



Department  
for Education

# Reforming Key Stage 4 Qualifications

## Consultation Response Form

The closing date is: 10 December 2012  
Your comments must reach us by that date.

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**Please tick if you want us to keep your response confidential.** ☐

Reason for confidentiality:

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If your enquiry is related to the policy content of the consultation you can contact The Department on:

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If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Consultation Unit by e-mail: [consultation.unit@education.gsi.gov.uk](mailto:consultation.unit@education.gsi.gov.uk) or by telephone: 0370 000 2288 or via the Department's '[Contact Us](#)' page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input type="checkbox"/> Academy
<input type="checkbox"/> Higher Education Institute	<input type="checkbox"/> Further Education Institute	<input type="checkbox"/> Local Authority
<input checked="" type="checkbox"/> Subject Association	<input type="checkbox"/> Parent	<input type="checkbox"/> Student
<input type="checkbox"/> Union	<input type="checkbox"/> Employer-Business Sector	<input type="checkbox"/> Governor
<input type="checkbox"/> HT/Teacher	<input type="checkbox"/> Awarding Organisations	<input type="checkbox"/> Other

Please Specify:

## Title

1 Do you agree that the new qualifications should not be called "GCSEs"?

☐

Agree

☐

Disagree

**X** Not sure

Comments:

ALL Members were completely divided about the choice of name for the new qualifications. 40% of respondents wished to retain GCSE largely for reasons of continuity; 40% were happy with EBCs; 10% were indifferent; 10% were seeking an alternative title.

The reasons for divided opinion are described in Section 2 of this consultation.

2 a) Do you agree that the new qualifications should be called English Baccalaureate Certificates?

☐

Agree

☐

Disagree

**X** Not sure

40% of ALL respondents approved of the new EBC title on the grounds that this was a new qualification and EBC demarcated change.

40% expressed serious reservations about EBCs for the following reasons:

1. GCSE is widely understood by employers and the general public;
2. A change would undermine previous achievement at GCSE and also demoralise those students currently preparing for GCSE in 2013 and 2014, designating the examination as substandard irrespective of the grades awarded;
3. EBacc Certificate is misleading for two reasons:
  - (i) the EBacc is currently understood to be a composite performance measure describing achievement from A\* to C in five subject components; each EBC would only signify achievement in one of the five components and would therefore not enjoy the status of a credible 'stand alone' qualification;

- (ii) the well respected and widely known Baccalaureat in France and the International Baccalaureate Diploma Programme recognised by universities worldwide are both Level 3 qualifications taken at 18+, which could be confusing for international comparisons with other competing jurisdictions and affect the future mobility of English students in employment and further study.

2 b) If not, what alternative title should be adopted?

Comments:

10% of ALL respondents argued for something different. Suggestions for the examination title included ***School Certificate of Education in (name of subject)***. The academic core of subjects currently identified in the EBacc could be designated as EBC components and the EBacc could be awarded as a wrap around qualification to those who achieve it.

### High expectation of performance and accurate grading

3 Do you agree with our expectations for grading structures, set out in paragraphs 5.4 to 5.5?

☐

Agree

**X** Disagree

☐

Not sure

**Comments specific to Languages:**

There was a strong feeling among ALL respondents that Grade C at GCSE was not a 'minimal qualification' in languages and represented a worthwhile level of achievement.

There was nonetheless general agreement that it would be helpful to show clear distinctions between the proficiency of the very able from the average and lower attaining pupils and that this could be accomplished by transparent marks and more detailed descriptors of performance.

Strong concern was raised about average to low-attaining students. Languages risk being seen as elitist and if standards for the C grade are to be raised substantively, this will exclude and demoralise large numbers of pupils who could and should be reaching worthwhile levels of proficiency and enjoyment of language learning. A2 on the Common European Framework of Reference, the equivalent of Preliminary in Asset Languages and Grades D – G at GCSE is still a valid level to achieve, although this would currently not satisfy the EBacc requirements. We should develop an examination which is inclusive and recognises meaningful achievement from A2 to B1 on the CEFR.

**General recommendations across subjects:**

A further proposal recommended that the **School Certificate of Education** (if we adopt a different title for the examination, other than EBC) should be assessed by a system of **National Grades 1 – 4** linked to percentage bands to differentiate the performance of individual students in individual subjects. The grades could relate to stage as well as age e.g. **Grade 1 Preliminary; Grade 2 Standard; Grade 3 Intermediate; Grade 4 Advanced**. These would broadly equate with current GCSE D – G; A\* - C; AS and A2 respectively. The percentage bands would clearly identify the profile of the students both within and across subjects.

