Assessment practices in English higher education providers

Spelling, punctuation and grammar

Contents

Summary

1. In summer 2021, the Office for Students (OfS) undertook a review of policies and practices in a small number of higher education providers, to identify examples of approaches that maintain rigour in student assessment, and examples of approaches that do not. This review focused on spelling, punctuation and grammar in written assessment. It found a range of practices, with some common themes that gave us cause for regulatory concern. This report describes what we found and identifies our concerns.

2. The main findings may be summarised as follows:

   a. Some providers' assessment policies are designed in a way that means spelling, punctuation and grammar are not assessed.

   b. Some providers' interpretation of the Equality Act 2010 and other relevant legislation has led to their not assessing technical proficiency in written English for all students. We do not consider that approach to be necessary or justified.

   c. Providers should assess spelling, punctuation and grammar where this is relevant to the course, subject to compliance with their obligations under the Equality Act 2010 and other legislation. We would expect this to mean that most students on most courses should be assessed on their technical proficiency in written English.

   d. There is no inconsistency in a provider complying with equality legislation and making its assessments accessible, while also maintaining rigour in spelling, punctuation and grammar. Providers should ensure that students benefit from both accessibility and rigour.

3. The common features we have seen in the small number of cases in this review suggest that the practices and approaches we have set out in the case studies may be widespread across the sector. We are therefore drawing the attention of all registered providers to our findings, because they highlight matters that are likely to raise compliance concerns for the OfS.

4. By publishing this report, we expect providers to take notice and adjust their practice, to ensure the quality of students' education and the reliability of the qualifications they award are not undermined.

Introduction

5. The OfS's primary aim is to ensure that English higher education is delivering positive outcomes for students – past, present and future. Our regulatory objectives reflect the things that matter most to students: high-quality courses, successful outcomes, and the ongoing value of their qualifications. Ensuring that assessment of students is rigorous and consistent, and that the awards and qualifications granted to students are credible and hold their value over time, are therefore of central importance to the OfS's regulation. They also matter to the reputation and success of the English higher education sector.

6. Earlier in 2021, reports in the press suggested that some higher education providers might have adopted policies and practices that could undermine the integrity of assessment by disregarding poor spelling, punctuation and grammar when students' work is assessed.

7. The OfS has an interest in this issue for several reasons:

    a. Assessment is part of the learning process for students and delivers pedagogical benefits. If it is done poorly, or not at all, students lose out on the educational development provided by effective assessment.

    b. Accurate and effective spelling, punctuation and grammar matter from an academic perspective. Wherever a discipline requires analysis, effective communication is critical if students are to demonstrate an ability to engage with and convey complex arguments. This cannot be done without technically proficient use of sentence and paragraph structure, syntax, and other features of language.

    c. Poor practice in this area of assessment could be an indicator of wider concerns about a provider's approach; for example, whether other aspects of its courses are of sufficient quality, or whether it is admitting students who do not have a reasonable expectation of succeeding on or beyond their course.

    d. Employers rely on the qualifications awarded to students to ensure that potential employees have the capabilities they need. If graduates are not proficient in the use of English, and so are unable to communicate effectively in writing, then employers must either recruit from a smaller pool, spend time and money training graduates in basic written English, or operate with a less capable workforce. There is some evidence to suggest employers are struggling to recruit students with the right skills.[1]

8. Because of the importance of these issues, we undertook a short review during summer 2021 to gather evidence and examples of practice from a small number of providers about the extent

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[1] A 2019 survey by the Confederation of British Industry found that a quarter of respondents were dissatisfied with the literacy and numeracy skills of young people (see https://www.cbi.org.uk/articles/education-and-learning-for-the-modern-world/). A 2016 report by the Organisation for Economic Cooperation and Development (OECD) stated that weak literacy skills are relatively common among graduates in England (see https://www.oecd.org/unitedkingdom/building-skills-for-all-review-of-england.pdf [PDF]), and in 2018 Andreas Schleicher, Director for Education and Skills at the OECD, cited poor graduate literacy as one of the reasons for the high proportion of graduates in jobs requiring skills no higher than a school-leaver in England (see https://www.thetimes.co.uk/article/graduates-lack-basic-maths-and-literacy-skills-bwj37zlcs).

to which technical proficiency in written English is being assessed. This report summarises our findings and sets out their implications for our ongoing regulation of higher education providers.

