

A Storm in a Teacup or a New Horizon for EAP?

Implications of the Office for Students Directive on SPaG
Liz Molyneux & Eliot Wright

Session overview

What is the SPaG directive?

Why was it created?

The EHU response & next steps

What is the SPaG directive?

- ✓ Assess accuracy of spelling, punctuation and grammar/ technical proficiency in English of all students on all courses with very few exceptions
- ✗ Assess technical proficiency of English only when it is a learning outcome
- ✗ Deduct marks only where errors impede communication
- ✗ Assess English in line with graduate outcomes e.g. demonstrating effective communication skills, conveying information clearly for different purposes and audiences

Assessment practices in English higher education providers

Spelling, punctuation and grammar

(OfS, 2021b)

What if universities don't implement the SPaG directive?

- Technical proficiency in English is a B1/quality and B4/assessment condition of registration (OfS, 2022)
- OfS instructed to begin an 'inspections regime' of quality (Zahawi & Donelan, 2022)
- Assessment of technical proficiency in English is one of three 'strategic priorities' for inspection of quality (Zahawi & Donelan, 2022)
- Sanctions for breaches of quality conditions: monetary penalties, revocation of degree awarding powers, deregistration (Williamson, 2021)



What is the Office for Students' remit?

Arm's length regulator for HE in England receiving annual guidance from the DfE

Established by the Higher Education and Research Act 2017:

- 2 (1) In performing its functions, **the OfS must have regard to-**
 - (a) the need to protect the **institutional autonomy** of English higher education providers...
- (8) In this Part, “the institutional autonomy of English higher education providers” means—
 - (a) the freedom of English higher education providers within the law to conduct their day-to-day management in an effective and competent way,
 - (b) **the freedom of English higher education providers—**
 - (i) **to determine the content of particular courses and the manner in which they are taught, supervised and assessed**

‘We work with higher education providers to make sure that students succeed in higher education’ (OfS, 2023)

What is the need for the SPaG directive?

Higher Education and Research Act 2017:

2 (1) In performing its functions, the OfS must have regard to -

(g) so far as relevant, the principles of best regulatory practice, including the principles that **regulatory activities should be** -

(i) transparent, accountable, proportionate and consistent, and

(ii) **targeted only at cases in which action is needed.**



What is the need for the SPaG directive?

‘There is some evidence to suggest that employers are struggling to recruit students with the right skills’ (OfS, 2021b)

CBI and Person (2019)

- No mention of spelling, punctuation or grammar; no mention of university assessment practices
- No recommendations relating to literacy; literacy not mentioned in the key findings

Kuczera et al. (2016)

- OECD report on functional literacy, not SPaG
- Prioritise interventions in early years
- Universities should not graduate students with poor literacy; ‘[leave] institutions to work out how to deliver that outcome’ (2016: 14)

Why did the OfS feel compelled to go beyond its statutory powers?

2018-2021

Assessment of SPaG not on the HE agenda

10 April 2021

MailOnline

Fury as education regulator tells universities that marking students down for bad spelling is ELITEST

- Academics have been told that insisting on good written English discriminates
- Some universities have been adopting so-called 'inclusive assessment' systems
- Regulator wants to reduce gap between white and black student attainment rate

(Henry, 2021)

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15 April 2021

I am appalled by the decision of some universities to drop literacy standards in assessments—that is misguided and it is dumbing down standards. That will never help disadvantaged students. Instead, the answer is to lift up standards and provide high-quality education... **we will act on this** (Donelan, 2021)



Why did the OfS feel compelled to go beyond its statutory powers?

10 April – Inclusive assessment practices receive negative press (Henry, 2021)

15 April – Minister for Universities promises action (Donelan, 2021)

23 June 2021 – OfS launches review of assessment practices (OfS, 2021a)

7 October 2021 – OfS review of SPaG is published, establishing requirement to assess accuracy (OfS, 2021b)

22 March 2022 – Guidance letter from DfE to OfS, SpaG is a 'strategic priority' (Zahawi & Donelan, 2022)

24 November 2022 - Technical proficiency in English written into regulatory framework (OfS, 2022)

How can we respond to poor regulation?

- Universities' collective call for a regulator which is 'fit for purpose' (Bradshaw et al., 2023)
- Policy impact is influenced by the wider political context and the local institutional ecology
'there is little evidence of practitioners mechanically responding to [policy] in simple and predictable ways' (Steer et al, 2007: 187)
Institutions can ameliorate or exacerbate the impact of policy:
 - Provide shielding from the worst excesses of bureaucracy
 - Hide concerns about the effects of policy levers
 - Demonstrate strategic or ingenious compliance whilst acting in accord with professional values and judgement (Steer et al, 2007)
- Strategic compliance from EAP?
Blur the distinction between so-called 'home' and 'international' students; provide language and academic support to all students who need it (Jones, 2017)

Pathway Programmes

- STEM Foundation Programme.
- Arts, Humanities & Social Sciences Foundation Programme.
- Pre-sessional courses for UG and PGT students.
- Pre-sessional course for PGR students.
- Fastrack (7-week widening access course).