The advantage of this system is that students could prepare and take the School Certificate of Education at any time between 16 and 19, demonstrating performance at different grades, as appropriate. This would be more inclusive of those students who may take longer to prepare for the more rigorous standards anticipated in the new examination specifications.

This system would also allow greater flexibility for the development of the EBacc as a Level 3 qualification over time in line with the raising of the school leaving age with all young people continuing in education or training to 17 from 2013 and to 18 from 2015.

4 Do you believe that we should insist on a common grading structure for all English Baccalaureate Certificates or should we allow Awarding Organisations the freedom to innovate?

☒ Common Grading Structure

☐ Freedom to innovate

☐ Other

Comments:

Almost 100% of ALL respondents approved of a common grading structure. This would allow comparisons across and between subjects; ensuring transparency, accountability and accessibility of awards.

There would also be the potential to end the artificial divide between academic, vocational and technical subject pathways, if a common grading structure was applied to a range of contexts at all levels. The introduction of a fresh approach to grading would enable England to compete with its European partners in demonstrating high levels of achievement in both applied and academic routes.

There was a cogent and vigorous appeal against norm referencing in the interests of preventing severe grading in modern languages. In order to produce a reliable, valid, verifiable assessment system, we should ensure that the mark schemes are linked closely to criterion-referenced assessment. Hence, if teaching is strong and achieves improving standards, these should be acknowledged in the interests of equality of opportunity for the students irrespective of their year of entry.

### No tiering

5 Do you agree that it will be possible to end tiering for the full range of subjects that we will be creating new qualifications for?

☐ Yes

☒ No

☐ Not Sure



**Comments for languages only:**

The majority of ALL respondents felt that retaining some form of tiering would be helpful in languages, as less confident and lower attaining pupils would be highly demotivated to face lengthy papers of more open-ended questions that they could not attempt if a common paper was presented. There were also concerns, that as pupils already find languages more demanding than some other subjects, an untiered examination would lead to substantially more failures than the current Foundation and Higher Tiers system produces. This would leave non-EBacc grade pupils in no man's land with a sense of failure.

Rather than eliminate tiering, an argument in favour of short examinations with more tiering for the advanced learners who could attempt increased language challenges was put forward. This could be open to all students who wanted to attempt the intermediate to higher level challenges. A mixture of multiple choice and open-ended tasks could be offered. The key to success would be to keep the entry dates flexible and not to impose early decisions on which tier candidates enter, as this is unhelpful and a disincentive for pupils in making progress in the final year of exam preparation.

There was considerable anxiety over the notion of raising the bar above current Grade C. This was fuelled by current concerns over severe grading in languages which flies in the face of reports of grade inflation in other subject areas. Rigorous data analysis of examination results in languages over time and evidence of disparity in the conversion of marks to grades has been conducted by a specialist statistician on behalf of ALL and ISMLA with findings reported to the Right Honourable, Nicholas Gibb, previous Minister for Schools and to Ofqual. This matter has also been raised by Baroness Jean Coussins, Chair of the All Party Parliamentary Group in the House of Lords. To avoid further risk of continued severe grading, it may be more sensible to retain some level of tiering with transparent mark schemes and clear and reliable classification of task types and success criteria.

A significant minority of respondents believed that there could be some elements of the language examination which were more open-ended and which could be assessed by outcome without tiering. There was a reasonable level of consensus that assessment by task and outcome was better suited to speaking and writing than to listening and reading. Retaining a level of tiering, particularly for reading and listening allowed pupils to play to their strengths and raise their attainment by entering foundation or higher tiers according to their levels of proficiency in each skill individually, therefore allowing an asymmetrical profile across the skills.

However, there were concerns, even among those favourable to an untiered approach that if there were to be task-based assessments with different task types measuring the quality of pupils' work by outcome, this would lead to very complex and lengthy papers, more complex mark schemes and more room for lengthy appeals procedures, as assessment criteria could be open to more subjectivity. This could prove to be more time-consuming and costly.

