

Consultation on Reforming GCSEs in Modern Foreign and Ancient Languages



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1. Scope, purpose and context of the consultation
 - 1.1 GCSEs taken by students in England are being reformed. New GCSEs in English language, English literature and maths are being introduced for first teaching in September 2015. These will be followed by new GCSEs in other subjects, including in modern foreign and ancient languages, to be taught from September 2016. The Government has already consulted on the content for these subjects and will publish the final content once we have taken decisions on the structure and assessment of the qualifications.
 - 1.2 We are responsible for making sure the new GCSEs are of a high quality and that they provide valid and reliable results. We have already consulted and announced decisions on the features of new GCSEs that will apply to all subjects, for example assessment principles, tiering and grading arrangements. In this consultation we are seeking views on how we propose to apply our assessment and tiering principles to new GCSEs in modern foreign and ancient languages. We are consulting separately on setting grade standards for new GCSEs.¹
 - 1.3 We will consult at a later date on the regulatory requirements (such as the Conditions of Recognition) that will govern the way exam boards design, deliver and award new GCSEs in these subjects. The exam boards that wish to offer new GCSEs in these subjects can then develop their qualifications for accreditation in 2015 ready for teaching from September 2016.

Equality analysis

- 1.4 We have considered the possible impact of the proposed arrangements for new GCSEs in modern foreign and ancient languages on students who share particular protected characteristics. We set these out in section 7. We encourage you to read this section and respond to our questions.

Regulatory impact

- 1.5 Before we take decisions about the structure and assessment of new GCSEs in modern foreign and ancient languages we will identify and take into account the wider impact of the proposed changes including on schools and the exam boards. We are seeking your views on these issues too, in particular on the future availability of GCSEs in a range of languages and on the fees exam boards might charge and schools and colleges would be willing to pay.

¹ <http://comment.ofqual.gov.uk/setting-the-grade-standards-of-new-gcse-april-2014>

How to respond

The closing date for responses to the consultation is Friday 23rd May 2014.

Please respond to this consultation in one of three ways:

- Complete the online response at <http://comment.ofqual.gov.uk/modern-foreign-and-ancient-languages>.
- Email your response to consultations@ofqual.gov.uk – please include MFL and AL GCSE Consultation in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to: MFL and AL GCSE Consultation, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.

2. Assessing modern foreign language GCSEs

Principles for assessment of all new GCSEs

2.1 We have already announced, following our summer 2013 consultation, that GCSE assessments should be by exam, except where essential subject-related skills cannot be assessed in that way. We are consulting now on how this principle should be applied to modern foreign and ancient languages.

Assessment of current modern foreign language GCSEs

2.2 Current modern foreign language GCSEs must be designed so that:

- in all, 40 per cent of the marks are allocated to assessments set and marked by the exam boards and taken under exam conditions and 60 per cent to controlled assessment;
- the skills of speaking and writing are assessed using controlled assessments;
- between 20 and 30 per cent of the total marks available for the qualification are allocated to each of the four skills of listening, speaking, reading and writing.

2.3 Exam boards are allowed to allocate:

- up to 10 per cent of the controlled assessment marks to listening and/or reading.

2.4 We published a report last year setting out a number of concerns about the use of controlled assessment in GCSEs.² The report was based in large part on the views of teachers. Modern foreign language teachers told us that controlled assessments are promoting rote learning and memory-testing rather than the development of true language skills, to the detriment of students' successful progression to A levels. The relevant part of the *Review of Controlled Assessment* is attached at appendix A.

Assessment of new modern foreign language GCSEs

2.5 The content and assessment objectives for the new GCSEs on which the Department for Education (DfE) consulted during 2013 will require students to demonstrate their abilities to listen, speak, read and write in the modern foreign language being assessed. The marks will be distributed evenly between these skills – that is, 25 per cent to each skill.

² www.ofqual.gov.uk/files/2013-06-11-review-of-controlled-assessment-in-GCSEs.pdf

Assessing reading and writing

- 2.6 We have spoken to subject experts and considered current and past practice. We believe that the skills of reading and writing can be assessed by written exams. In line with our principles, we propose that these skills should be assessed using exams set and marked by the exam boards.

Assessing listening

- 2.7 We propose that the listening assessment should be set by the exam boards, sent to schools in an audio format and marked by the exam boards, as now. This will make sure all candidates have a comparable experience, for example with regard to the speed at which, and the accent with which, the words are spoken.

Assessing speaking

- 2.8 Speaking skills cannot be assessed by exams. We propose that speaking skills should be assessed using tasks set and marked by the exam boards in ways that address the weaknesses of the current assessments, explained in the controlled assessment report.
- 2.9 We are discussing with the exam boards the safeguards that should be put in place to protect the validity and security of speaking assessments, in particular:
- The notice students have of the topic and format of their speaking assessment. Currently students have many weeks to prepare for their speaking assessment. This allows them to memorise phrases and can turn the assessment into a test of recall rather than of speaking skills.
 - The way exam boards protect the confidentiality of the tasks and monitor how schools comply with the requirements.
 - The timing of the speaking assessments, both within a school and across the country.
 - The number of different tasks set by an exam board for each series and the number and the way in which the actual tasks taken by any one student are allocated.
 - The conduct, recording and marking of the student's performance, taking into account the appropriate use of available technology.
- 2.10 We propose that all exam boards must use a common approach to the way assessments are conducted. Schools can then be assured that, regardless of

the specification they choose to teach, the arrangements for the conduct of the speaking assessments are consistent and fair.

- 2.11 We propose that exam boards should mark the speaking skills assessment directly, rather than allowing teachers to mark their own students' performance. This could be managed either by recording the assessment for submission to the exam board or by exam board examiners conducting the assessments in schools and colleges. Alternatively, if teachers mark the assessments, we will consider whether exam boards should use statistical moderation to help identify inaccurate marking.
- 2.12 Any extra costs could be reflected in the fees. We will aim during the consultation period to quantify the costs of the options and we will take these into account, alongside responses to the consultation, before we take a decision.

Reporting the outcome of the speaking assessment

- 2.13 We propose that the outcome of the speaking assessment should contribute to the overall grade of the qualification, as now, rather than be reported as a separate grade, as will be the case for speaking skills in English language GCSEs.
- 2.14 For modern foreign language GCSEs the ability to speak the language is a key aspect of the qualification. Modern foreign language GCSEs are designed to develop and recognise students' skills in a second or additional language. This is in contrast to English language GCSE which is designed to be taken by English speakers.
- 2.15 Modern foreign language GCSEs are not under the same pressures as GCSE English language. GCSE English language will remain more significant, and central to the ways in which schools are held to account. For that reason we are implementing different and more robust arrangements for GCSE English.
- 2.16 Fewer students take modern foreign language than English language GCSEs. It will be more manageable and affordable to put in place new safeguards for modern foreign languages speaking assessments to make sure they are conducted and marked fairly. This will in turn give us greater confidence in the validity and reliability of the assessment and its contribution to a single grade.

Summary of current and proposed assessment arrangements

Assessment objective	Current requirements	Proposed requirements
Listening	20 to 30% of the marks. Assessed mainly by exam, although up to 10% of these marks may be assessed by controlled assessment.	25% of the marks. Assessed by exam.
Speaking	20 to 30% of the marks. Assessed by controlled assessment. The outcome contributes to the overall grade.	25% of the marks. Assessed using non-exam assessment under more tightly controlled conditions than now, marked by the exam board with the outcome contributing to the overall grade.
Reading	20 to 30% of the marks. Assessed mainly by exam although up to 10% may be assessed by controlled assessment.	25% of the marks. Assessed by exam.
Writing	20 to 30% of the marks. Assessed by controlled assessment.	25% of the marks. Assessed by exam.

Questions

Please respond to the following questions on different aspects of assessment. A number of the questions begin with a statement followed by a number of options for you to choose from. Please select the option that most closely represents your views.

1. Reading skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

[Within a national examination system, it makes sense for reading to be](#)

assessed via an exam. The setting of valid, reliable reading assessments is a skilled job best undertaken by an independent awarding body for a consistent and standardised approach.

Some ALL members expressed concerns about target language (TL) testing within an examination framework that claims to offer discrete skills testing. Others believe that TL testing can, under the right conditions, provide a valid means of assessment. However, there is unanimity amongst members that students should be absolutely clear what they are been asked to do in all parts of the examination, and that question types should be skilfully chosen and formulated, so that the tests are a valid mechanism for assessing students' understanding and/or use of language, and so that students are never likely to be penalised for misunderstanding an examination rubric.

2. Writing skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

All views expressed to the Association for Language Learning support the removal of Controlled Assessments for writing. Controlled Assessment, as it has been implemented within the current GCSE framework, has reduced valuable teaching time. An examination should offer the fairest means of assessing students' written production, and is coherent with a focus on grammar, independent and creative language use. As such, it offers the most coherence in terms of joining up the new curriculum at KS3, KS4 and productive skills at KS5.

3. Listening skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

The rationale here is the same as that given in the case of reading (Q1). As with reading, and given the DfE position on TL questioning, we would strongly urge that all due consideration is given to achieving maximum question validity, ensuring that:

(i) students understand the questions set

(ii) there is clarity and transparency about which single skill is being tested at any one time

In the case of listening, our members request that listening material is provided as video, rather than disembodied audio. This is something that association members have discussed on many occasions. Publishers at KS2-5 have included much more video material in their courses in recent years. Given the visual nature of talk interaction generally, and the dominance of visual culture online, it seems incongruous to retain voice-only listening assessment at GCSE. This is entirely compatible with the aim of achieving a challenging, rigorous GCSE, and may assist awarding bodies in the sourcing of more high quality, authentic listening material.

4. Speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam board. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

There is widespread acceptance that the teacher should conduct speaking assessments at GCSE. On the issue of whether the awarding body should mark the assessments, ALL members expressed a variety of views. Overall there is more support for the view that marking by the awarding body ensures fairer outcomes for students for three reasons:

firstly, there would be less pressure on teachers to 'second guess' the exam board marking and under-estimate their students' performance to avoid their centre's work being marked down;

secondly, it would avoid the situation where awarding bodies need to adjust the grade boundaries in one section of the exam to achieve the desired overall outcomes year or year. In short, there is ironically a great chance of achieving something closer to criteria-driven assessment if the exam board marks all exam components.

thirdly, with performance-related pay linked to exam results there is the need for exam results to be much more stable and less prone to individual component fluctuations than currently.

One key disadvantage of divorcing teachers from the marking process is the risk of de-professionalising them. A key strength of the current system has been the need for teachers to understand the assessment process much more intimately. A further disadvantage highlighted is a concern about the quality of assessment of the speaking, if left to the awarding bodies. Many ALL members have been examiners and are aware of the tightly-constrained time frames in which training of markers, moderation and assessment are carried out. ALL urges awarding bodies to ensure that there is a rigorous process of training in place, adequate time allowed for assessment, and crucially for moderation processes, and for the development of clear, transparent mark schemes for assessing speaking, which are clear to students, teachers and examiners alike. (For further detail, see answer to Q5 below).

