

Proposed changes to NSS and Unistats: NUS response

**NUS responds to the four UK HE
funding councils' consultation on
changes to the National Student
Survey, Unistats and information
provided by institutions**

December 2015

Introduction and context

Introduction

This document presents NUS's response to the consultation on changes to the NSS, Unistats and the provision of information by higher education institutions.

The provision of accurate, comparable and insightful information for prospective students is extremely important. Students dedicate a huge amount of time, effort and resource into completing a higher education course and most will only do so once, so it is crucial that they are as well-informed as possible when making the choice of what and where to study. The increased marketization of higher education has the potential to incentivise institutions to present an idealised version of themselves through the information they provide to prospective applicants, and it is welcome that the funding councils recognise this and propose steps to counter it.

The review goes beyond the provision of information and considers the use of the National Student Survey for quality enhancement within higher education institutions. Although not one of the original purposes of the survey, enhancement of learning and teaching provision is an important part of how the survey is used. The survey has also been used as a springboard for more active engagement with students: co-design of solutions to problems raised in NSS data is increasingly common practice across universities and colleges. Many of the proposed changes reflect this changed usage of the survey, and most of these proposals are welcomed by NUS.

The provision of accurate, comparable and insightful information for prospective students is extremely important.

Context

The four UK HE funding bodies have been reviewing the provision of information in HE for two years. This review is overseen by the Higher Education Public Information Steering Group, a sector board on which NUS has representation. This group commissioned an extensive literature review and consultation into the National Student Survey, the report of which was published in [July 2014](#). Further consultation was carried out on the recommendations of this review, as well as cognitive testing of proposed new questions and a pilot survey of 15,000 students. The findings from this consultation, testing and piloting form the basis of the proposed changes to the NSS.

Proposed changes to the Unistats website are similarly backed by extensive research. This research found that students prioritised detailed information at a course level, which is difficult to present in the Key Information Set in its current form. This finding, combined with this year's publication of the Competition and Markets Authority's [guidance](#) for higher education institutions, broadened the scope of the review to cover the information provided by higher education institutions themselves. You can read more about the research conducted for this review on [HEFCE's website](#).

This consultation was launched prior to the publication of the Government's Higher Education [Green Paper](#), which suggests that the National Student Survey might provide some key metrics for assessing teaching quality through a proposed Teaching Excellence Framework. The Green Paper also mentions increasing the transparency and accountability of students' unions, which we address in this response concerning the proposed removal of a core NSS question on students' unions.

We encourage students' unions to submit a response to this consultation, which you can do [here](#) until noon on Friday 4th December.

Unistats

1. *Do you agree with the respective roles we have identified for institutions and funding bodies in meeting students' information needs?*

Broadly yes – we will comment further below on the proposed changes to learning and teaching information in the KIS. Much of the proposed regulation is governed by advice and good practice documents rather than strict requirements, which may mean that HEIs are able to present a not entirely accurate picture of what students should expect. Whilst most HEIs are taking the CMA guidance very seriously, a small number have commented to our members that they view the guidance as optional. We would like the funding bodies to take a firmer stance on what is expected of institutions, in line with the CMA guidance, as well as being explicit about the consequences of non-compliance

2. *Do you agree that our proposed changes to Unistats and the Key Information Set will improve the accessibility of information and ensure that the data we provide is meaningful for students?*

NUS recognises the need for an independent, authoritative source of data to inform prospective students' choices before entering higher education. However, we also recognise that the current quantitative, metric-based measures around learning and teaching do not offer a complete or indeed helpful picture of what a higher education experience is. We agree that institutions are best placed to offer detailed, course level information, but it must be recognised that the increased marketisation of education means there are clear incentives for HEIs to present this information in the most positive possible light. As such, we would expect the funding bodies to produce robust guidance for institutions as to exactly the information they need to provide and how it

needs to be presented, so prospective students can continue to compare like with like and make informed decisions about their study choices. We are particularly mindful of the need to simplify financial information such as bursaries and fee waivers available to make these data as comprehensible as possible and comparable across different institutions' websites.