6 Are there particular approaches to examinations which might be needed to make this possible for some subjects?

☒ Yes

☐ No

☐ Not Sure

**Comments for languages only:**

If consideration of an untiered approach is taken forward for languages, then it would be possible to develop elements of an open-ended oral examination where performance was determined against criterion-referenced descriptors, where candidates would be graded according to outcome. This method of assessment could also apply to creative writing assignments.

There could also be consideration of some mixed skill testing where tasks could be graded according to the complexity of the authentic stimulus material presented and the linguistic demands of the task types set. These could take the form of a series of challenges with increasing linguistic demand.

However, the majority of members would prefer to retain some form of tiering.

**Assessed 100% by examination, or minimising reliance on internal assessment**

7 a) We intend that English Baccalaureate Certificates should be assessed 100% by externally marked examinations. Do you agree?

☐ All

☐ sciences

☒ languages

☐ English

☐ history

☐ None

☐ mathematics

☐ geography

**Comments for languages only:**

The majority of ALL respondents believe that the speaking element should be conducted, recorded and assessed by the teachers in school and then sent away for external moderation to the Awarding Body. This is to minimise the stress that an external examiner places on pupils sitting the oral test.

A small number of respondents also put forward the proposal that extended writing should be assessed by the teachers and then sent away for moderation.

The vast majority agreed that controlled assessments had placed an unnecessary burden on classroom teachers and that an inordinate amount of time had been diverted from teaching and learning to facilitate the assessment process. There was also a lack of confidence in the reliability of controlled assessments, as these were felt to be open to interpretation of the rules which could disadvantage pupils whose schools applied the regulations more rigorously. There was also widespread agreement that the controlled assessments had led to rote learning and had not prepared learners for independent language use.

A very small number of respondents regretted the move away from controlled assessments, as they believed that controlled assessments had allowed them to develop a more innovative and pupil-centred curriculum for languages.

7 b) If not, which aspects of English, mathematics, the sciences, history, geography or language do you believe absolutely require internal assessment to fully demonstrate the skills required, and why?

**Comments:**

It is highly recommended that the subject teacher should conduct and assess the oral element of languages and then send recorded tests to the Awarding Body for moderation.

There was a very strong steer from Head Teachers that internal assessment of the oral examination was crucial, as assessment conducted by external examiners would seriously disadvantage pupils with SEN, LDD and ADD.

**Size requirement for syllabus**

8 Should our expectation be that English Baccalaureate Certificates take the same amount of curriculum time as the current GCSEs? Or should schools

be expected to place greater curriculum emphasis on teaching the core subjects?

☐

Same amount of curriculum time

☐

Greater curriculum emphasis

☒ Other

**Comments:**

ALL respondents were divided in their views about the amount of time that should be allocated to languages in the new curriculum.

60% felt that the same time allocation should be given as currently and that decisions about time allocation to subjects should be determined by individual schools.

However, 40% felt strongly that languages were not allocated sufficient time in the curriculum and that the lack of teaching time affected progress adversely. There is clear evidence from the OECD survey, Survey Lang and Language Rich Europe that time allocation to language learning in England is significantly lower than in other leading jurisdictions and is a contributory factor to England's low status and ranking in international performance tables of language competence.

There was a strongly expressed view that if languages are to be regarded as core subjects, then language learning should receive equal teaching time as maths, English and science, particularly if the curriculum for languages is likely to be more rigorous in its cognitive and linguistic demands of the learners.

There was, however, general concern that overemphasis on the EBacc would lead to an unbalanced curriculum which would be detrimental to pupils' learning of non-EBacc subjects such as music, art, drama, religious education, technology and information technology.

## **Examination aids**

9 Which examinations aids do you consider necessary to allow students to fully demonstrate the knowledge and skills required?

Comments:

General consensus that access to bilingual dictionaries would be appropriate for written examinations and perhaps some of the more complex reading texts, as the skilled use of bilingual dictionaries is considered to be an essential language learning strategy.

### Subject suites

10 Do you agree that these are appropriate subject suites? If not, what would you change?

☒ Yes

☐

No

☐

Not Sure

Comments:

There is general agreement that these are appropriate subject suites.

There is support for the introduction of a sixth suite of subjects to include the creative and technical subjects currently excluded in the EBacc.

11 Is there also a need for a combined science option covering elements of all three sciences?

☒ Yes

☐

No

☐

Not Sure

Comments:

For those students unlikely to reach an EBacc in separate sciences, a combined science option covering elements of all three sciences will provide a very worthwhile foundation of scientific knowledge to equip learners for life, employment and further study or training.