5. What considerations need to be taken into account to make sure students' speaking skills are assessed in a way that is:

ALL welcomes the assessment of speaking that is based on assessment of a student's ability to interact in the foreign language, in a way that is unplanned and unscripted, but plays out within a context that is familiar, thereby allowing candidates to be assessed positively for what they can communicate, rather than be penalised for the inevitable errors that occur in spontaneous discourse, (even among fluent native speakers of the language). Regarding the validity, reliability and fairness of speaking assessments, we draw attention to the following points:

- a) valid

Validity refers to the extent to which a test measures what it sets out to measure. Comments referring to the concerns about TL testing (above) are relevant in this regard. Equally, ALL points out that speaking assessments,

particularly those that will assess the new criteria which stress unplanned, spontaneous production, are not single skill assessments. They are in their essence a test of both listening and speaking. To acknowledge this, one of two actions is required: firstly, the claim to discrete skill assessment could be removed for the speaking exam. There are examples of speaking assessment markscheme (iGCSE - www.cie.org.uk/images/128380-2015-syllabus.pdf) in which listening and speaking are explicitly recognised, something which results in a much clearer understanding of what represents good performance in spoken interaction, which is, by definition, a mixed-skills event. Alternatively, the speaking assessment criteria would have to start from the premise that the ability of understand a question is not part of measuring speaking ability and therefore ensure that the criteria do not penalise for any aspects of spoken performance that rely on listening skills. This seems rather difficult to imagine in an assessment that deliberately sets out to test unplanned speaking.

reliable, and

Reliability in languages assessment concerns two specific aspects of reliability. Firstly, in relation to the setting of questions in all four skills papers, there is the need to ensure that the assessment tool produces stable and consistent results. This is important, both over time, when different papers that purport to test the same level and extent of language understanding / use are compared over several years, and also within one individual paper, when different question types are chosen to test the same knowledge at different levels. Secondly, and just as importantly, inter-rater reliability is required (particularly when assessing written and spoken performance) to ensure that the application of a markscheme to a student's performance produces the same outcome, regardless of the assessor / marker. To help to ensure that this happens, where there are key terms, such as 'fluency', 'spontaneity', 'complex lexical items' 'takes initiative' 'elaborate responses' etc., these should all be exemplified, so that there is no guesswork about the sorts of performance they describe.

.....
b) fair?

The principle of fairness relates to the need to ensure that all candidates take the assessment under the same conditions and have equality of experience. To ensure that this is the case, there is a need to:

(i) ensure that grade boundaries reflect the new spontaneity paradigm, recognising that previous incarnations of speaking assessments (however well-

intentioned) have resulted in marathon feats of memorisation in a great many centres

(ii) eliminate teacher / student choice beforehand and any other opportunities to pre-prepare or over prepare

(iii) provide clear tasks with transparent markschemes, which are applied consistently year on year.

(iv) ensure that the themes and topics that students talk about in the assessments are relevant, interesting and up-beat, able to engage all learners, irrespective of gender, ability or interests.

(v) ensure inter-rater reliability at exam board level when marking performances

6. How might any aspects of the proposed assessment requirements impact on:

a) the costs, and

As far as the cost of the exams themselves are concerned, the consensus is that costs did not go down when teachers assumed responsibility for marking the speaking component, so that there is no cause for them to go up, when the responsibility for marking the speaking component returns to the awarding bodies.

In schools, however, the conditions requiring higher levels of control / supervision / invigilation and a recording of all tasks increase staffing costs, i.e. the cost of cover when teachers need to administer tests.

b) likely take-up of new modern foreign language GCSEs?

1 In speaking, it is crucial that those involved in designing the assessment, and more crucially, in the criteria for assessment, understand the difference in performance that is implicated in truly 'unplanned' language production. It is not possible to retain the notions of fluency and accuracy, and just add spontaneity to them, without the explicit acknowledgement that increased spontaneity incurs a re-negotiation of expected levels of fluency and accuracy. Not to do this from the outset (and not to make it explicit for teachers) will lead to the outcry that the impossible is being asked. Two possible consequences in the short time would be that:

(i) teachers believe that the new exam is only accessible to higher ability learners and 'market' the course according in their schools, resulting in a lower, skewed KS4 uptake

(ii) teachers attempt to spot any and all ways to enable their students to achieve e.g. by working out how students can learn / memorise all that they might need

(which would return us to the pre CA GCSE where teachers complained that candidates had to memorise numerous questions from all topics).

2 In writing, we believe that students will benefit from the increased teaching time freed up by the removal of CAs and that they will respond positively to producing shorter pieces of writing independently under exam conditions. The inclusion of prose translation may also appeal to boys, whose writing is often penalised when they are disinclined to develop or elaborate.

3 Cost – if languages examinations are more costly than other GCSEs, there is a danger that this may be a disincentive for school leaders when it comes to encouraging uptake.

4 Grading – if grading issues are resolved for the new incarnation of the GCSE in languages, such that there is no difference between the subjects on offer, there is no reason to believe that the new assessment requirements would not see an increase in take-up at GCSE.

7. The outcome of the speaking component should contribute to a student's overall grade. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

The ability to speak the foreign language is a key element of the GCSE qualification.

Additional point:

ALL members would like to see the CEFR used in all languages assessment frameworks, including the new GCSE. All other European countries use the CEFR in their foreign language teaching, learning and assessment. It has proved useful in the past to bench-mark, reference and incorporate descriptive language from the CEFR in other English assessment frameworks for modern languages, including the Languages Ladder in the UK.

3. Tiering of new modern foreign language GCSEs

Principles for tiering of all GCSEs

- 3.1 We confirmed on 1st November 2013³ that new GCSEs should be tiered only where a single set of assessments cannot in a valid and manageable way assess students across the full ability range.
- 3.2 The technical issues and arguments for and against tiering were set out in our June 2013 consultation on new GCSEs.⁴ In summary, in some subjects, students of all abilities can understand and answer the same exam questions or complete the same assessment tasks. The level of their answers will, of course, vary in accordance with their abilities. In other subjects, common questions can be too easy for some students and inaccessible to others. For this latter type of subject, common assessments must include a sufficient number and range of questions/tasks to allow both the most and the least able students to demonstrate their abilities. Such assessments can be long and potentially demotivating for students at both ends of the ability range.
- 3.3 When a GCSE is tiered a student enters for either higher tier or foundation-tier assessments. This allows the assessments to be targeted to a narrower ability range, with the higher tier stretching the most able and the foundation tier being accessible and rewarding for students who find the subject more difficult.
- 3.4 Students entered for the foundation tier cannot achieve the highest grades, however well they perform in their assessments. This creates the risk that some students who are entered for that tier will not have their full abilities recognised and rewarded. We have decided that tiering should be used only when essential.
- 3.5 We have considered whether common assessments in modern foreign languages can properly assess students across the full ability range. We have asked subject experts. We have also looked at entry and performance data for current GCSEs in these subjects. We set out our conclusions and seek your views.

³ www.ofqual.gov.uk/news/design-details-of-new-gcse-in-england

⁴ <http://comment.ofqual.gov.uk/gcse-reform-june-2013>

Tiering in current modern foreign language GCSEs

3.6 Broadly, there are two types of modern foreign language GCSEs:

- GCSEs that cover languages typically taught by schools and taken by relatively large numbers of students: French, German and Spanish. These are usually taken by students who are not already regular users of the language. In this consultation we describe the qualifications in this category as being in ‘Category 1’.
- GCSEs that cover a range of languages that are taken by students in a smaller number of schools for example Bengali, Greek, Panjabi, Polish and Urdu. The languages are not necessarily taught by the schools. We believe these are often taken by students who use the language in their home and/or community. In this document we describe the qualifications in this category as being in ‘Category 2’.

3.7 The current approach to tiering is based on historical practice, rather than on a principled approach. The regulatory rules for current modern foreign language GCSEs require the listening and reading assessments of all modern foreign language GCSEs to be tiered. This is the case for languages in Category 1. Exceptions have been made for GCSEs in languages in Category 2, many of which are untiered.

3.8 Table 1 shows the current range of GCSEs, an indication of the number of students taking each language and whether or not they are tiered.

Language	Approximate number of students who typically take a full GCSE in the language in England	Listening and reading	Speaking and writing
French	163,000	tiered	untiered
German	60,300	tiered	untiered
Spanish	84,700	tiered	untiered
Italian	5,000	tiered	untiered
Arabic	3,400	untiered	untiered
Bengali	1,100	tiered	untiered
Chinese	2,500	tiered	untiered
Dutch	400	untiered	untiered
Greek	500	untiered	untiered
Gujarati	500	untiered	untiered
Japanese	1,100	untiered	untiered
Modern Hebrew	400	untiered	untiered

Punjabi	900	tiered	untiered
Persian	400	untiered	untiered
Polish	3,600	untiered	untiered
Portuguese	1,800	untiered	untiered
Russian	2,200	untiered	untiered
Turkish	1,400	untiered	untiered
Urdu	4,500	tiered	untiered

Table 1⁵

Tiering in new modern foreign language GCSEs

- 3.9 The primary purpose of new GCSEs is to provide evidence of students' achievements against demanding and fulfilling content and a strong foundation for further academic and vocational study and for employment. If required, they should be able to provide a basis for schools and colleges to be held accountable for the performance of all their students. The qualifications must be designed to reflect this purpose.
- 3.10 New GCSEs must be as accessible, with good teaching, as the current qualifications are to students across the ability range.
- 3.11 Modern foreign language GCSEs should support and encourage students to develop new language skills and to recognise the achievements of those who do. The level of demand is therefore appropriate for a student who is learning a language as a second or additional language, in contrast to GCSE English language, which is designed to be taken by English speakers.
- 3.12 In modern foreign languages the most able students, aiming for the highest grades, are expected to have a more extensive vocabulary and to understand, read and write more complex materials than less able students. This expectation is reflected in the exam questions and assessment tasks they are set. Less able students are likely to find such questions and tasks difficult or impossible to answer.
- 3.13 Having spoken to subject experts and considered current and past practice, we do not believe that modern foreign languages GCSEs can be designed so that one set of assessments can, in a manageable and valid way, allow both the most and the least able students to demonstrate their abilities. The introduction of more demanding content requirements will further increase the difficulties of designing such assessments.

⁵ This data is taken from JCQ's provisional data on 2013 results: www.jcq.org.uk/examination-results/gcse/gcse-and-entry-level-certificate-results-summer-2013

3.14 We therefore propose that all assessments (for reading, writing, speaking and listening) in all new modern foreign language GCSEs should be tiered. The assessments can then be targeted at higher- or lower-ability students, allowing all students to demonstrate their knowledge and skills.

3.15 We have considered whether any exceptions should be made so that GCSEs in some languages could be untiered, as now. We have taken into account entry and performance patterns for the current GCSEs.

