referring to the questions in the survey.
Core questionnaire Core NSS	The core NSS currently comprises 26 single choice questions relating to various aspects of the student course that are asked of all students. Providers can extend the survey by adding questions from NSS optional question banks or two questions of their own choosing.
Summative question	This refers to the NSS question 'Overall I am satisfied with the quality of the course', asked to students in Wales, Scotland and Northern Ireland only.
Response scale	Designed for quantitative analyses, a limited number of response options are provided for most questions. The NSS currently uses a question-specific scale.
Additional questions	The additional questions are new questions for 2023 asked of all students but do not form part of the core questionnaire. Questions on freedom of expression (England only) and mental wellbeing provision.
Direct questions	Questions which elicit respondents' views on an issue of interest by asking about it directly. The questionnaire response options are tailored specifically to match the question.

Consultation proposals and questions

Information we would normally expect to publish

26. We propose that we would normally expect to publish information from the NSS as set out below. In making publication decisions we would consider the factors set out in Annex D in the manner we consider to be appropriate.

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

What are we proposing?

27. NSS results have been being published since 2005. We propose to continue publishing results and to do so broadly in line with the approach in previous years since the last review in 2017, with publication at provider level and sector level, thresholds and aggregation. This is described in further detail below and in Annex H.

28. Where the change in questionnaire or wider statistical work has necessitated a review or change of approach to previous years, this is covered in detail in proposals 2-6 below.

29. We propose to continue publishing the NSS results. In many respects, our approach to publication will remain unchanged. In particular we propose that:

    a. We will publish the results both on the OfS website, and the Discover Uni website, with the Discover Uni presentation being aimed at prospective students and their advisers.

    b. We will not publish the raw NSS data, but will instead present the results as summaries.

    c. In order to address the interests of data users, we will provide these summaries at varying levels of aggregation, ranging from sector-wide to specific to individual courses.

    d. We will publish the results both as data visualisations, and as data downloads.

    e. We will accompany the data with explanatory text (such as methodology documents and FAQs).

30. Respondents to the consultation may find it helpful to familiarise themselves with our current approach to publication, by visiting the Office for Students website and Discover Uni.[6]

31. Further information about our general approach to publishing is included in this proposal. Subsequent proposals focus on specific aspects of the publication, particular those which we propose to change. Annex H contains a list of the items we propose to publish.

32. The general policy for publication we are consulting on does not cover the provider results released via the provider portal. Further details of that data can be found in the 'Information we would not normally expect to publish' section below.

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[6] see NSS data: overview - Office for Students; About our data | Discover Uni.

33. From time to time we will make changes to the way we publish the NSS results. We may need to do this to respond to external circumstances, to changes to the data sources we use, or to evolving expectations of statistical practice (among other reasons). When considering changes to the way we publish NSS results, we will also consider whether consultation is necessary, including with regard to whether the change diverges from the general policy; and if so, to what extent. In some circumstances, we may judge it appropriate to make a change without consulting.

Publication thresholds

34. In previous years, when we published the NSS results, we applied some suppressions to the data, generally to protect the confidentiality of respondents, and maintain the quality of the data. This meant that we routinely did not publish results for a unit (such as a provider, or a subject group within a provider) when the numbers are too small, or when a small proportion of respondents within that unit answered the survey. Very occasionally, we suppressed results for other reasons, such as external factors that we consider make the results misleading. In 2022 and earlier surveys, the thresholds for publication were set at ten individual students and a 50 per cent response rate. That is, we did not publish NSS results for a unit if fewer than ten students responded, or if the response rate for that unit was less than 50 per cent.

35. In this consultation, we seek views on the general approach we will take into account when establishing response rate thresholds both for the NSS publication, and on Discover Uni. We also describe our proposed approach to publication thresholds, both for the 2023 results, and for later years.

36. In 2023 and beyond we propose that our general approach to determining publication thresholds for the NSS publication and Discover Uni would be as follows:

    a. To consider data protection, and the need to protect the confidentiality of individuals. This means that our publication thresholds must be consistent with the commitments to respondents made in the NSS privacy notice. This is important as part of our duty to comply with data protection regulation. In addition, we recognise that to gather full and frank responses from students, we require their trust: it is therefore essential to the success of the survey that we do not disclose information that students would expect us to keep confidential.

    b. To consider the needs of data users, including the fact that both providers and prospective students are often interested in data that is drawn from small populations.

    c. To consider the risk that the results will be misrepresentative of the population that they cover. This is a particular risk when the response rate for a publication unit is low, as the students who responded to the survey may hold views that are different from the non-respondents.

    d. To consider whether our approach is clear to data users. This means that we would consider the risk that a complicated threshold makes it hard to understand why some results have been suppressed, which could reduce trust in the NSS results. We would also consider the risk that changing the thresholds from one year to the next will reduce clarity and comparability.

e. To consider the balance between the factors described above, recognising the importance of complying with data protection law where relevant. We also note that there is a potential tension between publishing information that is of public interest, and ensuring that data is reliable and fit for purpose, in the sense that data users will sometimes be interested in data that we do not consider to be reliable. We would aim to arrive at an approach that balances these factors appropriately. We note that such a balance would often involve some compromise, and we would communicate this clearly.

f. As well as setting thresholds for routine suppression, to consider whether exceptional suppressions might be required. This could happen, for example, if we were to judge that a provider experienced exceptional circumstances during the survey period which means that students' responses are unlikely to give an accurate picture of the student experience. It could also happen if we consider that students' responses have been subject to 'inappropriate influence', meaning that they are unreliable.

Approach to publication thresholds in 2023

37. In the section above, we propose a general approach to setting publication thresholds. This section illustrates how we would apply the proposed general approach in 2023 and 2024, should it become final. This description is provided for information, and to help consultation respondents understand how the general approach would work in practice.

38. In 2023, we would apply the general approach largely by maintaining the existing publication thresholds, with one change which is described below. This means that we would publish results for a unit only if at least ten students respond, and the response rate is at least 50 per cent. The response rate will be calculated as the number of respondents who did not answer 'This does not apply to me', divided by the number of students in the population. We would also consider whether additional suppressions are required, as described in paragraph 31f.

39. We have arrived at these thresholds through the approach described in paragraph 31. The numeric threshold of ten responses is intended to protect the confidentiality of respondents. Since any published statistic will be drawn responses from at least ten students, there is very little risk that someone could use these statistics to find out about an individual. We have set this threshold as low as we consider appropriate, having had regard to the factors described in paragraph 31. By doing so, we aim to meet the needs of respondents by not suppressing data unnecessarily, as might happen in some circumstances if we raised this numeric threshold. The response rate threshold of 50 per cent suppresses results when only a minority of the population have responded to the survey. This tends to reduce the risk that the published results may not be representative of the views of the student population in question. Finally, this approach has the benefits of simplicity and clarity; as well as familiarity to data users.

40. We have considered alternatives to the approach described above; in particular whether it would be possible to lower the response rate threshold – and thereby publish more useful data – while still maintaining the reliability of the results. However, we have noted that it would not be possible to develop such an approach without a detailed analysis of the 2023 results. Such an exercise would take several months, and would therefore delay publication of the results until late autumn 2023. We know that data users appreciate swift publication of the data. We therefore do not propose to pursue this alternative for the 2023 publication.

41. In the 2023 publication, we anticipate applying the general approach, as finalised through consultation, to make a small change to response thresholds. This would involve suppressing results when the response rate is very high for a publication unit and the results are unanimous (or close to unanimous). This is because we have identified a risk, in such cases, of revealing how individual students responded. In these rare cases, rather than fully suppressing the results, we would instead indicate whether the positivity measure for the publication unit is high or low. We have decided to respond to the risk like this because it provides the most information possible to data users, without compromising data protection. We provider further technical details on how we will implement this change in the supplementary information which accompanies this consultation.

Approach to publication thresholds beyond 2023

42. As mentioned in paragraph 34 there may be alternative publication thresholds which would allow us to publish more results, while nonetheless maintaining their reliability. We are interested in exploring this, because we believe it would meet the needs of data users. In the past years of the survey, we have suppressed some or all results for several large providers because their response rate has been below 50 per cent, despite interest from prospective students and the general public in these results.

43. Following the 2023 NSS publication, we will therefore analyse the results to determine whether the response rate threshold could be lowered, while managing the risk that the data becomes unrepresentative. This will involve examining the extent to which non-response bias – which occurs when respondents are different from non-respondents in a way that affects their responses – is present in the survey. The examination of non-response bias in the Graduate Outcomes survey commissioned by the Designated Data Body (DDB) in 2021 provides an example of this sort of analysis.[7]

44. This analysis may lead to a change in the publication thresholds in 2024 or later years. In making any such change, we would use the general approach described in paragraph 33, subject to any changes following this consultation. We would also draw on any additional information that respondents have given us, through this consultation, about the advantages and disadvantages about particular thresholds. We do not anticipate consulting again on changes to the thresholds, provided that they are made using the general approach. This is because any such changes would be drawn from the application of statistical techniques, and we consider that only a small minority of consultation respondents would be able to respond authoritatively on these matters. We will be fully transparent in the rationale for any such changes, including publishing the relevant statistical information.

Aggregation across years

45. In some previous years, we have increased the amount of publishable results by allowing results to aggregate across years. This means that when a publication unit (such as a provider, or a subject group within a provider) did not reach publication thresholds, we have combined the current results with the results from the previous year. In some cases, this allowed us to publish a statistic for the publication unit calculated from two years of data. These aggregated statistics were clearly identified as such.

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[7] For further information see www.hesa.ac.uk/blog/21-06-2021/graduate-outcomes-no-need-to-weight.

46. We routinely practiced aggregation across years until the NSS 2021 survey. For the NSS 2021 and the NSS 2022, we did not aggregate across years. This is because analysis showed us that between 2020 and 2022, results were less stable between years than they had been previously, an effect we attributed to the coronavirus pandemic. Therefore, we considered aggregated statistics to be less helpful to data users, who typically want to know about the current student experience. We also acknowledged the risk that aggregated statistics could hinder a fair comparison between providers (if, for example, results from the current year tended to be more negative than results from the current year, as was the case in 2021).

47. Aggregation across years has also been used when we publish the NSS results on Discover Uni. We aim to publish the NSS results specific to each course, and when these results do not meet publication thresholds, we draw on data from the previous year. As with the NSS publication, we did not use aggregation across years in the Discover Uni updates published in 2021 and 2022.

48. From 2023 onwards we propose the following general approach to deciding whether or not to aggregate across years:

   a. To consider the needs of data users, and the extent to which aggregating across years will meet these needs by making more data available, recognising that Discover Uni is mainly used by prospective students and their advisers, and their needs will be different from the users of the NSS publication.

   b. To consider the extent to which aggregation would be misleading, or invalidate comparisons between publication units. This risk is increased by changes in the survey (either to the questionnaire, the population, or otherwise). It also increases when the results are more changeable from year to year, as occurred during the coronavirus pandemic.

   c. To consider how to keep our approach to publication simple, transparent and consistent across years, thereby increasing the trust of data users.

   d. To balance these factors, noting that there will be tensions between them. For example, aggregating across years will generally make more data available, but it will also make our approach to publication more complicated.

49. If this general approach is agreed, we would implement it as follows. For the 2023 survey, we would not aggregate across years in either the NSS publication or Discover Uni. This is because the questionnaire and the response options have changed between 2022 and 2023. We could, in theory, create a combined statistic by combining the 2022 agreement rate and the 2023 proposed positivity measure. But this statistic would be hard to interpret and likely to be misleading. For example, we expect the positivity measure to be higher than the agreement rate for most publication units. Therefore, this method would disadvantage those providers with aggregated data.

50. For NSS 2024 results and beyond, we would decide whether to aggregate across years using the general approach described in paragraph 45. To apply the approach, we will consider the stability of the data between years. This will be achieved both through data analysis, and through considering the external events which could have affected the student experience in the two years in question. We will also consider the availability of data, and the needs of data

users. For example, it is likely to be relevant that Discover Uni aims to provide data which is relevant to a particular course (rather than the broader category of a subject within a provider). Since fewer NSS results are available for each course, aggregation across years has a greater impact on data availability than it does for the main NSS publication.

51. We will not routinely consult on aggregation across years, but will instead make decisions u the general approach (as finalised following this consultation). We will also draw on any additional information that respondents give us, through responses to this consultation, about the advantages and disadvantages of aggregating. Our expectation is that once we have determined the general approach, we will have enough information to decide whether aggregation is appropriate, and that further consultation would therefore add burden rather than benefit. We will be transparent about the grounds for our decisions, and about any risks or disadvantages they entail.

Why are we making this proposal?

Publication at sector and provider level

52. The NSS gathers robust information on the perceptions of students on aspects of their academic experience.

53. The general approach to publication supports the three main aims of the survey:

    a. To inform prospective students' choices

    b. To provide data that supports universities and colleges to improve the student experience

    c. To support public accountability.

Publication to inform student choice

54. As part of phase one of the NSS review, 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. This found that 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).[8]

55. 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

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[8] See NSS review: Phase one report - Office for Students.

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.[9]

56. 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. As part of phase one of the review we found some providers, including 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. Therefore publication of the NSS may widen student choice.

57. For international higher education recruitment, it is reputation that 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.[10] 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 survey results 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.

58. 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 and part of our general duties as outlined in Annex D. It is also clear that students want to have access to independent unbiased information about the student academic experience

Publication for improvement to the academic experience

59. Phase one of the review 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 (which is enabled by the published data).

60. 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. In phase one of the review, 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

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[9] See Our research - Office for Students.

[10] See Student satisfaction, league tables and university applications: Evidence from Britain - ScienceDirect.

schools, hospitals, rail operators or colleges. Higher education would be an outlier if we were not to publish NSS results.

61. Furthermore, provider and student feedback suggests the publication and public availability of the results gave the survey results greater prominence, incentivising providers to make improvements to the student experience which could lead to improvements in quality of outcomes.

Publication for public accountability

62. Without the NSS results, there is no published 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. Some other 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 of providers.

63. Phase one of the NSS review asked respondents for their view about publishing NSS results. There was a strong consensus that the outcomes of the survey should continue to be published at both sector level and provider level. 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.

64. 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 higher education, 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.

Publication thresholds

65. We are proposing a general approach to determining publication thresholds. We are making this proposal because we wish to arrive, through consultation, at an approach which we can use each year to set the thresholds, including sometimes making changes to them. This general approach sets the groundwork for a review of the response thresholds in 2024. A general approach allows us to be transparent about how we set response thresholds, while allowing us the flexibility to change the thresholds themselves in future, particularly when new evidence becomes available.