## Track Record

12 What qualities should we look for in English Baccalaureate Certificates that will provide evidence that they will support students to be able to compete internationally?

Comments:

Where available, EBCs or whatever title the new qualifications receive, should calibrate to existing internationally recognised subject standards. In the case of languages, the Common European Framework of Reference provides just such a mechanism and should be used as reference tool to support the development of the new suite of language qualifications. The CEFR is widely used across mainland Europe, the USA and research is underway to modify the CEFR in order to better describe Asian languages, including Mandarin Chinese and Japanese. The successful Awarding Body should demonstrate its academic rigour and credibility by showing understanding of the standards and taxonomy used in the CEFR to describe language proficiency. This will ensure that the new examinations are transparent and understood across other major, competing jurisdictions.

For languages the essential qualities of the new examination should include the ability to communicate independently in speech and writing with a strong command of how the language works, including grammar and syntax in line with similar level qualifications in use in other countries. The ability to show a range of key competences through the use of the language in line with the core skills that are now coveted by employers and universities such as critical thinking and problem solving, communication, collaboration, creativity and innovation. In other countries, these skills are usually recorded in some form of profile to accompany a certificate of achievement e.g. socle commun de connaissances et de compétences.

It would be helpful if attainment could be demonstrated in a range of contexts at all levels including in both applied contexts e.g. vocational and

business as well as academic contexts. The new qualifications should be seen to be credible by employers as well as by schools and universities.

### Assurance of literacy and numeracy

13 Do you agree that we should place a particular emphasis on the successful English language and mathematics qualifications providing the best assurance of literacy and numeracy?

☐

Agree

**X** Disagree

☐

Not sure

Comments:

Literacy and numeracy are also developed and demonstrated in other disciplines and evidence of literacy and numeracy will be both explicit and implicit in other subject qualifications, (including in non EBacc subjects).

Literacy will certainly be developed through the study of ancient and modern languages. There would be great advantage to developing a more coherent curriculum and assessment framework for developing and assessing literacy skills that could support coherence in assessment criteria across a number of subjects including English, modern and classical languages, history and geography. High levels of literacy will be shown in how effectively pupils express ideas, facts and feelings in the language(s) they are studying, using appropriate grammar, vocabulary and register. Progress will be evidenced by improvements in how to structure a presentation or argument, develop and justify hypothesis and draw coherent conclusions. All of these skills will be assured across a number of subject areas not just English and are likely to feature at relative levels of complexity in assessment criteria used in different subject areas.

Similar evidence on numeracy could be deduced from science and geography and will also be developed through non-EBacc subjects like technology.

### School and Post-16 institution Support

14 In order to allow effective teaching and administration of examinations, what support do you think Awarding Organisations should be:

a) Required to offer?

Comments:

Awarding Organisations should undertake to develop very clear specifications which state unambiguously the skills, range of levels and content that they are intending to assess.

They should offer training and clear guidance on how the examination will be administered, explaining the mark schemes, assessment criteria and grade boundaries.

They should provide specimen papers, showing the task types, balance of questions and other stimuli, length of paper and layout.

They should also show specimen answers illustrating how the criteria are met at different levels so that pupils and their teachers are clear on what is expected.

They should provide training for the speaking test and example recordings of performances at different levels.

They should provide a chief examiner's report outlining the strengths and weaknesses of a particular cohort in order to inform schools of potential weaker areas in their teaching which may have put candidates at a disadvantage.

14 b) Prevented from offering?

Comments:

They should not give advance notification of examination questions or specific exam contexts.

15 How can Awarding Organisations eliminate any unnecessary burdens on schools and post-16 institutions relating to the administration of English Baccalaureate Certificates?



**Comments for languages only:**

The controlled assessments introduced for the best of intentions following the publication of the Dearing Report have created considerable stress and a significant administrative burden on schools and have not made a significant impact on standards of achievement. ALL members would like to see controlled assessments removed from the GCSE specification as soon as possible. The new specifications should not include any form of controlled assessment.

One of the most effective changes that can be made through the new examinations is to ensure the oral examination is conducted by the teacher and is then externally moderated or even assessed by external examiners supervised by the Awarding Body.