3.16 The data in Table 2 is from summer 2013 GCSE awards. It suggests the range of performance demonstrated by the students taking Category 2 languages (here described as “Other modern foreign languages”) is both narrower and higher than for students taking Category 1 languages.⁶

Language	Cumulative percentage awarded A*	Cumulative percentage awarded a C or above	Cumulative percentage awarded an E or above
French	9.8%	70.2%	95.8%
German	9.2%	74.9%	97.1%
Spanish	13.1%	72.1%	95.1%
Other modern foreign languages	34.5%	87.4%	97.1%

Table 2

3.17 When a GCSE is tiered students taking the higher tier are currently able to be awarded grades A* to E. Students taking the foundation tier are able to be awarded grades G to B. The 2013 figures show that of the students taking the “Other modern foreign languages” only 2.9 per cent did not achieve at least a grade E. The figure for French is 4.2 per cent.

3.18 We have considered whether these figures indicate it is not necessary for all the category 2 languages to be tiered, as, assuming the current profile of students continues, very few students are likely to find untiered assessments too demanding.

3.19 However, a GCSE must be designed to be accessible to the full range of students. For untiered modern foreign language GCSEs, the assessments must include questions that can be attempted by students whose skills in the

⁶ This data is taken from the provisional JCQ date on 2013 results: www.jcq.org.uk/examination-results/gcses/gcse-and-entry-level-certificate-results-summer-2013. The JCQ reports the languages in Category 1 individually but groups the others together as “Other modern foreign languages”.

language are less well developed than is the case for students who are aiming for the highest grades. There must also be a sufficient number of such questions to enable them to achieve one of a range of grades.

- 3.20 The pattern of achievement shown by the data suggests that where the qualifications are untiered a majority of the students taking them are answering some questions they will find very easy. This is not in line with the purpose of GCSEs that students should find the content demanding and fulfilling.
- 3.21 Some of the Category 2 languages are offered in tiered form. We have considered entry patterns for these tiered qualifications. Although more students enter for the higher tiers, the proportion entering for the foundation tier is not insignificant.
- 3.22 Another factor to consider is cost. Exam boards will incur extra costs if new GCSEs in languages they do not currently provide in tiered form must be tiered. The costs would arise from a requirement to set an additional paper/assessment task for each of the four aspects, and to have these marked by examiners. However, to help equate the level of demand for the overlapping tiers (which for the new GCSEs will be grades 4 and 5) we will require that there are questions that are common to both tiers of assessment. This will help to contain any additional costs.
- 3.23 GCSEs are provided by competing exam boards. Exam boards are not required to offer qualifications in any specific subject. It is possible that a requirement to tier all languages would deter exam boards from offering the current range of languages. On the other hand, as a tiered qualification should be accessible to a wider range of students than an untiered qualification, it is possible that entries might increase, making the qualification more attractive to an exam board to offer. All GCSEs should be designed to be accessible to the full range of students taking GCSEs. They must also fulfil the purpose of the qualification. Assessment must be valid and manageable. We believe that untiered modern foreign language GCSEs would not meet these requirements.
- 3.24 We propose that all new modern foreign language GCSEs must be tiered.

Mixed-tier entries

- 3.25 Students do not necessarily develop their listening, speaking, reading and writing abilities to the same level. A student might, for example, develop higher level writing and speaking skills but lower-level reading and/or listening skills. Currently, for the languages in which GCSEs are tiered, the listening and reading assessments are tiered and the speaking and writing assessments are

untiered.⁷ Students are currently permitted to enter for a mixture of higher and foundation-tier modern foreign language units.

3.26 We have looked at entry and performance data across the four exam boards.

3.27 The 2011 entry patterns for the tiered units for GCSE French are outlined below. In respect of the two units that are currently tiered (listening and reading):

- 23.2 to 29.1 per cent of students were entered for two foundation units;⁸
- 62.5 to 70.7 per cent were entered for two higher tier units;
- 4.3 to 8.5 per cent were entered for a combination of higher and lower tiers.

3.28 In practice most students are entered for all assessments in one tier or the other.

3.29 Of the students who were entered for a combination of tiers, the great majority performed well enough in both tiers to be awarded at least a grade D in the foundation-tier unit. This suggests that they had the knowledge and skills needed to complete the higher tier assessments. There is the possibility that had these students been entered for both higher tier assessments they may have achieved a higher grade than that available to them from the foundation-tier alone.

3.30 However, it is also possible that had a combination of tiers not been allowed the students would have been entered for the lower-tier assessments only, a route that might have capped their opportunities further.

3.31 The data from a number of the category two languages illustrates that for some languages students (assumed to be mainly students who speak the language at home or in their communities) are more confident understanding the language in spoken than written form. A very strong performance in the speaking and listening assessments will compensate for a weaker performance in the reading and writing assessments. The opportunity to enter for mixed tiers may deter

⁷ In current modern foreign language GCSEs listening and reading are assessed by exam and speaking and writing are assessed using controlled assessment in which the tasks are set by teachers. We propose (see section 3) that for new GCSEs all skills are assessed using tasks set by the exam boards.

⁸ The units assessed by controlled assessment are not tiered.

such students from developing their reading and writing skills to their full potential.

- 3.32 New GCSEs will be linear qualifications, so each candidate will take the full range of assessments in one exam series. This means a uniform mark scale will not normally be needed.⁹
- 3.33 This simplification of the process for the new qualifications will have a range of benefits. Importantly, it will make the way students' marks are aggregated clearer to them, their parents and their schools.¹⁰ There are some technical advantages too.¹¹
- 3.34 If students are allowed to enter for a combination of foundation and higher tier assessments a uniform mark scale type approach for combining attainment would be needed. In light of the issues with the use of a uniform mark scale and the benefits of a more direct approach, we would prefer it is not used for any subject.
- 3.35 If students' skills are not equally well developed, there is most likely to be a disparity between their productive skills (speaking and writing) and their receptive skills (reading and listening). The current tiering and assessment arrangements do not allow this potential difference to be reflected in the combination of tiers taken. Although mixed-tier entries are currently small in

⁹ Uniform mark scales are used to convert students' actual marks on an assessment (referred to as their 'raw' marks) to points on a scale that is fixed (or 'uniform') over time. This approach is used for unitised qualifications so that candidates' marks across different exam series can be accurately added together (or 'aggregated') even though the difficulty of the assessments between exam series would often vary.

¹⁰ Where uniform mark totals are much higher (or lower) than the raw marks used for an assessment, the conversion may appear misleading. For example, if an assessment is marked out of 40, but is worth 200 uniform marks, then each raw mark is actually worth 5 uniform marks. As such, a large difference between two candidates' uniform marks may in fact be owing to only a very small difference in their actual marks. Understandably, that can be difficult for those taking and delivering the qualifications to appreciate.

¹¹ All the uniform mark grade boundaries are always set at exactly equal intervals. But the raw mark boundaries are only equal between any two that are set by judgement. (For example, those for a GCSE might be equally spaced out between A/B and C/D at, say, 10 marks each; and then equally spaced out between C/D and F/G at, say 5, marks each.) This means that the number of uniform marks a raw mark is 'worth' can often vary based on where it falls in terms of the whole grade range.

number, if, as we propose, all the assessments are tiered (not just reading and listening), the demand for mixed-tier entries might grow.

- 3.36 Exam boards currently provide a number of short course GCSEs in modern foreign languages, in addition to their full courses. These qualifications focus either on the written or the spoken language. The short-course qualifications take units (and assessments) from the full-course GCSEs. Currently, where the full course is tiered, the short course is also tiered, and where the full course is not tiered, neither is the short course. Exam boards will be able to offer short-course new GCSEs should they wish to.
- 3.37 We propose that, in line with the position for other tiered GCSEs, students should take assessments for one tier or the other. Mixed-tier entries should be prohibited.
- 3.38 If mixed-tier entry routes to full GCSEs were not available, a student could enter for two short-course GCSEs, in different tiers, if that better suited their ability profile. They could, for example, enter for a higher tier short course GCSE in speaking and listening and lower-tier short course GCSE in reading and writing.

Targeting tiers to grades

- 3.39 We propose that the foundation-tier assessments should be targeted at the level of demand required for the award of grades 5 to 1. The higher tier assessments should be targeted at the level of demand required for the award of grades 9 to 4. This is the model of tiering we are proposing to use for the new GCSE in maths too.
- 3.40 Where a qualification is tiered and some grades can be awarded to students who took either higher or foundation tier papers it is important that the level of performance required for the award of a specific grade is the same, regardless of the tier taken.
- 3.41 To help equate the overlapping grades, we propose that for each of the assessments some questions/tasks are used that are common to both the foundation and higher tiers. We have discussed with subject experts how this might best be achieved. In light of these discussions, we propose that the percentage of marks that should be assigned to these common questions in each of the four assessments should be as follows: listening 20 per cent, reading 20 per cent, writing 20 per cent, speaking 50 per cent. (This is within the context of 25 per cent of the overall marks being assigned to each of the four areas, as explained in section 2.)
- 3.42 We propose that the percentage of overlap for the speaking assessment is greater than for the other assessments. This is because the assessment

standard is in larger part determined by outcome (how well the students respond to the task) rather than by the complexity of the task itself. This makes it possible and appropriate to use a greater range of tasks common to both tiers.

Questions

Please respond to the following questions on different aspects of tiering. A number of the questions begin with a statement followed by a number of options for you to choose from. Please select the option that most closely represents your views.

8. All assessments (reading, writing, listening and speaking) in new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree this statement?

Strongly agree ([but see alternatives below](#))

Agree

Disagree

Strongly disagree

Don't know/no opinion

[ALL members' view align themselves with two different positions as regards tiering:](#)

[Model 1](#)

[All students complete a short foundation tier in each skill. Completion of a further higher tier paper in any or all of the skills is optional.](#)

[Advantages](#)

- [\(i\) There is no risk for students \(or teachers\) in selecting the best tier.](#)
- [\(ii\) There is flexibility built-in and the opportunity for learners to make progress at different rates, including rapid improvement in the last stages of the course](#)
- [\(iii\) Students are not demotivated when taking the tests \(we have found that students completing the higher tier reading and listening papers can be demoralised by a tricky question encountered early in the paper, with knock-on detrimental effects on their completion of the remainder of the paper\). When middle ability students take the higher paper, they are already secure in the knowledge that they have completed the foundation tier confidently. Conversely, able students are not put-off by being required to complete a short set of questions that is too easy for them.](#)
- [\(iv\) There is no requirement on the exam board to produce such precision-balanced, comparable papers with an overlap.](#)

Disadvantages

- (i) an overall increase in assessment time (but many GCSE subjects already have far longer examination time than languages)
- (ii) an increase in marking (it would be possible to devise a system, whereby the marking of the higher tier was dependent on achievement in the foundation tier, or that the achievement of a certain level in the higher tier removed the need to mark the foundation tier paper. Equally, electronic marking might also provide gains in terms of time.

Model 2

Tiering is built into all four skills, with an overlap for foundation and higher level.

There are members who hold one of these two views, but no views expressed that are not covered in one of these two models.

9. All available new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

ALL strongly supports the view that schools should be encouraging students to study a range of languages at GCSE level, and that achievement at both foundation and higher level in the full range of languages must be allowed for.