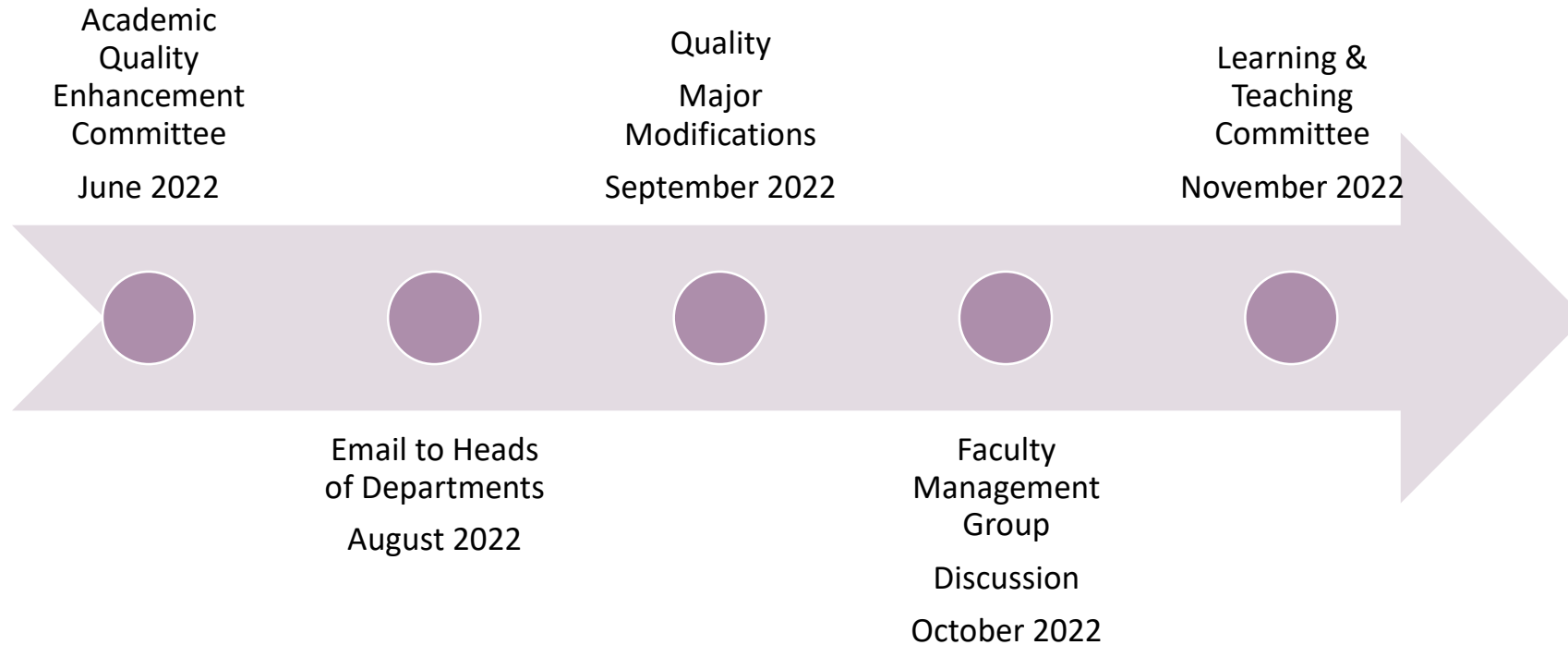
English Language Teaching & Training

- MA TESOL.
- *Academic language & literacy support for students on/off campus (in-sessional support).*
- Teaching refugees & asylum seekers.
- English language development courses (summer schools).
- Teacher Training in ELT.

Foreign Languages & BSL

- British Sign Language
- Mandarin
- Japanese
- Arabic
- French
- German
- Italian
- Spanish
- Foreign languages & cultures lectures & conversation clubs.