**Qualification supports progression of lower achievers**

16 Which groups of students do you think would benefit from a "Statement of Achievement" provided by their school?

**Comments:**

There is serious concern that a 'Statement of Achievement' is tantamount to a 'Statement of non-Achievement'. Any pupil receiving a SoA will be judged as inferior to those holding the EBacc. This is unacceptable and will create a more divisive two-tier system than has ever existed before.

To avoid such risks, the new suite of examinations must be suitable for the majority of learners and should develop a grading system which enables all candidates to demonstrate what they have achieved. An inclusive assessment system providing a School Certificate of Education for all candidates with examinations assessed by national grades linked to percentages (See Section 3) would allow for differentiated outcomes. Such a system would clearly show the profile of individuals and the levels of competence in different subjects, including those designated as EBacc subjects and those outside of the EBacc.

Some members raised further areas of concern about the potential reliance

on only one examination. Teachers and Head Teachers felt that one size does not fit all. While avoiding an unhelpful plethora of qualifications, serious consideration should be given to valid alternative accreditation routes to enable achievement at **all** levels to be recorded in academic, technical and vocational contexts.

For those students with Special Educational Needs or Learning Difficulties and Disabilities for whom formal examinations are inappropriate or inaccessible, it would be helpful to revisit the concept of a Record of Achievement to profile and reward their abilities and inform future employers or education and training providers.

17 How should we ensure that all students who would benefit from a "Statement of Achievement" are provided with one?

Comments:

All schools, colleges or other training providers must abide by national regulations and legislation with regard to providing information and support to those students with SEN and LDD. This should also include the statutory requirement to provide a Record of Achievement at appropriate points of transition and a summative record at the end of formal schooling.

## **Equalities**

18 a) Do you believe any of the proposals in this document have the potential to have a disproportionate impact, adverse or positive, on specific pupil groups?

☐

Adverse impact

☐

Positive impact

**X Both**☐

No impact

Comments:

**Benefits to national language capability**

The introduction of the EBacc performance measure has undoubtedly reversed the declining numbers of those students continuing language study post 14 and this is to be welcomed. Language teachers strongly support the teaching and assessment of a wide range of languages at 16 and at 18, including, wherever possible, languages spoken in the home in addition to those newly learnt in school. The potential of the EBacc stimulating higher achievement in a wider range of languages is very encouraging and positive.

**Anxieties over the average and below average learners**

There is serious concern over the negative impact of the EBacc on average attaining pupils and those working below the national average expectations. There must be a valid and worthwhile accreditation system which recognises and values achievement at current grade C and current grades D – G. If the EBC (grades A\*-B) were to be the only available assessment mechanism in operation, approximately 55% of pupils currently taking GCSE would fail to achieve a recognised award. This will potentially lead to a spiral of severe decline and demotivation

**Risks to a broad and balanced curriculum**

Language teachers are concerned that the priority given to languages is to the detriment of other creative subjects such as music, art, drama and technology. At a time of fiscal crisis, this seems counterintuitive culturally and economically. As a nation we need to provide a balanced education across the sciences and the arts in line with the curriculum of other leading countries in Europe and across the world. The new EU Erasmus for All Programme, Europe 2014 - 2020 emphasises the importance of languages and the arts, particularly highlighting the contribution both can make to economic recovery. The consideration of a sixth pillar in the EBacc to include creative subjects seems very sensible.

**Risks at national level**

There is particular concern that the EBacc elite group is likely to include only those with the current equivalent of A\* - B which will become de facto the new floor standards. If all others were to receive the SoA, this would mean creating significant numbers of pupils who were deemed to be working 'below national expectations'. This cohort of pupils would be leaving school or attempting to continue education with no recognised qualifications, holding a valueless SoA. The implications of such a situation would be critical, affecting social cohesion, economic competitiveness and the international status of many citizens in this country who would not be able to study or work outside the UK.

For this reason, it is crucial to develop an inclusive national assessment system to valorise achievement at different levels. The EBacc can remain and develop as a performance measure (See Section 3) but should either evolve to represent achievement in at different levels or should not be the only mechanism for recording achievement.

18 b) If they have potential for an adverse impact, how can we reduce this?

