### Modern and ancient languages

6a Do **the proposed subject content and assessment objectives** for modern and ancient languages cover the appropriate knowledge and understanding for GCSEs in these subjects?

Yes, with certain reservations	No -insufficiently demanding	No- overly demanding
Not Sure		

#### Comments:

We fully support the intention, clearly signalled in the proposed content and assessment objectives, to raise performance at GCSE and to require candidates to express themselves with greater fluency, to use language more independently and in appropriate contexts. We hope that more interesting teaching and examination requirements at KS3 and KS4 will encourage students to continue their study of languages to KS5.

We welcome the elements within the current draft that signal, more clearly than previously, the skills and knowledge required for further academic study at KS5.

With regard to the deduction of meaning, summarising, and drawing conclusions, elements are clearly and aptly signposted in the references.

There are perhaps further elements that might be considered, such as research and reference skills, but we recognise that these are more likely to be detailed within a programme of study.

In addition, certain elements would perhaps benefit from greater definition to guide those designing assessments for students at the upper end of the ability spectrum. For example, the statement that students should 'initiate and develop conversations and discussion, producing extended sequences of speech' might be further clarified. Similarly the penultimate statement in the writing objectives might be further explained.

In the responses we have received and in discussion with members, the phrase 'more creative and complex use of the language' has generated some uncertainty. Were the criteria for progression made more specific, this could help allay fears among some teachers that the document is directed towards those at the upper end of the ability spectrum.

As an Association, we very much support the attempts to steer assessment towards a qualification that prepares higher ability students for further study. We are also aware of, and largely support, the intention to raise standards and

achievement. There appears to be a concern among teachers however that overall the document may be more suitable for higher achieving students and may not cater for the full ability range.

Currently only 9% students taking GCSE French progress to A level, still the most popular foreign language at KS5. This figure must be seen in the context of the fact that, even this year after the Ebacc impact, only 52% of the whole GCSE cohort (largely the more able students) has entered for a GCSE in a foreign language (based on projected figures quoted as uptake for KS4 September 2011 <a href="http://www.britac.ac.uk/policy/State\_of\_the\_Nation\_2013.cfm">http://www.britac.ac.uk/policy/State\_of\_the\_Nation\_2013.cfm</a>).

To fulfil the aspiration of making GCSE a qualification for the majority of KS4 students - which corresponds with Ofqual's clear commitment (June 2013) to assessment 'accessible to all' - the criteria should be appropriate for the full ability range at this level.

We wonder if further guidance for lower levels (with reference to the ECF) may be helpful for Ofqual and the Awarding Bodies in preparing assessments, as they necessarily have to cater for the wide range of ability and may need to extrapolate progression towards the goals and define grades for those who do not match the upper boundary descriptions.

Some members are concerned about the already recognised disparity in subject difficulty at GCSE. This has been a major concern among language teachers for a number of years and much detailed work has been done (notably by ASCL) to support the claim of "severe grading" in GCSE languages examinations. In its recent consultation document, Ofqual refers to research that has highlighted the issue of relative difference in difficulty between different subject areas at GCSE (and A level). Ofqual states that it is committed to being 'open and clear about comparability between subjects' and that this is the time to 'develop reformed GCSEs that address these issues and that will be better suited to the wider context in which they are taken'. We welcome this commitment from Ofqual and believe that the current criteria will need to leave room for all potential outcomes, including the possibility that the current level of challenge (A2/B1) may be deemed sufficient for the vast majority of students when the GCSE in languages is compared with the new levels of challenge expressed in the subject criteria for the reformed GCSEs in other subjects.

Finally, with respect to the overall level of stretch and challenge contained in the current draft document, members point out that it will be the new Year 7 cohort in September 2013 that will take the reformed GCSE in 2018, but that the new KS2 and KS3 programmes of study, which serve as the rational premise for the more challenging assessment at KS4, first come into force in September 2014. The implication is that it is only those students entering Y7 in 2018 that will have had the curriculum provision at KS2 and KS3 on which the reformed GCSE

expectations are built. This position in itself assumes a rather optimistic implementation from zero to optimum in the first year of the new Programme of Study. This five-year time lag in the raising of standards raises important issues (beyond the scope of these draft criteria) about interim measures.

