

Ensuring the integrity of National Student Survey data: Reporting and investigating concerns about institutional data quality, including attempts to influence results inappropriately.

Purpose of this document

1. This document sets out our processes for handling concerns raised with us about the quality of National Student Survey (NSS) data including concerns regarding attempts by institutions to influence results inappropriately. It also outlines the measures we may take to ensure data is robust. It should be read in conjunction with the Memorandum of Assurance and Accountability.¹
2. These processes apply to all institutions which participate in the NSS and are funded by the UK higher education funding bodies. The NSS is managed by HEFCE on behalf of the UK funding bodies. Where concerns relate to institutions outside England HEFCE will work with the appropriate funding bodies to determine the course of action in line with the processes below.
3. Where concerns relate to Alternative Providers, HEFCE will involve BIS to determine the appropriate course of action in line with the processes described below.
4. This document focuses on data collection processes and does not include complaints about the use and publication of NSS results. Complaints regarding the use of data by institutions are covered by the Competition and Markets Authority and the Advertising Standards Authority.

Background: the NSS

5. The NSS is a UK wide survey which seeks to collect information about students' academic experiences. The purpose of this is to contribute to public accountability, help inform the choices of prospective students and provide data that assists institutions in enhancing the student experience. The survey is funded by the UK funding bodies; Higher Education Funding Council for England (HEFCE), Higher Education Funding Council for Wales (HEFCW), Scottish Funding Council (SFC), Department of Employment and Learning Northern Ireland, (DELNI), Health Education England (HEE) and National College for Teaching and Learning (NCTL). The survey is managed by HEFCE on behalf of the other funding bodies.
6. Results of the survey are published by HEFCE and are made available to higher education providers via a dedicated results website. NSS results are also made available to prospective students via the Unistats website.

¹ Readers should refer to paragraphs 39-42 of the Memorandum of assurance and accountability between HEFCE and institutions <http://www.hefce.ac.uk/pubs/year/2014/201412/>.

7. The results of the NSS provide an important dataset which is used by a range of users:
 - a. Higher education providers to identify good practice and areas for enhancement.
 - b. Prospective students use the data to inform decisions as to where to study.
 - c. Funding bodies, Government and student organisations use the data to inform policy development.
 - d. Compilers of national league tables and other third parties who provide public information.

Data Integrity

8. The UK funding bodies need to ensure the integrity and robustness of the NSS data and be reassured that students who complete the survey have not been influenced by their institution to respond in a certain manner.
9. Concerns regarding the integrity of data can be identified through a number of routes:
 - a. Through assurance and audit processes managed by the funding bodies
 - b. Reported through a third party, such as a student, a member of staff at an institution or a member of the public.
 - c. Through HEFCE data management processes.
10. The UK funding bodies define inappropriate influence as “any activity or behaviour which may encourage students to reflect anything other than their true opinion of their experiences during their course in their NSS responses.” Institutions are provided with guidance regarding the promotion of the survey and how to avoid “inappropriate influence”.²
11. Factors which could impact the integrity of data include but are not limited to:
 - a. Explicit/implicit instruction on the type of responses students should make.
 - b. How the survey is presented to students, including drawing attention to uses of the survey that may influence their response such as
 - i. its relationship with other surveys both internal and external,
 - ii. its use in league tables
 - iii. its impact on employers’ perceptions and outcomes
 - c. How the response scale is understood by third parties.

² Ipsos MORI, National Student Survey, Guidance on setting up and preparing for the NSS 2016 at your institution, October 2015, page 73

d. Methods to encourage participation in the survey, such as the use of promotional materials (either explicitly or implicitly) or incentivisation methods (such as prize draws) that may bias responses.

12. Ipsos Mori (on behalf of UK funding bodies) has issued detailed guidance to institutions on “inappropriate influence” along with supporting marketing materials. (Available from the Ipsos Mori Extranet homepage)

13. The Higher Education Statistics Agency and the funding bodies have also published a Code of Practice for higher education data collections which sets out standards and principles we expect providers to meet.

