



Department
for Education

Consultation Response Form

Consultation closing date: 1 May 2013
Your comments must reach us by that date.

Secondary School Accountability Consultation

Consultation Response Form

THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://www.education.gov.uk/consultations>).

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

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

Reason for confidentiality:

Name	Bernardette Holmes (Past President)
Organisation (if applicable)	Association for Language Learning
Address:	University of Leicester, University Road, Leicester LE1 7RH

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

Please mark an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher	<input type="checkbox"/> Head teacher	<input type="checkbox"/> School
<input type="checkbox"/> Parent-Carer	<input type="checkbox"/> Local Authority	<input type="checkbox"/> Awarding Body
<input checked="" type="checkbox"/> Subject Association	<input type="checkbox"/> Union	<input type="checkbox"/> Governor/Governing Body
<input type="checkbox"/> Other		

Please Specify:

The **Association for Language Learning** (ALL) is the UK's major subject association for those involved in teaching modern languages at all levels. There are currently 4,500 members.

The Association actively promotes the teaching and learning of languages by:

- providing information and publications
- organising professional development activities
- acting as a public voice on behalf of members

ALL aims to:

- encourage an understanding of the importance of languages at all levels in our society
- promote the development of language policies which reflect the linguistic diversity and the language needs of the country and its population
- advance public understanding of language learning and the techniques and approaches for successful language teaching
- promote improved standards of language teaching.

1 Do you agree with the proposals for the headline accountability measures?

☐

Yes

☐

No

☒ Not Sure

Comments

The Association for Language Learning believes that all learners benefit from learning another language and that as many learners as possible should achieve a recognised qualification in at least one other language and preferable two by the age of 16. This is essential to equip our young people for study and work in an internationally competitive and mobile, knowledge-based society.

ALL argues that qualifications and capability in languages should be a key component in any future national headline accountability measures for 15/16 year olds. Our central question is whether the current proposals for England are fit for purpose.

While ALL believes that in principle the **two** proposed headline accountability measures could support an expansion in language learning, as part of a broad and balanced curriculum, we are aware of widespread confusion over the proposals. This confusion is already having a negative impact on the health of languages in the curriculum post 14.

We recognise that Section 8.2 in the consultation guidance emphasises the government's intention that the numbers of learners achieving the EBacc should increase. However, the public perception is that the EBacc no longer exists.

We have received reliable reports from schools across the country where senior leadership teams are making irreversible decisions about the curriculum offer for languages in Key Stage 4. This is arising because schools are unaware that the EBacc will remain as an accountability measure which will be reported in the public domain. On the false assumption that schools will no longer be judged against their performance in the EBacc, individual schools and academy chains see no further need to plan for the strategic expansion of language learning. There is firm evidence that specialist language teachers are losing their posts as language departments reduce their provision.

This is a further example of the pernicious effects of the '**perverse incentives**' created by accountability measures which the Wolf Report first identified in relation to the previous system. There are indications that schools are now planning to avoid 'difficult subjects' within the new accountability measure over 8 subjects to ensure a higher average points score for more pupils.

In such a climate, the Secretary of State's aspiration to engender greater interest in languages and his aim to increase the number of young people achieving a qualification in a language is seriously threatened.

ALL strongly urges the DfE to publish an unequivocal statement to clarify:

- 1. the status of the EBacc in the new accountability measures; and,**
- 2. the position of languages within the EBacc.**

2 Is there any further information we should provide about the performance of disadvantaged students?

☒ Yes

☐ No

☐ Not Sure

Comments:

The introduction of the EBacc in 2010 has resulted in more pupils learning a language post 14. However, even given the positive impact of the EBacc, we are still far from achieving the original aim of the National Curriculum which was to offer the opportunity of 'languages for all'. Between 1988 and 2004, when languages became optional, many learners including those with learning difficulties and those in special schools enjoyed a successful experience of learning a language.

The new GCSE should offer a worthwhile course of study to a wide ability range but it is unlikely that it will be broad enough to provide appropriate recognition for the full ability range.

It is strongly recommended to revisit the concept of measuring what learners know and can do within a positive framework. Success in graded assessment schemes like ASSET languages which was based on the Languages Ladder should continue and should be made available in a wide range of languages to reflect the culturally diverse and languages rich profile of learners in our schools.

3 Should we look to use a relative measure as the floor standard in the first year of the new exams?

☐

Yes

☒ No☐

Not Sure

Comments:

It is highly recommended that the first year of the new examinations should be used to test the validity of the examinations. Specialists from all disciplines should be enlisted to analyse and review the outcomes of the examinations and moderate standards against the new criteria to establish a reliable evidence-based consensus over what constitutes achievement at different levels.

It would seem unwise and inappropriate to set an arbitrary and theoretical relative measure as a floor standard in the first year.

4 Are there any other measures we should consider publishing?

☒ Yes☐

No

☐

Not Sure

Comments:

Language learning in the school curriculum is a complex discipline which may involve one or many languages over the learning lifetime of an individual pupil.

