



QAA Response to Consultation on Changes to the National Student Survey

Introduction

On 28 July 2022, the Office for Students (OfS)¹ published [a consultation on proposed changes to the National Student Survey](#). The consultation is part of the second phase of a [review of the NSS](#), which was launched in 2020. This document is QAA's response to that consultation. We have not answered every question, instead focusing our responses on issues regarding quality and the student experience, where we believe we have the knowledge and expertise to comment authoritatively.

QAA's primary concern is with Proposal 3, which would remove the current question 27 in England only. If accepted, it would mean that students in England are no longer asked about how satisfied they are with the quality of their course. This is the only question that addresses the quality of a course and how satisfied current students are with their experiences. We believe that current and future students will be at a disadvantage if that important source of information is lost. As this question - or a version of it - would remain in Wales, Scotland and Northern Ireland, it would also lead to further divergence from a UK-wide approach to quality, which is valuable to our global reputation for excellence.

We strongly disagree with this proposal and recommend that the NSS retains a summative question on students' satisfaction with the quality of their course in England.

Proposal 1: The criteria for the core NSS should remain as agreed in 2017

1. Do you agree we should retain the current criteria for NSS core questions?

Yes. However, we do not agree with the interpretation that the OfS has newly introduced - that the meaning of 'public accountability' includes the use in England of the survey outcomes in the regulation of individual providers (as set out in the footnote on page 8).² While it is for the OfS to determine whether to use the NSS for its regulatory purposes, we do not believe it follows that it is therefore one of the key purposes of the survey. The outcomes of the survey are widely used by many constituencies for a variety of purposes. The OfS may have a statutory purpose, but that does not necessarily override the public interest of all other users of the survey.

Furthermore, we believe it cannot be right both to propose the criteria are unamended, and simultaneously to propose a new interpretation of the criteria that cannot be what the original authors intended. When the Higher Education Public Information Steering Group (HEPISG) agreed the principles in 2017, the OfS did not exist, and the regulatory framework was not published. HEPISG, therefore, could not have conceived that the

¹ The OfS manages the NSS on behalf of the UK funding and regulatory bodies: the Department for the Economy (Northern Ireland), the Scottish Funding Council and the Higher Education Funding Council for Wales.

² Footnote 8, page 8 of the consultation: 'In England, public accountability is delivered through various mechanisms, including the use of NSS outcomes in the regulation of individual providers'.

criteria would be interpreted in this way. The footnote represents a change to how the criteria are to be interpreted, which is material.

This approach was not what was suggested in phase one of the review when discussing the criteria. Respondents to the phase one consultation may have given different feedback had they been aware that the OfS would go on to suggest it was going to adopt this interpretation. The view put forward in the findings (paragraph 145 of the [phase one analysis](#)) was that the original regulatory framework quality and standards conditions made it clear that 'national surveys of students' views for the provider will be used in the assessment and monitoring of conditions B1 and B2'. While the OfS highlighted the new conditions it was at the time consulting on, the final version of these conditions does not contain reference to national surveys, either in the conditions or the guidance that accompanies them. The OfS does not set out in the [Consultation of quality and standards conditions](#) from July 2021, how NSS responses would be used in future in relation to the new B conditions and, in the [Outcomes](#) from that consultation, only makes passing reference to the use of the NSS in relation to compliance with condition B2 only.

It would therefore appear that through this proposal, the OfS is introducing both a) another new mechanism for operation of its regulatory framework that inserts the NSS into a wider monitoring role than previously described for the new B conditions, and b) introduces a new definition of the meaning of public accountability that does not align with either the stated findings of phase one of the NSS review or their original purpose.

Proposal 3: Removal of the summative question for England

(Note: The summative question that this proposal concerns reads: 'Overall, I am satisfied with the quality of the course')

3. What are the consequences - both positive and negative - of removing the summative question for England only?

QAA believes that the negative consequences of this proposal far outweigh any benefit.

The detail of this proposal frames the NSS as existing to serve a regulatory function, but this is not the sole purpose for which the NSS was conceived. The consultation in paragraph 15 cites the three key purposes for the survey - of which one is public accountability. In particular, we consider that the invaluable purpose of this question in informing prospective student choice has not been considered in the consultation proposal. The NSS consultation does not set out that different purposes of the survey carry different weights to each other. Retaining the question would allow the survey to continue to inform student choice as well as the other stated purposes.

We are concerned by the framing of the core survey criteria in relation to public accountability. In this consultation, the OfS has stated that 'public accountability is delivered through various mechanisms, including the use of NSS outcomes in the regulation of individual providers'. This appears to be a new interpretation of the meaning of public accountability, which does not appear in the phase one review, nor was in the mind of the original authors of the key purposes of the NSS. This is because the key purposes of the NSS were developed and published before the OfS existed and before the regulatory framework was published.