3. *Do you have any comments on our proposals for Unistats and the areas we propose to ask institutions to provide on websites? Are there any gaps?*

We agree that those areas currently covered by Unistats should be transferred to institutional websites rather than removed completely, with the exception of data that have been proven of less use to students, such as the most common types of entry qualifications (whilst retaining the UCAS tariff). We are concerned that information on the costs of accommodation and financial support from the institution are proposed for removal without explicit mention of robust guidance for institutions: living costs are an important issue for students and form an important part of their decision-making, particularly for students from widening participation backgrounds. As with the information about learning and teaching, the funding bodies should publish robust guidance detailing their expectations from institutions on this type of information to ensure accuracy, completeness and comparability across institutions.

National Student Survey

4. *Do you agree with the criteria we propose should be applied to the main National Student Survey questionnaire?*

Yes.

5. *Do you have any comments on this proposal?*

We welcome the introduction of criteria for core questions and agree that the survey should be focused on the academic experience, in order to prevent the survey becoming so large and broad that response rates and the quality of responses suffer.

6. *Do you agree that we should include questions on student engagement, to strengthen the role of the survey in improving learning and teaching?*

Yes.

7. *Do you have any comments on the proposed themes, terminology or sequencing of our proposed student engagement questions, or any wider comments about this proposal?*

NUS welcomes the introduction of questions on student engagement, which not only reflect a growing expectation in the sector, but also come closer to measuring positive learning outcomes.

We welcome specifically the introduction of questions on the student voice, but we fear that the suggested language is too passive: questions focusing on 'feedback' and 'response' suggest a transactional, consumerist relationship between staff and students that does not reflect the sector's current

commitment to true partnership. Genuine student engagement is more than the opportunity to provide feedback at the end of a course or module, it is the opportunity for students to be engaged at every stage of their educational journey and in every part of their institution. We feel these questions could be worded so as to recognise the active role students play when truly engaged by their institution. We also believe that more emphasis needs to be placed on the impact of student engagement: the question asking whether feedback has been acted on is a start but again suggests a passive, consumerist relationship rather than genuine student engagement. On the first question in the bank on student voice, we prefer 'sufficient' or 'enough' opportunities to provide feedback rather than 'the right' opportunities, as we feel this is easier for students to give a definitive answer.

We welcome the introduction of questions on academic challenge/reflective learning, and the learning community/collaborative learning. We ask the funding councils to ensure that all questions are rigorously tested for applicability across all subjects and disciplines, particularly the suggested question on applying knowledge: some more abstract or theoretical subjects may be disadvantaged in this question due to their nature rather than actual student dissatisfaction.

8. *Do you agree with the proposed rewording of questions on learning resources?*

Yes.

9. *Do these questions include all the areas relating to learning resources which are of importance to institutions and students? If not, which aspects are missing?*

The questions cover most of the important areas of learning resources, although quality of teaching and learning spaces is notable by its

absence. The current question on specialist equipment is often interpreted by disabled students as meaning disability support facilities, software or resources: whilst the proposed new question is much clearer, it does mean that the opportunity for this group of students to comment on their support has gone. Disabled students are nationally far less satisfied across the board, but particularly with learning resources and organisation and management. We would ask the funding councils to explore the option of an additional question in this section available only to those students who are identified as disabled.

10. *Do you agree with the proposed rewording of questions on assessment and feedback?*

Yes.

11. *Do you have any comments on our proposal to amend these questions?*

The amendments are sensible and clarify what is being asked. We also welcome the funding bodies' recognition that the NSS drives institutional behaviour, sometimes in unhelpful ways, and we encourage those leading the review to be mindful of this for all proposed new questions.

