

Student Minds response to consultation on changes to the National Student Survey (NSS)

Background

In July, the Office for Students published a consultation on proposed changes to the National Student Survey (NSS), including proposals for new questions to be introduced in the 2023 survey.

This document outlines Student Minds' response to the consultation. Our primary focus is on Proposal 5, which proposes the introduction of a question on mental wellbeing provision. As the UK's student mental health charity, we have prioritised providing a detailed response on this issue. Our response outlines our concerns around the framing of this question and its specific focus on support provision, rather than a whole university approach to mental health.

We have also chosen to respond to Proposal 4, which focuses on Freedom of Expression. Our response outlines our concerns around the relevance of this question and the ability to capture enough information through the NSS to provide important context around this complex issue.

Proposal 4: Should a question on freedom of expression be asked as an additional question after the core questionnaire?

No.

Student Minds recognises that freedom of expression has been a central topic of discussion within certain pockets of the higher education sector in recent times. We are aware that some believe students' freedom of expression is being compromised and that more should be done to protect this right. However, we believe that the common media and political narrative often contradicts what is known through evidence, and does not align with what students believe and prioritise. Insight from our Student Advisory Committee suggests that:

- Students feel they are being used to further a political issue and that the debate isn't truly centred around their university experiences.
- Students are concerned that 'freedom of expression' is increasingly being used as a smoke screen for outright discrimination, the furthering of inequalities and the avoidance of repercussions.
- Students recognise and define 'freedom of expression' or 'freedom of speech' in different ways, making it difficult to understand in a universal sense.

We are particularly conscious that there are certain important exceptions to absolute freedom of expression which are recognised, for example, through legislation such as the Equalities Act 2010. As such, understanding the context of how students' interpret their freedom of expression is important - but it is not possible to understand this context through a single question in the NSS. We therefore challenge the notion that this question would effectively measure the extent to which students find it difficult to express themselves freely, as we do not feel responses to this question would offer a full picture.

Student Minds also questions the relevance of this question when considering the criteria for the NSS. We have not seen enough evidence to suggest that freedom of expression is of 'enduring importance' or that this question is 'meaningful and useful' to students. We are also wary of the potentially complex implications for universities should responses be notably negative. Given the legal and statutory duties of higher education providers, we are unsure on what more can be done to promote students' freedom of expression whilst also adhering to these duties and protecting the wellbeing of all students.

Thus, overall, Student Minds does not agree that a question on freedom of expression should be included in the NSS. As noted above, we challenge the idea that a question of this nature could accurately or effectively measure the extent to which students find it difficult to express themselves freely. This is due to the lack of contextual information being collected, as well as the aforementioned challenges in defining the issue in a universally understood way. We also do not believe that this question meets the Office for Students' own criteria for inclusion.

However, if the question were to be included, we would strongly recommend that the OfS takes steps to ensure the data can be understood alongside as much contextual information as possible. This could be achieved, for instance, by making it easier to disaggregate data based on student characteristics, enabling the sector to understand whose freedom of expression is being compromised and how this could be addressed.

Proposal 5: Should a question on mental wellbeing provision be asked as an additional question after the core questionnaire?

Unsure.

As the UK's student mental health charity, Student Minds welcomes the proposal to introduce a question around mental wellbeing. We view this as a positive opportunity to better understand students' wellbeing and the role of universities in shaping this.

However, we have reservations and concerns around the proposed question and its specific focus on services and support provision. Though important, services form just one aspect of a whole-university approach to mental health. As noted in our University Mental Health Charter (Hughes and Spanner, 2019): "A whole-university approach must include both adequately resourced, effective and accessible mental health services and proactive interventions. It must provide an environment and culture that reduces poor mental health, as well as supporting good mental health, and facilitating staff and students to develop insight, understanding and skills to manage and maintain their own wellbeing."

The current proposed question focuses solely on awareness of provision of mental health services, and therefore responses will not offer any insight into the current mental wellbeing of students, the factors influencing or shaping their mental wellbeing during their university experience, or what universities could do to proactively improve students' wellbeing. This could result in a distorted representation of students' experiences for a number of reasons:

- High awareness of provision is not necessarily positive. Students may report good awareness of support provision for a variety of reasons. This does not mean that the support provision is effective or useful, or that students would report positive experiences of accessing this support.
- Inconsistent use of terminology and language across the sector could mean students do not have a shared understanding of what 'mental wellbeing support services' are. Thus, the proposed question would not provide an accurate measure.

We are also conscious of the possible risk that including a question on mental wellbeing support services in the NSS could result in universities prioritising this aspect of their approach above proactive interventions and the development of mentally healthy cultures and environments.

For additional context on how we view services within a whole-university approach to mental health: when conducting assessments of HE providers for the University Mental Health Charter Award scheme (endorsed by multiple Secretaries of State and Ministers in the Department for Education), a university with outstanding service provision would not be guaranteed to achieve the Award mark if there were significant issues identified in other aspects of students' experiences. Though unlikely, it is therefore plausible that a provider which scores highly on a service provision NSS question could fail to achieve the Charter Award mark, creating a disconnect between these two methods of assessing support for student wellbeing.

We therefore advocate for the framing of the question to be shifted, to better reflect the importance of a whole university approach to mental health and to capture more useful insights to inform both the sector and individual institutions. Our recommendation would be for the NSS to include a more general, student-centred question around how being at university affects students' mental wellbeing. We believe that, given the importance of a whole-university approach to mental health, this would still meet the criteria for inclusion within the NSS, as a students' mental wellbeing and academic performance are often linked. We also believe that universities can directly influence students' mental wellbeing, by adopting a whole university approach and giving equal priority to both services and proactive interventions.

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

Student Minds encourages the Office for Students to provide a link to Student Space within the NSS, to make students aware of the support platform and encourage them to access advice and support if they feel they need it.

We recognise that there may be some risk of students experiencing distress when sharing experiences related to their mental wellbeing. Though we believe these risks to be relatively small in this context, we recommend that the Office for Students tests a final version of the question(s) with experienced academics, clinicians and students to ensure that phrasing is fully understood and any unintended consequences are avoided or mitigated.