The [analysis of phase one of the review of the NSS](#) discusses the purpose of the NSS. While it notes that there is benefit in further clarifying the purpose, it does not suggest

reframing it as a regulatory tool in this way by giving weight over the other key purposes, and adding a new interpretation of public accountability. Indeed, it notes that stakeholders judged the primary purpose to be its use in enhancing the student experience by providers, and that it is also used by prospective students as a source of information. It further notes: 'given the public investment in higher education, on the whole it was seen that transparent, official information should be in the public domain'. The proposal to remove the one question that provides an overall view about how satisfied students are with the quality of their learning experiences seems to be at odds with these important and valued purposes.

Notwithstanding the above, the OfS does state that it does not use the summative question for a regulatory purpose, and we assume that this would continue to be the case even if the question were to be retained. However, the OfS's decision that the current question 27 of the NSS does not serve its regulatory functions, does not compel the NSS to stop asking a question that others in the sector find incredibly helpful.

We believe that there is a risk of harm to prospective students, who will no longer have a direct comparator in England and across the UK of what real students at the universities and colleges that they are considering thought about the quality of their experience. Resolving a perceived issue around the use of these data and becoming a shorthand for a 'satisfaction survey' is a minor concern in comparison to losing these rich data for students and the wider public.

We understand that funding bodies in Scotland, Wales and Northern Ireland wish to retain the current wording. Our strong preference, therefore, would be for the survey in all nations of the UK to retain the original summative question. There is also a risk of harm to students and the reputation of the UK-wide higher education sector if there is no longer a shared understanding of students' perception of satisfaction with quality across the UK.

In 2022, around 85% of respondents to the NSS were from English providers.³ Removing the majority of responses to the current summative question is likely to make the information less useful to the sectors in the rest of the UK. This would be at odds of the findings of phase one of the review, which indicated that the UK-wide role of the survey should be considered in any recommendations. Furthermore, if the only providers for whom this summative information is available are those outside England, student applications may be driven to non-English providers for whom this information is available. This risks creating a false market and imbalance within the UK sector as a whole.

To summarise: a) there is value in the question in informing prospective student choice across all nations (including benchmarking as stated in the consultation document); b) data are used for public accountability purposes in the nations other than England; and c) we consider that public accountability has a wider meaning than a narrow interpretation that is focused on the regulation of individual providers. We conclude, therefore, that a summative question should be retained. We do not consider that the reason given in paragraph 55 is compelling, because we consider 'the need to ensure clear links between the information provided by the OfS and the aspects of quality that are subject to regulation' is significantly outweighed by the stated key purposes of the NSS that support retaining the question.

There is an alternative available, although it would not be our preferred option. Question 4 of this consultation suggests that the survey question in the rest of the UK be revised to focus on quality and remove reference to 'satisfaction'. We see no reason why this could

³ According to the [NSS 2022 quality report](#), there were 324,329 responses in total from across the UK. Of these, 276,344 were from England; 14,417 from Wales; 26,410 from Scotland; and 7,158 from Northern Ireland.

not be used in England. This could address the stated concern that the survey results could be misapplied by third parties as a satisfaction survey while retaining an opportunity for students at English institutions to comment on quality. We believe that this option is far less ideal than simply retaining the current summative question across the UK, to support a sufficient sample size for comparison. However, if there is to be a change in England we strongly recommend that at the very least a question on real students' perceptions of the quality of their learning is retained in some form.

4. Should we retain the current summative question for Scotland, Northern Ireland and Wales or move to the revised question with a focus on quality not satisfaction?

It is our understanding that the funders in Wales, Scotland and Northern Ireland wish to retain the current summative question. We support this position.

Proposal 5: New question on awareness of mental wellbeing provision should be included as an additional to the main survey

6. Should a question on mental wellbeing provision be asked as an additional question after the core questionnaire?

Yes, this is an important and welcome addition. A similar question now forms part of the annual Advance HE-HEPI Student Academic Experience Survey.

We do note, however, that this question is just as at risk of being used by league tables and media outlets as a way of ranking providers for the wellbeing of students, which was seen as a negative factor previously in the reasoning for Proposal 3.

7. What are the unintended consequences of asking a question about students' awareness of mental wellbeing services where no support to respondents can be offered?

We welcome this consideration; there is certainly a risk that asking students about their awareness of mental wellbeing services could cause an individual distress and be at risk of harm as a result of this question, but without access to support. The survey should signpost credible charities and official sources of medical advice. Institutions could also be offered guidance and support on signposting appropriate local support wherever they promote the NSS in a way that is compliant with the requirements regarding undue influence. We would support a technological solution where students could be informed of providers' mental wellbeing services after they have provided a response to this survey.