10. Students should be required to enter for either higher- or foundation-tier assessments but not a combination of the two. To what extent do you agree or disagree this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

Students have different profiles to those described in paragraphs 3.35 – 3.38. The completion of two short courses at different levels in one language is not a solution that accounts for the different learning and achievement profiles presented to teachers in our membership in the classroom. On this basis, we argue strongly for the retention of mixed tier entering (notwithstanding our suggestion about tiering in Q8 response). In addition, we propose that all awarding bodies adopt the approach of the exam board that allows flexibility in terms of tier entry to the day of the exam itself.

11. For the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation and higher tier assessments. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

The proposal seems to be that the overlap would be 'grades' 4 and 5 on the 1-9 point scale. Currently the overlap (G – C / E – A*) allows for the equivalent of 3 of the available 8 grades, which seems to be adequate. There might therefore be the need to allow for the awarding at higher tier to allow for achievement at the current E-grade equivalent, to ensure that there is no sudden drop off to 0 after 4.

50% seems on the face of it to be a very large degree of overlap, but presumably this anticipates a general conversation section, which will be differentiated by outcome.

12. Do you have any further comments on the tiering of modern foreign language GCSEs?

.....
.....

4. Assessing ancient language GCSEs

Assessment in current GCSEs in ancient languages

4.1 Current ancient language GCSEs are assessed by exam only.

Assessment in new GCSEs in ancient language

4.2 The assessment objectives for new ancient language GCSEs were consulted on, alongside the content, by DfE. The post consultation objectives are set out below:

Assessment objectives	Weighting
Demonstrate knowledge and understanding of the language	50% (10 to 20% of this AO should be attributed to translation into the ancient language or the permitted alternative.)
Demonstrate knowledge and understanding of literature and/or other ancient sources	25%
Analyse, evaluate and respond to literature and/or other ancient sources	25%

4.3 These skills can each be assessed validly and reliably by exam.

4.4 We propose that ancient language GCSEs will be assessed by examinations only, as now.

Questions

Please respond to the following question on different aspects of the assessment of ancient language GCSEs. The question begins with a statement followed by a number of options for you to choose from. Please select the option that most closely represents your views.

13. New GCSEs in ancient languages should be assessed wholly by examination. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

() Don't know/no opinion

Please give reasons for your answer.....

5. Tiering of ancient language GCSEs

Tiering in current ancient language GCSEs

5.1 The current qualification criteria for GCSEs in ancient languages (part of the classical subjects criteria) require them to be tiered. In the past, some exceptions have been made. GCSEs in ancient languages are currently offered by one exam board only (OCR). OCR currently offers a GCSE in Classical Greek in an untiered form only; it is typically taken by about 1,000 students. It offers Latin in a tiered form. Latin GCSE is taken by about 9,000 students of which about 250 enter for the foundation tier. Biblical Hebrew is untiered and typically taken by about 400 students.

Tiering in new ancient language GCSEs

5.2 New GCSEs in ancient languages will assess a student's knowledge and understanding of the language and culture (understanding of literature, society and values through analysis, evaluation and response). The qualifications should stretch the most able, but also be accessible and rewarding to students who are less able in the particular subject.

5.3 In contrast to modern foreign language students, all ancient language students are expected to study the same content, including the same vocabulary list. The range of skills being assessed is different from that in modern foreign languages, notably speaking and listening skills are not assessed. In many ways, the skills required for these GCSEs are more similar to those required for history and English literature than for modern foreign languages.

5.4 Having spoken to subject experts and considered current and past practice, we believe that manageable ancient language assessments can be designed that will enable students from across the ability range to demonstrate their abilities. We propose that GCSEs in ancient languages should not be tiered.

Questions

Please respond to the following question on different aspects of tiering of ancient language GCSEs. The question begins with a statement followed by a number of options for you to choose from. Please select the option that most closely represents your views.

14. New ancient language GCSEs should not be tiered. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

The non-tiering of ancient languages GCSEs may seem logical and to reflect the current cohort of students that enter these exams. As long as (as suggested in 5.4) the assessments can be so designed that students across the ability range can demonstrate their abilities, we agree that these exams could be untiered.

6. The availability of modern foreign language and ancient language GCSEs
 - 6.1 GCSEs are currently available in a range of modern foreign languages, as explained in section 2. This has enabled some students to take a GCSE in the language that is spoken in their homes or wider communities. The language of the GCSE they take might be their first language, a second or an additional language.
 - 6.2 The content requirements for modern foreign languages, developed by the DfE, will apply to all modern foreign languages for which there is a new GCSE.
 - 6.3 Each exam board decides in which subjects it makes GCSEs available, including in which modern foreign languages (if any), taking into account expected demand and costs.
 - 6.4 An exam board must be certain it has or can secure the resources to offer a qualification, including the people it will need to design, mark and award it. An exam board must take into account the availability of examiners who have the subject knowledge and expertise to undertake the role when it considers developing a new GCSE in a language.
 - 6.5 Currently, apart from the higher-volume subjects such as French, Spanish and German, most modern foreign and ancient language GCSEs are available from one exam board only.¹²
 - 6.6 Some schools enter students for GCSEs in languages they do not teach; students are self-taught or learn in their families or wider communities. This can cause problems for the setting, supervision and marking of controlled assessment (which currently makes up 60 per cent of modern foreign language GCSEs). If a school has entered a student for a GCSE in a language for which it has no teachers, it is not able to set and mark the controlled assessments.
 - 6.7 For new modern foreign language GCSEs we propose that all reading, writing and listening assessments will be taken under exam conditions, with only speaking being assessed using non-exam assessment. This change will reduce some of the current difficulties schools may encounter when entering students for languages that are not taught at the school. Depending on our final decisions about the conduct of speaking assessments, schools who enter students for languages they do not also teach may continue to need additional exam board input to conduct the speaking assessment. Again, an exam board

¹² Chinese, Italian and Urdu are currently offered by two exam boards.

would have to consider its capacity to provide such support, should it be needed, before it decides to offer a GCSE in the language.

- 6.8 There are steps we could potentially take, working with the exam boards, to make it less risky for an exam board to offer a GCSE in a particular language, including a managed process for coordinating desirable market outcomes. This could reduce the risk that none of the exam boards would make provision in a language because they could not be sure of their market share. Nevertheless, it would not guarantee that the current range of languages will continue to be available.
- 6.9 There are a number of language qualifications available for students to take, other than GCSEs. It does not follow that a student who wants to take a qualification to develop and demonstrate their skills in a particular language has to take a GCSE.
- 6.10 We would welcome your views on any steps we could take to promote the availability of GCSEs in a wide range of modern foreign and ancient languages, including those for which there is currently limited demand, and whether you consider it is important that we do so.

Questions

Please respond to the following questions on the availability of new GCSEs in modern foreign and ancient languages. A number of the questions begin with a statement followed by a number of options for you to choose from. Please select the option that most closely represents your views.

15. Modern foreign language GCSEs in a wide range of languages should be available in the future. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

ALL members are united in their view that GCSEs should be available in a wide range of languages. Not only do they believe that the current range of languages should be maintained, they argue strongly that additional languages

should now be offered, to fill the gap that has arisen following the withdrawal of Asset Languages qualifications.

The association believes strongly that the diversity of languages learnt and spoken in England is an asset that should be promoted and recognised in the national examination system. We do not wish to see some languages and cultures prioritised over others, rather we want to encourage the learning of all languages within the immediate community, the wider context of the UK and Europe as a whole, as well as those languages of particular interest and importance at a global level, economically, politically and socially.

16. Modern foreign language GCSEs for which there is low demand should be available in the future. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

The UK needs a diverse range of language skills for the future. The British Councils' 2014 *Languages for the Future* report identified Spanish, Arabic, French, Mandarin Chinese, German, Portuguese, Italian, Russian, Turkish and Japanese as the languages most vital to the UK over the next 20 years. This list includes many languages not usually regarded as "high demand" for GCSEs, even though they have been forecast as being key to the UK's future from the view of the needs of UK businesses, the UK's overseas trade targets, diplomatic and security priorities, and prevalence on the internet.

As our global community is constantly and rapidly changing, it is therefore crucial that we keep a diverse range of languages available at GCSE, as no doubt other languages will become identified as significant to the UK according to the economic, social, political and cultural environment of the time.

In addition to these globally-significant languages, there are several key community languages that should continue to be accredited in England at GCSE level. These languages are economically and socially highly significant. Many home speakers of the languages are encouraged to retain and develop their interest in their home language because there is recognised accreditation for its study. In this way, language speakers that might not otherwise have acquired higher levels of literacy in their home language are encouraged to do

so. The positive benefits on our society of learners that are literate, whether in English, a modern foreign European language, or additionally a heritage language, (or all three) are clearly demonstrable.

17. Modern foreign language GCSEs should be available for students who are existing users of the language. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

Existing users of a language should also be able to get accreditation for the language, whatever it may be, and for the reasons outlined above. However, ALL would welcome an attempt to exempt literate native speakers from the norm referencing so that only learners competing on a level playing field are part of the % allowed at every grade. This would not be completely straightforward and would rely on teacher professionalism and 'fair play', but we do believe that teachers, in cases where a student was clearly going to achieve A* in every component as a result of a long period of residence in the country or a bi-lingual upbringing resulting in native speaker levels of competence, would be willing to indicate this as point of entry. This identified cohort would achieve A* as before, but the higher % of A* grades overall would be justified and national figures could report them separately as two figures, if necessary (A* and A* - BL).

To ensure that all languages are available, each exam board should have to provide an equal number of 'lower-demand' GCSE languages, worked out in terms of numbers of entries. Each exam should also be accessible to non-native speakers of those languages.

18. In your opinion would schools and colleges be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand?

Some would, but others would find this more challenging. Charging more might disadvantage precisely those schools that could benefit most from 'lower demand' language entries. Above all, there should be equality of opportunity for all learners with respect to their language learning and its summative accreditation.

19. What, if any, steps do you think Ofqual should take to secure the availability of GCSEs in a range of modern foreign languages?

It seems reasonable to come to an arrangement with the awarding bodies such that they 'share out' the provision for less widely taught languages.

Ofqual would need to insist on an identified list of languages that GCSEs would be provided in, as commercial interests alone will be insufficient.

20. A range of ancient language GCSEs should be available in the future. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

ALL believes that the current range of ancient language GCSEs is appropriate and should be maintained.

21. What, if any, steps should Ofqual take to secure the availability of GCSEs in a range of ancient languages?

Ofqual should continue to encourage awarding bodies to maintain their current provision.

7. Equality impact analysis

Proposed reforms to GCSE in modern foreign languages

- 7.1 Ofqual is a statutory body, established by the Apprenticeships, Skills, Children and Learning Act 2009. The Act sets out our objectives.¹³
- 7.2 Our statutory objectives include the qualifications standards objective, which is to secure that the qualifications we regulate:
- a) give a reliable indication of knowledge, skills and understanding; and
 - b) indicate
 - i. a consistent level of attainment (including over time) between comparable regulated qualifications; and
 - ii. a consistent level of attainment (but not over time) between qualifications we regulate and comparable qualifications (including those awarded outside of the UK) which we do not regulate.
- 7.3 We must therefore regulate so that qualifications properly differentiate between students who have demonstrated they have the knowledge, skills and understanding required to attain the qualification and those who have not.
- 7.4 We also have duties under the Apprenticeship, Skills, Children and Learning Act 2009 to have regard to the reasonable requirements of relevant students, including those with special educational needs and disabilities, of employers and of the higher education sector.¹⁴ We are also under a duty to have regard to aspects of government policy when so directed by the Secretary of State.¹⁵
- 7.5 As a public body we are subject to the public sector equality duty (PSED).¹⁶ This duty requires us to have due regard to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct which is prohibited under the Equality Act 2010;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

¹³ Apprenticeships, Skills, Children and Learning Act 2009, section 128(1).