Comments:

**Teacher supply**

The emphasis on five EBacc subject areas at school level will place considerable pressure on teacher recruitment and supply in shortage subject areas such as languages, physics and maths. History has shown that the supply and quality of highly skilled teachers is a major factor in the success or otherwise of introducing educational reform. Serious attention should be given to recruitment strategies at national and international levels to meet the deficit in specialist areas. This should include consideration of incentives and professional training to encourage returners or new recruits from industry to enter the profession. There should also be support for specialist teachers from abroad to encourage international cooperation in meeting recruitment needs in shortage subjects such as languages.

**Develop the EBacc to become a more inclusive and differentiated Level 3 qualification**

(See Sections 3 and 18)

## Implementation

19 Should we introduce reformed qualifications in all six English Baccalaureate subjects for first teaching in secondary schools in 2015, or should we have a phased approach, with English, mathematics and sciences introduced first?

☐

In all six subjects from 2015

☐

Phased approach

**X** Other

Comments:

The majority of ALL respondents called for time to prepare for a changed curriculum and assessment system, favouring a phased approach with English, maths and sciences introduced in 2015 and the other EBacc subjects to follow in 2017. This would allow the first examination cohort to have experienced the reformed KS3 POS before beginning their EBacc specification in languages.

A significant number of respondents were concerned that there would be less parity of esteem if the traditional core subjects were introduced earlier than the other EBacc subjects. Some respondents called for a delay in all subjects so that the full EBacc performance measure could be introduced across all six subjects simultaneously rather than having a partial EBacc in 2015 and a full EBacc from 2017.

There were three other main areas of anxiety:

1. Urgent changes are required for languages in the current GCSE.  
There was widespread support for the end of controlled assessments and a return to equal weighting of the four skills e.g. 25% weighting for each of the four skills, Listening, Speaking, Reading and Writing. It was recommended that these changes should be introduced with immediate effect from 2014 and that such changes should help to inform the development of the new examination whichever Awarding Body takes this forward.
2. There is great confusion over the status of GCSE and the future of assessment for non-EBacc subjects. Is the intention that GCSEs are phased out altogether from all subjects and if so, what is to replace them? If GCSE is thought to be inappropriate for the big six, then what is the implication for those subjects outside of the EBacc?
3. In a phased approach to the introduction of the EBCs, all of those candidates entering GCSE will be preparing for a discredited qualification. This affects EBacc subjects as well as non-EBacc subjects.

**Further consideration of the life-long implications of these changes to generations of school leavers should be a matter of national priority.**

20 How best can we prepare schools for the transition to these reformed, more rigorous qualifications?

Comments:

There is plainly a role for the Awarding Body in charge of each suite of EBacc qualifications to outline a training programme to support the introduction of the new, more rigorous examinations. However, given that there will only be one Awarding Body responsible for each EBacc subject suite in the future, there is clearly a likelihood that there will be insufficient human resources to ensure national coverage. Partnership arrangements with Subject Associations and Training Schools would be one way of ensuring a 'training the trainers' approach, which would allow teachers access to information, guidance and support at local and national levels.

The Association for Language Learning would strongly advocate funding for professional development or 'support in kind' to provide information and training on the new qualifications for languages. Our membership includes leading teachers and experts from higher education, many of whom would be willing to collaborate with the successful Awarding Body to develop training programmes for language teachers, including online support and face-to-face training. The introduction of the new qualification will benefit from opportunities for teachers to network and develop an understanding of the assessment criteria, levels of proficiency and format of the examination and the implications of these to their teaching and schemes of work. The ALL branches and networks can provide an infrastructure to deliver training and support the transition to the new assessment system.

It is highly recommended that competing awarding bodies should outline their strategies for providing national and local training as a condition of the award of the contract.

21 How long will schools need to prepare to teach these reformed qualifications?

<input type="checkbox"/>	Up to 12 months	<input type="checkbox"/>	12 - 18 months	<input checked="" type="checkbox"/>	More than 18 months
<input type="checkbox"/>	Other				

Comments:

New examinations will need to be tested in pilot schools and modified. A period of development where the Awarding Body can conduct trials of new assessment tasks and approaches, analyse assessment data and feed back to schools will enable appropriate assessment models to be developed and implemented to the necessary, rigorous standards demanded by the current reform.

Schools will need at least 18 months to prepare for the new specifications and to ensure that there is a common understanding of the new standards and assessment criteria. The scope of training will now be national with EBCs available to some 4000+ institutions. To provide training for all of these establishments and to enable every education institution to fully prepare for the extent of the changes will necessitate a longer lead time.