ALL welcomes the statutory order to provide language learning in KS2. This offers significant opportunities for language learning but also presents potential challenges in recording and validating achievement in languages over time. The learning profile for pupils in different schools and different areas of the country is unlikely to be uniform. This will mean courses of language learning with a variety of different starting and end points.

Typical models could include:

- One language for nine years from Y3 to Y11;
- One language from Y3 – Y6 with a change of language from Y7 – Y11;
- One language from Y3 – Y9 with a change of language from Y10 – Y11
- One language from Y3 – Y6 and two or more languages from Y7 – Y11
- And combinations thereof.

Other pupils will have capability in a home language in addition to the new modern language that they learn in school. Opportunities should be available for pupils who wish to validate their home language to do so.

Development of a Languages ePortfolio

Therefore, it is strongly recommended to introduce a Languages Portfolio where learners can profile their language capability and experience. This can take the form of an e-portfolio which will enable such information to be readily available and follow the pupil from one educational setting to another and into employment.

Achievement can be measured against internationally recognised levels and calibrated against the Common European Framework of Reference.

Development of flexible system of graded assessment aligned to CEFR

It is highly recommended to develop flexible accreditation like the graded assessment schemes e.g. ASSET so that language capability can be validated and rewarded at different end points. This work should also align to the CEFR and could be used at all transition points e.g. KS2/3 and KS3/4. In developing such accreditation, further work at national level should be undertaken to fine tune the levels of the CEFR to identify the early stages of progress and attainment in KS2, in particular. Such work would supersede the function formally fulfilled by the National Curriculum Levels. It would also develop appropriate descriptions to record progress and attainment in line with the new Programme of Study which has introduced a number of key innovations in content.

A flexible accreditation system of this type would be of considerable value to record additional languages learned at any time both in formal school and outside of formal school. All achievements in language capability should be valorised and captured by the new **School Performance Data Portal**. This will support smoother transition and transfer arrangements, enable coherent planning for individuals and cohorts of pupils and provide data of national interest to researchers and policy makers.

Appropriately rigorous alternative accreditation to GCSE

The GCSE alone is unlikely to be sufficient to capture the diversity of language capability which should be recognised and validated. ALL recommends the development of an appropriately rigorous vocational qualification to replace the NVQ, which was being widely used in schools but which has lost its GCSE equivalence and is thus now in decline. The development of a new applied language qualification which meets the new stipulations of 30% external assessment and synopsicity is highly desirable if we are serious about wanting to recognise and accredit languages for all.

5 Do you think we should collect and publish test data from internal assessments through the Data Warehouse?

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Yes

☒ No

☐

Not Sure

Comments:

ALL believes that it is not in the best interests of learners if their teachers are required to spend disproportionate amounts of time on recording and reporting data and entering them online from internal tests.

The advantages of an e-portfolio for languages are that it will remain 'live' at all times and can be edited, when appropriate.

6 What other data could be published to create the right incentives for schools, including special schools, to ensure the best progress and attainment for all of their students?

Comments:

Learning and achievement are more than testing and attainment. Schools should also publish data about the breadth of experience that is offered to their pupils. In the case of language learning, it is invaluable for all learners to have the experience of 'living' albeit briefly 'through another language and culture'.

The e-portfolio would be an appropriate and worthwhile recording mechanism to demonstrate language knowledge, skills and experience e.g. using language in a cross-curricular project; visiting a school abroad; taking part in an international project; meeting someone from another language community and culture; participating in a virtual link up with another school; taking part in an international sports, music, art or drama event; learning a subject of the curriculum through the medium of another language.

7 Do you agree that the Department should stop the collection of Key Stage 3 teacher assessment results?

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Yes

☒ No

☐

Not Sure

Comments:

It is essential for reasons given in Section 4 referring to the different starting and end points of language learning that teachers continue to report way stages in their pupils' learning.

8 How should we ensure that achievement beyond formal qualifications is recognised?

Comments:

Entitlement to a range of experiences should be an essential part of the accountability measures for all schools.

With reference to Section 6, schools should ensure that all pupils have an opportunity to experience life through another language and culture. Examples have been enumerated e.g. using language in a cross-curricular project; visiting a school abroad; taking part in an international project; meeting someone from another language community and culture; participating in a virtual link up with another school.

9 How can national sample tests best be introduced?

Comments:

ALL would recommend that existing channels are used to sample learners' achievement in languages. It is our understanding that the first European Survey of Language Competences developed by Cambridge Assessment, working with European partners and conducted in 2012 will be conducted again. It will be very valuable for a sample of English schools to be involved in such internationally valid comparisons.

In addition, we would like to recommend that the DfE considers funding some university-led policy research in partnership with teacher networks into the successful implementation of the new curriculum.

This could involve sample testing of achievement against the attainment targets in the Programme of Study which specify the matters, skills and processes which pupils are expected to know, apply and understand.

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 x

E-mail address for acknowledgement: bh327@cam.ac.uk

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?

X
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 on-line or 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

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 1 May 2013

Send by post to:
Phil Elks
Department for Education
Level 2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: accountability.consultation@education.gsi.gov.uk