¹⁴ Apprenticeships, Skills, Children and Learning Act 2009, section 129(2)(c).

¹⁵ Apprenticeships, Skills, Children and Learning Act 2009, section 129(6).

¹⁶ Equality Act 2010, section 149.

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.6 GCSEs are designed and awarded by bodies described in the Equality Act 2010 as ‘General qualifications bodies’, which, for the purposes of GCSEs, we call exam boards. These bodies are required by the Equality Act, among other things, to make reasonable adjustments for disabled people taking their qualifications, except where we have specified that such adjustments should not be made.
- 7.7 When we decide whether such adjustments should not be made, we must have regard to:
- the need to minimise the extent to which disabled persons are disadvantaged in attaining the qualification because of their disabilities;
 - the need to secure that the qualification gives a reliable indication of the knowledge, skills and understanding of a person upon whom it is conferred;
 - the need to maintain public confidence in the qualification.
- 7.8 Legislation therefore sets out a legal framework within which we must operate. We are subject to a number of duties and we must aim to achieve a number of objectives. These different duties and objectives can, from time to time, conflict with each other. For example, if we regulate to secure that a qualification gives a reliable indication of a student’s knowledge, skills and understanding, a student who has not been able to demonstrate the required knowledge, skills and/or understanding will not be awarded the qualification. A person may find it more difficult, or impossible, to demonstrate the required knowledge, skills and/or understanding because they have a protected characteristic. This could put them at a disadvantage relative to others who have been awarded the qualification. It is not always possible for us to regulate so that we can both secure that qualifications give a reliable indication of knowledge, skills and understanding and that equality between people who share a protected characteristic is advanced. We must review all the available evidence and actively consider all the available options before coming to a final, rational decision.
- 7.9 We place on the bodies we regulate General Conditions of Recognition.¹⁷ These are the rules that exam boards and the other awarding bodies that we

¹⁷ www.ofqual.gov.uk/documents/general-conditions-of-recognition

regulate must follow. These General Conditions include a number of requirements on exam boards to design qualifications so that they do give a reliable indication of the knowledge, skills and understanding of those on whom they are conferred. The General Conditions also require the exam boards to avoid where possible features of a qualification that could, without justification, make a qualification more difficult for a student to achieve because they have a protected characteristic. The General Conditions require exam boards to monitor whether any features in their qualifications have this effect.

Our approach to equality

7.10 Qualifications cannot be used to mitigate inequalities or unfairness in the education system or in society more widely that might affect, for example, students' preparedness to take the qualification and the assessments within it. Whilst a wide range of factors can have an impact on a student's ability to achieve a particular mark in an assessment, our influence is limited to the way the qualification is designed and assessed.

GCSE reforms

7.11 We have considered the equality impact of the reforms to GCSEs generally in our *GCSE Reforms: Equality Analysis Report* (November 2013).¹⁸ We are now considering and seeking views on the impact on students who share protected characteristics of the specific proposals for new GCSEs in modern foreign and ancient languages.

Proposed reforms to GCSEs in modern foreign languages

7.12 We have not identified any aspects of the proposed arrangements for new GCSEs in modern foreign languages that may have a negative impact on students because of age, gender reassignment, pregnancy and maternity, sex or sexual orientation (beyond those that apply generally because of the timing of assessments and as considered in our November 2013 report).

7.13 Some languages provide access to religious scripts and practices. We have not identified any adverse impacts which our proposals in respect of GCSEs in modern foreign languages will have on students who share a particular religion. We would, however, be interested to hear from respondents who believe that our proposals would have an adverse impact.

7.14 Where a student takes a GCSE in a modern foreign language with which he or she is already familiar, that student's access to religious scripts and practices will not be affected by our proposals.

¹⁸ www.ofqual.gov.uk/documents/equality-analysis-report-on-reforms-to-gcses-from-2015

7.15 Our proposal that all GCSEs in modern foreign languages must be tiered will make those qualifications that are provided accessible and rewarding to students from across the ability range. This could provide greater access to GCSE qualifications in modern foreign languages for students who wish to learn those languages for religious purposes.

7.16 Some disabled students may be at a disadvantage relative to other students when they take modern foreign language speaking and listening assessments. This is the case now and will remain so in the future. We have identified that deaf and hearing-impaired students are most likely to be disadvantaged.

7.17 To remove or reduce this disadvantage disabled students may have adjustments made to the way their assessments are conducted.¹⁹ The reasonable adjustments that are currently made to the conduct of speaking and listening assessments for deaf and hearing-impaired students include:

- Students who have sufficient hearing to complete the listening assessment using the recording provided by the exam board may need the recording to be played at a higher volume than other students. They may also find it more difficult to hear the recording among any background noise in the exam room. In these cases students may undertake the assessments in a private room, away from other students, and in the presence of an invigilator only.
- Some students use speech reading to understand spoken language. In these cases, a teacher reads to the student the script of the recording to which other students listen. The student can read the teacher's lips and facial expressions. This replicates the way the student would communicate in the language being assessed outside of an assessment situation.
- A student who is unable to attempt any part of an assessment can be given an exemption from that component. This is the reasonable adjustment 'of last resort'. The marks the student gains in the remaining assessments are scaled up and the student's certificate includes an indication to show that an exemption has been given.

7.18 The first of these two forms of reasonable adjustments should continue to be available to students taking the new GCSEs in modern foreign languages. A student will be able to apply for an exemption from any one of the components

¹⁹ The Equality Act 2010 places duties on exam boards to make reasonable adjustments for disabled students, except where the regulator has lifted this duty in respect of certain reasonable adjustments.

(speaking, listening, reading or writing) if they cannot attempt any part of the assessment.

- 7.19 We have the power under the provisions of the Equality Act 2010 to limit the extent to which exam boards must make reasonable adjustments for disabled students. We use this power to make sure a reasonable adjustment does not undermine the integrity of a qualification and that a qualification continues to give a reliable indication of a student's knowledge, skills and understanding.
- 7.20 We have used this power to limit the percentage of marks from which a student can be exempt in a given qualification. We have limited this to 40 per cent. We believe if a student is exempted from parts of the qualification that constitute more than 40 per cent of the total marks available for a qualification, then the qualification cannot be said to give a reliable indication of a student's knowledge, skills and understanding.
- 7.21 The percentage of marks in new GCSEs in modern foreign languages allocated to speaking and listening will be set at 25 per cent each.
- 7.22 Currently a disabled student could in theory be exempted from both the speaking and listening assessments if an exam board had designed its modern foreign language GCSEs so that the total marks for speaking and listening were 40 per cent (at the bottom of the permissible range for both skills). Under the new arrangements a student could be exempt from speaking or listening but not both, as this would account for 50 per cent of the marks.
- 7.23 The exam boards have told us that although they occasionally exempt a student from either the listening or the speaking assessment (typically one or two students per exam board per year are given such an exemption) they do not receive requests to exempt students from both the speaking and listening assessments.
- 7.24 We could consider changing the limit we have placed on the percentage of marks from which a student can be exempt to enable a disabled student who could not attempt any part of either the speaking or the listening assessment to be exempt from both. We do not propose to do so, however. We believe the current marks exemption limit of 40 per cent is appropriate and that we should not make provision for a student who has not demonstrated either speaking or listening skills in the language to have the marks they gain in the reading and writing assessments scaled up.
- 7.25 Currently there are short-course GCSEs available in modern foreign languages that cover either reading and writing or speaking and listening. We are not proposing to stop such short-form GCSEs from being available in the future. A student who, because of a disability, was unable to attempt either of the

speaking or listening assessments, could decide to take instead a short-course GCSE covering reading and writing.

- 7.26 Some disabled students may be at a disadvantage relative to other students when their reading and writing skills are being assessed, for example visually-impaired and dyslexic students. The proposed equal allocation of marks between speaking, listening, reading and writing may help to reduce any disadvantage experienced by students whose speaking and listening skills may be stronger than their reading and writing skills.
- 7.27 We have considered whether the proposed reforms to modern foreign languages could have an impact on students because of their race.
- 7.28 We assume, on the basis of performance and data on entry patterns, that many students who take modern foreign language GCSEs in languages for which there is a low level of demand are already speakers of the language. In turn they are likely to be of a race or national origin with which the language is associated. If exam boards decide to offer new GCSEs in languages for which there is a low level of demand and that might typically be taken by students who use the language, we do not believe the proposed approach to modern foreign language GCSEs will have a negative impact on the students who take the qualifications. Indeed, the reduction in the amount of non-exam assessment should make it easier for schools that enter students for GCSEs in languages which they do not also teach to do so.
- 7.29 Whether or not the qualifications are tiered and, if so, whether students should be able to take a combination of tiers might have an impact on some students. A student may speak a language at home or in his or her community, but not read or write in the language on a regular basis. The opportunity to take a combination of tiers might in such a case be attractive to a student.
- 7.30 However, as identified above, there is a risk exam boards will decide not to offer GCSEs in the range of languages that are currently on offer, particularly if we require every modern foreign language GCSE to be tiered.
- 7.31 We are seeking views on whether all modern foreign language GCSEs should be tiered. A tiered qualification may be more accessible to students who are not users of the language being assessed and, in turn, more accessible to students from a wider range of racial groups and national origins. This may promote better understanding between different racial groups and national origins.

Proposed reforms to GCSEs in ancient languages

- 7.32 We have not identified any ways by which the proposed requirements for new GCSEs in ancient languages may impact (positively or negatively) on persons

who share a protected characteristic, over and above those impacts that apply to the changes to GCSEs generally.

7.33 We recognise that the continuing availability of a GCSE in Biblical Hebrew is a matter that will be of particular interest to members of the Jewish community.

Questions

Please respond to the following questions on the potential impact of the proposed arrangements for GCSEs in modern foreign and ancient languages on students who share protected characteristics. Where a question begins with a statement followed by a number of options for you to choose from, please select the option that most closely represents your views.

22. A disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

It is not entirely clear why 40% has been selected, but it means that a student would be disadvantaged were s/he not in a position to complete 3 of 4 components. We have experience in members' schools where students have not been able to complete two of the four exam components. For example, a blind student who could only complete the listening and speaking components in Mandarin Chinese as the reading paper could not be brailled and neither was it possible to complete the written component. We believe strongly that in these cases, it should be possible for awarding bodies to aggregate to full GCSE award.

23. We have identified a number of ways the proposed requirements for new GCSEs in modern foreign languages may impact (positively and negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?

Yes/No

If yes, what are they?