Aggregation across years

66. We are proposing a general approach to deciding whether to aggregate across years. In this case, a general approach is particularly helpful as the considerations for and against aggregation may change year on year, depending on the availability of data and the stability of the results. A general approach will allow us to react to these changes without further consultation, while being transparent about the factors that we take into account.

67. By consulting on a general approach, but not on its implementation each year, we aim to reduce consultation burden and publication timelines, while still taking in account the views of providers, the general public and others interested in the NSS.

What would the effect of this proposal be?

68. We would normally expect to publish information from the NSS as set out above on the OfS website and Discover Uni. In making publication decisions we will consider the factors set out in Annex D in the manner we consider to be appropriate.

69. We anticipate that this publication would meet the aims of the NSS, and by making data publicly available:

   a. Prospective students would have access to data on the experiences of current students to help inform their decisions about whether and where to study

   b. Providers would be able to understand their own data in the context of the whole sector, and make better informed decisions about how to make improvements

   c. Providers would be further incentivised to make improvements.

Publication thresholds

70. The general approach to publication thresholds will typically lead to suppressions, meaning that less data will be available. In some cases, this data would have been of interest to prospective students and other data users. More positively, the general approach will allow us to:

   • protect the personal data of respondents

   • reduce the risk of publishing unrepresentative results

   • take steps to maintain trust in the NSS (for example, by showing that we handle personal data responsibly).

Aggregation

71. The general approach to aggregation would result in a decision each year about whether or not to aggregate, both in the NSS publication and in Discover Uni. If we decide to aggregate, we would be able to publish more data than would otherwise be the case. However, the data would be harder to understand, and there would be an increased risk that comparisons between publication units will be misleading. We will consider these issues when we apply the general approach.

72. An effect of both proposals would be that we would not routinely consult on publication thresholds or aggregation, provided that our decisions are made using the general approaches. This means that we would be able to respond to new evidence, or changed circumstances, without further consultation. This would reduce the burden of responding to multiple NSS consultations, and also ensure that the NSS results can be published soon after the survey ends. A potential negative effect is that those who are interested in the NSS would not be able to express their views on the way we implement the general approaches. This increases the risk that a decision about implementation could have unanticipated consequences. We intend to mitigate this by gathering information through this consultation about any additional

considerations relevant to making a decision about thresholds, or about aggregation. We would draw on this evidence each year when we determine how to implement the general approaches.

Questions for proposal 1

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

2. Do you agree with our general approach to determining publication thresholds, as described in paragraph 33?

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

4. Do you agree with our general approach to determining whether we aggregate across years, as described in paragraph 44?

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

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

Proposal 2: Positivity measure for each question

What are we proposing?

73. Previously, the NSS results included an 'agreement rate' for all core questions. Respondents could choose from five options when answering questions with response options 'Strongly agree', 'Mostly agree', 'Neither agree nor disagree', 'Mostly disagree' and 'Strongly disagree'. The agreement rate was calculated as the proportion of respondents who answered the question with the response options 'Definitely agree' or 'Mostly agree'.

74. **We propose replacing the agreement rate with a 'positivity measure'.** This would be created for all core questions, as well as for two new questions on freedom of expression and mental wellbeing provision. The positivity measure would be calculated as the proportion of respondents who answered the question using the first or second response option – that is, the more positive options. These options would vary by question. For example, for questions which measure degree, the positivity measure would be the proportion of respondents who answer 'To a great extent' or 'To some extent'. For questions which measure frequency, the positivity measure would be the proportion of respondents who answer 'Very often' or 'Fairly often'. Annex B details which response options would be regarded as positive.

75. As with the previous agreement rate, we propose that students who do not answer the question, or who answer 'This does not apply to me' would be excluded from the calculation.

76. Table 1 shows how we propose to calculate the positivity measure, using fictional responses to the question 'How often is the course intellectually stimulating?' as our example.

Table 1: Fictional responses to the question 'How often is the course intellectually stimulating?'

Respondent	Response	Included in positivity measure?	Count as positive?
1	Very often	Yes	Yes
2	Rarely	Yes	No
3	Very often	Yes	Yes
4	Very often	Yes	Yes
5	Fairly often	Yes	Yes
6	Not very often	Yes	No
7	This does not apply to me	No	No
8	Not very often	Yes	No
9	Not very often	Yes	No
10	Fairly often	Yes	Yes
11	Fairly often	Yes	Yes
12	No response	No	No

Calculation of the positivity measure based on Table 1:

Sum of responses (excluding 'This does not apply to me'): 10

Sum of positive responses: 6

Positivity measure: 60 per cent

Why are we making this proposal?

77. We propose creating a summary measure for each question because it makes it easier for users to understand the data. Without a summary measure, data users would need to digest five separate data points which some users would find burdensome. Others could create their own ways of summarising the data, which could confuse other data users, including prospective students. There is also a risk that onward users, including providers, could create their own summary measures which would benefit their own point of view, rather than being a fair and comparable representation. We know from previous consultations with providers and students that a summary measure is valued and widely used.[11]

78. A summary measure can be controversial because it does not capture all the complexities in the data. For example, some data users objected to the previous agreement rate on the grounds that it implicitly treated the middle response option – 'neither agree nor disagree' – as negative. We accept that any summary measure will simplify the data, and in doing so may occlude information that may be of interest to some data users. We nevertheless consider that

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

the benefits described above outweigh this risk. If we adopt this proposal, we would further propose publishing information about the number of students using each response option alongside the summary measure, as we appreciate that some data users will choose to refer to these.

79. Of the potential summary measures available, we consider a positivity measure to be the best option. It is simple to calculate, present and understand. We take the view that a focus on positive responses is appropriate, given that the NSS responses over the past 17 years have consistently told us that most students have a positive experience of higher education. We also have some early evidence that respondents tend to view the most positive response options as similar to each other, and distinct from the more negative options.[12] We consider that the positivity measure has fewer disadvantages than the other options considered below.

80. We have considered the possible risks of the positivity measure. We have noted, for instance, that the positivity measure will be built out of different response options, depending on the question. For example, for question one – 'How good are teaching staff at explaining things?' – the positivity measure will be constructed from the response options 'Very good' and 'Good'. For question two – 'How often do the teaching staff make the subject engaging?' – the positivity measure will be constructed from the response options 'Very often' and 'Fairly often'. It might be argued that since the two positivity measures summarise different response options, they cannot be regarded as equivalent. That is, a 70 per cent positivity proportion for one question may express something different from the same proportion for another question.

81. We recognise this issue. It is a consequence of our decision to adopt direct questions, with response options tailored to each question. The rationale for this decision, as explained in our earlier consultation[13], is the need to ask more engaging questions which elicit higher quality responses. We are reassured that our early research suggests that students regard the response options as expressing broadly similar sentiments,[14] regardless of the wording used, but accept that further research is needed to understand this fully. If we were to adopt this proposal, we would expect to keep the positivity measure under review, and would consider revising our approach if it emerges that certain response options are associated with higher or lower positivity proportions, independently of the subject matter. We note that this issue is not entirely new. The agreement rate used previously summarised agreement with statements which used different concepts ('stimulating' and 'interesting', for example) meaning that the item measured varied across questions. However, we acknowledge that the new question-specific responses make an existing issue more explicit, and potentially more problematic.

82. A second potential concern is that the positivity measure we propose is likely, for many publication units, to be a higher number than the agreement rate it replaces. This is largely due to the removal of the middle option ('neither agree nor disagree') used in the previous questionnaire. Students who would previously have used this middle option tended to choose instead one of the positive options.[15] A higher summary measure could present several issues.

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[12] This early evidence, gathered as part of testing in 2022, is presented in Annex C.

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

[14] See Annex C for a summary of this research.

[15] See 'National Student Survey 2022 pilot', paragraph 65, available at National Student Survey 2022 pilot - Office for Students.

First, it might make it harder for data users, such as prospective students, to differentiate between courses. Second, it might cast doubt on the credibility of the survey, as uniformly positive results would not normally be a plausible outcome. Finally, there is a risk that the higher summary measures could be misinterpreted as an improvement in the student experience, rather than a change in the instrument used to understand it.

83. We recognise these as potential issues. However, we do not judge them likely to materialise in practice, for the following reason: although the positivity proportions are likely to be higher than the previous agreement rates, we do not expect them to be uniform. We expect to see variations in positivity at both course and provider level, particularly where there are pockets of provision where student perceptions of their experience are low. This means that we expect the data to continue to be useful both for prospective students who wish to differentiate between courses, and for those who seek to understand the quality of higher education. If we were to adopt this proposal, we would assess the variation in positivity once the 2023 survey is complete. We have proposed that we will in addition make available information about the number of students giving each response option, because this will allow data users to explore the proportion of students who respond very positively (or very negatively) when describing their experience (see Annex H).

84. The final concern was that the new summary measure could lead data users to conclude, incorrectly, that there has been a change in the student experience. There is a risk whenever we change the questionnaire, or the way the results are presented. In this case, we will mitigate it with clear communication and labelling.

Alternatives to a positivity measure considered as part of our proposals

85. We have considered whether we should publish the NSS results without a summary measure. This approach could be long-term or temporary. If temporary, our approach would be to analyse the NSS results once the 2023 survey is complete, and determine on this basis whether a summary measure is appropriate. If appropriate, the measure could be added in autumn 2023, or else for the publication of the 2024 NSS survey. The considerations for and against this alternative are:

   a. **For:** We would be able to analyse a full set of NSS results before deciding whether a summary measure is appropriate, and if so, which alternative is best. This would allow us to determine whether the risks described above have materialised, and to thoroughly test alternatives.

   b. **Against:** There is a clear appetite for summarised information. If we do not provide this it others are likely to do so instead, but may do so in a way that is not robust. Furthermore, different users might produce different ways to summarise data (for example, some might produce a mean score; some might produce a proportion based on the most positive response option; whereas others would produce a positivity proportion using a slightly different method). This could be confusing to other users of the data, particularly prospective students. There is also a risk that data users could construct measures to suit their own purposes, which would not necessarily be fair or comparable. This risk would likely not be mitigated by publishing a summary measure later in the year, after further analysis, because interest in the NSS peaks directly after the publication of the results.

c. **Against:** Without a summary measure there is a risk that some users find it hard to engage with the data. We know from responses to the 2022 consultation that students, providers and data users value a summary measure, as it reduces the burden of engaging with a complex dataset consisting of many questions and breakdowns, each with multiple data items.[16]

d. **Against:** The NSS results are currently presented in Discover Uni[17] using a summary measure. While it would be possible to redesign the website to avoid using a summary measure, we do not think this would meet the needs of prospective students, particularly those who are less confident in understanding data. In addition, this redevelopment would mean that NSS 2023 results could not be included in the annual update of Discover Uni, planned for autumn 2023, leaving students dependent on data from 2022. This is of particular concern for two reasons. First, the NSS responses – while remaining positive – have been unusually volatile in the past two years of the survey, most likely reflecting the impact of the COVID-19 pandemic. This makes it important that students can see the most recent data, as, particularly at course level, it may be very different from the data from the previous year. Second, changes to the questionnaire were introduced to improve the measurement of the different aspects of the academic experience – using the previous survey means the prospective student would be unable to benefit from the improved survey instrument.

86. We have considered whether we should publish a high positivity measure, consisting of the proportion of students who used the first, most positive, response option ('very good', or 'to a great extent', for example). The considerations for and against this alternative are:

a. **For:** This approach might allow data users to easily identify providers and courses which students regard in the most positive terms. It could be used to emphasise that the regulators and funders of higher education want to promote excellence in higher education.

b. **Against:** A high positivity measure would treat the first response option as substantially different from the other three response options; different enough to justify placing all such responses in their own category. This cannot be defended without further research. There is a risk that whether a respondent uses the first or the second response option will depend not only on their experience, but also upon their interpretation of the wording, or even upon their general tendency towards moderate or extreme sentiments. If so, a high positivity measure would not track genuine differences in the student experience. Early research conducted as part of the NSS pilot adds some weight to this concern. The research suggests that respondents see the first two response options as expressing a broadly similar sentiment, which is in turn distinct from the negative response options.[18]

c. **Against:** Our pilot work suggests that, for most questions, the high positivity measure would be around 30 to 40 per cent.[19] The general public and those with an interest in the

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

[17] See Discover Uni Home | Discover Uni.

[18] See Annex C for further information.

[19] See the supporting data companying the report at National Student Survey 2022 pilot - Office for Students.

survey are used to seeing agreement rates at a certain level – around 70 to 80 per cent. Such a large fall in the headline figures would be difficult to communicate and could be misconstrued as a deterioration in quality.

87. We have considered whether we should publish a negativity measure. This would consist of the proportion of respondents who used the two more negative response options (for example, 'not very often' and 'rarely'). Since the new questionnaire contains only four substantive response options, the negativity measure would contain the same information as the positivity measure – that is, the proportion of respondents who give a negative response would be equal to 100 minus the proportion of students who give a positive response. As a result, replacing the positivity measure with a negativity measure would not change the relativities between providers or courses. The considerations for and against this alternative are:

    a. **For:** A negativity measure could bring into sharper focus concerns about students' experiences. For example. a 45 per cent negativity proportion may be more obviously worrying than a 55 per cent positivity proportion, even though both measures summarise the same data.

    b. **Against:** The NSS results for the past 17 years show that on the whole, students describe their experience in positive terms. Changing the focus at this stage would lose such continuity and could distract from focusing on where the concerns about quality were strongest because of a perceived overall drop in scores across the sector due to a change in methodology.

88. We have considered whether we should publish a net score as a summary measure. This would be calculated as the proportion of negative responses subtracted from the proportion of positive responses. For example, consider a course with a positivity measure of 70 per cent. The net score would be calculated as 70 per cent minus 30 per cent (the proportion of negative responses): that is, 40. Like the negativity measure, the net score is a different way of presenting the information contained in the positivity measure. It will therefore yield the same relativities as the positivity measure. Unlike a percentage, the lower limit of the net score would be -100 and the upper limit would be 100. The considerations for and against this alternative are:

    a. **For:** As with the negativity measure, it might be argued that this brings poor performance into sharper focus. For example, if fewer than half the students on the course used the first two response options, the net score for the course would be a negative number (that is, below zero). Negative scores would attract attention, which might in turn lead to improvements in provision.

    b. **Against:** The net score is more complex for a wide range of users to understand than the alternatives. The positivity measure is the proportion of students who give a positive response; the negativity measure is the proportion of students who give a negative response. A net score is not a description of the data using familiar concepts, such as proportions, but a new construct created by subtracting one proportion from another. For example, when presented with a net score of 40, data users would need to work out what this meant before deciding whether it was reassuring or concerning.