12. *Do you agree that we should remove Q3, Q5 and Q9 from the survey to ensure that it remains short?*

We agree with removing Q3 and Q9 but would prefer to see Q5 remain. Clarity and accessibility of marking criteria and the fairness of marking are two different aspects of assessment and it is important to see students' perceptions of both. The question on marking fairness is of particular importance given the funding bodies' (and NUS's) attention to the BME attainment gap. NSS data from 2005-2013 shows that Black, Asian, Mixed and Other

ethnicity students consistently mark this question lower than white students, and NUS's 'Race For Equality' report (2011) highlights that many Black students perceived that 'fair and balanced teaching, assessment and support...was currently lacking, to some extent, at their current institution'.

We understand from the consultation events that there is a strong response from institutions that they would like to retain Q6 rather than Q5 as it is easier to design quality enhancement interventions, but we feel that both questions are of value and that students' perceptions of the fairness of marking should not be discounted.

13. *Do you agree that we should remove some or all of the personal development questions and consider how we can gather this information through an alternative route?*

Yes. The current questions are vague and of little use to institutions for enhancement, as well as being less important for prospective students. We welcome the development of a more focused optional bank on personal development, and particularly questions around social agency and empowerment. We would like these questions to reflect the transformative nature of higher education and recognise that employability, whilst important, isn't the only way students are developed and changed by their higher education experience. If this bank of questions is designed in this way, we would welcome consideration of making it a core bank of questions, as such measures give a better picture of the multiple ways in which HE can benefit a student than current measures such as the DLHE and graduate salary information.

14. *Do you agree that we should remove Q23 and instead include an optional bank of questions related to student unions?*

We acknowledge that Q23 has prompted many students' unions to improve their offer to their members, and indeed many unions have used the results to successfully demonstrate their positive impact on students' lives. We also recognise that the data has been used by many of our members to secure more funding from their institution, and to target interventions at groups of students that evidence low engagement with the students' union.

However, we have had extensive feedback from our members that there is widespread dissatisfaction with the current wording of the question. The wording is extremely broad, and it is not at all clear which of the many services provided by the students' union are being rated when a student answers the question. Further, we acknowledge the concerns of the cognitive testers in recognising that students' interpretation of the current question differs from the intent of the question itself. Students' unions welcome the opportunity to be held to account by our members, but would prefer to be measured by data that has been proven valid and provides more nuanced and contextualised information about the range of services our members offer.

We welcome the opportunity to work with the funders to develop an optional bank of questions around the students' union, although we would prefer the bank to be part of the core survey. We feel that asking four or five questions about different aspects of the students' union would be very helpful to our members, and would enable them to target their interventions and changes at the areas highlighted by students. Given the context of the recent Green Paper, which explicitly mentions increasing the transparency and accountability of students' unions, we feel that there is a case for a publishable bank of questions on students' unions. This could be achieved by either a) making the students' union bank core (which would require a specific exemption from the criteria for core questions), or b) by appending the students' union bank to

the end as a 'mandatory' bank that is not part of the core survey, but yields publishable data.

What would be lost with the removal of a core question in the NSS is the ability to benchmark against other unions in order to contextualise results and share good practice. Many of our members have made huge changes to their offer as a direct result of Question 23: it is currently the only published data they have. The current measure is flawed, but its complete removal would leave a many unions with a poorer understanding of how their students engage with them. NUS would like to work with students' unions and the HE funding councils to share data between students' unions even if such data is not published, to ensure that valuable enhancement work continues to take place. We also think that in order to ensure a sufficiently broad sample of students' unions to make the data meaningful, if a students' union wishes to include the optional bank then the institution must not be able to veto its inclusion.

15. *Do you have any comments on our proposals for changes to the optional banks including that the choice should be made jointly with the student union or student guild?*

We strongly support the proposal that students' unions should be given joint sign-off on the optional banks of questions, particularly the proposed bank on students' unions. Our members have fed back to us that the majority are not currently involved in any way in decisions around the optional banks, and that often the banks are chosen outside the formal committee structures that would ensure student input at the approval stage. We believe that if the core question on students' unions is removed it is essential that an optional bank is retained. If students' unions wish to include the bank concerning them, then the institution should not be able to veto this.

