About Universities Wales
Universities Wales represents the interests of universities in Wales and is a national council of Universities UK. Universities Wales' membership encompasses the Vice chancellors of all the universities in Wales and the Director of the Open University in Wales. Our mission is to support a university education system which transforms lives through the work Welsh universities do with the people and places of Wales and the wider world.

We are writing in response to your consultation on changes to the National Student Survey (NSS).

Broadly, we are supportive of retaining a common approach throughout the UK. However, we recognise that it is timely for some elements of the survey to alter with appropriate caution being exercised.

Consultation questions

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

   We believe that the current criteria are sensible and provide a solid foundation for the NSS. While we understand the reasons given by some stakeholders for proposed changes to the criteria, we are in agreement that including questions around accommodation and transport would remove the survey too far from the original intention.

2. **What are the consequences – both positive and negative – of changing to the use of direct questions for the NSS?**

   We are cautiously supportive of the proposal to alter questions to remove ambiguity, improve student understanding and to remove double-barrelled questions.

   We are concerned that there are ‘further changes to questions’ planned and would like it to be made clear of the timeline for consultation on these before acquiescing to further change.

   We would also express concern at the inclusion of the option ‘this does not apply to me’ for questions such as whether the student understands the marking criteria used to assess their work. We are unaware of any courses that do not have marking criteria in the UK.

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

   We feel that removing another UK-recognised benchmark could undermine the current UK-wide higher education sector and remove a key comparator between the UK nations. We do not support removing this question from the survey. If the question is only removed in England, a useful, well-known benchmark will effectively not exist within a short period of time.
Question 27 is used widely, particularly in league tables as a broad marker and as a question is relatively well understood by the public.

An unintended consequence of this suggested change is that those that produce league tables will pick another proxy marker (as yet unknown) from the available data, one that is less broad and not universally understood.

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?**

We would be supportive of retaining the current question 27. Retaining the current Q27 would give a richer set of data in terms of historical comparison. It is well understood by students. Given it is the final question, we do not feel that it detracts from student the findings made apparent by the other questions and consider it good practice to have a summative question at the end of the survey.

If the UK sector as a whole was able to agree a revised question 27 relating to quality rather than satisfaction, we would support this on the basis of maintaining a consistent UK-wide benchmark,

5. **Should a question on freedom of expression be offered as an additional question after the core questionnaire?**

We would not be supportive of adding this question to the survey. We do not recognise the ‘chilling effect’ noted in the consultation and, given the legal protections afforded to freedom of expression, it would not be appropriate to use as a measure in this way.

More broadly, we would not be supportive of it being an extra compulsory question following the main bank of questions.

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

We have significant concerns with this proposal. The question as suggested remains too broad and does not particularly (in current form) align well with the criteria for NSS core questions.

Asking students about their awareness of a service will be unlikely to provide useful data. Universities offer a broad range of support services, for example, pastoral, financial or careers advice as well as mental wellbeing services. Whilst these can be broadly promoted, sometimes a student may not choose or have the need to engage with them. It is apparent to us that awareness of a service is not a proxy for reach or quality of service.
7. **What are the unintended consequences of asking questions to students on the awareness of mental wellbeing services where no support to respondents can be offered?**

We are unaware of an institution in Wales which would not provide mental wellbeing support.

8. **Do you agree that we develop a process where the NSS is reviewed on a four-year cycle? Is the proposed timing between reviews a sensible balance between developing insight and maintaining capacity to change?**

We are in agreement that a regular review point of the NSS would be helpful. We do not agree that a four year cycle is optimal. Our quality enhancement review cycle is six-yearly. Somewhere between 6-8 years would provide time for decent longitudinal data to develop, it would also mean that undergraduate courses (some of which are 4 year) would not have their metrics changed part way through the course.

We would also suggest that only a defined percentage of the survey could change in any one review cycle so that the data retains value over time and to ensure that core questions are only changed for sound reasons and not prone to adjusting to the popular topic of the day.

We also do not recognise the rationale that changing the survey often would discourage the ‘coaching’ of students as we do not believe that this is a normal occurrence.

9. **What would be the impact on students and providers of the fieldwork period running from mid-February to the end of April for all providers?**

We foresee no significant impact arising from this proposal for the bulk of providers, although there will be some that would benefit from a longer timeframe for this due to the nature of their student cohorts.

10. **In relation to the design and use of the NSS in Wales, what effect (if any), positive or negative will the proposals outlined have on a) opportunities for persons to use the Welsh language and b) treating the Welsh language no less favourably than the English language?**

We foresee no negative effects arising from this proposal.

11. **In relation to the use and design of the NSS in Wales, how could the proposals be changed so that the policy decision would have positive effects, or increased positive effects on a) opportunities for persons to use the Welsh language and b) treating the Welsh language no less favourably then the English language?**

We foresee no negative effects arising from this proposal.
12. Did you find any aspects of the proposals unclear? If so specify which and tell us why.

We found the consultation to be clear.

13. In your view, are there ways in which the objectives of this consultation (see paragraph 7) could be delivered more efficiently or effectively than is proposed here?

We have no further comment.