6b Is the relative weighting of the assessment object	ives	right for	modern	and
ancient languages?				

#### Comments:

As controlled assessments are to be discontinued in the reformed GCSEs, ALL supports the return to equal weighting, as a position that is familiar, and preferable to the current 60:40 ratio. Not all members share this view, however, and an alternative view put forward is that we should consider a greater weighting for oral communication. One reason for this is the persistent view from Ofsted reports, supported in other studies, which it is in spoken interaction that the least progress has been made over the past 30 years.

We very much welcome the inclusion of repair strategies in the assessment of oral interaction and the explicit acknowledgement of the potential tension between spontaneity/fluency and accuracy. However, some members are concerned about **how** this might be done. We suggest that the current speaking objectives might be re-worked a little to offer awarding bodies more clarity with respect to the delineation of spoken production versus spoken interaction and the assessment of both.

We recognise the difficulty in crafting oral examinations that measure spontaneity effectively. Criteria alone do not describe the standard; they have to be interpreted and valid, reliable interpretations are difficult to achieve. Judging interaction is particularly hard. One suggestion was that reinstating a version of a role play / negotiation task might be positive. Interactional scenarios have the potential to generate unscripted responses and have the advantage that they can be made relevant to situations in which young people might realistically find themselves.

We believe that there is consensus amongst teachers that we want to focus on the sort of language and interactional competence that you need if you are to engage in, sustain and even direct a conversation that follows broadly familiar but unrehearsed lines. The overarching aim in the assessment of speaking at GCSE level must be to avoid pre-learnt regurgitation, whilst ensuring that students are not faced with a leap into the situational and linguistic unknown, and we hope that the awarding bodies will bear this in mind. It may be that the

individual skills statements in the current framework draft might benefit from a little further clarity to guide awarding bodies in their design of the speaking assessment component in particular.

We welcome the opportunities for innovation offered by this framework and hope that there may be the potential to develop new forms of oral assessment which will help overcome some of the pitfalls described above. Other examinations, the current IB for example, or Mode 3 GCSEs in the past, have successfully used pair and group oral assessment or tested speaking and listening or reading skills together.

6c Do the proposed subject content and assessment objectives for modern and ancient languages provide assurance that essential knowledge taught at the earlier key stages is built upon and represented adequately?

Yes No No	ot Sure
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#### Comments:

We very much welcome:

- The specific reference to asking as well as answering questions. This builds directly and appropriately on essential knowledge and skills for interaction that are taught at KS2 and KS3 in the new Programme of Study.
- The reinstatement of the requirement to use formal and informal registers appropriately.
- The stipulation in the criteria that the grammar requirements be classified as productive / receptive, acknowledging that whilst this does already happen in practice, it was not previously a requirement of the awarding bodies.
- The overall emphasis on interaction in speaking which reflects the direction of learning outlined in earlier key stages too.
- The overall balance across the four skills. The allocation of marks explicitly for grammar (10%) is unchanged from the 2008 specification and has not raised undue concern, as it is a continuation of the present position.

There are a few specific points that we wish to raise:

1. There is a view among some members that it will not be appropriate to include translation into the foreign language within the reformed GCSE ("translate sentences and short texts from English into the assessed language"). Teachers generally view translation positively as a teaching and/or formative assessment tool but have pointed to two concerns about its inclusion at GCSE: first, it is viewed as an unrealistic task in all but the rarest of situations; secondly, it is felt that it would require the use of dictionaries for it not to be a lexical test rather than a test of grammar.

