



Department  
for Education

**Consultation Response Form**

**Consultation closing date: 19 September 2014**  
**Your comments must reach us by that date**

**Reformed GCSE and A level subject content**

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

The government is reforming GCSEs and A levels to ensure that they prepare students better for further and higher education, and employment. GCSEs are being reformed so that they set expectations which match those of the highest performing countries, with rigorous assessment that provides a reliable measure of students' achievement. The new A levels will be linear qualifications that make sure that students develop the skills and knowledge needed for progression to undergraduate study.

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.

<b>Please tick if you want us to keep your response confidential.</b>	
Reason for confidentiality:	

Name:	
Please tick if you are responding on behalf of your organisation.	
Name of Organisation (if applicable): <b>Association for Language Learning</b>	
Address:  <b>University of Leicester, University Road, Leicester LE1 7RH</b>	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division 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 GOV.UK '[Contact Us](#)' page.

What best describes you as a respondent?

<input type="checkbox"/> Academies	<input type="checkbox"/> Awarding organisations	<input type="checkbox"/> Colleges
<input type="checkbox"/> Employers/business sector	<input type="checkbox"/> Further education	<input type="checkbox"/> Headteachers
<input type="checkbox"/> Higher education	<input type="checkbox"/> Local authorities	<input checked="" type="checkbox"/> Organisations representing school teachers and lecturers
<input type="checkbox"/> Parents	<input type="checkbox"/> Schools	<input checked="" type="checkbox"/> Subject associations
<input type="checkbox"/> Teachers	<input type="checkbox"/> Young people	<input type="checkbox"/> Other

Please Specify:

**ALL is the national membership association for teachers of Languages and other Languages professionals.**  
**[www.ALL-languages.org.uk](http://www.ALL-languages.org.uk)**

**As such our responses are only in respect of those questions pertinent to Languages.**

1 Is the revised GCSE content in each of these subjects appropriate? Please consider:

- whether there is a suitable level of challenge
- whether the content reflects what students need to know in order to progress to further academic and vocational education

Please provide evidence to support your response.

1 a) Art and design

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

**n/a**

1 b) Computer science

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

**n/a**

1 c) Dance

☐ Yes

☐ No

☐ Not Sure

Comments:

**n/a**

1 d) Music

☐ Yes

☐ No

☐ Not Sure

Comments:

**n/a**

1 e) PE

☐

Yes

☐

No

☐

Not Sure

Comments:

**n/a**

2 Is the revised A level content in each of these subjects appropriate? Please consider:

- whether the content reflects what students need to know in order to progress to undergraduate study

Please provide evidence to support your response.

2 a) Dance

☐

Yes

☐

No

☐

Not Sure

Comments:

**n/a**

2 b) Music

☐

Yes

☐

No

☐

Not Sure

Comments:

**n/a**

2 c) PE

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	-----------------------------	-----------------------------------

Comments:

**n/a**

3 Is the revised AS qualification content in each of these subjects appropriate?

Please provide evidence to support your response.

3 a) Dance

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	-----------------------------	-----------------------------------

Comments:

**n/a**



3 b) Music

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	-----------------------------	-----------------------------------

Comments:

**n/a**

3 c) PE

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	-----------------------------	-----------------------------------

Comments:

**n/a**

4 Is the revised A level content in each of these subjects appropriate in view of the issues raised in ALCAB's reports? Please consider:

- whether the content reflects what students need to know in order to progress to undergraduate study

Please provide evidence to support your response.

4 a) Modern foreign languages

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
------------------------------	-----------------------------	--

Comments:

Members agree that stimulating content is a priority, but that the proposals do not meet that challenge.

Members agree that recruitment to A-level courses (and thence to HE) is a priority but do not see that this proposal would attract more students to A-Level MFL.

Members support the development of Literature- / Culture- related content in line with the curriculum for younger learners, but disagree on the sort of examples and methodologies proposed.

Members recommend the development of a list of more contemporary and diverse cultural examples which could be accessed flexibly by teachers

ALL members readily appreciate that content needs to be stimulating, challenging and appropriate to the age and intellectual levels of students. Members agree that cultural content is both relevant and interesting.