Our approach to this review

9. The approach we have taken to this review is new for the OfS. We sought voluntary cooperation from a small number of providers, selected to allow us to explore a range of assessment practices. The inclusion of a particular provider in the review was not driven by whether or not it had featured in press reporting about its assessment practices, and this report does not identify the providers that were involved in the review.

10. Where we have identified practices that are likely to be of regulatory concern, we will issue guidance to the provider in question. We expect other providers to find this report helpful and to adjust their policies and practices as necessary in response to our findings. Our aim is to protect students, employers and taxpayers from approaches to assessment that are likely to erode standards across the sector rather than maintaining rigour.

11. Some of the practices we have seen during this review raise regulatory concerns. This is particularly the case if they prove widespread across the sector. By publishing this report, we expect providers to take notice and adjust their practice, to ensure the quality of students' education and the reliability of the qualifications they award are not undermined.

12. We recognise that some providers may need time to review and revise their approaches to the assessment of technical proficiency in written English. We will revisit this issue in a year's time. From October 2022, we would expect to take action where we find assessment practices that lack rigour in the ways identified in this report.

Relationship with the OfS's current quality and standards consultations

13. The OfS is currently consulting on a range of issues relating to its approach to the regulation of quality and standards. This report does not prejudge the outcomes of any live or recently closed consultations. Where we have indicated in this report that particular practices are likely to cause regulatory concerns, we are basing that view on the requirements currently set out in the OfS's regulatory framework.[2]

Features of providers' assessment policies

14. In considering a range of assessment policies and practices, we identified the following features:

   a. All providers had a written assessment policy, typically containing elements such as principles of assessment, policy on different forms of assessment (for example, oral examinations) and approaches to marking and feedback to students. In some cases, these policies existed separately; in others, they were components of a provider's wider

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[2] See www.officeforstudents.org.uk/advice-and-guidance/regulation/the-regulatory-framework-for-higher-education-in-england/.

regulations. In all cases they were linked to learning, teaching, and curriculum design policies in some way.

b. Assessment policies varied between providers in a number of ways: for example, their level of detail and focus, the level of prescription they contained, and the extent to which decision making about the implementation of a policy was devolved to individual schools or departments.

c. In some cases, there was variation in the way that an institution-wide policy was implemented by different academic departments, for example in how assessment requirements were communicated to students. Some providers used templates to increase consistency in the approach adopted by different departments.

d. Assessment policies all included approaches to assessing disabled students, including making reasonable adjustments to assessment arrangements.

e. Assessment policies were often framed by reference to a desire to achieve or promote inclusivity in general terms, and in some cases included specific sections or separate policy documents on inclusive assessment.

f. Some providers had statements about the general capabilities they expected of their graduates, setting out the attributes, knowledge and skills that those graduating would possess.

g. Providers often gave formative feedback to students on their proficiency in written English. This judgement about areas of weakness did not always affect the marks awarded to students, and sometimes the extent to which marks were affected was not clear.

Case studies

15. This section contains five case studies from our review. We have sought to preserve the anonymity of individual providers, including combining observations from multiple providers into single case studies in some instances. The case studies include examples of both good and poor practice.

Case study 1

What did we find during the review?

16. This provider states that it has designed its assessment procedures to be fully inclusive. This includes the design of assessment instruments, communication of assessment requirements to students, marking practices, and providing feedback to students on their performance. The provider defines 'inclusive' as seeking to ensure that no student is placed at an advantage or disadvantage by the assessment methods adopted, while ensuring that academic standards are maintained.

17. The provider's assessment policy states that technical proficiency in written English should only be assessed if it has been identified as a learning outcome for a module or course. This means that there is no general or universal requirement to assess students' proficiency in written English.