16. *Do you have any comments on our proposals relating to discontinued questions?*

None that have not been covered.

this information is valuable, but may be better collected elsewhere. Additionally the employability, skills and entrepreneurship questions are being considered by HESA's review of graduate destinations data and there is little sense in duplicating data collection.

17. *How do you or your institution use the optional banks?*

Our members have limited engagement with the optional banks of questions as most are not currently involved in institutional discussions about them. However we do feel they are valuable for institutions to investigate areas that are of specific concern to them and their students, and to prevent the over-lengthening of the core survey.

18. *How could we improve the usefulness of the optional banks? Have we identified the right additional themes for new banks?*

We welcome the idea of considering optional banks looking at student well-being and mental health, and support for disabled students. Our previous response about the 'specialist equipment' question in the learning resources section could potentially fit in this bank, or be adapted to better reflect disabled students' specific needs. Student well-being and mental health are a key concern across the sector, with many universities reporting huge increases in the numbers of students requesting counselling, and the severity of the problems they face. Disabled students are nationally less happy across the board, particularly with organisation and management, and an understanding of their specific experiences and needs would be valuable both at an institutional but also a national level.

We are less enthused with the idea of introducing optional banks on employability, enterprise and extracurricular activities, as this is broadening the scope of the survey far beyond the academic sphere. We believe that

Post-2017

First-hand accounts

19. *Do you agree with the principle of making balanced first-hand accounts from students available?*

Potentially yes, although we do not support the use of the current NSS open-text questions for this purpose.

20. *Do you have any comments about the possible use of NSS open text comments, or suggested alternative approaches to gathering and presenting such information?*

The current questions should not be used for marketing or information purposes for several reasons. First of all, a key strength of the survey is its independence and students' anonymity, which encourages participants to give an honest account of their experiences. If students knew these comments would be made public they may be less honest, and their use for enhancement would be vastly diminished. Secondly, these comments would become hugely political, and could be used [or abused] by either survey participants or the institution to express particular views that are not necessarily a fair reflection of students' experiences.

The research has identified an 'information gap' amongst prospective students in this area: they want the information and cannot find it. There are several third party provider websites that do offer qualitative feedback from students, but perhaps what is missing is an impartial and authoritative source such as Unistats. If qualitative feedback is to be used for information purposes, it must be clear to survey participants that this is the purpose of the specific question and it must be separate from the enhancement-focused qualitative questions. There must be an opportunity for

institutions or students' unions to appeal unfair comments' publication, and great thought must be given to how a 'balanced' picture is presented. For example, posting an equal number of positive and negative comments is probably not balanced: the comments will vary in their strength and severity. Eliciting a more holistic response from the student may help in this regard, but consideration must also be given to who decides what 'balanced feedback' looks like.

Extending the coverage of the NSS

21. *Have we identified the correct priorities for extending the coverage of the NSS?*

Yes. It is important that prospective students have access to the same quality of information from alternative providers as from mainstream HE provision, and that students have the opportunity to give feedback in the same way. Even more crucial is finding a way to survey non-completers, as it is rightly indicated that surveying successful finalists excludes some students who may have valuable feedback. This is particularly important in the context of widening participation: less 'traditional' students are also more likely not to complete their course, and therefore their views are disproportionately not being captured.

22. *Do you agree that we should develop a flexible online survey to include all students who are on short or flexible courses?*

Yes. This would also make it easier to survey students on courses with atypical start or end dates and ensure that the full range of student views has been captured.

23. *Do you have examples of how data and feedback from non-completers are currently collected by institutions?*

No.

24. *How should we give students who withdraw from their studies an opportunity to provide feedback, and how could their views be shared?*

It should be investigated as to whether the NSS in its updated form is appropriate for non-completers, or whether an alternative should be created. Whatever the approach taken it is important to recognise the often sensitive, personal reasons why students might leave higher education and conduct any interviews or surveys in light of this. It may be more useful to higher education institutions to receive qualitative feedback from non-completers in addition to statistics, and it is possible that this information would be better collected by institutions themselves. We would like further research to be done into this as it is important that non-completers' views are gathered in a way that is suitable for them.