89. We have considered whether we should publish a mean score as a summary measure. This would be calculated by attributing a number to each response option, and taking the summary measure to be the mean of these numbers. In the simplest version, the numbers would be one to four, with one corresponding to the most negative response option, and four to the most positive. Variations would be possible, involving different numerical intervals between response options. The considerations for and against this alternative are:

   a. **For:** Unlike the alternatives, a mean score allows every response option to make a different contribution to the summary measure. For example, consider a course with ten respondents, all of whom used a positive response option when responding to question one ('How good are teaching staff at explaining things?'). The positivity measure for this course will be 100 per cent, regardless of whether the students responded 'Very good' or 'Good'. In contrast, the simple version of the mean score described in paragraph 89 would vary between four and five, depending on the precise response option chosen by the students. In this example, the mean score conveys more information about the full set of responses.

   b. **Against:** The mean score is harder to interpret than a proportion, such as the positivity measure. To interpret a mean score, a data user needs to understand the maximum and minimum points in the range. There is potential for confusion, particularly if data users assume that the maximum score achievable is five (as is common in various websites which use a star-based system for ratings).

   c. **Against:** Some of the additional precision described in above is deceptive. The simple version of the mean score assumes that, in some sense, positivity increments evenly between response options. Someone who responds 'Not very good' is twice as positive as someone who responds 'Not at all good', and so on. This is the assumption implicit in the mathematical calculation. The reality is that we do not know that this is the case and so assigning such values represents application of an arbitrary weighting for individuals' responses. We do not consider that arbitrary weightings are appropriate and it is hard to conduct research that would establish any non-arbitrary ones. The little evidence that we have suggests that the response options are not adequately captured by sequential integers. Any attempt to attribute different numbers to the response options would face similar challenges. Returning to the example in paragraph 89a, this means that while a mean score of 3.4 may seem more precise than a positivity measure of 100 per cent, we cannot be confident that it is more accurate in representing the student experience.

90. Having considered the alternatives, we take the view that the best option would be to publish a positivity measure as a summary measure, and to do so as part of the initial NSS publication in summer 2023. If we adopt this proposal, we would monitor its impact when we have the NSS 2023 survey results to ensure that the positivity measure is, as anticipated, an effective way of summarising the data. In response to our findings, we might make minor changes to the way the measure is calculated. We would not anticipate consulting on these.

91. We would not anticipate adopting an entirely different summary measure without further consultation.

What will the effect of this proposal be?

92. The positivity measure would be provided as a key measure in the various NSS publications and data dashboards, and would be used in OfS regulation of English providers. The positivity measure would be used for future annual publications of TEF indicators. It would be used in the monitoring of providers across Scotland, Wales and Northern Ireland. For every breakdown of the data we publish, we would make available the number of students who use each response option – but, in some presentations, we would use the positivity measure as our headline, or as our only measure of how students responded. We would include the positivity measure in the package of NSS results shared directly with each provider.

93. As a result of this approach, we consider it likely that more users will be able to understand and engage with the data.

94. We further consider it likely that public discussions of the NSS results will focus on the positivity measure. The benefit of this would be that different groups would be using the same statistics, which would aid understanding and confidence in the survey and help the publication achieve its aims.

95. This approach could also have the effect of focusing providers' attention on making changes to maximise the positivity measure. More attention could be given to changes intended to make students more likely to choose one of the two positive options for each question, rather than changes to make students who are already positive more likely to choose the top option or for students who currently choose the bottom one to choose the second from bottom one.

Questions for proposal 2

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

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

Proposal 3: Publication of theme measures

What are we proposing?

96. The NSS questionnaire pre-2023 was split into groups of questions, sometimes called scales. These grouped similar themed questions together. Analysis showed that students responded to the questions in these groups in a similar way.

97. NSS results publications have previously included an agreement rate for each group of questions, calculated by combining the responses to the questions within the group. These measures have been used for the purpose of producing the NSS indicators for the TEF.[20] They are also widely used by providers and by third party users as a way of condensing the information.

98. The new NSS questionnaire also contains groups of questions, each of which relates to a theme – such as 'academic support' or 'organisation and management'. The groups are variously sized, and response options differ between questions within a theme.

Example: 2023 NSS 'Academic support' group of questions

> **How easy was it to contact teaching staff?**
>
> Response options: Very easy / Easy / Not very easy / Not at all easy
>
> **How well have teaching staff supported your learning?**
>
> Response options: Very well / Well / Not very well / Not at all well / This does not apply to me

99. We have considered whether to provide a theme measure, which would summarise responses within a theme. Providing a theme measure is appropriate only if the questions within the theme relate to distinct aspects of the student experience. This can be assessed through cognitively testing the questions with respondents, and through statistical analysis. The statistical analysis would assess the extent to which individuals give responses which are similar within themes, and distinct across themes (suggesting that the themes themselves are individually coherent and largely non-overlapping). It would also assess the themes for redundancy: that is, whether several questions within a theme are, in effect, asking the same thing, implying that the theme itself is not as robust as it should be.

100. Cognitive testing during the development of the questionnaire confirmed that students understood the questions as relating to the appropriate themes.[21] Statistical analysis carried out on earlier versions of the questionnaire, piloted in 2022, suggested that in many cases the patterns of responses supported the proposed themes, with some exceptions related to particular questions or groupings.[22] These exceptional issues have largely been addressed

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[20] For more information about the TEF, see About the TEF - Office for Students.

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

[22] See 'National Student Survey 2022 pilot: Assessing new questions and response options', pages 19-23, available at National Student Survey 2022 pilot - Office for Students.

through further developments of the questionnaire. At the point of this consultation, we have not carried out similar analysis using the responses to the final NSS questionnaire because this data is not yet available. This means that at the point of writing, we can have some confidence that the question themes are appropriate, and that it would therefore be appropriate to construct theme measures but we cannot be sure given that we have yet to carry the analysis of the responses to the 2023 questionnaire.

99. Therefore, we propose not to include theme measures in the initial NSS publication. Instead, we would review the themes once we have received the NSS 2023 data, using the statistical approaches mentioned in paragraph 74 above. The findings of this review would support a decision about whether it is appropriate to publish theme measures, and if so, the form they should take. Any such publication would be planned for autumn 2023. We would not consult further on the theme measures, but instead use the evidence available and our expert judgment to make a decision.

Why are we making this proposal?

100.   The benefit of this proposal is that it would allow further assessment of the NSS 2023 responses before deciding whether or not theme measures are appropriate. This would reduce the risk that we publish theme measures that are misleading. The disadvantage of this proposal is that the theme measures would not be available as part of the initial consultation. They would be published in Autumn 2023, at the earliest.

101.   However, we recognise this does not meet the needs of data users, particularly those who rely on theme measures as a way of condensing the large volume of data associated with the NSS. There is also a risk that in the absence of published theme measures, data users will find their own ways of summarising the data. A proliferation of summaries using different approaches would be confusing to users, particularly prospective students. We are therefore keen to hear views on how this impact could be mitigated or to understand the impact of these proposals on users of the data.

Alternatives to the question grouping considered as part of our proposals

102.   We considered the following alternatives to the proposal above for question grouping:

   a. Publishing thematic groups as part of the initial publication

   b. Not publishing question groups.

   c. Delaying publication of the NSS until the question grouping can be tested and confirmed.

103.   **Publishing thematic groups as part of initial publication. We would create theme measures that use groups of questions presented to survey respondents.** These groups are as follow:

- Teaching on my course

- Learning opportunities

- Assessment and feedback

- Academic support

- Organisation and management

- Learning resources

- Student voice*

- Mental wellbeing provision

*Excluding the question 'How well does the students' union (association or guild) represent students' academic interests?'

We provide a full list of question groupings and questions in Annex C.

104. The benefit of publishing thematic groups initially is that it would make the theme measures available as part of the first NSS publication. This would meet the needs of those data users who would rely on the theme measures to condense the NSS results. The risk is that option 1 involves publishing the theme measures without a full assessment of their statistical integrity. This means that, at worst, they could mislead users of the data. Based on the information we have at present, we judge it is possible, but unlikely, that this risk will materialise. Regardless, we would mitigate this risk by communicating clearly that these theme measures are experimental, and will be further reviewed.

105. **We considered not publishing question groups**. This would mean the score for questions would be published but there would be no group score for questions with a similar topic or theme.

   a. Advantages – we would not be relying on untested groupings; results would likely be published in line with previous years, which we know is important for student information and for providers to make improvements before the start of the next academic year.

   b. Disadvantages – this approach is likely to result in additional analytical burden on users of the data. The grouping helps condense the 26 questions in a format which is more accessible to users. There is also a risk that providers create their own groupings or ways of summarising the data to serve their own purposes which could confusing to users, particularly prospective students.

106. We considered delaying publication of the NSS until the question groups could be tested and confirmed. This would likely delay the publication to autumn 2023 at the earliest.

   a. Advantages – any groupings would be tested and we could be confident of their statistical integrity. Providers and other onward users, in the absence of wider results, would not be able to create their own summary measures.

   b. Disadvantages – a later publication of NSS results would mean that the information was not available prior to the start of the academic year which could affect the timeliness of improvements made within providers and information available at the start of a new application cycle for prospective students, which is when we know information like this plays a crucial role.

107.   Having considered the alternatives, we take the view that the best option would delay publication of any question groupings until the statistical integrity analysis can be done but release the wider NSS results in summer 2023.

What will the effect of this proposal be?

108.   The 2023 initial publication would not include theme measures. We note, in addition, that we would not include theme measures in the dissemination portal. We would review the theme measures using the NSS 2023 following the initial publication. Depending on the results of this review, we may publish the theme measures in autumn 2023, or at a later date. We would not anticipate consulting further on theme measures.

109.   We consider it likely that:

   a.   some users would find it harder to understand and use the data as initially published

   b.   burden in understanding the initial results would be increased for some providers and other data users

   c.   some users may not be able to use the data as initially published, and others may choose not to

   d.   some users may not take action based on the initial publication due to the lack of question groups.

110.   If further analysis revealed that there were no serious issues with the way the theme groupings were constructed, it would mean that not publishing them initially was a missed opportunity to:

   a.   reduce burden on some users, and

   b.   allow other users to make use of the data, for enhancement or other activity, at the earlier stage.

111.   If groups are published on the OfS website, we would conduct user testing for Discover Uni to assess if the benefits of summarising data in this way was useful for student information purposes.

Annual publication of TEF indicators

112.   We consider that it is appropriate to take account of the proposed review of theme measures before proceeding with future annual publications of TEF NSS indicators. We consider this approach will minimise burden on providers by removing the possibility that TEF NSS indicators are constructed using different theme measures to the main NSS results. It also reduces the risk indicated in paragraph 110 that users of the data take inappropriate actions on the basis of groupings that are subsequently shown to have issues.

113.   In the decisions relating to our consultation on the TEF, we confirmed our intention that TEF exercises should be conducted every four years.[23] Use of any new theme measures would

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[23] See footnote 4.

in the first instance relate to forthcoming annual publications of TEF NSS indicators. We intend to evaluate the TEF exercise currently underway to understand how well it has delivered its intended purpose and consider whether improvements and efficiencies can be made to the TEF scheme for participating providers, students and the OfS. We would expect to consult on any substantive changes for future TEF exercises.

Questions for proposal 3

9. Do you agree with our proposal to publish thematic groups of questions once we have undertaken statistical testing of their integrity?

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

Proposal 4: Splits of data presented on the OfS website

What are we proposing?

114.   Splits of data refer to how we break down the responses to focus on particular student or course characteristics. To maintain consistency over time, the definitions of splits and how they are used in the data we present have not been revised for a long time. The time series will necessarily be broken for NSS 2023 because of the new survey and we consider that this is the best time to update these definitions and how they are used in the presentation of NSS results.

Updating definitions of splits

115.   **As part of our general policy we propose using changed definitions of the splits** for the data published on the OfS website data, in order to align more closely with other sources of higher education statistics. The changes proposed are as follows:

a. **Mode of study:** We propose to include apprenticeships as a separate mode alongside full-time and part-time. We also propose to define the mode of study of the student by reference to the first year of their engagement. This is a change from the previous approach, where we defined the mode of study of a student by reference to the most recent year of data (that is, the penultimate year of their engagement with an education aim). These changes would make the data consistent with other publications. In particular, this approach to defining mode of study is consistent with that used in the TEF indicators and quality and standards indicators.

b. **Level of study:** We propose to separate undergraduate courses with postgraduate components from other first degree courses. There are observed differences in NSS responses between the two groups even when other characteristics are accounted for and we judge it would be helpful to separate them. For example, a student on an integrated masters' course would be more likely to respond positively having continued for four years rather than exiting after three.

c. **Subject of study:** Currently, students on Initial Teacher Training (ITT) courses with a specialism in another subject are grouped together in the teacher training subject group. This is different to the approach taken by the Designated Data Body (DDB) and by the

OfS in TEF and monitoring of student outcomes, which count each student towards both teacher training and their subject specialism, with half weight for each. We propose aligning with the DDB and other OfS regulatory functions.

d. **Age:** We propose to split the '25 and above' age group category into two age groups: '25-29' and '30 and above'. This allows comparison with other OfS and DDB publications.

e. **Taught or registered provider:** In future we propose to define the teaching provider as the provider which carries out most of the teaching over the student's whole engagement. However, we note that there are technical challenges applying this definition consistently across the whole sector, so we only propose to do this once we consider we can do so sufficiently consistently. This means we are not proposing to change this split definition for NSS 2023; we would continue to define 'teaching provider' as the provider which carries out most of the teaching in the most recent year of data available.

116.   Note that data shared with providers through the dissemination portal would also use these updated definitions to ensure consistency.