<https://www.hesa.ac.uk/code-of-practice-for-higher-education-data-collections>

14. The remainder of this document deals with processes relating to concerns regarding inappropriate influence. However, the processes described would also apply to other types of concerns about NSS institutional data quality or robustness.

Process

How can a concern be raised?

15. Where a student, member of staff or member of the public is concerned that an institution may be attempting to influence the way in which students respond to the NSS (rather than simply encouraging the student to participate in the NSS), they should first raise the concern with the institution through the institution's internal complaints procedure.

16. Where this is not possible or appropriate or where the student, member of staff or member of the public has raised the concern with the institution but is dissatisfied with the institution's response, they may raise their concern in writing to HEFCE.

17. Concerns can be raised through the following routes:

- a. Direct contact with HEFCE (NSS Project Manager: nss@hefce.ac.uk)
- b. Ipsos MORI helpline (Ipsos MORI: nss@ipsos.com)

18. Concerns can be raised at any time during the year. However it is helpful if they are brought to our attention as early as possible during the surveying period and before results are published in August as this ensures there is sufficient time to investigate and address any issues before data are published. It is worth considering that whilst we will look into every concern raised with us, concerns brought to us after data have been published may not always result in a full investigation as detailed in this document.

How will concerns be dealt with?

19. On receiving notification of a concern the following will take place HEFCE will endeavour to adhere to the timescales specified, but may not always be able to do so.

- a. The receipt of a concern will be acknowledged by HEFCE within five working days. (Where a concern is raised through Ipsos MORI this will be passed to HEFCE within three working days.)
- b. In acknowledging receipt of a concern, HEFCE will ask the informant to provide in writing any further details they may have about their concern, including any supporting evidence. They will also be asked whether they have raised their concern with the institution to which it refers and if so, why they are dissatisfied with the outcome. If the concern has not been raised with the institution the reason will be explored with the informant. The informant will have ten working days from receipt of HEFCE's acknowledgment to provide this information to HEFCE.
- c. The informant will be asked if they would like their identity to be kept confidential. In the event that to further the investigation it is necessary to reveal the informant's identity, HEFCE will first seek their consent. If that consent is not forthcoming, it may not be possible for HEFCE to proceed further. If this is the case, HEFCE will notify the informant and explain why.
- d. HEFCE will communicate with the informant via email; if an alternative means of contact is preferred HEFCE should be advised.
- e. HEFCE will review the concern and any supporting evidence provided to consider whether there is sufficient evidence to initiate further investigation. This assessment will be made by the NSS project manager in conjunction with a member of the HEFCE panel, seeking advice as necessary.
- f. HEFCE will notify the informant within five working days of receipt of the information requested in paragraph b. above as to whether they will undertake further investigation. If this investigation proceeds, the informant will not normally receive any further communication from HEFCE until after it has been concluded, unless HEFCE finds that it requires additional information from the informant as part of the investigation. The informant will be notified of the outcome investigation on its conclusion, feedback will be general and this may not be specific in nature.

How will any investigation be conducted?

20. Where HEFCE considers that sufficient material has been presented to HEFCE for a further investigation to be undertaken, HEFCE will contact the institution concerned promptly and request it to undertake an internal investigation and report its findings in writing to HEFCE within 20 working days of receiving the request.

21. On receipt of the institution's response a HEFCE Panel will consider the information received from the informant and the institution's response (if any). The role of the Panel is to make a recommendation on how to respond to the concerns raised to the HEFCE Director with responsibility for the NSS.

22. The Director may seek further advice to assist them in making their decision, which could include advice from the HEFCE Senior Data Owner, legal advice, and/or consideration by HEFCE's Risk Assurance, Designation and Registration Group.