18. The policy recognises that, for some subjects, technical proficiency in written English may be a learning outcome required by a professional, statutory or regulatory body (PSRB) or a Quality Assurance Agency for Higher Education (QAA) subject benchmark statement, but considers these to be 'exceptional cases'. In such cases, assessment of technical proficiency in English should not take place under examination conditions, unless this is specifically stipulated by the PSRB or in the subject benchmark statement. In all cases, module leaders are required to seek approval for assessing technical proficiency in English.

19. The policy is clear that, provided a marker can assess the content of a student's written answer or other learning outcomes effectively, marks should not be reduced on the basis of written expression. This includes, for example, spelling, punctuation, use of grammar, overuse of subclauses, poor paragraph structure and regional differences in expression. Markers are actively encouraged to accept spelling, grammar or other language mistakes that do not significantly impede communication. The policy requires students to be clearly informed that they will not lose marks as long as poor language does not detract from the meaning or clarity of the point being made. Although the policy rules out summative assessment of written English in all but exceptional circumstances, it does allow markers to provide formative feedback to students on their use of language, expression and structure.

20. The provider has developed generic grading descriptors, which refer to technical and higher-order academic characteristics to be demonstrated by students. These descriptors inform its assessment criteria and marking practices. The policy says that these descriptors are aligned with external reference points, including the Framework for Higher Education Qualifications.[3]

21. The grading descriptors reflect the provider's statement of graduate attributes. The statement says that students will be able to demonstrate effective communication skills, including conveying information clearly for different purposes and audiences. As a result, staff are expected to support all students to improve their competence in the use of English for effective communication. The graduate attributes statement is clear that students are expected to demonstrate effective communication skills by the time they graduate. However, the grading descriptors indicate that students may be awarded degrees even when their written English is poor, provided a basic standard is achieved.

What might the impact of these policies be?

22. The approach adopted by this provider, whereby technical proficiency in written English is only assessed on an exceptional basis, is unlikely to preserve a rigorous approach to assessment. Rather than helping students, such practice could result in students being disadvantaged at a later stage in their studies, or following graduation, because they have not been required to demonstrate such proficiency.

23. It is not clear how the provider ensures that students develop technical proficiency in English so they are effective communicators of information, as required by its statement of graduate attributes. There is a tension between the provider's grading descriptors and its statement of graduate attributes: the former indicate that students with poor written or oral communication skills may be awarded degrees, while the latter states that graduates should have developed effective communication skills by the time they complete their studies.

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[3] See https://www.qaa.ac.uk/quality-code/qualifications-frameworks.

24. Introducing these policies may have lowered standards, which in turn may have contributed to greater proportions of students being awarded higher degree classifications. Rather than helping individual students, the provider's policies could disadvantage them later in their studies or when they enter the workforce. Employers may be affected if the graduates they employ are unable to perform written tasks to an appropriate standard. All of these effects would be detrimental to taxpayers, who would have contributed to the funding of courses that had not delivered the intended social benefits.

Case study 2

What did we find during the review?

25. The provider's assessment policy requires markers to focus on the communication of ideas in students' written work, rather than on technical aspects of their written language. There is an overall expectation that all students should be able to communicate their ideas and demonstrate their knowledge effectively in writing, although the level of proficiency is expected to differ depending on the nature of the course.

26. Where technical proficiency in English language is not a learning outcome for a module or course, markers are required to ignore weaknesses in English writing, including spelling, grammar and punctuation. They are required instead to focus on the content of students' written work, including the knowledge, ideas and understanding demonstrated. The provider's reasoning for this policy is that some students, including those whose first language is not English, could be disadvantaged if they are assessed on their technical proficiency in English rather than on their ability to communicate their ideas successfully.

27. Feedback to students is expected to be clear that any comments on the use of English language are intended to support the development of skills. Feedback is also expected to identify whether and where students' use of English language has affected the marks awarded.

What might the impact of these policies be?