Adding personal characteristics to the sector-level data

117.   We propose a general policy of publishing on the OfS website student characteristics at sector level which are likely to be useful in meeting regulatory expectations on equality of opportunity. This would be informed by a consideration of those characteristics which would add most value for a range of users, including students, providers, and the organisations responsible for the funding and regulation of providers. The Office for Students' main regulatory expectations in regard to equality of opportunity for providers registered in England are set out in Regulatory notice 1, Regulatory advice 6 and associated documentation, including our Equality of opportunity risk register.[24]

118.   **I**n particular, the OfS's ambition is that factors beyond their direct and meaningful control should not prevent any student or prospective student from accessing, succeeding or progressing in the higher education sector. By this we mean that students should be empowered by the people, institutions and systems around them to make choices about their own lives and learning. They should be able to make these choices in the full knowledge of what those choices may lead to and the investment the students themselves will need to make. They should also have full confidence that no aspect of a student's life experience or background will limit their choices, or the consequences of their choices, unfairly. This is what we mean by 'equality of opportunity'.

119.   In England, higher education providers have a significant role in ensuring equality of opportunity in the sense we have described above. They can make sure that their own processes, culture and teaching are open to all on the basis of fair and transparent criteria. They can also take all reasonable steps, including the use of their influential position within local and national society and the economy, to remove barriers to fairness that fall outside their own institution but which have profound effects on those who access, succeed and progress in that institution and in higher education more widely. In particular, we consider that the higher

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[24] See Regulatory notice 1: Access and participation plan guidance - Office for Students; Regulatory advice 6: How to prepare your access and participation plan - effective practice advice - Office for Students; Equality of opportunity risk register - Office for Students.

education sector, as one dedicated to knowledge creation, curation and dissemination, has a role in furthering our understanding of the barriers to equality of opportunity and the most effective means of removing them. Each iteration of access and participation plans should enhance our knowledge of the nature, causes and effective mitigations of risks to equality of opportunity.

120.   In relation to equality of opportunity in England, for the NSS 2023 publication, this proposal would mean extending the range of personal characteristics beyond those which were previously made available through annual publications of NSS results or currently available other outputs (such as the TEF indicators and other regulatory data indicators). In particular, it would mean publishing, for the first time, NSS responses based on whether students are living locally to their provider.

121.   We are aware of some student characteristics which may in principle be useful for understanding access and participation issues, but for which data collection is inconsistent across different providers (for example, coverage of students with caring responsibilities) or for which it is unclear that data quality is currently sufficient to support use for this purpose. Our general publication policy would be to consider new or additional characteristics for publication on a case by case basis, informed by the merits of each characteristic in terms of:

- whether it would provide information capable of supporting reliable interpretations of any differences in the experiences of students

- data availability and applicability to as wide a population as possible

- appropriate data quality

- alignment with standard data reporting approached in the sector, to minimise the burden of understanding and engaging with our approach

- whether the characteristic would suffer from the risks of data sparsity. In particular, the onward risks of breaching data protection principles, and of increased statistical uncertainty in the information we report

- the policy interest in that characteristic in terms of access, progression and success in higher education, or other regulatory need

- the increased burden which comes through publishing more splits of data, along with the potential for confusion and risk of users selectively focusing on results based on their own interests rather than those which are most important.

122.   The personal characteristics we are currently planning to publish at sector level are below.

123.   For most of these groups there is data applicable to all providers. However it also includes disadvantaged groups for which it is important to recognise differences in their student experiences, but where data is only available or reliable for providers in one particular country. This means it is only suitable to display them for providers from that country. In those cases we would make the coverage of that data clear in the presentation of the results.

124.   For example, free school meals eligibility is a commonly-used measure of financial disadvantage. However, information on a student's eligibility to receive free school meals during their key stage 4 schooling is recorded within the Department for Education's national pupil database, which means it only covers students who attended state-maintained schools in England in or after 2009-10. While information about free school meals would be available for some students who attended schools in England and higher education providers outside England, we consider that it would be misleading to produce statistics based on those students, because they would only represent a small proportion of the respondents at those providers. So our proposal is only to provide the free school meals split for students at English providers.

Additional UK-wide splits[25]

- Domicile (UK, EU, Rest of the world)

- Disability type

- Local students

- Parental higher education

- Sexual orientation.

Additional country-specific splits

- Care experienced students – available across the UK but defined differently for providers in England and Scotland; we would expect to show these as separate splits

- Estranged learners, as defined by the Student Loans Company – available for English, Welsh and Northern Irish providers

- Free school meals eligibility, a proxy for financial disadvantage during students' school background – available for English providers

- Learners from military families – available for English providers

- TUNDRA (Tracking underrepresentation by area), an area-based measure identifying educational underrepresentation for young people – available for English providers[26]

- English Index of Multiple Deprivation – available for English providers

- Scottish Index of Multiple Deprivation – available for Scottish providers

- Welsh Index of Multiple Deprivation – available for Welsh providers

- Northern Irish Index of Multiple Deprivation – available for Northern Irish providers.

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[25] See Annex E for the detail of what categories will be presented for each measure.

[26] See About the TUNDRA area-based measures data - Office for Students.

Publishing additional provider-level data

125.   Currently, if users want to see the data split by mode or level they can only see it at subject rather than provider level. This breakdown is not available for all students at a provider. Similarly, users are currently unable to see the data for all students at a provider in a particular subject. We are proposing to publish more data to make these types of comparison possible.

126.   **At provider level, we propose to publish data that allows users to split by any combinations of mode, level and subject**.

- Mode of study – full-time, part-time, apprenticeship, all modes of study

- Level of study – undergraduate with postgraduate components, first degree, other undergraduate, all undergraduate

- Subject of study – Using the Common Aggregation Hierarchy[27] (CAH) levels 1, 2, and 3.

127.   This proposal would allow users to choose whether to look at a provider's taught or registered population, as they can under the current system. We propose that for all of the above splits the data would have two years shown separately (as now) once there are at least two years of data.

128.   Figure 1 shows the range of provider-level data we propose to publish via the OfS website for each year.

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[27] For more information see Common Aggregation Hierarchy (CAH) | HESA.

Figure 1: Reporting structure for NSS statistics published on OfS website

Population view	Taught	Or	Registered		

Provider	[UKPRN]				

Mode of study	Full-time	Or	Part-time	Or	Apprenticeship	Or	All modes of study

Level of study	Undergraduate with postgraduate components	Or	First degree	Or	Other undergraduate	Or	All undergraduate

Subject level	CAH1	Or	CAH2	Or	CAH3	Or	All subjects

Subject of study	[CAH code]				
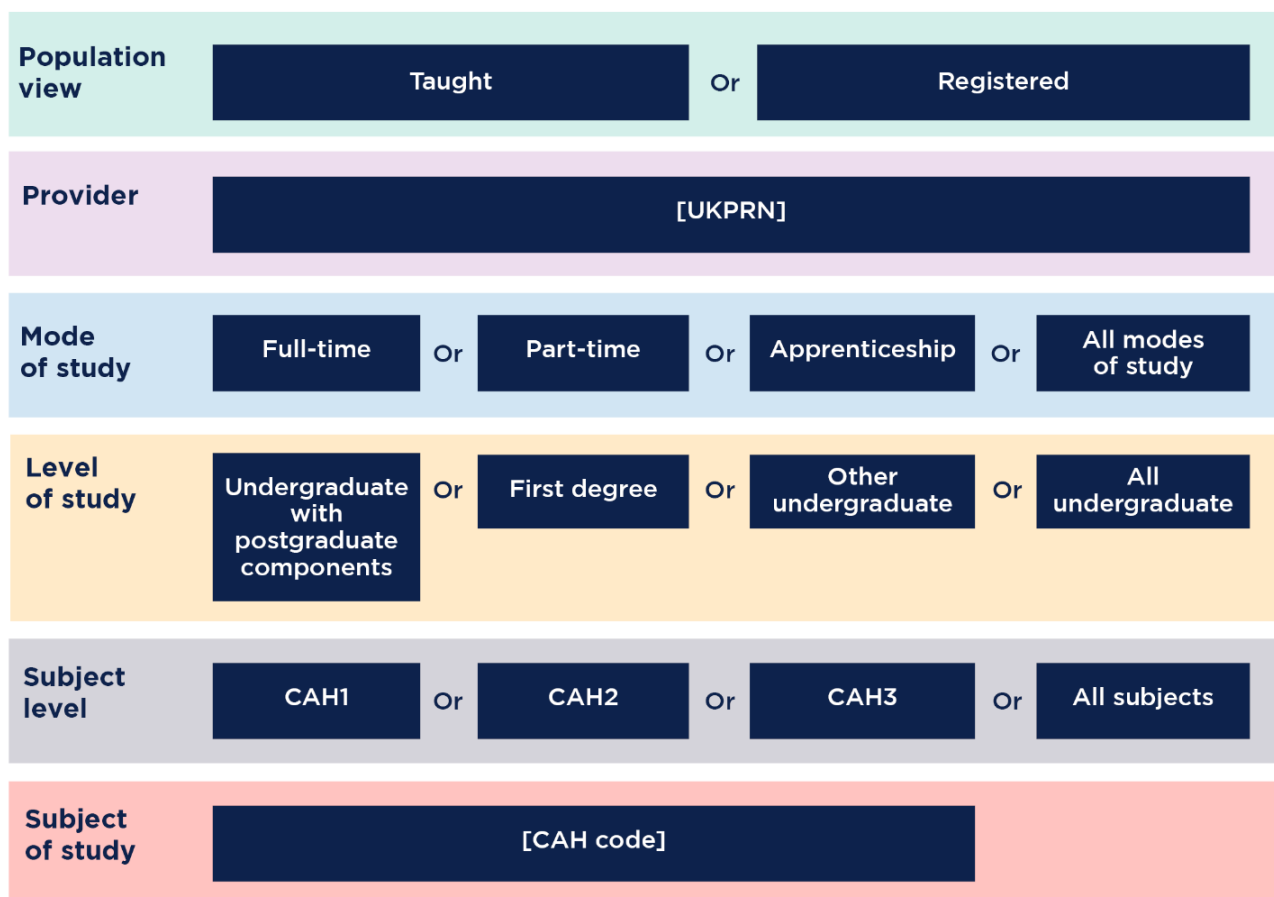
129.   We have published a data table alongside this consultation document[28] to give an indication of how we would expect the provider-level data to be structured, were these proposals to be taken forward. The data would also be presented in other ways, in spreadsheet and dashboard form,[29] but these other presentations would be subject to further development and user testing.

Why are we making this proposals?

Updating definitions of splits

130.   Overall, the proposals to update the definitions of the splits would increase the coherence and comparability of UK statistics. The definitions would move closer to those used by the DDB and by the OfS in TEF, monitoring of student outcomes and access and participation. This would reduce the burden on providers and other users because it would reduce the need to understand and explain slightly different figures for the same statistic presented in different places. This would also make it easier for users to compare NSS results published on the OfS

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[28] See www.officeforstudents.org.uk/publications/consultation-on-the-approach-to-publication-of-results-of-the-national-student-survey/.

[29] Current OfS publications give some indication of the likely form of these spreadsheets and dashboards – in particular see those produced as part of the current NSS publication, available at: NSS data: provider-level - Office for Students; and those produced as part of the TEF publication, available at: TEF data dashboard: Data dashboard - Office for Studentshttps://www.officeforstudents.org.uk/data-and-analysis/tef-data-dashboard/data-dashboard/.

website to statistics used in other places, to gain a more holistic understanding of outcomes for different groups of students. For the avoidance of doubt, the proposed update to the definitions of the splits would not supersede the definitions already consulted on for the TEF, which we intend to use for future annual publication of TEF NSS indicators.

131.   Apprenticeships are sufficiently different to be published separately and we propose that they should be considered as a separate 'mode' of study. We take the view that the design and delivery of apprenticeships includes distinctive characteristics and they are structurally different from other types of courses and from both full- and part-time modes of study. Making data available specifically relating to apprenticeships is necessary for other regulators of apprenticeships, and will enable users to better understand the experience of students on these courses.

132.   In terms of our proposed change to define mode of study with reference to the first year of a student's engagement, we note that the number of students who change mode during their course is relatively small, and judge that using definitions which are different to other publications is unlikely to be proportionate. We consider that students who started in the same mode of study are likely to share more similar motivations for their higher education study than those who are in the same mode of study later in their course, where some students will have changed mode. By defining the mode of study split with reference to the start of the engagement we would therefore be more likely to publish splits consisting of students with broadly similar motivations. While we could, once data allows, define mode with reference to students' final year of engagement, when they are taking the survey, it is sometimes the case that students take a different mode of study in their final year, which could mean it does not give a fair reflection of their whole course.

133.   These proposals mean that the splits used when publishing the NSS results would have some differences to those used previously. In some cases this would make it harder to directly compare with previous years of data. However, the changes to the survey mean that direct comparison with previous years is not possible, and so we judge that the benefits brought by using definitions users are familiar with from other DDB and OfS publications would outweigh the reduced ability to compare with previous years.

134.   The proposal to define 'teaching provider' as the provider carrying most of the teaching over a student's whole engagement is a better fit with the policy intent of the NSS, which asks students to reflect on their course as a whole. Once we are able to make this change consistently across the whole sector, it would mean results would be published relating to the provider offering the most teaching. We judge that this would improve student information and increase accountability for those providers. However, we take the view that using consistent definitions across the whole sector is more important than making this change, so would not make the change until we are confident it can be implemented in a way that is sufficiently consistent.

Adding personal characteristics to the sector-level data

135.   Providers have previously suggested that student experience as measured in the NSS should be an important factor in understanding the access and participation of students in a more holistic way. We expect to explore in future whether and how it would be helpful to publish NSS results at provider level split by personal characteristics, as an indicator of possible risks to equality of opportunity. The recent changes in the NSS mean that our

exploration will be conducted over the coming years, because we will likely need to build up enough data for a new time series before this can be published in support of access and participation. For the OfS, this could mean publishing it within our access and participation dataset alongside data on the other lifecycle stages, or publishing it in a different but comparable NSS-focused dashboard. Prior to publication of additional student characteristics becoming feasible at provider level, we consider that publishing sector-level data on a wider range of student characteristics could inform understanding of risks to equality of opportunity by providing insight as to the extent of variations in the student experience for different student groups.

136.   In particular, publishing NSS responses based on whether students are living locally to their provider is considered to add value because of the likely correlations between local and commuter students, and other underrepresented groups. In other uses, the inclusion of local students in the construction of the Associations Between Characteristics of Students (ABCS) analyses (which seek to understand these sorts of correlations) means that separate consideration of local students may have merit but would have limited additionality as a split of the data. We consider that in publishing NSS results, where ABCS analyses are not currently available, separate consideration of local students is worthwhile.

