

Association for Language Learning (ALL)

Response to the DfE Consultation on KS4 Performance Measures

About the Association for Language Learning (ALL)

The Association for Language Learning is the UK's leading subject association for languages, representing teachers and other language educators across England, Wales and Northern Ireland. ALL is committed to promoting high-quality language education for all learners, recognising language learning as central to curriculum breadth, social mobility, inclusion, international understanding and the UK's economic and cultural future. This response reflects ALL's longstanding policy positions and draws on evidence from a survey of ALL members, representing a wide range of roles, phases and contexts across the school system. The response is framed in line with ALL's established approach to government consultations, including our recent response to the Curriculum and Assessment Review (CAR), with a focus on curriculum breadth, equity, inclusion and the national need for language capability.

Question 11: Balance between breadth and flexibility in the proposed Progress 8 model

The majority of ALL members **partly agree** that the proposed changes have the potential to increase flexibility and, in theory, curriculum breadth. Members welcome the move away from a rigid EBacc structure and the recognition of creative and technical subjects alongside academic ones.

However, **the dominant concern** emerging from the survey is that flexibility without clear incentives will **not** secure genuine breadth. Many members report that accountability pressures continue to drive risk-averse curriculum decisions, with schools prioritising subjects perceived as "safer" within performance measures. Languages, given their comparatively severe grading outcomes and status within the proposed model, are therefore particularly vulnerable.

Therefore, it is important that languages have been given some structural support in the proposal in as much as pupils must choose two from TWO of humanities, languages and creative, whereas in the current P8 EBacc3 bucket it can easily be filled without a language, which led to a reduction in language uptake before the introduction of the 2019 Ofsted Framework reversed the trend. We would strongly urge that this structural support (or something similar) is introduced, especially in the light of the new 2025 Ofsted Framework.

Some members noted that previous accountability reforms achieved breadth only because specific subjects (including languages) were explicitly incentivised. As ALL argued in its CAR response, *"breadth cannot be left to chance in a high-stakes accountability system"*.

Without explicit protection or incentive for languages, the proposed model risks accelerating existing declines in uptake, particularly in disadvantaged communities.

Overall, while the intent to rebalance breadth and flexibility is positive, ALL is not confident that the proposed changes will deliver equitable curriculum breadth in practice, whilst welcoming the structural support for languages in the requirements for the breadth slots 5 and 6.

Question 12: Inclusion of a fourth category (science) for breadth slots 5 and 6

A clear majority of ALL members **do not support** the inclusion of a fourth (science) category. Members consistently argue that science is already strongly protected through compulsory double science and, in many cases, triple science pathways. Adding science as a further breadth category risks *narrowing*, rather than broadening, pupils' experience by encouraging schools to prioritise additional sciences at the expense of languages, arts and humanities.

Members expressed concern that this proposal would further reinforce subject hierarchies and deepen an already dominant STEM narrative, marginalising languages and creative disciplines. Such an outcome would directly undermine the stated aim of increasing breadth.

ALL therefore opposes the inclusion of science as a fourth category for breadth slots.

Question 13: Allowing technical awards in breadth and choice slots (maximum of two)

The majority of ALL members **support** the inclusion of high-quality technical and vocational awards within Progress 8, with an overall cap of two.

Members recognise the value of technical qualifications in engaging a broader range of learners, supporting diverse strengths, and enabling meaningful progression into further education, training or employment. There is strong support for recognising achievement beyond purely academic routes.

However, many members stress that parity of esteem is essential. Several respondents highlighted the absence of equivalent recognised vocational or applied pathways in languages and warned that, without such provision, MFL could be further disadvantaged. ALL reiterates its position, also articulated in its response to the CAR, that applied and vocational language qualifications should be developed and recognised within accountability measures.

Overall, ALL supports this proposal in principle, subject to robust quality assurance and equitable treatment across subject areas.

Question 14: Minor methodological adjustments to Progress 8

ALL has no objection in principle to the proposed minor methodological adjustment and recognises the value of clearer, fairer banding within published measures.

Some members expressed concern about the use of statistical assumptions, such as confidence intervals, within a system calculated using whole-cohort data. There is support for greater transparency and methodological simplicity to ensure Progress 8 is well understood and trusted by schools and stakeholders.

Question 15: Any other comments on the proposed changes (Chapter 1)

Members repeatedly emphasised that **changes to accountability measures alone are unlikely to change curriculum behaviour** unless they are clearly aligned with inspection frameworks and wider accountability messaging. Ambiguity risks conservative interpretations that narrow provision rather than widen it.

ALL is particularly concerned that the removal of EBacc-style incentives, without compensatory safeguards, will hasten the erosion of language provision at KS3 and KS4 - an issue already widely reported by survey respondents. (See also response to question 21).

Question 16: Introducing a 'best-fit' progress measure for pupils with low prior attainment

Views among ALL members are **mixed but generally cautious**.

Members recognise the potential of a best-fit measure to capture progress more fairly for pupils with SEND or disrupted educational trajectories and to reduce perverse incentives around qualification entry patterns.

However, others express concern that such a measure could entrench low expectations or create implicit tracking, particularly for disadvantaged pupils. Several members highlighted the risk of labelling pupils, especially those with EAL, as 'low prior attainers' throughout their school career, despite clear evidence that many flourish when given access to a broad and ambitious curriculum.

ALL's position, consistent with our CAR response, is that progress measures should support inclusion **without narrowing entitlement or aspiration**.

Question 17: Impact of a best-fit measure on qualifications entered for low prior attainers

Most ALL members believe the impact on qualification entry patterns is **likely to be limited**, given that Progress 8 will remain the primary accountability measure.

That said, some members caution that schools under significant resource or staffing pressure may interpret a best-fit measure as justification for reducing curricular ambition if clear safeguards are not in place.

Question 18: Considerations in deciding which pupils might study fewer than 8 qualifications

ALL members strongly agree that any decision for pupils to study fewer than eight qualifications must be guided by **individual need and professional judgement**.

Key considerations identified include SEND, health and attendance issues, disrupted schooling, and significant gaps in literacy or numeracy. Members stressed that this should remain an exception rather than a systemic norm, with quality, depth and meaningful progression prioritised over the sheer number of qualifications.

Question 19: Visibility of the best-fit measure

The majority view among ALL members is that the measure should initially be **visible to schools only**.

Respondents expressed concern that, without careful explanation and contextualisation, wider publication could lead to misinterpretation, stigmatisation or inappropriate comparisons between schools. Some members support wider visibility in principle, but only if accompanied by clear guidance and public communication.

Question 21: Further comments on Chapter 2 proposals

ALL remains deeply concerned about the broader impact of the proposed reforms on equity, subject entitlement and social mobility.

Members reported *immediate and planned reductions* in language provision following the withdrawal of EBacc-related incentives and the change to the new Ofsted Framework away from the 2019 one with its emphasis on curriculum design, including:

- reduced curriculum time at KS3;
- fewer languages being offered;
- compulsory language study being removed;
- staffing reductions and redundancies within MFL departments.

As ALL stated in its response to the Curriculum and Assessment Review, the decline of language learning risks becoming **structural and irreversible**, disproportionately affecting pupils in disadvantaged areas and widening existing social and educational divides.

In conclusion, ALL urges the Department to:

- ensure explicit protections for curriculum breadth, including languages;
- avoid reforms that reinforce subject hierarchies;
- align accountability changes clearly with inspection and curriculum expectations; and
- recognise language learning as a national strategic priority, not an optional enrichment.

Without such measures, the proposed reforms risk undermining the very breadth, equity and ambition they seek to promote.