28. This provider's policies, whereby technical proficiency in written English is not assessed unless it is a learning outcome for a module or course, is unlikely to preserve a rigorous approach to assessment. It is also unlikely to benefit students whose first language is not English, because it does not require them to demonstrate the language skills that would be expected from an English higher education qualification. It reduces the pedagogical benefits associated with assessment, and may limit students' employment prospects if their written English proficiency is below their prospective employers' expectations.

Case study 3

What did we find during the review?

29. The provider's policy on inclusive assessment states that, in most instances, learning outcomes for modules and courses can be met without including technical accuracy in written English as an objective, as long as ideas and knowledge are communicated effectively in writing. Where requirements for written English are made by a PSRB or in the relevant QAA subject benchmark statement, the provider devolves responsibility for determining the approach to be taken regarding spelling, punctuation and grammar to subject teams. It does this on the basis that, from the provider's perspective, subject teams are well versed in the

requirements of the subjects and courses they teach, and are therefore best placed to make a judgement about whether and how they should assess technical proficiency in English.

What might the impact of these policies be?

30. Such a policy is unlikely to preserve the rigour of assessment of spelling, punctuation and grammar and could lead to unacceptably low standards. In addition to the issues (covered in previous case studies) created by removing requirements for written proficiency in English, the level of proficiency required could vary by subject or course because of different subject area teams' inconsistent interpretations of the policy and approaches. Furthermore, since different teams could have different requirements for English proficiency, students undertaking joint or combined honours courses may find themselves subject to different requirements.

Case study 4

What did we find during the review?

31. The provider has a proofreading policy for any text submitted for assessment (such as dissertations), which is intended to make it clear to students and staff that responsibility for proofreading written work rests with the student. The policy states that students may use dictionaries, thesauruses and spelling- and grammar-checking software, but cautions against an overreliance on such aids and emphasises the importance of students' careful reading of their work.

32. The policy also sets out the role of staff regarding proofreading assessed work. Staff may highlight spelling mistakes, typographical errors, misused words and phrases, and lapses in sentence construction, grammar or punctuation in their formative advice to students. However, such advice should not amount to the systematic and comprehensive correction of errors in spelling, grammar or punctuation throughout an entire piece of work, and the policy explicitly prohibits staff from editing a student's work. Among other resources, the policy signposts students to guidance on developing their skills in written English and proofreading.

What might the impact of these policies be?

33. The provider's policy sets out clearly the responsibilities of staff and students in relation to developing students' ability to produce technically proficient writing commensurate with their level of study, and in relation to guarding against the potential for breaches of academic integrity. The policy makes clear the extent to which staff can advise on students' proficiency in written English. It conveys the importance the provider attaches to the development of students' academic writing skills. It provides signposting to internal support mechanisms available to students to enable them to develop the good practice in academic writing necessary for success in their studies and beyond. Were this policy to be coupled with a consistent and effective approach to assessing technical proficiency in English, it would be likely to maintain the rigour of assessment and preserve standards.

Case study 5

What did we find during the review?

34. Where technical proficiency in written English is assessed, the provider requires students to be informed through an assessment brief, which sets out the need for them to use correct and consistent grammar, punctuation and spelling throughout their assignment. The brief includes

the assessment criteria to be used to assess students' work, showing the breakdown of marks to be awarded. Written communication accounts for 15 out of a total of 100 points.

35. The marks awarded are for performance ranging from exemplary to very unsatisfactory. At the top end of the scale, students are expected to demonstrate a high level of written communication with no or very few minor typographical errors, grammatical issues or punctuation mistakes. Towards the lower end of the scale, students' work may demonstrate a reasonable or basic standard of written communication, containing a number of errors in grammar, punctuation or other areas.

What might the impact of these policies be?

36. The disaggregation of marks awarded for the different components to be assessed ensures students understand where they have performed well or poorly in an assessment, enabling them to identify areas where further development is required. Assessment feedback given to students enables them to understand how they can improve and where support is available to enable them to do so.