Quotation: *This feels like undergraduate study themes already*

Quotation: *a greater cultural emphasis is welcome, particularly at AS, but the emphasis on languages skills must not be lost at its expense.*

However, in the view of those consulted, the illustrative themes and texts give a very limited interpretation of Culture, one which is often very Eurocentric and even open to criticism of cultural imperialism. The topic listings are also at a confusingly contradictory level of age-appropriateness: titles such as *The Generation of 1898* or *French Mathematics* sound academic and HE-specific, while the *French Impressionists* are often explored in the Primary School.

Quotation: *Awarding 20% of the marks for cultural knowledge is not a test of language.*

Respondents do not feel that the examples given provide the stimulus that would engage 17 and 18 year-olds, and were not convinced that the views of older teenagers had been sought concerning the themes they would be interested in exploring in these years of study.

In summary respondents feel that the themes and texts should include more diversity, more contemporary references and be much more flexible for teachers to use. Strong guidance should be given to awarding bodies so that we do not end up with a 'reading list' from the 1970s.

Quotation: *many of the works would present language teachers with the huge challenge of making this content stimulating to typical 17 year olds.*

Members would also like to see evidence from other high performing legislations on the content of their qualifications at this level, in order to establish international equivalencies.

Quotation: *I support the inclusion of a personal research project, provided the range of topic areas is stimulating and at an appropriate level.*

4 b) Ancient languages

☐

Yes

☐

No

☐

Not Sure

Comments:

4 c) Mathematics

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

**n/a**

4 d) Further mathematics

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

**n/a**

4 e) Geography

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	-----------------------------	-----------------------------------

Comments:

n/a

5 Is the revised AS qualification content in each of these subjects appropriate?

Please provide evidence to support your response.

5 a) Modern foreign languages

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not Sure
------------------------------	--	-----------------------------------

Comments:

There is considerable predication of the feasibility of these proposals on

- the successful implementation of the new 7-14 curriculum requirements
- the potential impact these will have on competence in the long term
- the potential impact these will have on recruitment into key stage 4 and
- the potential for ongoing progression there.

If all of this goes well, and the transitions flow smoothly, and the new GCSE proves attractive workable, and everything settles, then it may be that the proposals made here will also be workable at some level, but the success of that initiative remains to be seen (and won't be seen for another seven to ten years).

Members are concerned that there is no **evidence** that this proposals will be effective, nor that school leaders will be supportive of the implication of the proposals on whole-school curriculum planning, including timetabling.

Those consulted feared that specifically there may be some naivety or wishful thinking about what can be achieved by the end of key stage 3, and about recruitment into key stage 4, with knock-on effect in the Sixth Form.

Correspondents are puzzled in general by the emphasis placed on the positioning of Languages alongside Humanities, when there is such a clear distinction between the challenges: the intellectual challenges of a Humanities subject relate to the content, source or text under study; in a Language lesson this challenge is **compounded** by having to learn the related vocabulary etc. before, or alongside, study of the text etc. This is an intrinsically layer of difficulty which Humanities subjects do not share; the cognitive level is not the same.

ALL members feel that the focus within the AS year should remain on Language, with themes and texts being chosen flexibly for their motivational interest.

*Quotation: Language learning is a discipline with its own extensive body of literature, based on empirical and theoretical evidence, relating to how languages are learnt. This makes us different in quite fundamental ways from other disciplines, including Humanities. A key and uncontested pre-condition for successful language learning is ample exposure to and engagement with the TL. The A-level curriculum should be more clearly and more explicitly informed by what we know about language learning. We can expect our linguists to learn other subjects (such as Humanities subjects) as part of their A-level study but they can and should do this through the medium of the TL and not instead of it.*

There is concern about the burden of content suggested in the proposals which seem to ignore the focus in Year 12 on developing confidence and skill in the handling of more complex grammar and high level interaction in the Target Language.

This is on top of the concern about tackling the proposed Themes / Texts in Year 12 with students who have just emerged from GCSE.