137.   The proposal would also mean that the range of personal characteristics published in sector-level outputs is more closely aligned with equivalent outputs published by the organisations responsible for the funding and regulation of providers, in support of their regulation of access and participation and student outcomes, including through the TEF. For example, access to information on the student outcomes and experiences of people estranged from their families has been considered helpful to support activities that identify and reduce gaps in equality of opportunity between student groups. This is because there is increased interest from all four funding bodies in understanding the student experience for different groups of students.

138.   In the data disseminated to providers, we already include information about some of these groups, to allow providers to understand and address issues of different student experiences for different groups of students. This proposal therefore has the effect of supporting transparency, and access and participation policy priorities, by proposing the publication of the same characteristics in the sector-level data, so that all data users can understand these differences across the sector.

Publishing additional provider-level data

139.   In making available data to providers with combined levels, modes of study, and subjects, we are prioritising the availability of data across all of the intersections of these characteristics that are likely to be of value to a range of users. We know that, to drive improvements to course provision and student information, users find it helpful to see NSS results at a more granular level, and this proposal means that data will be available for as many granular splits as possible. For instance, if a user was interested in a specific subject group at CAH level 3, it would make the availability of data more likely if data was available for all undergraduate students with any mode of study, whereas at this level of granularity, it may be reasonable to assume that data would sometimes be unavailable for all undergraduates studying that subject on a part-time mode of study.

140.   We note that this proposal means combining full-time, part-time and apprenticeship students. We judge that, by asking final year students to reflect on the entirety of their course using the specific questions asked through the survey, the NSS has been designed in such a way that students' responses will relate to a shared student experience at a given provider, irrespective of whether they were studying on courses designed and delivered through full-time, part-time or apprenticeship modes. While some part-time students may have studied at the provider for longer than their full-time counterparts, their experiences have overlapped. The themes on which the NSS asks students to reflect means that we therefore consider that their responses to the NSS can be meaningfully combined. Furthermore, we are also choosing to prioritise the availability of data over any risk that combining data from students on different modes of study could be masking materially different student experiences. However, we expect to keep this approach under review, particularly if the number of students on apprenticeships or other similar types of course continue to increase, as we recognise that there are distinctive characteristics of these courses that may increase this risk. It is for this reason that we are proposing the publication of the combined modes of study alongside, rather than instead of, publication of NSS results for the modes of study separately. We would expect to include appropriate guidance for users about the opportunities and challenges of interpreting data for the separate and combined modes of study.

141.   It can currently be confusing for users to find that they are not able to see a combined rate for certain groups of students at a provider, such as all full-time students. We judge that publishing in a way that lets users see outcomes for students on courses of all modes, all levels, or all subjects will give users more flexibility as they seek to understand the data in their context. The proposal would allow the data to be presented in a way that is easier for users to navigate and engage with.

What will the effect of this proposals be?

Updating definitions of splits

142.   Users would see definitions of splits which are more familiar and comparable to other DDB or OfS publications, although different to those used in the NSS publication in previous years. We expect this would reduce burden on providers and others over the medium term as it enables more consistent comparisons with other data publications.

143.   Users would be able to see data on apprenticeships much more easily, which we expect to increase the level of attention paid to those courses. Giving greater prominence to apprenticeships by having NSS data available and allowing comparison to other provision as part of student choice. This could increase accountability for these courses, and better enable providers to understand how their apprenticeships compare with others in the sector.

144.   There may be some apprenticeship courses where there are too few students to be included in the published data, due to the publication thresholds used (see proposal 1 for more information). The negative effect this could have is mitigated by the publication of data for all modes of study combined, since the responses made by students on suppressed modes of study will still count towards the 'all modes' total.

145.   Users would be able to see data on undergraduate courses with postgraduate components as distinct from other first degree courses, which we anticipate would help users make fairer comparisons between different providers and subject areas. This may have the effect of

helping prospective students make better choices, or helping providers make better-targeted improvements by comparing with the rest of the sector.

146.   The proposal to change the definition of teaching provider would impact the relatively small proportion of courses where the provider carrying out most teaching over the engagement is different to the provider carrying out teaching in the most recent year of data. The effect of this would be that users would see the results attributed to the provider offering most teaching, and that provider would have more attention paid to their performance.

Adding personal characteristics to the sector-level data

147.   We anticipate that the publication of additional splits by personal characteristics at sector level will cause more attention to be given to differences between groups of students. This may highlight where more work is needed across the sector to support certain groups of students during their studies.

148.   We further expect this data will be used by providers to assess the risk of equality of opportunity for the groups of students included, and to use the sector-level data to contextualise their own data. We would anticipate this leading to changes to improve the quality of teaching and the experience of underrepresented groups.

Publishing additional provider-level splits

149.   We expect that the proposal to publish data for combined modes, levels and subjects of study would mean data at a more granular level will meet publication thresholds. This would allow prospective students, providers and other users to see consistent data across the sector for the specific area they are interested in. And in turn this would enable targeted activity and information for prospective students.

Questions for proposal 4

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

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

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

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

Proposal 5: Benchmarks

150.   What is benchmarking?

a.   Benchmarking is a method to help users take account of the mix of courses and students at a provider by indicating how well that provider has performed compared with performance for similar types of students on similar types of courses in the higher education sector as a whole.

b. The benchmark is calculated as a weighted sector average which represents the outcomes that would have been achieved by the provider if it retained its mix of students and courses, but its outcomes across the benchmarking factors were replaced by the sector-overall rates for those student groups. It represents the performance of similar types of students on similar types of courses to that of the provider. Our approach means that a provider is not being compared with a pre-set group of providers, but rather the outcomes for a provider's students are compared with the outcomes of similar students across the entirety of the higher education sector.

151. For the NSS results we have previously calculated benchmarks for each provider's indicators and split indicators based on the characteristics of courses and students that we have selected as benchmarking factors.

152. Benchmarking is also used at sector level to assist users in interpreting the performance of overall groups of students, and to understand how much of the differences of groups are caused by differences in the other characteristics of the group.

153. The OfS, as part of its data indicators consultation,[30] consulted on and made decisions about student experience indicators:

a. The benchmarking methodology as a methodology.

b. The principles for selecting and grouping benchmarking factors.

c. The specific benchmarking factors and groups we selected for the purposes of benchmarking NSS-based student experience indicators (covering the judgement and statistical elements of this).

d. The publication of the end product of all of the above for the purposes of TEF and B3.

154. In this consultation, we do not plan to revisit these decisions with regards to student experience indicators. However, we are proposing to take an approach which is consistent with the student experience indicators. In applying this approach we would need to add mode of study as an extra benchmarking factor not used in the student experience indicators, which never show combined results for students with different modes.

What are we proposing?

155. In this consultation we are seeking views on proposals on benchmarks and their application to the general approach to publication of the NSS results.

156. **As part of our general policy, we propose to**:

a. Continue to publish UK-wide benchmarks on the OfS website, both at provider level and at sector level.

b. Publish benchmarks for all provider-level and sector-level splits of data.

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[30] See Outcome and experience data - Office for Students.

c. Use guiding principles to review technical definitions of benchmarking factors, and use updated factors for the initial NSS 2023 publication. For instance, how ages are split into groups for the purpose of benchmarking, and whether to define the mode of study by reference to a student's first year of engagement instead of the most recent year of data.[31]

d. Further review the benchmarking factors using data from the new NSS survey.

e. Publish the contribution a provider makes to its own benchmark.

157.   The proposal to publish UK-wide benchmarks means that benchmarks calculated as a weighted sector average (as described above) would define the sector as all English higher education providers registered with the OfS which have returned individualised student data to the Education and Skills Funding Agency (ESFA) or the DDB, and all providers which are funded or regulated by one of the devolved administrations, at the time that we publish the data. In other words, the sector within which we are making comparisons of the outcomes for similar students is made up of students across the whole of the UK.

158.   The proposal to provide benchmarks for all provider-level and sector-level splits of data means that for each split of data we would also publish a benchmark, the difference from benchmark, and some figures to indicate the level of uncertainty for the difference.

159.   The basis on which benchmarking factors are defined is key to the integrity and robustness of the benchmarks we calculate. The definition of benchmarking groups relies on achieving a balance of policy considerations and statistical properties associated with a range of benchmarking factors. To identify a set of preferred factors we use guiding principles, which were developed with the DDB and other stakeholders, reviewed by the Office for National Statistics, and have been tested by the OfS through consultations with the sector.[32] These guiding principles are found in Annex G. These are the same guiding principles we used for the consultation on constructing student outcome and experience indicators for use in OfS regulation.

160.   Following these guiding principles would mean that for the initial NSS 2023 publication we would expect to use the definitions as set out in Table 3. Note that these definitions are used only for benchmarking, and in some cases smaller groups are combined with other groups in order to maintain statistical integrity. This does not impact the data which will be published, for example we will continue to publish results for all CAH levels and groups, whenever publication thresholds are met.

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[31] For more information on the proposed change to the definition of mode of study see the 'Updating definitions of splits' section in proposal 4.

[32] See Outcome and experience data - Office for Students.

Table 3: Proposed new benchmarking factors

Factor	Current NSS	Proposal
Mode of study	Full-time, Part-time	Full-time, Part-time, Apprenticeship (Defined with reference to first year of engagement)[33]
Subject of study	CAH level 1	For full-time students: CAH level 2 (with CAH19-02 Celtic studies combined with CAH19-04 Languages and area studies) For part-time students and apprenticeships: Broadly defined subject groups (see Annex F)
Age on entry	Under 21, 21 to 24, 25 and over	Under 21 or unknown, 21 to 30, 31 and over
Ethnicity	Asian, Black, Other, White, Unknown	Asian, Black, Other, Unknown or White, Mixed, non-UK domiciled
Disability *(No change proposed)*	Declared, None known	Declared, None known
Sex	Male, Female, Other	Female or Other, Male (only used for full-time students)
Level of study	Not used in benchmarking	First degree, Other undergraduate, Undergraduate with postgraduate components

161.   Once we have received the final NSS 2023 data we are proposing to conduct a brief review of the benchmarking factors according to the guiding principles set out in Annex G. This review would seek to confirm that the statistical properties of the existing selection and grouping of benchmarking factors are not fundamentally different than those which have previously been observed in results from the 2022 and earlier NSS surveys. For the initial NSS 2023 publication, we would expect to make only minor modifications to the factors set out in Table 2 (such as an adjustment to the groupings used), or no changes.

162.   We are proposing to conduct a wider review of benchmarking factors after the initial NSS 2023 publication, in accordance with the guiding principles set out in Annex G. This review would use the new NSS responses to test the statistical and other properties of a more comprehensive range of candidate benchmarking factors (similar to the exercise the OfS

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[33] For more information on the proposed change to the definition of mode of study see the 'Updating definitions of splits' section in proposal 4.

conducted in 2022[34]). It would seek to ensure an up to date understanding of the correlations between various student and course characteristics and responses to the new NSS questions, and identify whether the new survey surfaces new or different evidence about the nature of these statistical relationships that would impact our judgement of the appropriate selection and grouping of benchmarking factors. The outcome of this review will be a set of benchmarking factors and groupings to be used in future publications of NSS results on the OfS website, selected on the basis of the most recent evidence available.

163.   We propose to show as a percentage the contribution each provider makes to its own benchmark. This statistic indicates the influence of the provider's own students on the sector averages that informs the calculation of the provider's benchmark, and helps us understand the risk of self-benchmarking (which can arise when the characteristics of students at the provider in question do not frequently occur among students in the wider sector, and the provider's own students would be making a substantial contribution to its benchmark). Where this happens the utility of the benchmark is undermined. In such cases providers may appear close to their benchmark when their performance is in fact quite different to other providers.

164.   We are not proposing to start using benchmarks in Discover Uni.

165.   It should be noted that the proposals described here in relation to benchmarking for the general NSS release will not supersede the benchmarking approach set out in the consultation on constructing student outcome and experience indicators for use in OfS regulation. However, we will consider whether the effect of decisions relating to theme measures set out in proposal 3 has any impact on the stability of benchmarking factors used for future annual publication of TEF NSS indicators. We will also consider whether any findings from the proposed further review of the benchmarking factors, using data from the new NSS survey, has any impact on the benchmarking factors used for future annual publication of TEF NSS indicators.

Why are we making these proposals?

166.   We judge that the benchmarks are useful for enabling users to compare different providers and subject areas in a way that takes account of the characteristics of the students and the types of course they are on.

167.   The benchmarking methodology used by the OfS is well established, and aims to indicate how well a provider has performed compared with performance for similar types of students on similar types of courses in the higher education sector as a whole. Because we calculate the benchmark as a weighted sector average, reflecting the number of students at the provider with given characteristics, it gives information about the values that the sector overall might have achieved for the indicator if the characteristics included in the benchmarking factors are the only ones that are important. Where differences exist between an indicator and its corresponding benchmark, these may be due to the provider's performance, or they may be due to some other characteristic which is not included in the weighting.

168.   We therefore consider that taking account of the mix of students and courses in this way is an important and effective way for users to interpret the NSS measures when assessing varying levels of performance for the mix of students and courses in each provider and subject.

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[34] See Review of the selection and grouping of benchmarking factors - Office for Students.

Furthermore, we consider that the resulting interpretations of performance relative to a benchmark value may support and incentivise providers to identify areas with potential for improvement, and to share best practice. This may lead to enhancement of the student experience.

169.   We take the view that the benchmarking methodology used by the OfS achieves an appropriate balance of statistical sophistication, with relative simplicity and transparency for users. However, we acknowledge that the presentation of NSS results impacts on a wide range of users, and on the knowledge or resources required to understand and engage meaningfully with the information we have published. As a statistical method, we recognise that the benchmarking concept may be less familiar to some users. This might lead to some users misunderstanding the data or not realising it had been adjusted in any way. As a method, benchmarking relies on a series of judgements about the student and course characteristics to be taken account of; its outputs may be more challenging for some users to interpret accurately. This is because our selection and definition of benchmarking factors is key to the integrity and robustness of the benchmark values we calculate: we must balance the need to protect the statistical integrity of our benchmarking approach with the desire to ensure that benchmarks are fit for purpose and as comprehensive as possible in accounting for relevant characteristics.[35]

170.   While we acknowledge that the benchmark values we propose to calculate and publish may be challenging for some users to interpret, we consider that they will add significant value for other users. On balance, we judge that the benefits from using benchmarks outweigh the potential disadvantages, especially because we propose to mitigate the potential disadvantage by carefully considering in what contexts to use benchmarks: in particular we propose below that they are not published on Discover Uni. We consider that, once the benchmarks are understood they provide more insight into underlying performance, so intend to work to make them as intuitive and understandable to as many users as possible.