Implementation Timeline

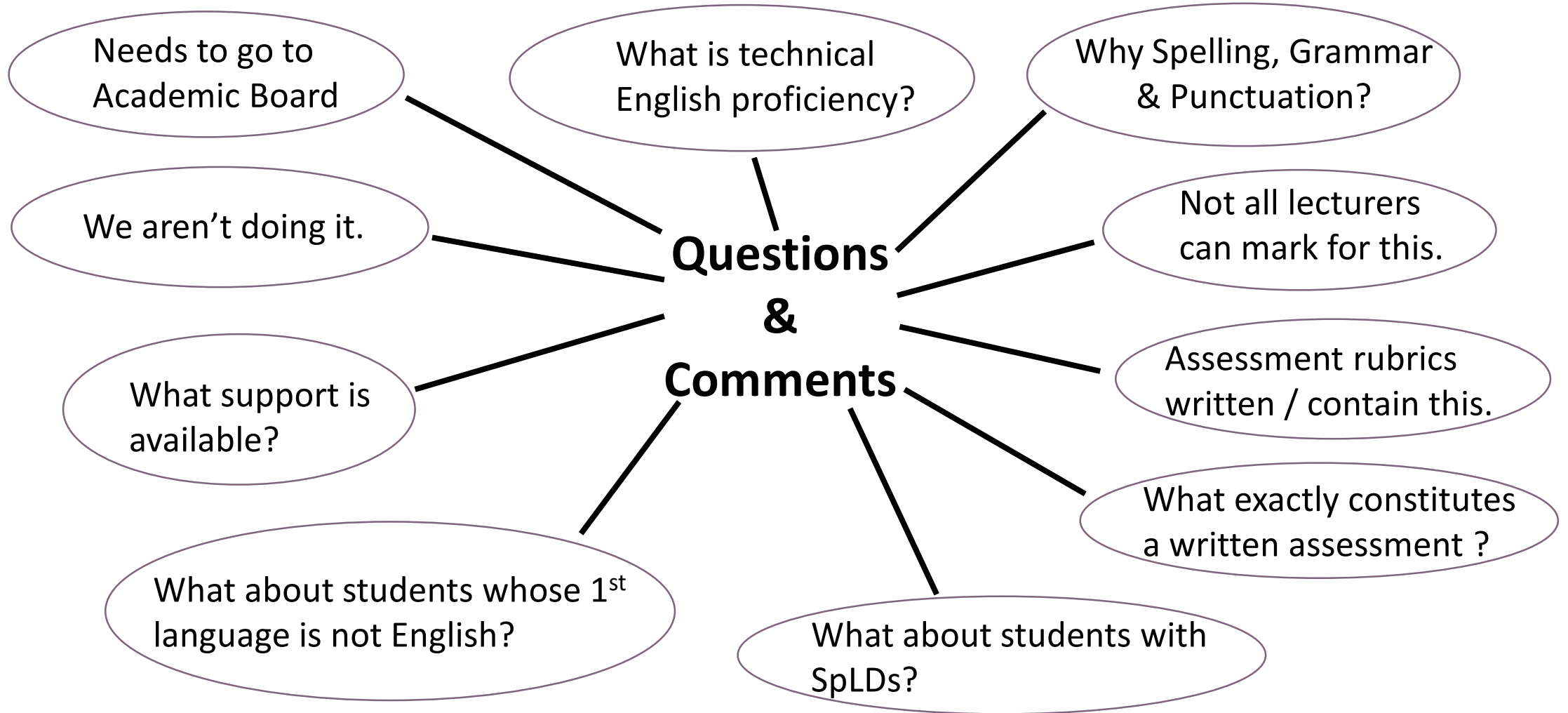


English Proficiency and Assessment

It has been agreed to include *English proficiency as a programme learning outcome under transferable skills for each level of study*.

Action:

- Programme leaders to identify modules that have significant written assessments per level of study that can be mapped against the additional programme learning outcomes.
- Module Leaders: Ensure that assessment criteria for written assignments include an element on academic writing and language worth 5% of the total marks. What has become known as a sliding scale.



The Response / Support Offered

Info/CPD sessions provided by the Centre for Learning and Teaching Covering:

- 1-2-1 English language advising sessions.
- The Language Centre's Padlet of academic literacy.
- Use of Academic Marker: a self-guided e-learning platform for developing academic English proficiency.
- University of Manchester's Academic Phrase bank

The Response / Support Offered

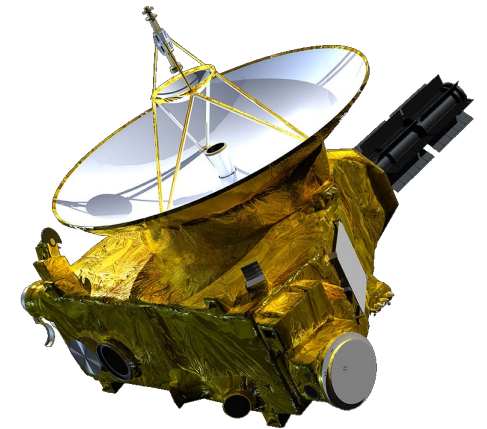
- SpLD Support
- Disability Support
- Assistive technologies including: Microsoft Immersive Reader; Read aloud feature in word; Spelling & Grammar check in word, and word editor feature.
- SP&G Guide
- Uniskills (Guides & Toolkits), classroom sessions, workshops & 1-2-1 appointments
- Proofreading & Referencing Toolkit

Conclusion

The OfS and poor regulation

Opportunities for strategic compliance

- Enhanced provision of academic literacy support
- Boosted prominence of the Language Centre
- Increased resources for student support
- Accelerated uptake of assistive technologies



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