*Quotation: Is this thought through? Language learning is cumulative and progressive ...*

Teachers in Consultation meetings could not readily understand how they could teach combined classes of AS and A2 students even working on the same topic, when the linguistic and intellectual levels would be so disparate.

Senior leaders in charge of whole-school curriculum will need to devise an innovative approach to whole-school 6<sup>th</sup> form curriculum planning to accommodate a Year 12/13 cross-over timetable that will allow for such teaching to take place.

Given the identified need to smooth the path between GCSE and AS, members are concerned that the current proposal for AS will in fact remove what current support for progression there is.

Quotation: *I am concerned that the leap from GCSE to the new AS level will be even more abrupt than it is now for many students. There is no guarantee whatsoever that the new GCSE will produce more skilled linguists. This is wishful thinking.*

5 b) Ancient languages

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

5 c) Mathematics

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Sure
--------------------------	-----	--------------------------	----	--------------------------	----------

Comments:

**n/a**

5 d) Further mathematics

☐

Yes

☐

No

☐

Not Sure

Comments:

**n/a**

5 e) Geography

☐

Yes

☐

No

☐

Not Sure



Comments:

n/a

- 6 Is the revised modern foreign languages content, covering assessment of all four skills (reading, writing, speaking and listening), applicable to all languages currently available for study at AS and A level?

☐

Yes

☐

No

☒

Not Sure

Comments:

Experienced teachers of Languages refer specifically to the requirement for an essay in English as a backward step which will take away valuable teaching time from use of the Target Language, and encourage, rather than discourage, rote learning. Experience from the previous A-level exam structures (which included this sort of exercise) demonstrates that learners are very likely to be given bullet points in English to memorise and reproduce in their exams; they are likely also to study the set text in translation to begin with, rather than being exposed to the authentic, original text, so the risk is that this is lost Language learning time several times over. Compared to modern foreign language qualifications in the European context at the same level, this would be a step backwards.

ALL members would in any case be interested to see evidence that writing in English allows students of this level to express more complex thoughts or perform deeper analysis.

Linguistically, it may be that technical literary terms will be (near-)cognates but, in any case, the language of literary analysis is another vocabulary set to master, and a useful one for students engaged in this type of study. Why would students not be trusted to acquire it and use it in communicative classroom activity?

Quotation: *The essay in English will have a harmful backwash effect on teaching methods, reducing the amount of time given over to target language work.*

On this matter of Language use, the proposals make no obvious reference to the developments schools have made in use of the Target Language across the curriculum – in CLIL activities for instance (which are a priority across the European Union). Pupils from Primary upwards have experience of studying other subjects through the medium of the Target Language and acquiring the technical language required to describe and comment on matters scientific, historical, social and cultural.

Of course not all students at 16+ will have followed a CLIL course but it would seem to be a negative message to say that they do not have the linguistic wherewithal to express their thoughts after 12 years of Language learning.

The parameters given to ALCAB give the message that A-level study is the precursor to Higher Education study; respondents are concerned that the current proposals are in fact only appropriate for a very select HE experience, and do not reflect the requirements of a large number of HE courses.

Quotation:

*The experience of studying languages to degree level can vary considerably. For example, some courses focus on translation and interpreting skills; others include very little language work or explicit instruction. Some courses focus on the detailed study of literature; others include no requirement to read any TL literature at all. Some courses expect a dissertation in the TL, but not all. Some courses conduct lectures and classes in the TL but not all. Some include 'ab initio' language study but not all, etc*

The concern is that the course content as is proposed would only be preparing students for certain sorts of University, not for the broadest range.

Quotation: *As they stand, the proposals would appear to privilege a particularly academic, literature based course of undergraduate study. And there is the risk that the proposed A-Level would only attract or appeal to a small academic elite.*

Furthermore in an era of student mobility, when students may spend some of their HE study time abroad (even if not enrolling in MFL-related degree courses), members are concerned that they see no reference within the proposals to the nature / content of Language study in HE in other countries. They fear that UK students may be badly served if the content and approach is very different and recommend some reference in the documentation to the nature of HE Languages studies in other European countries.