23. The Panel will normally include;

- a. NSS Analyst, Analytical Services Directorate,
- b. Regional Consultant, Institutions Directorate,
- c. NSS Project Manager, Research, Education and Knowledge Exchange Directorate,
- d. NSS Policy Lead, Research, Education and Knowledge Exchange Directorate,
- e. Head of Governance/ Head of Knowledge & Information Management, Governance Team

24. The Panel will consider three questions

- a. Was the process of the institutions investigation undertaken appropriately?
- b. What are the findings of the institutions investigation?
- c. Was the Ipsos MORI guidance on inappropriate influence breached?

25. Because in practice it is not possible to prove whether students have been inappropriately influenced, the Panel adopts the approach that there is a case to suppress data if it determines that, on the balance of possibilities, those data have been inappropriately influenced.

26. In determining whether action should be taken the Panel's consideration will include the following factors:

- a. The specific nature of the concern
- b. The quality of the evidence

- c. The extent to which the quality of the relevant NSS data is challenged by the case in question
- d. The explanation and/or investigation carried out by the institution
- e. How HEFCE have dealt with other cases to promote consistency of approach
- f. The IPSOS Mori guidance on inappropriate influence.
- g. The actions taken by the institution to resolve any breach.

What will happen with the outcomes of the investigation?

27. Where the investigation demonstrates that the Ipsos MORI guidance on inappropriate influence has been breached and that the survey results could have been affected as a result of the breach, the following action may be taken (in isolation or in conjunction):

- a. Request an action plan from the institution to address the problems identified.
- b. Request an independent investigation (and potentially recover the costs of this)
- c. Temporarily or permanently suppress the institution's NSS data set in whole or in part. This may include providing an explanatory note to indicate data has been suppressed because of concerns over data quality.³
- d. Where appropriate, recover the costs of re-surveying a proportion of the students originally surveyed at the institution.
- e. Institute an audit of the institution's processes in the following survey year which may include requiring all of the institution's own survey material being approved by HEFCE.

28. HEFCE aims to notify the institution and the informant of the outcome of the investigation and any actions to be taken by the institution within 10 working days of the HEFCE Panel beginning its work under paragraph 21 above.

29. The institution may, within ten working days of the date of HEFCE's decision, appeal the decision in accordance with the procedures set out in the next section

³ Readers should refer to paragraph 29, section i, in the Memorandum of assurance and accountability between HEFCE and institutions <http://www.hefce.ac.uk/pubs/year/2014/201412/>

Appealing the outcome of an investigation into concerns that an institution has attempted to influence NSS data inappropriately

An institution which is subject to an investigation into concerns that it attempted to influence NSS data inappropriately may appeal the outcome. The appeal is considered by an Appeal panel having had no prior involvement in the investigation and/or decision and is the final element of challenge available to institutions under HEFCE's processes.

How can an appeal be submitted?

1. An institution may appeal the outcome of an investigation on the grounds of:
 - a. substantive new evidence
 - b. a point of process
2. The institution must lodge its appeal in writing to the Chief Executive within ten working days of the date of HEFCE's decision. The appeal will be acknowledged by HEFCE within five working days of receipt. At the same time, HEFCE will notify the informant that its decision is the subject of an appeal by the institution.
3. The institution must submit in writing to HEFCE any evidence to support its appeal within 10 working days of lodging its appeal. If no such evidence is received within the period allowed, HEFCE will be entitled to treat the appeal as having been abandoned.