## Languages

22 Should all languages in which there is currently a GCSE be included in our competition?

☒ Yes

☐

No

☐

Not Sure

Comments:

ALL members strongly support the underpinning principle that all languages should be valued as an asset. Therefore, the availability of qualifications in as wide a range of languages as possible, including the availability of examinations in lesser taught languages and home/heritage languages is highly recommended.

We are aware of the financial constraints which Awarding Bodies face in preparing examinations which have a very small take-up. However, there should be some form of valid accreditation for all languages within the community. This does not necessarily have to be an EBC. There is general concern over the future of alternative accreditation, including the future viability of ASSET languages which has provided a robust and valued accreditation for many community languages to date.

For this competition, it will be essential for the successful Awarding Body to justify their choice of languages offered. There could be a sensible and rational case for phasing in the development of different languages for the EBC e.g. French, German, Spanish, Italian, Russian, Mandarin Chinese, Japanese and Arabic would be sensible choices for the first phase of modern languages in the reformed curriculum, developing in parallel to an appropriate group of community languages such as Punjabi, Urdu, Modern Hebrew, Polish and Portuguese. There is a clear expectation that Classical languages Latin and Greek will also be developed within the first phase.

Mechanisms to develop EBCs or valid alternatives in other languages as demand increases should feature in the information provided by Awarding Bodies in the tender.

23 Should the number of languages for which English Baccalaureate Certificates are identified be limited? If so, which languages should be included?

☐

Yes

**X** No

☐

Not Sure

Comments:

We do not believe that the number of languages that count towards the EBacc should be limited. However, we would like to stress the importance of pupils having the opportunity to acquire a new language as well as consolidating a language that may be spoken in their home or wider community. In the spirit of developing and valorising multilingualism in the UK, we would favour an approach which recognises bilingualism and accredits one or more languages in the EBacc.

In order to compete favourably with other countries in the EU and across the wider world, we need to promote plurilingualism and work towards meeting the targets approved at the Council of Europe in Barcelona 2002 where member states agreed to promote a policy of mother tongue plus two.

24 Given the potential number of new languages qualifications to be developed, should they be introduced to a later timescale than history and geography English Baccalaureate Certificates?

☐

Yes

**X** No

☐

Not Sure



Comments:

It will not be necessary to delay the introduction of EBCs in languages to a later timescale than history and geography, although a phased approach has been recommended (See Section 19)

However, it may be sensible to develop language qualifications in stages, (See Section 22)

## Post-16

25 Should we expect post-16 institutions to be ready to provide English Baccalaureate Certificates at the same time as secondary schools?

☒ Yes

☐

No

☐

Not Sure

Comments:

Further Education Colleges and Sixth Form Colleges should be ready to provide EBCs in a range of subjects.

This will be particularly relevant if we develop the EBacc as a Level 3 qualification in line with other European Countries and to correspond to the raising of the school leaving age. (See Section 3)

26 How best can we support post-16 institutions to prepare to provide English Baccalaureate Certificates?

Comments:

Post-16 institutions should benefit from access to the same national and local training opportunities as schools. Membership of subject associations should be encouraged to enable subject specialist tutors to engage in professional networks to develop their understanding of the new qualifications and implications for change to their pedagogy and classroom practice.

**Choosing the best qualification in each subject**

27 Do you agree that five years is an appropriate period for the new qualifications to feature in the performance tables before the competition is rerun?

☐

Agree

**X** Disagree

☐

Not sure

Comments:

A minimum of five years will be required in order to garner sufficient empirical assessment data to evaluate the effectiveness of the new examinations and identify trends.

There is a general consensus that constant change is disruptive and costly. It will be better to develop trustworthy qualifications and leave them in place for a longer period to allow them to embed and become respected and widely understood.

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

Comments:

The process has been clear and unambiguous. The online form is easy to complete and accessible. There is some overlap in the types of questions and these could have been reduced in number.

The timescale for response has been generous and has allowed Subject Associations to consult widely with members.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply** ☐

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

☐

Yes

☐

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed and emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, Tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 10 December 2012

Send by post to:

Public Communications Unit  
Level 1 Area C  
Castle View House  
East Lane Runcorn  
WA7 2GJ

Send by e-mail to: [KS4QualReform.CONULTATION@education.gsi.gov.uk](mailto:KS4QualReform.CONULTATION@education.gsi.gov.uk)