The overall concern is that it may not be a valid assessment mechanism as it will not be able to assess what it purports to test. One respondent suggested the requirement should be to "transpose" meaning rather than "translate", seeing this as a more useful skill which often demonstrates a student's overall linguistic ability,

2. A further concern is how awarding bodies will deal with the use of literary texts and authentic materials for assessment purposes. In terms of listening materials, members have asked whether the use of video could be permitted. Many members support the use of video in listening assessment, particularly when authentic sources are to be used. In addition, there has been some concern raised about the phrase 'clear standard speech at normal speed'. We draw attention to the CEFR statements at B1 level, which make particular mention of adjusted speed: 'I can understand the main point of many radio or TV programmes on current affairs or topics of personal or professional interest when the delivery is relatively slow and clear.' We suggest a statement about the speed of delivery would be beneficial and would support the inclusion of visual-audio sources in the assessment.

In terms of literary texts, it is pertinent to refer to the KS3 statement about the purpose of reading literary texts: 'to stimulate ideas, develop creative expression and expand understanding of the language and culture'. In the main, we feel that teachers have relatively few concerns about the role of literature in their teaching. They have some concerns however when it comes to valid ways of assessing ideas, creative expression and cultural understanding. We feel it is very important for pupils to have rich learning experiences related to the study of various types of literature. We fear that external assessment which focussed on those elements of literary study that can realistically be tested would risk restricting the learning experiences that students would have at KS3 and 4. Were it to be the case, for example, that the only aspect of the KS3 statement that could be put forward for assessment through literary texts is 'understanding of the language', then this should be a correspondingly minor part of the assessment.

We have also considered the issue of how to ensure that students receive their full curriculum entitlement at KS3 if this is not later substantially tested at KS4. We are not currently sure how best to resolve this issue, but we feel that awarding bodies will probably need a little more guidance if they are to get this right.

6d Will the proposed qualifications in modern and ancient languages secure **sound progression for the purposes of further academic and vocational study?** 

#### Comments:

We welcome the breadth of contexts in the draft document and are convinced that the proposed qualifications secure progression for the purposes of further academic study. We have some concerns that vocational language knowledge and skills appear rather under-represented.

Given the vital importance of language skills for our economic wellbeing as a nation, there is little mention of specific vocational skills in the current document, although we recognise the potential within the contexts for these to be included.

Teachers' responses regarding vocational language study are probably influenced by the current position of the NVQ Business Language course. In responses to various consultations members have highlighted the positive value of this course, reporting that students perceived the relevance of applied language learning and that uptake improved at KS4 when the NVQ was offered. They have been very disappointed that the course has been devalued ("I don't believe there will be sound progression for vocational purposes now that NVQ is no longer an accredited benchmark").

If the DfE is not keen to reinstate the equivalent value of the NVQ course, an alternative would be to ensure that the reformed GCSE meets the needs of those learners who would previously have taken the NVQ. The need for courses that combine language skills with vocational study is highlighted in the recent British Academy report into language skills in the UK: "Learning languages is rarely combined with the acquisition of other workplace skills. And language courses are seldom offered to learners with lower academic attainment."

This point leads on to wider issues about the content / themes of the GCSE proposals that are also relevant here.

The possibility for choice of contexts and purposes by centres, prompted by the Dearing Report recommendation, was a significant innovation in the previous GCSE (2008). We wonder if this will still be possible in the new GCSE and would urge the Government to consider this as it allows for considerable flexibility.

For centres engaged in bilingual learning, the element of choice allows for cross-curricular knowledge to be recognise in assessment. How will the awarding bodies design specifications that 'make appropriate links to other areas of the curriculum and enable bilingual and deeper learning' if this flexibility is not retained? It will not be realistic for all centres to pursue bilingual learning

at the same rate or to the same degree. Perhaps a choice of papers might reflect different directions here.

If so, and this is our second point, perhaps vocational (business or other applied language uses) could be one of these optional pathways. Other options might be literary, bilingual, or interpreting and translation. This could open up possibilities for the consideration of alternatives to overlapping tiering, the model currently favoured by Ofqual for the reformed GCSE (if untiered examinations are unrealistic). Future consultation on the structure of the GCSE might give us the opportunity to suggest something along the lines of a core + extension model (with a choice of extension papers). We see that this would add complexity to the GCSE and there would be a need for complete transparency about the requirements / challenge of each.

Please answer all the remaining questions, which include questions on literacy, numeracy and impact on specific groups of students.