171.   We further judge that the aims of the NSS are best met by providing UK-wide benchmarks, which allow comparisons between providers in different countries on a consistent basis. This is because we do not consider it reasonable to assume that prospective students would only limit their higher education choices to providers or courses within a single UK nation. If prospective students are interested in understanding the choices open to them across UK higher education as a whole, it may be misleading if providers in different nations are only compared against a subset of the UK population through the construction of benchmarks.

172.   We do not propose to publish both UK-wide and country-specific benchmarks. We take the view that this would be confusing and make it harder for users, including both direct users of the data and those seeing statistics elsewhere have been derived from the data.

173.   We do not propose publishing benchmarks on Discover Uni. Previous research has shown that it is not the most effective way to communicate with the target audience of prospective students, and their advisers.[36] Discover Uni aims to make information on higher education courses as simple and accessible as possible. This is because we know that some audiences

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[35] The balance we need to strike when selecting and defining benchmarking factors was discussed further in our Review of the selection and grouping of benchmarking factors - Office for Students.

[36] See Student information use and behaviour - Office for Students.

are unable to engage with data in the same way as an expert audience might. Metrics which have been adjusted in some way, such as benchmarks, are often misinterpreted as raw or unadjusted values and therefore could be misleading.

174.   In updating the definitions of the factors, we used previous NSS results to assess each factor against the guiding principles expressed in Annex G, aggregating each factor appropriately.[37]

175.   However, given the differences between the 2023 NSS survey and previous surveys, it might be that when reviewing these benchmarking factors there is evidence that these factors need to be altered. Before publishing, we will therefore check whether these factors remain appropriate and still provide statistical integrity when used as factors for the new survey. We plan to also conduct a further, more in-depth review of the benchmarking factors to inform future publications of NSS results: we will consider whether the findings of this review has any impact on the benchmarking factors used for future annual publication of TEF NSS indicators.

What will the effect of these proposals be?

176.   Benchmarks would continue to be published on the OfS website. Discover Uni would continue not to use benchmarks. The provider dissemination portal would not have benchmarks initially, but may do in future.

177.   Users would be able to see benchmarks for more splits of the data: by mode, subject and level as well as by provider. For providers in England the definitions and presentation of the results would be very close to those used in other OfS dashboards.

178.   Different versions of the questionnaire are asked in different countries of the UK. The question on freedom of expression is only asked in England – therefore freedom of expression could only be benchmarked against English providers; the overall satisfaction question would only be benchmarked against non-English providers. Our labelling and presentation of the data would make this difference clear to data users.

179.   The proposal to produce benchmarks for combinations of provider, level, subject and mode of study means more information will be provided than previously. This will help providers and other onward users of the data to make comparisons with the sector as a whole not just by provider as previously. They will be able to measure performance at a more granular level, which will lead to better information for providers and greater public accountability; this in turn could lead to improvements being made to the student experience.

Questions for proposal 5

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

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

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[37] For more information on the analysis undertaken, see Review of the selection and grouping of benchmarking factors - Office for Students.

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

What are we proposing?

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

181.   We propose a general policy of publishing these questions on the OfS website and on Discover Uni. Their use on Discover Uni would also be subject to user testing to ensure that students can gain an appropriate understanding of the results.

182.   However, we propose not to include these in the initial NSS 2023 publications. This is because we do not yet know whether the change to the coverage for these questions has been effective. We also do not yet know whether there are groups of students who have been asked the questions for whom they are not relevant. Once we have the NSS 2023 data, we will be able to assess this with the intention of including these questions in subsequent publications if appropriate.

183.   This analysis will include an assessment of:

   a.   The level of responses saying the questions were not relevant, across the sector, in specific subject groups, and by provider.

   b.   Other patterns of response which suggest the questions are not being understood consistently by all respondents.

   c.   A consideration of whether there are other students on very similar courses who are currently not asked the questions.

184.   To note, we would normally plan to share the data for each individual provider with that provider through the dissemination portal to inform improvements in the provision of placements regardless of whether we publish. This will also enable providers to better understand whether the changes to population have been effective. We welcome feedback to help our assessment of whether to publish these questions for all groups of students.

Why are we making this proposal?

185.   We judge that responses to the questions relating to healthcare, allied health and clinical placements have information which can help meet the goals of the NSS. They could provide relevant information for prospective students applying to courses where the placement elements are a key part. They can provide helpful information for providers, and making this

data more widely available can support accountability and encourage providers to focus on improving the quality of placements offered.

186. However, to meet these goals, users need to be confident that the questions are being asked to the right students. If students not taking healthcare placements are asked these questions, their responses could be unreliable or misleading. If students on similar courses with relevant placements are not being asked the questions, the overall data for the provider may be incomplete and potentially misleading.

187. We judge that the benefits of assessing the coverage of these questions before publishing outweighs the benefits of publishing them sooner. We note that the results from these questions have not been published for a few years, and judge that some of the aims of these questions will be met by sharing the data with providers through the dissemination portal.

What will the effect of this proposal be?

188. By not including these results in the 2023 publication, we reduce the risk that users are misled by using results which are misleading or partial, which could in turn lead to poor choices by students or divert provider resources away from areas in most need of enhancement. A disadvantage of this proposal is that the data will not be available to some people who would find it useful and interesting.

189. However, if we could gain assurance that the change to the coverage has been effective, we could publish the results on our website and on Discover Uni, making it available to prospective students, their advisers, and the wider public.

190. We anticipate that the impact of this future publication of results would be:

   a. that providers would be incentivised and assisted in making improvements to their provision of placements, and this would lead to improved educational experiences for students.

   b. that prospective students would be able to make more informed choices about which course to study.

Questions for proposal 6

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

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

Information we would not normally expect to publish

191.   This section convers information we would not normally expect to publish, unless we make an exception based on our consideration of relevant factors is set out below.

192.   A summary of a providers own results are made available to them through the provider portal, much of the information mirrors our wider approach to publication but to reduce burden for the provider is provided in a single place. Where there is additional information made available to a provider that we do not propose to publish our rationale for not including them in the general approach to publication is set out below.

193.   We would aim to have data available to providers through the portal whenever regulatory or student information data is published using that split (where data sharing agreements allow). The indicative specification for these tables has been published alongside this consultation document.[38]

194.   In addition, the following data, which we are not proposing to publish, will continue to be made available through the provider dissemination portal:

   a.   Responses to open text comments

   b.   Provider defined department splits

   c.   Responses for groups of students made up of at least ten respondents but with a response rate below 50 per cent.

195.   In the case of the open text comments, this is because we have had regard to the need for excluding from publication, so far as practicable, any information which relates to the affairs of a particular body or individual, where publication of that information would or might, in the opinion of the OfS, seriously and prejudicially affect the interests of that body or individual. Open text comments have names mentioned within the comments redacted; however, they can contain references to events or detail through which the identity of a respondent or staff member could be inferred, and this might seriously and prejudicially affect the interests of an individual. Furthermore, respondent anonymity encourages open and frank responses – by publishing comments, it may undermine the robustness of the survey and reduce its impact. Respondents are informed as part of the privacy notice how their comments are used.[39]

196.   Provider defined splits enable providers to view their data according to internally defined characteristics or fields. These fields do not appear in the wider higher education datasets. Due to the variation and inconsistencies in how these fields may be defined, these would be of limited or no benefit to external audiences and could potentially mislead. Therefore we intend to continue to only make these available to providers for the purpose of making improvements to the student experience.

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[38] See www.officeforstudents.org.uk/publications/consultation-on-the-approach-to-publication-of-results-of-the-national-student-survey/.

[39] See National Student Survey privacy notice (officeforstudents.org.uk).

197. Results for groups of students with response rates of below 50 per cent can give providers helpful information to use in making enhancements to their provision. Providers can use their judgement when determining how much weight to give these results based on the lower proportion of respondents and the increased risk of non-response bias. Given the limited benefits of this material outlined above we do not propose to publish this information, given that it may mislead users, or harm the interests of providers, by presenting information which could be unreliable.

198. We will add 'taught or registered' as a way of viewing the data for the dissemination site only. This split has been requested by providers as this is used by the OfS in regulation and it helps them to see their detailed NSS results in the same way. The value of this change is limited to some registered providers in England, and is unlikely to add much value for other users. So we do not plan to change the published splits.

199. For the 2023 survey, we do not plan to provide benchmarks through the provider dissemination portal. Through the portal, providers are able to produce tables based on many different groups of student and course characteristics, and it would not be feasible to produce benchmarks for all possible splits. It would therefore be confusing if benchmarks were available for some tables but not others. As such, in the first instance, we consider it is clearer for users to have all available benchmarks published in a single location, rather than some being on the OfS website, others on the dissemination site and some not available at all. We will however explore whether it will be possible in future, with a view to providing benchmarks through the portal if we judge this will aid the responsible use of data.

Optional banks

200. In addition to the core questions, the NSS includes a number of optional questions that are asked in particular nations or only for some providers. Providers can choose from a series of such questions, known as the optional banks. These questions remain unchanged for the 2023 survey and follow the previous NSS Likert scale format. We will continue to make this data available to individual providers through the provider dissemination portal as now.

201. The optional bank questions generally have a much lower response rate than the core survey questions. This is due in part to them being asked online only, and because they are asked after the core and additional questions leading to greater attrition. Moreover there are less responses for these questions compared with core questions because different providers chose different options or their own questions to ask. Furthermore, optional bank questions have not been subject to the same rigorous testing as the core and additional questions. Publishing them alongside the main results from the survey could imply that the question are as robust or have the same status has the core survey, which they do not.

202. The optional banks are often used by providers to assess known areas for improvement to the student experience and to measure progress over time. Publishing this information as part of the general policy for publication would reduce its usefulness for this purpose and thereby could be detrimental to the student experience if these improvements are not made or measured. Provider may be more likely to use these questions as an opportunity to highlight areas of good practice rather than areas for improvement. Due to the lack of robustness of these questions we would not want these being used for the purpose of student choice.

Other questions on the consultation

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

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

21. What effect will the proposals have on:

a. opportunities for persons to use the Welsh language?

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

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

a. opportunities for persons to use the Welsh language?

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

Annex A: Consultation questions

Questions for proposal 1

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

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

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

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

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

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

Questions for proposal 2

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

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

Questions for proposal 3

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

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

Questions for proposal 4

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

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

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

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

Questions for proposal 5

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

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

Questions for proposal 6

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

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

Other questions on the consultation

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

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

21. What effect will the proposals have on:

   a. opportunities for persons to use the Welsh language?

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

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

   a. opportunities for persons to use the Welsh language?

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

Annex B: NSS responses treated as positive in the construction of the positivity measure

Question	Responses	Positive responses
Core questions		
Teaching on my course		
How good are teaching staff at explaining things?	Very good Good Not very good Not at all good This does not apply to me	Very good Good
How often do teaching staff make the subject engaging?	Very often Fairly often Not very often Rarely This does not apply to me	Very often Fairly often
How often is the course intellectually stimulating?	Very often Fairly often Not very often Rarely This does not apply to me	Very often Fairly often
How often does your course challenge you to achieve your best work?	Very often Fairly often Not very often Rarely This does not apply to me	Very often Fairly often
Learning opportunities		
To what extent have you had the chance to explore ideas and concepts in depth?	To a large extent To some extent To a small extent Not at all This does not apply to me	To a large extent To some extent
How well does your course introduce subjects and skills in a way that builds on what you have already learned?	Very well Well Not very well Not at all well This does not apply to me	Very well Well

Question	Responses	Positive responses
To what extent have you had the chance to bring together information and ideas from different topics?	To a large extent To some extent To a small extent Not at all This does not apply to me	To a large extent To some extent
To what extent does your course have the right balance of directed and independent study?	To a large extent To some extent To a small extent Not at all This does not apply to me	To a large extent To some extent
How well has your course developed your knowledge and skills that you think you will need for your future?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
Assessment and feedback		
How clear were the marking criteria used to assess your work?	Very clear Clear Not very clear Not at all clear This does not apply to me	Very clear Clear
How fair has the marking and assessment been on your course?	Very fair Fair Not very fair Not at all fair This does not apply to me	Very fair Fair
How well have assessments allowed you to demonstrate what you have learned?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
How often have you received assessment feedback on time?	Very often Fairly often Not very often Rarely This does not apply to me	Very often Fairly often

Question	Responses	Positive responses
How often does feedback help you to improve your work?	Very often Fairly often Not very often Rarely This does not apply to me	Very often Fairly often
Academic support		
How easy was it to contact teaching staff when you needed to?	Very easy Easy Not very easy Not at all easy This does not apply to me	Very easy Easy
How well have teaching staff supported your learning?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
Organisation and management		
How well organised is your course?	Very well organised Well organised Not very well organised Not at all well organised This does not apply to me	Very well organised Well organised
How well were any changes to teaching on your course communicated?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
Learning resources		
How well have the IT resources and facilities supported your learning?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
How well have the library resources (e.g. books, online services and learning spaces) supported your learning?	Very well Well Not very well Not at all well This does not apply to me	Very well Well

| Question	Responses	Positive responses
How easy is it to access subject specific resources (e.g. equipment, facilities, software) when you need them?	Very easy Easy Not very easy Not at all easy This does not apply to me	Very easy Easy
Student voice		
To what extent do you get the right opportunities to give feedback on your course?	To a large extent To some extent To a small extent Not at all This does not apply to me	To a large extent To some extent
To what extent are students' opinions about the course valued by staff?	To a large extent To some extent To a small extent Not at all This does not apply to me	To a large extent To some extent
How clear is it that students' feedback on the course is acted on?	Very clear Clear Not very clear Not at all clear This does not apply to me	Very clear Clear
How well does the students' union (association or guild) represent students' academic interests?	Very well Well Not very well Not at all well This does not apply to me	Very well Well

Question	Responses	Positive responses
Healthcare, allied health and clinical practice placement questions **(for students studying subjects which include healthcare, allied health and clinical practice placements)**		
I received sufficient preparatory information prior to my placement(s).	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
I was allocated placement(s) suitable for my course.	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
I received appropriate supervision on placement(s).	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
I was given opportunities to meet my required practice learning outcomes / competences.	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
My contribution during placement(s) as part of the clinical team was valued.	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
My practice supervisor(s) understood how my placement(s) related to the broader requirements of my course.	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree

Question	Responses	Positive responses
Overall satisfaction question (for students in Scotland, Northern Ireland and Wales only)		
Overall, I am satisfied with the quality of the course.	Definitely agree Mostly agree Neither agree nor disagree Mostly disagree Definitely disagree This does not apply to me	Definitely agree Mostly agree
Open text question		
Looking back on the experience, are there any particularly positive or negative aspects you would like to highlight?		
Additional questions		
Mental wellbeing services		
How well communicated was information about your university/college's mental wellbeing support services?	Very well Well Not very well Not at all well This does not apply to me	Very well Well
Freedom of expression (for students in England only)		
During your studies, how free did you feel to express your ideas, opinions and beliefs?	Very free Free Not very free Not at all free This does not apply to me	Very free Free

Annex C: Supporting analysis from pilot of response options

1. In August-September 2022, the OfS undertook a pilot to gather further evidence about the most appropriate response options to use in the NSS questionnaire. The questionnaires piloted at this stage were slightly different from the final NSS questionnaire, but similar enough for the information gathered through this research to have informed our thinking.