ALL members believe that the removal of mixed tiering will have a negative impact on a range of learners with 'non average' profiles (as detailed above), and that mixed tiering should therefore be retained.

24. We have not identified any ways by which the proposed requirements for new GCSEs in ancient languages may impact (positively or negatively) on persons who share a protected characteristic over and above those impacts that apply to the changes to GCSEs generally. Are there any potential impacts we have not identified?

Yes/No

If yes, what are they?

25. Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Yes/No

If yes, what are they?

We suggest re-thinking the proposal of a maximum 40% exemption and the removal of mixed tiering.

Regulatory impact assessment

26. Do any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for:

Schools Yes/no

Exam boards Yes/no

Others Yes/no

Please explain your response.....

Schools – the changes to the speaking assessments proposed here will require higher levels of invigilation and teacher examiner time.

Exam boards – the requirement on them to maintain and extend the current range of languages provision at GCSE. This should be incentivised at government level.

Appendix A – Extract from Ofqual’s Review of Controlled Assessment in GCSEs, June 2013

4.5 Modern foreign languages (MFL)

The table below provides a summary of the current controlled assessment arrangements in modern foreign languages (MFL).

Weighting of controlled assessment		60%
Skills assessed by controlled assessment		Minimum 50% must relate to communication in speech and communication in writing Maximum 10% may relate to understanding spoken language and/or understanding written language
Level of control specified	Task setting	Limited
	Task taking	Communicate in speech – medium Communicate in writing – high
	Task marking	Communicate in speech – medium Communicate in writing – high

OCR has advised us of emerging findings from a piece of research currently underway by Cambridge Assessment into controlled assessment in MFL that suggest controlled assessment:

- motivates independent learning by enabling students to learn and use language in the context of conducting their own research;
- can have a positive impact on teaching via greater teacher involvement in assessment resource/task development;
- allows assessment of the spontaneous production of language that goes beyond a pre-learned pattern of response;
- allows students to demonstrate their understanding of grammatical patterns and be able to re-use it in different contexts;
- encourages students to move beyond pre-learned materials in order to generate their own language development, supporting higher language development;
- allows the integration of reading, writing, speaking and listening skills.

However, the evidence we have gathered suggests that, in practice, controlled assessment in MFL is having a detrimental effect on teaching and learning. When we carried out our first research into the experiences of teachers in implementing controlled assessment,²⁰ we found that the implementation of controlled assessment raised more concerns in MFL than in other subjects. For example:

- Five per cent of French teachers said that a drawback of controlled assessment is that students are less well-prepared for A level, significantly higher than the average of 1 per cent of respondents who said the same across the nine subjects surveyed.
- Fifty-five per cent of French teachers said that they thought controlled assessment gives a fair assessment of student performance, compared with an average of 75 per cent of respondents who said the same across the nine subjects surveyed.
- Fifty-seven per cent of French teachers said controlled assessment is good at assessing an appropriate breadth of skills, compared with an average of just over three quarters (76 per cent) across teachers of all subjects.

We, therefore, commissioned a further piece of research to explore in more detail the causes and nature of these concerns,²¹ which found that:

- Most MFL teachers consider that the available teaching time is reduced and learning is narrowed by controlled assessment.
- Students' skills development is skewed towards those language skills covered by controlled assessment (speaking and writing), which means reading and listening skills suffer.
- The controlled assessment tasks test memory rather than language skills. Students often learn their written and oral material by rote, and simply reproduce it during the task taking. As one teacher observed, "... it's not testing their ability to write in French, it's testing their ability to learn French."

The final point was supported by respondents to our call for evidence, who stated that students can pass controlled assessment tasks by memorising chunks of text to reproduce either in written or spoken form. This limits the scope of language learning, fails to challenge students and also means they are not being equipped with skills that prepare them for further language study.

²⁰ Ipsos MORI (2011) *Evaluation of the Introduction of Controlled Assessment*.

²¹ Ipsos MORI (2012) *Controlled Assessment in Modern Foreign Languages*.

An MFL teacher taking part in a focus group convened by the AQA Centre for Education Research and Policy said that “Children are faced four times in Key Stage 4 with a rote learning task... because if anybody imagines that children are going to produce pieces of writing, or oral work, off the top of their head, they are living in complete cloud cuckoo land” (AQA Centre for Education Research and Policy, 2011c).²²

The same point was made by our subject experts, who found that “weaker learners... may rote learn chunks of language they do not necessarily understand with a detrimental effect on pronunciation and intonation” and also found evidence of “over reliance on learning large chunks of language during the preparation time that they then write out during task taking at the expense of creativity and spontaneity.”

This practice has a detrimental effect on students’ preparation for A level studies. A teacher interviewed as part of our research into controlled assessment in MFL told us: “We’ve got a really good set of GCSE results, but as we go through to AS, we’ve got grammar gaps, which are quite evident because they [the students] haven’t learned the grammar behind the concept, they’ve just learned what they need to get through the controlled assessment.”

This view is supported by Pearson Edexcel, reporting that A level teachers have stated that the rote learning applied in GCSE controlled assessment has resulted in students being less well prepared for A level studies.²³ Pearson Edexcel goes on to note that “teachers would not disagree that they do teach to the test but cite various mitigating factors including... the overwhelming pressure to maximise student performance for their school’s standing in league tables.”

As described above, controlled assessment is proving a valid test of students’ memory but not a valid test of their language skills. In the case of speaking tasks, which are subject to a medium level of control in task taking, there is also concern that students may be learning text that is not their own: “[They might be] getting someone else to write their stuff for them, then they’ll learn it off by heart... But because they’re not with me I cannot prove that so I have to take their word for it. And they might be lying through their back teeth to me or they might be telling me the truth, I just don’t know.” (Ipsos MORI, 2012).²⁴

²² AQA Centre for Education Research and Policy (2011) *Findings from Focus Groups: Is Controlled Assessment Working?*

²³ Pearson Edexcel submission to us, received 26th April 2013. Evidence taken from Pearson Teacher Panel survey results and stakeholder interviews.

²⁴ Ipsos MORI (2012) *Controlled Assessment in Modern Foreign Languages*.

Exam boards are varied in their responses on the validity of controlled assessment in MFL:

- AQA notes that controlled assessment of writing has become “to some extent a memory text” and recommends that an unseen piece of writing, with students having access to dictionaries, “would be a more valid form of assessment”.
- Pearson Edexcel recommends 100 per cent external assessment “as all skills (reading, listening, speaking and writing) can be validly assessed externally”.
- OCR suggests that the main issue with controlled assessment in MFL is the high weighting it carries (60 per cent), and it recommends only spoken language being assessed via controlled assessment.

8. Responding to the consultation

The closing date for responses to the consultation is Friday 23rd May 2014.

Please respond to this consultation in one of three ways:

- Complete the online response at <http://comment.ofqual.gov.uk/modern-foreign-and-ancient-languages>.
- Email your response to consultations@ofqual.gov.uk – please include the consultation title (MFL and AL GCSE Consultation) in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to: MFL and AL GCSE Consultation, Ofqual, Spring Place, Coventry Business Park, Herald Avenue, Coventry, CV5 6UB.

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the following information section.

We will publish our evaluation of responses. Please note that we may publish all or part of your response and attribute it to you unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may still quote from your response anonymously.

About you*

Your details:

Name:	Wendy Newman
Position:	Professional Officer
Name of organisation or group (if applicable):	Association for Language Learning
Address:	University of Leicester, University Road, Leicester LE1 7RH
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Would you like us to treat your response as confidential?* If you answer “Yes”, we will not include your details in any list of people or organisations that responded to the consultation and we will not identify you as the source of any quotations we publish from your response.

Yes No

Are the views you express on this consultation your personal views or an official response from the organisation you represent?*

Personal views

Official response from an organisation/group (please complete the type of responding organisation tick list)

If you ticked “Personal views”, which of the following are you?

Student

Parent/carer

Teacher (but not responding on behalf of a school or college)

Other (including general public) (please state capacity)

.....

If you ticked “Official response from an organisation/group”, please respond accordingly:

Type of responding organisation*

Awarding organisation

Local authority

School/college (please complete the next question)

Academy chain

Private training provider

University or other higher education institution

Employer

Other representative group/interest group

Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

Comprehensive/non-selective academy

State selective/selective academy

Independent

Special school

Further education college

Sixth form college

None of the above (please state what)

.....

Type of representative group/interest group

Group of awarding organisations

Union

Employer/business representative group

Subject association/learned society

Equality organisation/group

School/college or teacher representative group

None of the above (please specify)

.....

Nation*

England

Wales

Scotland

Northern Ireland

Other EU country (please state which)

.....

Non-EU country (please state which)

.....

How did you find out about this consultation?

Our newsletter or another of our communications

Via internet search

From our website

From another organisation (please state below)

Other (please state)

.....

May we contact you for more information?

Yes

No

*Denotes mandatory fields

Summary of questions

Assessing modern foreign language GCSEs

1 Reading skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

Within a national examination system, it makes sense for reading to be assessed via an exam. The setting of valid, reliable reading assessments is a skilled job best undertaken by an independent awarding body for a consistent and standardised approach.

Some ALL members expressed concerns about TL testing within an examination framework that claims to offer discrete skills testing. Others believe that TL testing can, under the right conditions, provide a valid means of assessment. However, there is unanimity amongst members that students should be absolutely clear what they are been asked to do in all parts of the examination, and that question types should be skilfully chosen and formulated, so that the tests are a valid mechanism for assessing students' understanding and/or use of language, and so that students are never likely to be penalised for misunderstanding an examination rubric.

2. Writing skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

) Strongly agree

) Agree

) Disagree

) Strongly disagree

) Don't know/no opinion

Please give reasons for your answer.....

All views expressed to the Association for Language Learning support the removal of Controlled Assessments for writing. Controlled Assessment, as it has been implemented within the current GCSE framework, has reduced valuable teaching time. An examination should offer the fairest means of assessing students' written production, and is coherent with a focus on grammar, independent and creative language use. As such, it offers the most coherence in terms of joining up the new curriculum at KS3, KS4 and productive skills at KS5.

3. Listening skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree this statement?

) Strongly agree

) Agree

- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

The rationale here is the same as that given in the case of reading (Q1). As with reading, and given the DfE position on target language (TL) questioning, we would strongly urge that all due consideration is given to achieving maximum question validity, ensuring that:

- (i) students understand the questions set
- (ii) there is clarity and transparency about which single skill is being tested at any one time

In the case of listening, our members request that listening material is provided as video, rather than disembodied audio. This is something that association members have discussed on many occasions. Publishers at KS2-5 have included much more video material in their courses in recent years. Given the visual nature of talk interaction generally, and the dominance of visual culture online, it seems incongruous to retain voice-only listening assessment at GCSE. This is entirely compatible with the aim of achieving a challenging, rigorous GCSE, and may assist awarding bodies in the sourcing of more high quality, authentic listening material.

4. Speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam board. To what extent do you agree or disagree this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

There is widespread acceptance that the teacher should conduct speaking assessments at GCSE. On the issue of whether the awarding body should mark the assessments, ALL members expressed a variety of views. Overall there is

more support for the view that marking by the awarding body ensures fairer outcomes for students for three reasons:

Firstly, there would be less pressure on teachers to 'second guess' the exam board marking and under-estimate their students' performance to avoid their centre's work being marked down;

Secondly, it would avoid the situation where awarding bodies need to adjust the grade boundaries in one section of the exam to achieve the desired overall outcomes year or year. In short, there is ironically a great chance of achieving something closer to criteria-driven assessment if the exam board marks all exam components;

Thirdly, with performance-related pay linked to exam results, there is the need for exam results to be much more stable and less prone to individual component fluctuations than currently.

One key disadvantage of divorcing teachers from the marking process is the risk of de-professionalising them. A key strength of the current system has been the need for teachers to understand the assessment process much more intimately. A further disadvantage highlighted is a concern about the quality of assessment of the speaking, if left to the awarding bodies. Many ALL members have been examiners and are aware of the tightly-constrained time frames in which training of markers, moderation and assessment are carried out. ALL urges awarding bodies to ensure that there is a rigorous process of training in place, adequate time allowed for assessment, and crucially for moderation processes, and for the development of clear, transparent mark schemes for assessing speaking, which are clear to students, teachers and examiners alike. (For further detail, see answer to Q5 below).

5. What considerations need to be taken into account to make sure students' speaking skills are assessed in a way that is:

ALL welcomes the assessment of speaking that is based on assessment of a student's ability to interact in the foreign language, in a way that is unplanned and unscripted, but plays out within a context that is familiar, thereby allowing candidates to be assessed positively for what they can communicate, rather than be penalised for the inevitable errors that occur in spontaneous discourse, (even among fluent native speakers of the language). Regarding the validity, reliability and fairness of speaking assessments, we draw attention to the following points:

- c) valid

Validity refers to the extent to which a test measures what it sets out to measure. Comments referring to the concerns about TL testing (above) are relevant in this regard. Equally, ALL points out that speaking assessments, particularly those that will assess the new criteria which stress unplanned, spontaneous production, are not single skill assessments. They are in their essence a test of both listening and speaking. To acknowledge this, one of two actions is required: firstly, the claim to discrete skill assessment could be removed for the speaking exam. There are examples of speaking assessment markscheme (iGCSE - www.cie.org.uk/images/128380-2015-syllabus.pdf) in which listening and speaking are explicitly recognised, something which results in a much clearer understanding of what represents good performance in spoken interaction, which is, by definition, a mixed-skills event. Alternatively, the speaking assessment criteria would have to start from the premise that the ability of understand a question is not part of measuring speaking ability and therefore ensure that the criteria do not penalise for any aspects of spoken performance that rely on listening skills. This seems rather difficult to imagine in an assessment that deliberately sets out to test unplanned speaking.

reliable, and

Reliability in languages assessment concerns two specific aspects of reliability. Firstly, in relation to the setting of questions in all four skills papers, there is the need to ensure that the assessment tool produces stable and consistent results. This is important, both over time, when different papers that purport to test the same level and extent of language understanding / use are compared over several years, and also within one individual paper, when different question types are chosen to test the same knowledge at different levels. Secondly, and just as importantly, inter-rater reliability is required (particularly when assessing written and spoken performance) to ensure that the application of a mark scheme to a student's performance produces the same outcome, regardless of the assessor / marker. To help to ensure that this happens, where there are key terms, such as 'fluency', 'spontaneity', 'complex lexical items' 'takes initiative' 'elaborate responses' etc., these should all be exemplified, so that there is no guesswork about the sorts of performance they describe.

.....
d) fair?

The principle of fairness relates to the need to ensure that all candidates take the assessment under the same conditions and have equality of experience. To ensure that this is the case, there is a need to:

(i) ensure that grade boundaries reflect the new spontaneity paradigm,

recognising that previous incarnations of speaking assessments (however well-intentioned) have resulted in marathon feats of memorisation in a great many centres

(ii) eliminate teacher / student choice beforehand and any other opportunities to pre-prepare or over prepare

(iii) provide clear tasks with transparent markschemes, which are applied consistently year on year.

(iv) ensure that the themes and topics that students talk about in the assessments are relevant, interesting and up-beat, able to engage all learners, irrespective of gender, ability or interests.

(v) ensure inter-rater reliability at exam board level when marking performances

6. How might any aspects of the proposed assessment requirements impact on:

b) the costs, and

As far as the cost of the exams themselves are concerned, the consensus is that costs did not go down when teachers assumed responsibility for marking the speaking component, so that there is no cause for them to go up, when the responsibility for marking the speaking component returns to the awarding bodies.

In schools, however, the conditions requiring higher levels of control / supervision / invigilation and a recording of all tasks increase staffing costs, i.e. the cost of cover when teachers need to administer tests.

b) likely take-up of new modern foreign language GCSEs?

1 In speaking, it is crucial that those involved in designing the assessment, and more crucially, in the criteria for assessment, understand the difference in performance that is implicated in truly 'unplanned' language production. It is not possible to retain the notions of fluency and accuracy, and just add spontaneity to them, without the explicit acknowledgement that increased spontaneity incurs a re-negotiation of expected levels of fluency and accuracy. Not to do this from the outset (and not to make it explicit for teachers) will lead to the outcry that the impossible is being asked. Two possible consequences in the short time would be that:

(i) teachers believe that the new exam is only accessible to higher ability learners and 'market' the course according in their schools, resulting in a lower, skewed KS4 uptake

(ii) teachers attempt to spot any and all ways to enable their students to achieve

e.g. by working out how students can learn / memorise all that they might need (which would return us to the pre CA GCSE where teachers complained that candidates had to memorise numerous questions from all topics).

2 In writing, we believe that students will benefit from the increased teaching time freed up by the removal of CAs and that they will respond positively to producing shorter pieces of writing independently under exam conditions. The inclusion of prose translation may also appeal to boys, whose writing is often penalised when they are disinclined to develop or elaborate.

3 Cost – if languages examinations are more costly than other GCSEs, there is a danger that this may be a disincentive for school leaders when it comes to encouraging uptake.

4 Grading – if grading issues are resolved for the new incarnation of the GCSE in languages, such that there is no difference between the subjects on offer, there is no reason to believe that the new assessment requirements would not see an increase in take-up at GCSE.

7. The outcome of the speaking component should contribute to a student's overall grade. To what extent do you agree or disagree this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

The ability to speak the foreign language is a key element of the GCSE qualification.

Additional point:

ALL members would like to see the CEFR used in all languages assessment frameworks, including the new GCSE. All other European countries use the CEFR in their foreign language teaching, learning and assessment. It has proved useful in the past to bench-mark, reference and incorporate descriptive language from the CEFR in other English assessment frameworks for modern languages, including the Languages Ladder in the UK.

8. All assessments (reading, writing, listening and speaking) in new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree this statement?

() Strongly agree (but see alternatives below)

() Agree

() Disagree

() Strongly disagree

() Don't know/no opinion

ALL members' view align themselves with two different positions as regards tiering:

Model 1

All students complete a short foundation tier in each skill. Completion of a further higher tier paper in any or all of the skills is optional.

Advantages

- (i) There is no risk for students (or teachers) in selecting the best tier.
- (ii) There is flexibility built-in and the opportunity for learners to make progress at different rates, including rapid improvement in the last stages of the course
- (iii) Students are not demotivated when taking the tests (we have found that students completing the higher tier reading and listening papers can be demoralised by a tricky question encountered early in the paper, with knock-on detrimental effects on their completion of the remainder of the paper). When middle ability students take the higher paper, they are already secure in the knowledge that they have completed the foundation tier confidently. Conversely, able students are not put-off by being required to complete a short set of questions that is too easy for them.
- (iv) There is no requirement on the exam board to produce such precision-balanced, comparable papers with an overlap.

Disadvantages

- (i) an overall increase in assessment time (but many GCSE subjects already have far longer examination time than languages)
- (ii) an increase in marking (it would be possible to devise a system, whereby the marking of the higher tier was dependent on achievement in the foundation tier, or that the achievement of a certain level in the higher tier removed the need to mark the foundation tier paper. Equally, electronic marking might also provide gains in terms of time.

Model 2

Tiering is built into all four skills, with an overlap for foundation and higher level.

There are members who hold one of these two views, but no views expressed that are not covered in one of these two models.

9. All available new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?

) Strongly agree

) Agree

) Disagree

) Strongly disagree

) Don't know/no opinion

Please give reasons for your answer.....

ALL strongly supports the view that schools should be encouraging students to study a range of languages at GCSE level, and that achievement at both foundation and higher level in the full range of languages must be allowed for.

10. Students should be required to enter for either higher- or foundation-tier assessments but not a combination of the two. To what extent do you agree or disagree this statement?

) Strongly agree

) Agree

) Disagree

) Strongly disagree

) Don't know/no opinion

Please give reasons for your answer.....

Students have different profiles to those described in paragraphs 3.35 – 3.38. The completion of two short courses at different levels in one language is not a solution that accounts for the different learning and achievement profiles presented to teachers in our membership in the classroom. On this basis, we argue strongly for the retention of mixed tier entering (notwithstanding our suggestion about tiering in Q8 response). In addition, we propose that all awarding bodies adopt the approach of the exam board that allows flexibility in terms of tier entry to the day of the exam itself.

11. For the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation and higher tier assessments. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

The proposal seems to be that the overlap would be 'grades' 4 and 5 on the 1-9 point scale. Currently the overlap (G – C / E – A*) allows for the equivalent of 3 of the available 8 grades, which seems to be adequate. There might therefore be the need to allow for the awarding at higher tier to allow for achievement at the current E-grade equivalent, to ensure that there is no sudden drop off to 0 after 4.

50% seems on the face of it to be a very large degree of overlap, but presumably this anticipates a general conversation section, which will be differentiated by outcome.

12. Do you have any further comments on the tiering of modern foreign language GCSEs?

.....
.....

13. New GCSEs in ancient languages should be assessed wholly by examination. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

14. New ancient language GCSEs should not be tiered. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

The non-tiering of ancient languages GCSEs may seem logical and to reflect the current cohort of students that enter these exams. As long as (as suggested in 5.4) the assessments can be so designed that students across the ability range can demonstrate their abilities, we agree that these exams could be untiered.

15. Modern foreign language GCSEs in a wide range of languages should be available in the future. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know/no opinion

Please give reasons for your answer.....

ALL members are united in their view that GCSEs should be available in a wide range of languages. Not only do they believe that the current range of languages should be maintained, they argue strongly that additional languages should now be offered, to fill the gap that has arisen following the withdrawal of Asset Languages qualifications.

The association believes strongly that the diversity of languages learnt and spoken in England is an asset that should be promoted and recognised in the national examination system. We do not wish to see some languages and cultures prioritised over others, rather we want to encourage the learning of all

languages within the immediate community, the wider context of the UK and Europe as a whole, as well as those languages of particular interest and importance at a global level, economically, politically and socially.