Quotation: *The fundamental shift is towards critical thinking and culture. But this may be at the expense of linguistic progress if the subject matter is uninspiring and fails to promote communication.*

One of the parameters given to ALCAB was to identify content which would serve

the purposes of Employment, and the interests of students with employment in mind. ALL members consulted are disappointed that this issue seems to be largely absent from the recommendations, especially as there is a diversity of motivation evident in the student cohort.

Employers put value on practical skills such as Speaking and Interpreting as well as (or above) those of Writing and have no obvious interest in academic essay writing or historical / literary texts.

*Quotation: Not enough marks are awarded to the skills of speaking and listening (approximately 40%) when compared with cultural knowledge, reading and writing.*

As an Association ALL believes that the UK needs Linguists! of diverse nature. ALL members are concerned that the alignment with the requirements of a specific Higher Education group devalues practical language skills in favour of very specific cultural content.

*Quotation: The proposals do not seem to prepare young people for undergraduate study abroad. Nor do they appear to prepare them for employment either in this country or abroad. In other words, these proposals would not prepare linguists well for situations where high level language skills are needed and sought after. And there can be no doubt that such skills are sought after. See, for example, the All-Party Parliamentary Group on Modern Languages' Manifesto for Languages, July 2014.*

- 7 Do you think that any of the proposals have the potential to have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics'? (The relevant protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.) Please provide evidence to support your response.

☒ Yes

☐ No

☐ Not Sure

Comments:

In some parts of the country, and in some establishments there is a considerable cohort of A-level Language students who are Native Speakers who have come to live locally. These students often have a high level of practical skill, of value to employers but are not necessarily academic students who would wish to progress to a HE Language course.

ALL members teaching in such situations fear that Native Speakers would be put off from taking a course

- Because of the academic nature of the content suggested
- because of the required essay in English

- 8 How could any adverse impact be reduced and how could the subject content of GCSEs and/or A levels be altered to better advance equality of opportunity between persons who share a protected characteristic and those who do not share it? Please provide evidence to support your response.

☐

Yes

☐

No

☐

Not Sure

Comments:

ALL respondents feel that a single focus on progression to HE excludes a large population of young language learners who currently continue study of a Language they have enjoyed, and gained success in, at key stage 4, but who do not intend to specialise in Language study in Higher Education.

ALL members feel that a Languages curriculum which only caters for an elite section of society is inadequate.

The development of multilingual citizens is a European Commission priority, and one not limited to those who study in Higher Education. The UK is signatory to a number of Language accords relating to the expansion of language learning and decision-makers will wish, no doubt, to make provision above and beyond this proposal for language learning opportunities, because of the importance of having a Language in later working life and for leisure.

Given what the ALL consultation reveals above about the potential of the current proposals to exclude non-academic students (who may have motivation and practical talent to study a Language at this level) one Consultation event proposed development of an alternative A-level qualification, of the same status and value, but with a practical focus which would be of greater relevance to Employment. This would be in line with provision in other high achieving legislations.

Quotation: *Most students today do not study Spanish alongside English Lit and French. They have a wide range of subjects, including things like Health and Social Care, Biology, Maths, Sport... They are interested in learning the language and through the language in learning about life in the country.*

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.

<b>Please acknowledge this reply.</b>	<b>X</b>
E-mail address for acknowledgement: RachelM@ALL-languages.org.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, please confirm below if you would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="checked" type="checkbox"/> Yes	<input type="checkbox"/> 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 use real discussion with affected parties and experts as well as the expertise of civil service learning to make well informed decisions
- departments should explain what responses they have received and how these have been used in formulating policy
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

If you have any comments on how DfE consultations are conducted, please contact Aileen Shaw, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [aileen.shaw@education.gsi.gov.uk](mailto:aileen.shaw@education.gsi.gov.uk)

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

Completed responses should be sent to the address shown below by 19 September 2014.

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

Send by post to: Alex Smith, Floor 2, Sanctuary Buildings, Great Smith Street,  
Westminster, London SW1P 3BT, UK