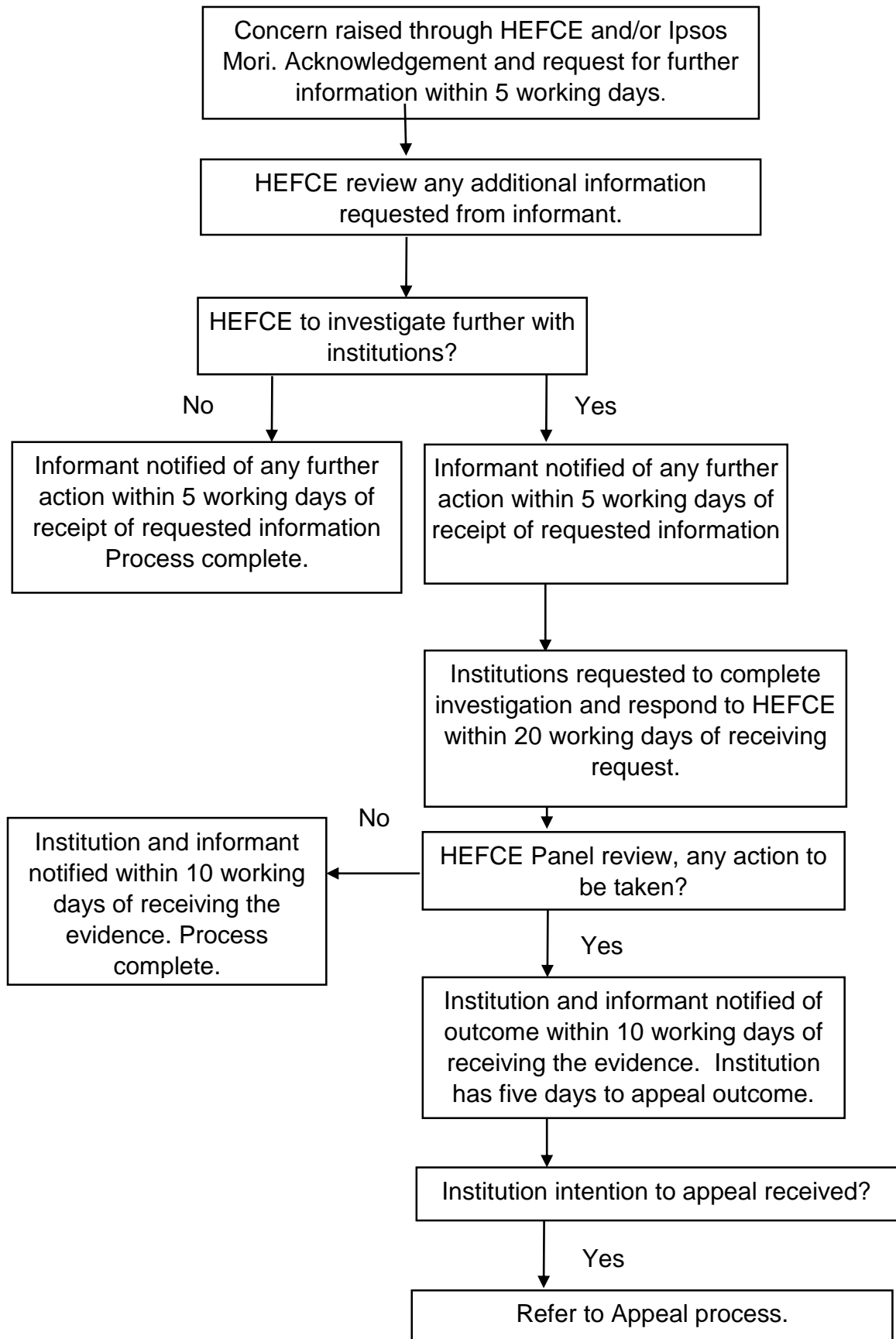
How will the appeal be dealt with?

4. The appeal along with its supporting evidence will be reviewed by an Appeal Panel made up of a minimum of two members of the HEFCE Executive unconnected to the original investigation and/or decision. The Appeal Panel may seek advice as necessary, including legal advice or policy advice from those with knowledge of the case. While these case advisors may have been involved in the original investigation, they will offer technical or process information only.
5. The Appeal Panel will make a recommendation to Chief Executive, who will make the final decision on the appeal.

What will happen with the outcomes of the appeal?

6. HEFCE aims to notify the institution and the informant of the outcome of the appeal within 10 working days of receipt of the appeal evidence. If an institution wishes to challenge the HEFCE decision or process further it may seek judicial review.

Procedure for reporting and investigating concerns that an institution has attempted to influence National Student Survey data inappropriately



Procedure for appealing the outcome of an investigation into concerns that an institution has attempted to influence National Student Survey data inappropriately.