37. This policy would be likely to benefit students if part of an effective set of assessment practices designed to maintain rigour.

Inclusive assessment

38. During this review, a common theme emerged across several providers. In setting policies and practices on assessment, providers often explained their approach by reference to a desire to achieve or promote inclusivity. 'Inclusivity' was generally defined in terms of avoiding or preventing students being placed at a disadvantage (or advantage) by the assessment methods used. The Equality Act 2010 was cited as one of the factors that had led to this framing of assessment policies and practices, the argument being that the characteristics of some students would mean that assessing proficiency in written English could disadvantage them.

39. The Equality Act plays an important role in supporting and promoting equality in higher education. However, the way some providers have interpreted the Act has led them to decide not to assess technical proficiency in written English for some or all of their modules and courses, unless this is required by a PSRB or a QAA subject benchmark statement. As a consequence, it appears that accurate use of spelling, punctuation and grammar is not assessed for many students at these providers, and in some cases its assessment is explicitly not permitted.

40. Providers should assess spelling, punctuation and grammar where they are relevant to a course, subject to compliance with their obligations under the Equality Act and other legislation. Compliance with this legislation does not in our view justify removing assessment of written proficiency in English for all students. Quality and standards must not be compromised: under the OfS's current regulatory requirements, we would expect providers to assess spelling, punctuation and grammar for most students and courses.

Disabled students and reasonable adjustments

41. All providers have obligations under the Equality Act that relate to the assessment of students. These obligations include a duty (under section 91 and Schedule 13 of the Equality Act) to make reasonable adjustments for disabled students. This duty is anticipatory – it requires consideration of and action on barriers that impede all disabled people before an individual disabled student seeks access to a course at the provider. The duty applies to disabled students generally, irrespective of whether the provider knows an individual is disabled or whether it currently has any disabled students.

42. In the context of assessment policies and practices, this means that providers should anticipate and remove barriers to assessment, regardless of whether they know that there are disabled students in their cohort. We have seen examples of this during the review, for example where a provider offers students a choice of assessment methods to demonstrate that their learning outcomes have been achieved.

43. The duty to make reasonable adjustments for disabled students does not apply to 'competence standards', which in this context refers to academic standards applied for the purpose of determining whether or not a person has a particular level of competence or ability. For example, competence standards for a higher education course could include demonstration of a practical skill, or a particular level of knowledge in a given area.

44. The competence standards for a particular course will depend on its nature: for example, practical skills are unlikely to be a competence standard on a theoretical course, and courses at different levels may require different levels of subject knowledge. In the context of a particular assessment, it is good practice for a provider to identify what it considers to be the applicable competence standards, to record why it takes this view, and to make this information available to students. This should be done before the course starts, to allow time for the provider to anticipate any necessary reasonable adjustments.

45. The practices we have seen during the review suggest that providers are identifying competence standards in the learning outcomes for modules and courses. Providers may also identify competence standards in response to requirements imposed by others, for example by a PSRB or other regulatory body such as the OfS.

46. Whether proficiency in written English is a competence standard will therefore depend on the nature of an individual course. Our view is that being able to use technical language, to communicate complex ideas in writing, and to construct coherent arguments, is an important part of most higher education courses. Providers should seriously consider treating these as competence standards to ensure that all students, including disabled students, develop these skills. This position is reflected in the OfS's current sector-recognised standards,[4] which include, for example, an expectation that holders of bachelors' degrees will be able to 'communicate information, ideas, problems and solutions to both specialist and non-specialist audiences.'

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[4] See 'Sector-recognised standards in England', available at www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/.

47. The obligation to make reasonable adjustments applies only to disabled students. It does not apply to non-disabled students.

Regulatory implications

48. The common features we have seen in the small number of cases we have considered in this review suggest that the practices and approaches we have set out in the case studies may be widespread across the sector. We are therefore drawing the attention of all registered providers to our findings, because they highlight matters that are likely to raise compliance concerns, now and in the future.