2. As part of this pilot, some respondents were asked first to answer selected NSS questions using the proposed response options, and then to answer the same question using a 'slider' which allowed them to select a number between zero and 100.

3. The aim of this research was to gather evidence as to whether response options were understood similarly by respondents; whether they captured distinct points of view; and whether they could be treated as interval data (that is, whether there are equal difference in sentiment between each response option).

4. Figure C1 below shows the results of this research for those respondents who answered the selected NSS questions using a four point response scale, very similar to that used in the 2023 National Student Survey (1,261 respondents). The upper x axis shows the question asked (listed in Table 1), and the lower x axis shows the response option chosen. The y axis shows the median and interquartile values given by the same respondents using the zero to 100 sliding scale. For example, we can see from the figure that respondents who gave the third response option, 'Good', to question 1 tended to give to give responses close to 70 when asked to answer the same question using the sliding scale.

Figure C1: Median and quartiles of 100-point scores given to each response option
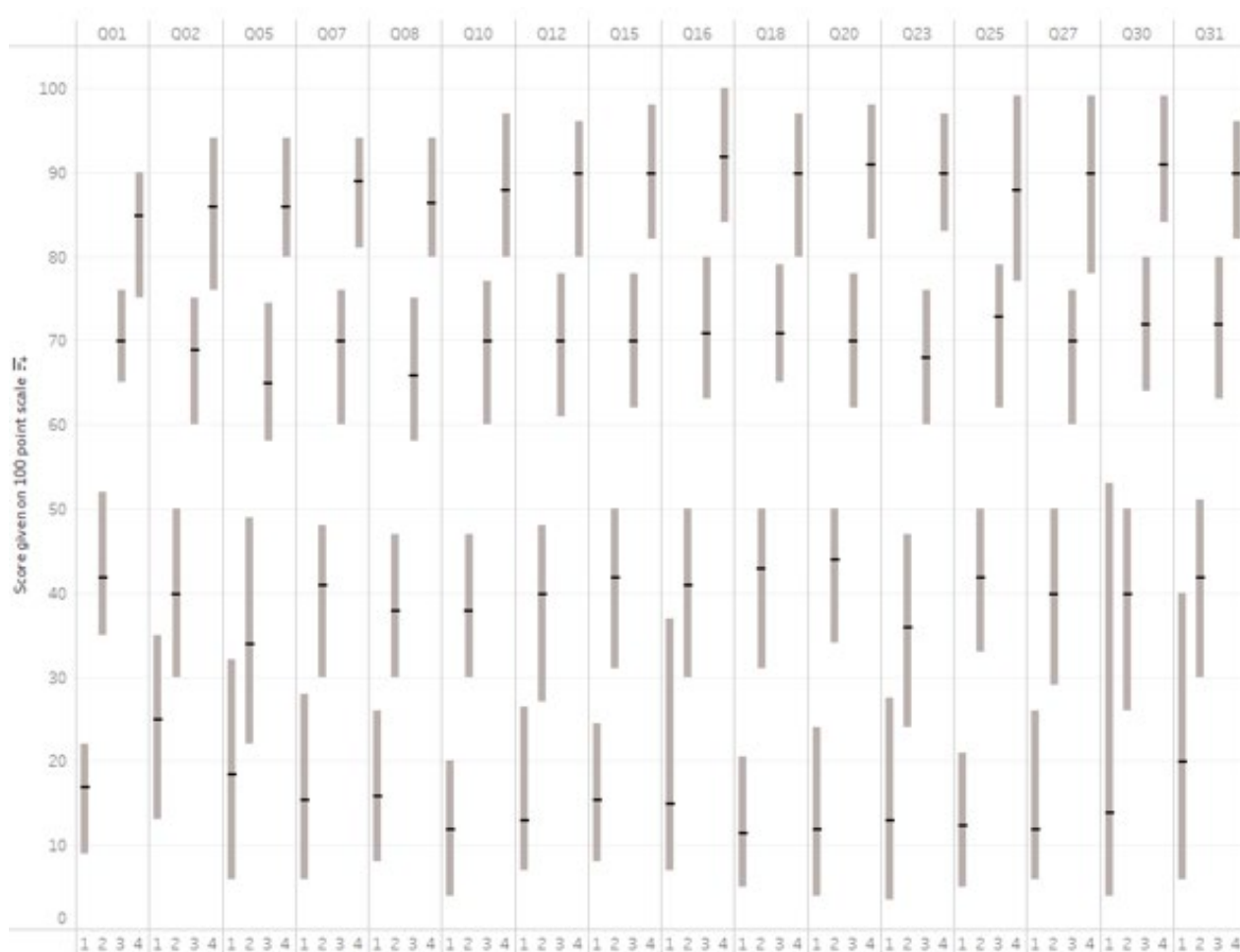
5. We treat this as early research, due to the small numbers involved and the experimental nature of the method. However, the findings are largely reassuring: they suggest that respondents view the four response options as distinct, and ordered as expected. This research further suggests that to respondents there is a clear gap between positive and negative response options. The most positive and the less positive response options are also distinct, but appear to express a more closely related sentiment. It is harder to draw conclusions about the relationship between the negative response options due to the smaller number of students who selected these options.

Table C1: Questions asked in the 0-100 research

Number	Question	Response options
1	How good are teaching staff at explaining things?	Very good
		Good
		Not very good
		Not at all good
		This doesn't apply to me

Number	Question	Response options
2	How often do teaching staff make the subject engaging?	Very often Fairly often Not very often Rarely This does not apply to me
5	To what extent have you had the chance to explore ideas and concepts in depth?	To a large extent To some extent Hardly at all Not at all This does not apply to me
7	How well does your course introduce subjects and skills in a way that builds on what you have already learned?	Very well Well Not very well Not at all well This does not apply to me
8	To what extent does your course have the right balance of staff-led and independent study?	To a large extent To some extent Hardly at all Not at all This does not apply to me
10	When working with other students as part of your course, how helpful was this for your learning?	Very helpful Helpful Not very helpful Not at all helpful This does not apply to me
12	How fair has the marking and assessment been on your course?	Very fair Fair Not very fair Not at all fair This does not apply to me
15	How often does feedback help you to improve your work?	Very often Fairly often

Number	Question	Response options
		Not very often
		Rarely
		This does not apply to me
16	How easy was it to contact teaching staff when you needed to?	Very easy
		Easy
		Not very easy
		Not at all easy
		This does not apply to me
18	How well organised is your course?	Very well organised
		Well organised
		Not very well organised
		Not at all well organised
		This does not apply to me
20	How well have the IT resources and facilities supported your learning?	Very well
		Well
		Not very well
		Not at all well
		This does not apply to me
23	To what extent do you get the right opportunities to give feedback on your course?	To a large extent
		To some extent
		Hardly at all
		Not at all
		This does not apply to me
25	How clear is it that students' feedback on the course is acted on	Very clear
		Clear
		Not very clear
		Not at all clear
		This does not apply to me
27	How well communicated was information about your university/college's mental wellbeing support services?	Very well
		Well
		Not very well
		Not at all well

Number	Question	Response options
		This does not apply to me
30	During your studies, how free did you feel to express your ideas, opinions, and beliefs?	Very free
		Free
		Not very free
		Not all free
		This does not apply to me
31	Overall, how would you rate the quality of your course?	Very good
		Good
		Not very good
		Not at all good
		This doesn't apply to me

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

The OfS's general duties

1. In formulating these proposals, the OfS has had regard to its general duties as set out in section 2(1) of the Higher Education and Research Act 2017 (HERA).[40] We consider that the proposals in this consultation are particularly relevant to general duties (b), (c), and (e), which relate to quality, choice and opportunities for students; competition where this is in the interests of students; equality of opportunity in connection with access to and participation in higher education.

2. In formulating these proposals, we have given weight to (b), and (e): promoting quality, choice and opportunities for students; and equality of opportunity.

3. The NSS results' key role in promoting quality is achieved through their general approach to publication. Publication of the results gives the survey credibility and visibility; accordingly providers and the sector as a whole pay close attention to the results. Through the mechanism of student choice and in particular competition this in turn can lead to improvements being made to the quality of course provision. We have previously seen this with the assessment and feedback scores for the preceding survey.

4. In formulating these proposals, we have sought to align wherever possible, development of the NSS with the recent changes we have made to our regulation of quality through the B conditions of registration and the revised Teaching Excellence Framework (TEF). This is in part to assist providers in monitoring their own performance. This also is consistent with duty (g) and the principles of best regulatory practice through engaging with fewer measures which is more transparent and consistent.

5. Our proposals would ensure parity in the way NSS results are published in a way that continues to promote quality though public accountability and student choice.

6. A key aim of the survey is to provide information to individual providers to support their quality improvement or enhancement activities. We have therefore sought to ensure that our proposals reinforce the incentives for providers to continue to do so, for example by presenting the results in a way that minimises analytical burden on providers, and where appropriate aligning to definitions used in the TEF, the principal aim of which is to incentivise excellence above the regulatory baseline.

7. Subject to appropriate decision making, we would normally expect NSS results to be published at sector level and in relation to individual providers. We see this as an important set of information that students and their advisers can use to decide what and where to study. Our use of the survey results as a tool to support informed student choice means that our approach to publication should be robust and transparent and to be of interest to future students in an accessible way. We take the view that our proposals achieve this by presenting results in a meaningful way. Presentation on Discover Uni will be user tested to ensure the results are

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

easy to understand and users can draw the correct conclusions from the results to make an informed choice.

8. The publication and public availability of the results gives the survey results greater prominence, incentivising providers to make improvements to the student experience which could lead to improvements in quality of outcomes.

9. Our proposed changes to the general policy for publication of the survey results at sector level and provider level are designed to ensure greater reporting by student characteristics than the current approach and are in line with our wider approach to access and participation. This is important to ensure the NSS continues to support equality of opportunity for different groups of students.

Factors in section 67A of HERA

10. In formulating our proposals we have had regard to section 67A of HERA. We consider the proposals in this consultation are particularly relevant to 5a, i, ii, iii which refer to the interests of students on higher education courses provided by English higher education providers, people thinking about undertaking, or who have undertaken, such courses, and English higher education providers. In formulating our proposals, we listened to providers and students to ensure we understand their views.

11. In reaching our proposals we have considered the information which will be of use to students on higher education courses through the positivity measure, making the results easier to engage with and understand by non-statistical experts. Students' unions and student representatives often use the data in conjunction with staff to devise improvement plans and or hold providers to account through evidencing where there may be issues. We have also proposed to expand the groups or splits we provide in our sector-level and provider-level data, enabling the monitoring of equality of opportunity and TEF activities by students. Our benchmark proposals make it simpler for students to assess provider performance based on its profile in a meaningful way.

12. Furthermore, publication of the NSS results through public accountability and student choice have an impact on current students through the improvements and providing an incentive for improvements to the student experience. Phase one of the review found that, in the view of students and many providers this where the NSS had greatest impact.

13. In reaching our proposals we have considered the information provided to people considering undertaking English higher education courses. We addressed this specifically in relation to the publication of results via Discover Uni and more generally throughout our proposals. The positivity measure which makes the results easier to engage with and understood by non-statistical experts. We are not proposing publishing data by student groups or splits for the purposes of student information, this is because it can have the effect of reducing equality of opportunity though students basing choices based on historic recruitment patterns rather on what might be the best course for them. We are not proposing using benchmarks for student information, this is because our research shows that this audience do not engage well with benchmarked data and therefore it could be potentially misleading.

14. In reaching our proposals we have considered the information given to higher education providers. In particular through the accessibility of the positivity measure and through the

widening of the splits of student groups, helping them achieve their equality of opportunity targets. Both options for the publication of question groups will assist with the understanding of the data within providers and responds to requests from providers for this aggregation of information. We also seek to align our proposals wherever possible with the approach used by B3 and TEF to assist providers in monitoring their own performance. The proposal to used benchmarks will also enable English education providers to assess their performance and was cited as a principle use for the survey within providers.

15. In reaching our proposals we have also had regard to the public interest need (5c) within section 67A, specifically by increasing the publicly available data. But balancing that with 5b and the interests of providers in making some provider specific data available to them via the dissemination portal.

16. In reaching our proposals we have had regard to the need for excluding from publication, so far as practicable, any information which relates to the affairs of a particular body or individual, where publication of that information would or might, in the opinion of the OfS, seriously and prejudicially affect the interests of that body or individual. In particular setting of a principle for thresholds to protect individuals. We also have had regard through the general policy for publication in the information we would not usually expect to publish, including in relation to optional banks whose response rates and generally much lower than the core survey and the open text comments where respondents or staff member could be inferred.

Public Sector Equality Duty

17. We have had regard to Schedule 1, paragraph 21 of HERA, which extends the Equality Act 2010, and therefore the Public Sector Equality Duty, to the OfS. This requires the OfS to have due regard to the need to eliminate unlawful discrimination, foster good relations between different groups and take steps to advance equality of opportunity.

18. More generally, we have considered whether there may be any interaction between our consultation proposals in relation to the NSS and equality matters. We consider that publication of student characteristic splits is likely to advance equality of opportunity because it will increase the incentive on providers to make improvements and the ability of students and others to engage with providers on an informed basis.

19. Through this consultation we are seeking views on any unintended consequences of our proposals for a general policy on publication, for example for particular types of provider or groups of students. We are also seeking views about the potential impact of our proposals on individuals on the basis of their protected characteristics. Responses to this consultation will inform our assessment of the impact of our proposals on different groups.