7 Does the English language content cover the <b>key elements of literacy needed for employment or further study</b> ?			
Yes	No	Not Sure	
Comments:			
8 Does the mathematics con employment or further study		Not Sure	
Comments:			

9 Do any of the proposals have potential to have a **disproportionate impact**, **positive or negative**, **on specific pupil groups**, in particular the 'protected

characteristic' groups? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation); if they have potential for an adverse impact, how can we reduce this?			
Yes - Positive impact	Yes - Negative impact	No	
Not Sure			
Comments:			

#### Comments:

Our response is based on discussions at ALL and other meetings, comments made by teachers to ALL officers and trustees at events, views expressed on ALL and other email fora, and a small number of detailed comments (10) sent to us by individual members. This rather low rate of response may be to do with the timing of the consultation period at the end of the school year (see 11 below). Phrases in italics in our response to questions in Section 6 and 10 are taken from these individual responses.

ALL has already pointed out that the new secondary curriculum and new examination requirements will create a very different and challenging environment both for pupils and teachers. Our members generally are aware of the benefits of moving away from the old system and many of the comments we have received, even where questions have been raised, have been positive in many ways.

"Broadly speaking I welcome the changes that these proposed GCSE objectives for Modern Languages will bring about, especially those that will force pupils (and teachers) to move away from pre-learnt chunks of language to developing pupils as independent language learners with a solid understanding of how language works"

"I am very happy with the proposals generally"

"This will bring a new impetus to motivate teachers and students further in a purposeful, innovative and meaningful approach to language learning"

However such radical change is bound to lead to uncertainty, especially in a system as accountable as our own and in which examination results are so crucial. Understandably, it is the uncertainties of teachers that have been reflected in the small number of more detailed responses that members have submitted to us. For us this underlines yet again the need for teachers to be supported in this move to greater autonomy and a more demanding curriculum and for schools to create the conditions (e.g. through adequate teaching time) for pupils to achieve their full potential.

"Teachers, pupils and schools will need to be supported in this move towards a more demanding GCSE"

There are further views and observations that have been raised by members of the Association and which either did not directly pertain to the questions above, or were more specific and detailed in nature and better included in this section:

### 1) Contexts and purposes

Some members saw the list of themes as a continuation of the current GCSE content, others as a step towards A level content. This may indicate that more detail could be needed to support awarding bodies to avoid misunderstanding

when the themes are interpreted and worked into assessment tasks.

2) Reference to past, present and future events

It was mentioned that this might lead to a return to simplistic judgements about attainment based on the mechanistic or formulaic inclusion of three tenses (although this is not mentioned explicitly in the document) in speaking and writing, rather than a more holistic overall assessment of the quality of language use. It was the observation of such practice that led to its exclusion from the previous specification.

### 3) Dictionaries

Opinions are split on the use of dictionaries, but above all with relation to the requirement to "translate sentences and short texts from English into the assessed language" for which they are considered essential. If we remove this element from the criteria, the opinions on dictionaries for assessments will be less divided.

# 4) Subject aims and learning outcomes

It would help to allay the concerns among some about aiming only at the most able in this section if we were to include a reference to 'practical communication'. E.g. develop their ability to use the foreign language for the purpose of practical communication in speech and writing (conveying what they want to say with increasing accuracy). It would also be helpful if we could retain a reference to 'enjoyment' and add the uses of travel and personal use.

## 5) Repair strategies

There was some confusion about what these are:

"Does this mean the ability to self-correct? If so, then I am all for it!"

More detail would be useful to both teachers and awarding bodies to help them design their inclusion and assessment within the qualification.

11 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

### Comments:

The number of questions was appropriate and the questions were structured to allow detailed answers. The consultation itself was easy to find, understand and complete.

One point of difficulty was the timing. Teachers are on holiday from the third week in July so much of the consultation period, with the deadline falling in the middle of August, is when most teachers will be away. It would have been preferable to put the deadline either earlier, time allowing, or at the end of September to enable colleagues to meet together to discuss the implications of such an important document before making a response.