49. The OfS's regulatory requirements for quality and standards are set out in the B conditions of registration. The current requirements include:

- '**Condition B1:** The provider must deliver well designed courses that provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed.'

  We take the view that, for a course to be well designed and provide a high-quality academic experience, it should ensure that students are required to develop and demonstrate subject-specific and general skills. These will include technical proficiency in written English in most cases. For students to demonstrate such skills, they need to be assessed and such assessment must be reliable. It is unlikely to be possible to reliably assess student achievement if proficiency in written English is not included in intended learning outcomes.

- '**Condition B4:** The provider must ensure that qualifications awarded to students hold their value at the point of qualification and over time, in line with sector-recognised standards.'

  We take the view that, if students are able to achieve qualifications with poor written English because it is not assessed, those qualifications are unlikely to have the value taxpayers and employers would expect.

50. The findings in this report are shared as case studies; we have not conducted a formal regulatory investigation. Any regulatory judgements we make in future would depend on the circumstances of an individual case, and would involve detailed consideration of the impact of a provider's policies on the marks awarded to students.

51. If we were to consider compliance with our current regulatory requirements for the practices described in the case studies, we would be likely to have regulatory concerns about the following:

- **Case studies 1 and 2:** In these examples, it seems plausible if not likely that some students are not being assessed on their proficiency in written English. This is because learning outcomes do not include this requirement. In these circumstances we would have concerns about whether the provider's courses are well designed and provide a high-quality academic experience. We would also have concerns about whether the qualifications awarded to students are valued by employers or enable further study. We would consider whether such qualifications represent value for money for students and taxpayers. For Case study 2, we would take a particular interest in the effect of the policies on groups of students whose first language is not English.

- **Case study 3:** In this example, we would have similar concerns as for case studies 1 and 2. We would also consider the adequacy and effectiveness of the provider's academic governance arrangements, which have the potential to create inconsistencies in the requirements for students in different subject areas.

52. We are currently consulting on proposals to clarify and strengthen our regulatory requirements for quality and standards.[5] We will consider all consultation responses carefully before reaching a decision about whether or not we should take forward our proposals, in full or in part. For illustrative purposes, if we were to implement the proposals as set out in the consultation document, the practices we have seen would be likely to raise concerns in relation to proposed conditions B1, B2, B4 and B5.

Grade inflation

53. The OfS has previously published data and analysis that show an unexplained increase in higher classifications being awarded for undergraduate degrees over the period since 2010-11.[6] 'Unexplained' means that the increase cannot be accounted for by considering, for example, the fact that students' prior attainment may affect a provider's classifications. In other words, if we adjust for increases in students' prior attainment, we are still unable to explain why there is an increase in higher classifications.

54. If the policies and approaches identified in this report are leading to students getting higher marks than they otherwise would, for instance because poor proficiency in written English is not being routinely assessed, then this not only undermines the rigour of assessment processes, but also contributes to unexplained grade inflation.

55. We will test this hypothesis for individual providers through our investigatory work.

Method

56. The evidence for the review was collected by the designated quality body for England. A small, targeted group of providers gave the review team access to the information requested during the activities listed in paragraph 57.

57. The review team:

- met with senior staff from each provider, to ensure clear communication of the scope of the review and the activities to be undertaken

- analysed documents submitted by each provider, to assess its approach to assessment

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[5] See 'Consultation on quality and standards conditions' (OfS 2021.24), available at www.officeforstudents.org.uk/publications/consultation-on-quality-and-standards-conditions/.

[6] See 'Analysis of degree classifications over time – changes in graduate attainment from 2010-11 to 2018-19' (OfS 2020.52), available at www.officeforstudents.org.uk/publications/analysis-of-degree-classifications-over-time-changes-in-graduate-attainment-from-2010-11-to-2018-19/.

- analysed examples of assessed student work from a range of modules and disciplines, along with marking criteria, marks and markers' comments, to identify how spelling, punctuation, grammar and other aspects of language accuracy were assessed in practice

- analysed publicly available information from the websites of a range of providers.