Information for taught postgraduate students

25. *Do you agree that we should consider collecting feedback for publication from taught postgraduate students about their experiences?*

In principle we are not opposed to providing greater information about postgraduate taught courses and giving students a chance to feed back, but we do not feel that a 'postgraduate NSS' is the best way to achieve this. As HEFCE's own 2013 review showed, taught postgraduate provision is extremely specialised and course populations are often small. The degree of comparability across different

institutions at PGT level is much less than at undergraduate level due to the specialist nature of the course, and the smaller sample sizes would make the data far more volatile.

We believe that for enhancement purposes the PTES offers valuable information to institutions, without the potential negative effects associated with published figures that lead into league tables. Having said that, we acknowledge that information for prospective postgraduate students is more complex and less comparable than for undergraduate students, and student opinion is a clear information gap. For information purposes, we would welcome clear guidance for institutions on what information they are expected to provide for PGT students on their websites. The quality of information should be comparable to that provided for undergraduate students, and the funding councils have a chance to achieve this by issuing robust guidance for institutions' own websites at each level of provision. We would also ask that if student satisfaction data is published in some form, that it is aggregated to department level and not course or institution: this way the sample size and specificity problems are addressed, and unhelpful institutional league tables would also be avoided.

26. *In light of changes to higher education fees and funding, do you agree that all three purposes of information (paragraph 24 of the consultation) are relevant to a summative taught PG feedback survey?*

As noted above, we feel that the nature and size of PGT courses mitigate against using course or institution level student satisfaction data to inform prospective students. We feel that the quality assurance and accountability elements come from institutions sharing their PTES data with their students, and that the primary purpose of surveys such as the PTES should be the ongoing enhancement of the student academic experience. Publishing department level satisfaction scores (or indeed, publishing selected questions from the PTES) would provide students with valuable

information without the problems associated with being too specific or too broad in scope.

27. *Which themes would it be important to gather and provide information on?*

No answer

28. *Do you have any other comments on this proposal?*

Conclusion included.

Conclusion

NUS welcomes the thoroughness with which this review has been conducted. Extensive literary and practical evidence, as well as genuine consultation with the sector, has resulted in a set of proposals that address the changing information needs of prospective students.

The introduction of nine new questions on student engagement in the National Student Survey recognises the importance of the student engagement agenda in the modern higher education sector. NUS has been at the forefront of developments in this area, with the publication of the 2012 Manifesto for Partnership contributing significantly to the change in discourse around students as partners, and hosting the sector-funded Student Engagement Partnership. Student engagement measures have been proven to lead to positive learning outcomes, and the shift away from just 'student satisfaction' in the survey is to be welcomed.

There are ongoing concerns about the proposed removal of a core question on students' unions, particularly in light of the Green Paper's emphasis on students' unions' transparency and accountability. Students' unions are a key part of students' experiences at university or college, and they actively contribute to

improving students' academic experiences. We hope that genuine consideration is given to our proposal to append four or five questions on students' unions to the end of the survey as a 'mandatory optional bank' – as in the rest of the survey, the questions' usefulness for enhancement purposes is potentially huge.

Finally, we encourage as many students' unions as possible to respond to this consultation. Universities, colleges and sector bodies will respond and it is important that students' unions voices are heard. You can respond online [here](#) until **noon on 4th December**.

Contacts

Primary contact:

Kate Little kate.little@nus.org.uk

Please do get in touch if you need help with your union's response.

Officer contacts:

Sorana Vieru Sorana.vieru@nus.org.uk

Richard Brooks Richard.brooks@nus.org.uk

Macadam House
275 Gray's Inn Road
London WC1X 8QB
t 0845 5210 262
e nusuk@nus.org.uk
www.nus.org.uk