The Regulators' Code

20. We have had regard to the Regulators' Code.[41] Section 1 of the code is particularly relevant: 'Regulators should carry out their activities in a way that supports those they regulate to comply and grow'.

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[41] Available at Regulators' Code - GOV.UK (www.gov.uk).

21. The proposals outlined in this consultation for the general policy for publication of sector wide and provider level data of the NSS would give providers and the wider public with extensive reliable information about the views of students. This is likely to support growth for providers with good results at cost of those with less good results.

22. The alignment where possible with TEF and B3 supports compliance. We have had regard to this through the alignment of data definitions and approach with B3 and TEF, this means that a provider's NSS results provide with insights into areas in which the OfS may identify compliance concerns in future.

23. Our general policy for publication also includes the addition of further splits within the published datasets, allowing greater transparency and supporting OfS and sector wide work on equality of opportunity. This will allow providers and third sector agencies to compare performance across providers for groups of students. Through its key aim of supporting informed student choice, the NSS provides a mechanism through which providers can improve and potentially grow through increased student recruitment.

24. Section 4 is also relevant: regulators should share information about compliance and risk Regulators should collectively follow the principle of 'collect once, use many times' when requesting information from those they regulate. We have had regard to section four through an alignment of approach across B3, TEF and its use in student information and public accountability through this general policy for publication, using a single data source which can easily be accessed from an open source by providers and other to help onward users target resources and activities and minimise duplication.

Guidance issued by the Secretary of State

25. We have had regard to all relevant guidance from the Secretary of State.[42]

26. We have had regard to strategic guidance of Feb 2021[43] and the request for a review of the NSS. The publication matters in this consultation arise from the review of the NSS and the changes made to the questionnaire. We have also sought to wherever possible reduce the burden of analysis for providers which the review found was its greatest burden and promote statistically responsible use of the NSS results.

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

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

29. Specifically the use of wider information beyond the student outcome thresholds that may point to concerns about quality as part of wider regulatory intelligence. The publication of wider information which informs the monitoring of providers enables providers and the wider public to

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[42] See Guidance from government - Office for Students.

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

see the data used for monitoring purposes. We had also had regard through the alignment of definitions and splits with those used in wider regulatory activity including B3 and TEF.

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

31. We have had regard to the access and participation priorities in the publication of splits outlined in the letter of from the Secretary of State announcing the new Director of Fair Access and Participation.[44]

Code of Practice for Statistics

32. We have had regard to the Code of Practice for Statistics in preparing our proposals for the publication of the results from the NSS.

33. The following pillars are particularly relevant for the proposed changes to the NSS (we have summarised the principles for brevity):

    a. **Quality:** Principle Q2.1 Methods and processes should be based on national and international practice, scientific principle or established professional consensus. We have reflected this principle in how we have developed proposals for publication in line with wider robust statistical work undertaken by the OfS over the past few years particularly in relation to proposals relating to benchmarking and communicating statistical uncertainty.

    b. **Value:** V1.1 Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which the statistics might be used and the nature of the decisions that are or could be informed by them. Our proposals seek to update the way we publish the data to address current issues including through harmonising the data definitions used across the assessment of quality and TEF wherever possible.

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

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

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[44] See Letter from the Department for Education announcing the appointment of the new director for access and participation (officeforstudents.org.uk).

a. **Trustworthiness:** T4.1 Organisations should be transparent about their approach to public engagement with users, potential users, and other stakeholders with an interest in the public good served by the statistics.

b. **Trustworthiness:** T4.2 A work programme should be established and regularly reviewed. Statistics producers should be open about progress towards meeting priorities and objectives. Users and other stakeholders should be involved to help prioritise statistical plans.

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

Annex E: Proposed splits of the data

Split	Sector level	Provider level	Dissemination portal
Year	✓	✓	✓
Taught or registered		✓	✓
Country of provider	✓		
Subject of study	✓	✓	✓
Level of study	✓	✓	✓
Mode of study	✓	✓	✓
Age	✓		✓
Disability status	✓		✓
Ethnicity	✓		✓
Sex	✓		✓
Domicile	✓		✓
Disability type	✓		✓
Local students	✓		
Parental higher education status	✓		
Sexual orientation	✓		
Care experienced students	✓		
Estranged learners	✓ (England, Wales, Northern Ireland)		
Free school meals eligibility	✓ (English providers only)		
Learners from military families	✓ (English providers only)		
TUNDRA (Tracking underrepresentation by area), an area-based measure identifying educational underrepresentation for young people[45]	✓ (English providers only)		

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[45] See About the TUNDRA area-based measures data - Office for Students.

Split	Sector level	Provider level	Dissemination portal
Index of multiple derivation	✓ (country-specific measure)		✓
Course			✓
Department			✓
Domicile			✓
Expected length of study			✓
Highest qualification on entry			✓
Socio-economic classification			✓
POLAR (Participation of local areas), a historical area-based measure identifying educational underrepresentation for young people[46]			✓

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[46] See Young participation by area - Office for Students.

Annex F: Broadly defined subject groups

Table F1: Broadly defined subject groups proposed for use in benchmarking for part-time and apprenticeship students

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

Annex G: Principles for the selection and application of benchmarks

1. These principles will be guiding rather than binding, but they are intended to provide an effective mechanism to build public trust and confidence in the benchmarks that the OfS creates and uses in its student outcome and experience indicators.

2. When selecting benchmarking factors, the intention is that each principle would be considered in turn and, where appropriate, evidence of its applicability would be sought from statistical analysis or modelling. We are aware that the principles may sometimes sit in tension with one another, and that in most cases a value-based judgement will be required to confirm fit or applicability with the principle.

3. The proposed **core principles** relating to the factors being considered for benchmarking are:

    a. The selection of benchmarking factors should be fit for purpose, evidence-based and robust, conforming to recognised best practice in the production of statistical information. In particular:

        i. Details of the selection process should be published for the benefit of providers and other users or interested parties.

        ii. The selection of benchmarking factors should vary across different student outcome and experience indicators only when there is a clear and valid rationale.

        iii. The number and definition of benchmarking factors selected should not compromise the statistical integrity of the broader benchmarking approach.

    b. Benchmarking factors should be applicable to, and available for, all types of providers across England that are delivering the higher education provision for which the indicator is measuring students' outcomes or experience.

    c. Benchmarking factors should contribute to an overall benchmarking approach which supports fair comparison of indicators across the higher education sector. A candidate benchmarking factor should therefore have relevance to help explain the context or differing characteristics of a provider's students or provision.

    d. The benchmarking approach should neutralise the effect of characteristics on a provider's performance where this is consistent with policy objectives. This approach guards against inadvertently creating incentives for providers to change their behaviour in terms of the students they recruit or the range of provision they offer in ways that could undermine our ability to meet our duties around access and participation, and competition. It does not imply that it is acceptable for some student groups to receive lower quality provision, but recognises that this is currently the case and the risks of not controlling for it. The benchmarking approach should only neutralise the effect of characteristics where there is such a risk of negative unintended consequences, as otherwise it risks creating perverse incentives.

e. Benchmarking factors should primarily reflect structural factors that contribute to variations in student outcomes or experience which are outside a provider's control, or undesirable for it to control for. This means that characteristics of the provider will not normally act as benchmarking factors.

f. In selecting the range of benchmarking factors to apply for a given indicator, the need to preserve the statistical integrity of the broader benchmarking approach requires that consideration should be given to limit the number of factors on the basis of:

   i. The size of the population for which the effect occurs: it is unlikely that a factor where the effect is limited to a small population will be selected where there are other factors with similar effects that have broad applicability.

   ii. The distribution of the population for which the effect occurs: it is unlikely that a factor where the effect is limited to a population concentrated in a small subsection of providers will be selected where there are other factors with similar effects that have applicability to a wider cross-section of provision.

   iii. The nature of the other candidate factors: where there are a number of similar candidate factors (for example, measures of disadvantage), it will normally be the case that only the one that has the greatest effect should be selected so that a balance of factors is achieved.

g. The factors used in benchmarking should be reviewed at regular intervals, to check that the evidence for, and applicability of, the approach remains current and fit for purpose, and to consider the impact achieved by previous benchmarking exercises.

Availability and data quality

4. The availability and data quality of candidate benchmarking factors should be considered in relation to the principles as follows:

a. The quality of data items considered as candidate benchmarking factors should be understood and judged to be of sufficiently high quality for use in a benchmarking exercise. The data items should normally be collected in a consistent and fair way across the sector; it should have a good sample base and use transparent definitions.

5. Where possible, benchmarking factors should be drawn from existing data sources. Any proposal to collect further data for the purpose of a benchmarking factor should be carefully considered against the principles for data burden

Statistical properties

6. The principles for the statistical properties that candidate benchmarking factors should demonstrate are:

a. Statistical models that seek to account for a range of characteristics should identify a remaining correlation between the benchmarking factor and the student outcome or experience that is being measured.

b. Once other factors have been accounted for, statistical modelling should identify that the performance being measured is not uniformly distributed across the attributes within a benchmarking factor, and that differences between these attributes are non-trivial.

c. A benchmarking factor should not be uniformly distributed across providers or performance units; rather, the factor should differentially affect the benchmarks that are calculated, meaning that factors which are distributed unevenly across providers or performance units should be considered as stronger candidates to be used as benchmarking factors.

d. Where possible, a benchmarking factor should be a direct measure, rather than a proxy.

e. As far as possible, the selection of benchmarking factors should limit the extent to which a benchmark value can be determined by a single provider. The selection of a benchmarking factor (and the subsequent grouping of attributes within it) should not compromise the statistical integrity of the broader benchmarking approach.

f. Benchmarking factors (and the data sources from which they are derived) should normally have longevity, with these statistical properties observed to continue over time.

Defining groupings of the attributes within the benchmarking factor

7. Once benchmarking factors have been selected, the principles for defining groupings of the attributes within the benchmarking factor are:

a. The grouping of attributes within benchmarking factors should be fit for purpose and determined through consideration of sound evidence.

b. The number of categories formed when grouping attributes within benchmarking factors should be the minimum for the benchmarking factor to be effective. The number and definition of the groupings should not compromise the statistical integrity of the broader benchmarking approach.

c. The grouping of attributes within benchmarking factors should avoid creating groups in which numbers of students possessing those attributes are either very small or very large in the sector overall. The effect of creating groups that are known to be very small or very large at individual provider level should be acknowledged where they cannot be avoided.

d. The attributes that form a grouping should share a consistency of student backgrounds, outcomes or behaviours with respect to the indicator to which they refer. The consistency of attributes should be understood from the evidence of statistical analysis.

e. The grouping of attributes within benchmarking factors should make practical sense, to form coherent groups which share a qualitative similarity.

f. The grouping of attributes within benchmarking factors should vary across indicators only when there is a clear and valid rationale. Where variations are necessary, those deviations should use other groupings that exist elsewhere in a sector-wide hierarchical view of the benchmarking factor in question, at a more aggregated or disaggregated level according to need.

g. The grouping of attributes within benchmarking factors should be reviewed periodically to ensure that it continues to comply with these principles.

Annex H: Summary of general approach to publication by item

Table H1: Sector-level data published on OfS website

Items	Sector-level data published on OfS website	
	Previously published elements carried forward to proposal 1	**New or changed elements and the proposals to which they refer**
For each question – number of respondents using each response option	Publishing for all questions and splits (Note: questions and response options new for 2023)	
Population measures	Sample size and number of respondents	
Confidence intervals		Publishing a wider range of uncertainty values – see proposal 1
Uncertainty around difference from benchmark		Publishing a wider range of uncertainty values instead of flagging significance – see proposal 1
Summary measure for each question (previously percentage agree)		A new positivity measure – see proposal 2
Groups of questions (previously referred to as question scales)		This consultation asks whether we publish these initially or delay until they have been tested using the new survey data – see proposal 3
Splitting data by student or course characteristics	Existing splits carried forward – Student characteristics: Age, Disability, Domicile, Ethnicity, Sex Course characteristics: Distance learning, Mode of study, Subject of study Other splits: Country of provider, Year of data	Adjusted definitions for some of the splits, with more personal characteristics added – see proposal 4

Sector-level data published on OfS website		
Items	**Previously published elements carried forward to proposal 1**	**New or changed elements and the proposals to which they refer**
Benchmarks	Benchmarks and differences from benchmark	Changes to benchmarking factors, further review planned with new survey data. Benchmarks available for all splits of data – see proposal 5
Healthcare questions		Review planned to determine whether they can be published in future – see proposal 6

Table H2: Provider-level data published on OfS website

Sector-level data published on OfS website		
Item(s)	**Previously published elements carried forward to proposal 1**	**New or changed elements and the proposals to which they refer**
For each question – number of respondents using each response option		Extending to all questions and splits – proposal 1
Population measures	Sample size and number of respondents	
Confidence intervals		Publishing a wider range of uncertainty values – see proposal 1
Uncertainty around difference from benchmark		Publishing a wider range of uncertainty values instead of flagging significance – see proposal 1 around presentation of uncertainty
For all questions – summary measure (previously percentage agree)		A new positivity measure – see proposal 2
Summary measure for groups of questions (previously referred to as question scales)		This consultation asks whether we publish a summary measure for groups of questions initially or delay until the groups have been

	Sector-level data published on OfS website	
Item(s)	**Previously published elements carried forward to proposal 1**	**New or changed elements and the proposals to which they refer**
		tested using the new survey data – see proposal 3
Splitting data by course characteristics	Course characteristics: Level of study, Mode of study, Subject of study Other splits: Taught or registered population, Year of data	More combinations of mode, level and subject, with adjusted definitions – see proposal 4
Benchmarks	Benchmarks and differences from benchmark	Changes to benchmarking factors, with further review planned with new survey data. Benchmarks available for all splits of data – see proposal 5
Healthcare questions		Review planned to determine whether they can be published in future – see proposal 6

Table H3: Course and subject data on Discover Uni

	Course-level and subject-level data on Discover Uni	
Item(s)	**Previously published elements carried forward to proposal 1**	**New or changed elements and the proposals to which they refer**
Splitting data by course	Course-level data shown where possible, aggregated to subject level where needed	
By question – population measures	Sample size and response rate	
Groups of questions (previously referred to as question scales)		This consultation asks whether question groups should be included in Discover Uni – see proposal 3
By question – summary measure (previously percentage agree)		A new positivity measure – see proposal 2

Course-level and subject-level data on Discover Uni	
Healthcare questions	Review planned to determine whether they can be published in future – see proposal 6