16. Modern foreign language GCSEs for which there is low demand should be available in the future. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

The UK needs a diverse range of language skills for the future. The British Councils' 2014 *Languages for the Future* report identified Spanish, Arabic, French, Mandarin Chinese, German, Portuguese, Italian, Russian, Turkish and Japanese as the languages most vital to the UK over the next 20 years. This list includes many languages not usually regarded as "high demand" for GCSEs, even though they have been forecast as being key to the UK's future from the view of the needs of UK businesses, the UK's overseas trade targets, diplomatic and security priorities, and prevalence on the internet.

As our global community is constantly and rapidly changing, it is therefore crucial that we keep a diverse range of languages available at GCSE, as no doubt other languages will become identified as significant to the UK according to the economic, social, political and cultural environment of the time.

In addition to these globally-significant languages, there are several key community languages that should continue to be accredited in England at GCSE level. These languages are economically and socially highly significant for the UK. Many home speakers of the languages are encouraged to retain and develop their interest in their home language because there is recognised accreditation for its study. In this way, language speakers that might not otherwise have acquired higher levels of literacy in their home language are encouraged to do so. The positive benefits on our society of learners that are literate, whether in English, a modern foreign European language, or additionally a heritage language, (or all three) are clearly demonstrable.

17. Modern foreign language GCSEs should be available for students who are existing users of the language. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

Existing users of a language should also be able to get accreditation for the language, whatever it may be, and for the reasons outlined above. However, ALL would welcome an attempt to exempt literate native speakers from the norm referencing so that only learners competing on a level playing field are part of the % allowed at every grade. This would not be completely straightforward and would rely on teacher professionalism and 'fair play', but we do believe that teachers, in cases where a student was clearly going to achieve A* in every component as a result of a long period of residence in the country or a bi-lingual upbringing resulting in native speaker levels of competence, would be willing to indicate this as point of entry. This identified cohort would achieve A* as before, but the higher % of A* grades overall would be justified and national figures could report them separately as two figures, if necessary (A* and A* - BL).

To ensure that all languages are available, each exam board should have to provide an equal number of 'lower-demand' GCSE languages, worked out in terms of numbers of entries. Each exam should also be accessible to non-native speakers of those languages.

18. In your opinion would schools and colleges be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand?

Some would, but others would find this more challenging. Charging more might disadvantage precisely those schools that could benefit most from 'lower demand' language entries. Above all, there should be equality of opportunity for all learners with respect to their language learning and its summative accreditation.

19. What, if any, steps do you think Ofqual should take to secure the availability of GCSEs in a range of modern foreign languages?

It seems reasonable to come to an arrangement with the awarding bodies such that they 'share out' the provision for less widely taught languages.

Ofqual would need to insist on an identified list of languages that GCSEs would be provided in, as commercial interests alone will be insufficient.

20. A range of ancient language GCSEs should be available in the future. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

ALL believes that the current range of ancient language GCSEs is appropriate and should be maintained.

21. What, if any, steps should Ofqual take to secure the availability of GCSEs in a range of ancient languages?

Ofqual should continue to encourage awarding bodies to maintain their current provision.

22. A disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. To what extent do you agree or disagree with this statement?

Strongly agree

Agree

Disagree

Strongly disagree

Don't know/no opinion

Please give reasons for your answer.....

It is not entirely clear why 40% has been selected, but it means that a student would be disadvantaged were s/he not in a position to complete 3 of 4 components. We have experience in members' schools where students have not been able to complete two of the four exam components. For example, a blind student who could only complete the listening and speaking components in Mandarin Chinese as the reading paper could not be brailled and neither was it possible to complete the written component. We believe strongly that in these cases, it should be possible for awarding bodies to aggregate to full GCSE award.

23. We have identified a number of ways the proposed requirements for new GCSEs in modern foreign languages may impact (positively and negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?

Yes/No

If yes, what are they?

ALL members believe that the removal of mixed tiering will have a negative impact on a range of learners with 'non average' profiles (as detailed above), and that mixed tiering should therefore be retained.

24. We have not identified any ways by which the proposed requirements for new GCSEs in ancient languages may impact (positively or negatively) on persons who share a protected characteristic over and above those impacts that apply to the changes to GCSEs generally. Are there any potential impacts we have not identified?

Yes/No

If yes, what are they?

25. Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Yes/No

If yes, what are they?

We suggest re-thinking the proposal of a maximum 40% exemption and the removal of mixed tiering.

26. Do any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for:

Schools Yes/no

Exam boards Yes/no

Others Yes/no

Please explain your response.....

Schools – the changes to the speaking assessments proposed here will require higher levels of invigilation and teacher examiner time.

Exam boards – the requirement on them to maintain and extend the current range of languages provision at GCSE. This should be incentivised at government level.

Appendix A – Extract from Ofqual’s Review of Controlled Assessment in GCSEs, June 2013

4.5 Modern foreign languages (MFL)

The table below provides a summary of the current controlled assessment arrangements in modern foreign languages (MFL).

Weighting of controlled assessment		60%
Skills assessed by controlled assessment		Minimum 50% must relate to communication in speech and communication in writing Maximum 10% may relate to understanding spoken language and/or understanding written language
Level of control specified	Task setting	Limited
	Task taking	Communicate in speech – medium Communicate in writing – high
	Task marking	Communicate in speech – medium Communicate in writing – high

OCR has advised us of emerging findings from a piece of research currently underway by Cambridge Assessment into controlled assessment in MFL that suggest controlled assessment:

- motivates independent learning by enabling students to learn and use language in the context of conducting their own research;
- can have a positive impact on teaching via greater teacher involvement in assessment resource/task development;
- allows assessment of the spontaneous production of language that goes beyond a pre-learned pattern of response;
- allows students to demonstrate their understanding of grammatical patterns and be able to re-use it in different contexts;
- encourages students to move beyond pre-learned materials in order to generate their own language development, supporting higher language development;
- allows the integration of reading, writing, speaking and listening skills.

However, the evidence we have gathered suggests that, in practice, controlled assessment in MFL is having a detrimental effect on teaching and learning. When we carried out our first research into the experiences of teachers in implementing controlled assessment,²⁵ we found that the implementation of controlled assessment raised more concerns in MFL than in other subjects. For example:

- Five per cent of French teachers said that a drawback of controlled assessment is that students are less well-prepared for A level, significantly higher than the average of 1 per cent of respondents who said the same across the nine subjects surveyed.
- Fifty-five per cent of French teachers said that they thought controlled assessment gives a fair assessment of student performance, compared with an average of 75 per cent of respondents who said the same across the nine subjects surveyed.
- Fifty-seven per cent of French teachers said controlled assessment is good at assessing an appropriate breadth of skills, compared with an average of just over three quarters (76 per cent) across teachers of all subjects.

We, therefore, commissioned a further piece of research to explore in more detail the causes and nature of these concerns,²⁶ which found that:

- Most MFL teachers consider that the available teaching time is reduced and learning is narrowed by controlled assessment.
- Students' skills development is skewed towards those language skills covered by controlled assessment (speaking and writing), which means reading and listening skills suffer.
- The controlled assessment tasks test memory rather than language skills. Students often learn their written and oral material by rote, and simply reproduce it during the task taking. As one teacher observed, "... it's not testing their ability to write in French, it's testing their ability to learn French."

The final point was supported by respondents to our call for evidence, who stated that students can pass controlled assessment tasks by memorising chunks of text to reproduce either in written or spoken form. This limits the scope of language learning, fails to challenge students and also means they are not being equipped with skills that prepare them for further language study.

²⁵ Ipsos MORI (2011) *Evaluation of the Introduction of Controlled Assessment*.

²⁶ Ipsos MORI (2012) *Controlled Assessment in Modern Foreign Languages*.

An MFL teacher taking part in a focus group convened by the AQA Centre for Education Research and Policy said that “Children are faced four times in Key Stage 4 with a rote learning task... because if anybody imagines that children are going to produce pieces of writing, or oral work, off the top of their head, they are living in complete cloud cuckoo land” (AQA Centre for Education Research and Policy, 2011c).²⁷

The same point was made by our subject experts, who found that “weaker learners... may rote learn chunks of language they do not necessarily understand with a detrimental effect on pronunciation and intonation” and also found evidence of “over reliance on learning large chunks of language during the preparation time that they then write out during task taking at the expense of creativity and spontaneity.”

This practice has a detrimental effect on students’ preparation for A level studies. A teacher interviewed as part of our research into controlled assessment in MFL told us: “We’ve got a really good set of GCSE results, but as we go through to AS, we’ve got grammar gaps, which are quite evident because they [the students] haven’t learned the grammar behind the concept, they’ve just learned what they need to get through the controlled assessment.”

This view is supported by Pearson Edexcel, reporting that A level teachers have stated that the rote learning applied in GCSE controlled assessment has resulted in students being less well prepared for A level studies.²⁸ Pearson Edexcel goes on to note that “teachers would not disagree that they do teach to the test but cite various mitigating factors including... the overwhelming pressure to maximise student performance for their school’s standing in league tables.”

As described above, controlled assessment is proving a valid test of students’ memory but not a valid test of their language skills. In the case of speaking tasks, which are subject to a medium level of control in task taking, there is also concern that students may be learning text that is not their own: “[They might be] getting someone else to write their stuff for them, then they’ll learn it off by heart... But because they’re not with me I cannot prove that so I have to take their word for it. And they might be lying through their back teeth to me or they might be telling me the truth, I just don’t know.” (Ipsos MORI, 2012).²⁹

²⁷ AQA Centre for Education Research and Policy (2011) *Findings from Focus Groups: Is Controlled Assessment Working?*

²⁸ Pearson Edexcel submission to us, received 26th April 2013. Evidence taken from Pearson Teacher Panel survey results and stakeholder interviews.

²⁹ Ipsos MORI (2012) *Controlled Assessment in Modern Foreign Languages*.

Exam boards are varied in their responses on the validity of controlled assessment in MFL:

- AQA notes that controlled assessment of writing has become “to some extent a memory text” and recommends that an unseen piece of writing, with students having access to dictionaries, “would be a more valid form of assessment”.
- Pearson Edexcel recommends 100 per cent external assessment “as all skills (reading, listening, speaking and writing) can be validly assessed externally”.
- OCR suggests that the main issue with controlled assessment in MFL is the high weighting it carries (60 per cent), and it recommends only spoken language being assessed via controlled assessment.

We are looking at how we provide accessible versions of our consultations and would appreciate it if you could spare a few moments to answer the following questions.

Your answers to these questions will not be considered as part of the consultation and will not be released to any third-parties.

3. Do you have any special requirements to enable you to read our consultations?
(For example screen reader, large text, and so on)

Yes/[No](#)

4. Which of the following do you currently use to access our consultation documents? (Select all that apply)

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Braille reader

Screen magnifier

Speech to text software

Motor assistance (blow-suck tube, mouth stick, etc.)

Other

5. Which of the following document formats would meet your needs for accessing our consultations? (Select all that apply)

A standard PDF

Accessible web pages

Large type PDF (16 point text)

Large-type word document (16 point text)

eBook (Kindle, iBooks or similar format)

Braille document

Spoken document

Other

6. How many of our consultations have you read in the last 12 months?

- 1
- 2
- 3
- 4
- 5
- More than 5

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