



Department  
for Education

# **Proposed permanent removal of the expectation that students engage with unfamiliar and abstract material in modern foreign language (MFL) GCSEs**

**Government consultation response**

**November 2022**

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## Introduction

Between 29 September and 20 October 2022, the Department for Education (the department) publicly consulted on the proposed permanent removal of the expectation that students engage with unfamiliar and abstract material in modern foreign language (MFL) GCSEs.

This report summarises the views expressed by those who responded to this consultation, and presents the government's response to these findings.

## Background

Existing GCSE subject content for MFL subjects requires pupils to understand and respond to abstract and unfamiliar material. Following a previous consultation, the department revised and published new [GCSE French, German and Spanish subject content](#). The new subject content stipulates that vocabulary that is not included in a pre-defined vocabulary list cannot feature in assessments, unless they are appropriately glossed, or part of an inference or dictation task. This will be taught from September 2024, with the first examinations in 2026.

To support pupils who had faced disruption to their education as a result of the coronavirus (COVID-19) pandemic, for examinations in 2022, the department introduced a number of adaptations to GCSE qualifications, in partnership with Ofqual. The adaptation made to MFL GCSEs was to remove the regulatory requirement that awarding organisations must include unfamiliar vocabulary within their assessments.

To bring the current subject content into line with the longer-term strategy for MFL GCSEs, the department consulted on the permanent removal of the expectation that pupils engage with unfamiliar and abstract material. This is a relatively minor amendment to the [current subject content for MFL GCSEs](#) and would impact pupils taking examinations in 2023, 2024 and 2025. These changes would offer awarding organisations greater flexibility when it comes to assessment design, as they would be permitted, but not obliged, to use additional vocabulary if they deem it appropriate to do so within an assessment. These changes would also make MFL subjects more comparable with other GCSE subjects, none of which require assessing content that has not been taught.

Ofqual has carried out its own separate consultation on amending their subject level conditions and guidance and assessment requirements for all GCSE language qualifications.

## **Approach to the consultation**

The consultation was published on GOV.UK, along with an online form for respondents to give us their views. There were 12 questions, which included a mixture of closed (quantitative) questions and open (qualitative) questions, where respondents were invited to provide a written response. Respondents were able to submit responses via email, including additional comments if they did not feel there was sufficient opportunity to include these as part of the online form. All 349 responses to the consultation were submitted via the GOV.UK site. There was an option to send additional comments through to a support email address, but none were received this way.

## **Data presentation**

Responses to the consultation are presented in the order in which questions were asked. Where the data presented in this document is in relation to individual question analysis, it is based only on those who responded to the question. Respondents were not obliged to answer every question, therefore the total number of responses for each question differ from the total number of responses to the consultation as a whole. All percentages throughout the report have been rounded to the nearest whole number.

# Summary of responses received and the government's response

## Main findings from the consultation

97% of respondents agreed or strongly agreed with the proposed new subject content for MFL subjects. This included 98% of pupils and 98% of teachers who responded to the consultation.

The most frequent reasons for agreement given by respondents were that the change would be a fairer way to assess pupils' abilities in MFL subjects at GCSE, and it would bring MFL subjects into line with what is expected in other GCSE subjects. Respondents also said that the change would also make MFL subjects more accessible to pupils and encourage uptake of MFL subjects.

Of the small number of respondents who disagreed with the proposal, the most common reason they gave was that they felt that responding to unfamiliar vocabulary is a useful language skill.

All comments about equalities impacts reflected that the proposed change would have either a neutral or positive impact on equalities. Some respondents suggested that, after this change, the assessments would be more accessible for both pupils with disabilities, and those who have predominantly learned the MFL subject through their schooling rather than due to their nationality or national origins.

## Government response

Having considered all the responses to the consultation (summarised in the question analysis section below), the government has decided to implement the proposals set out in the consultation document. The department will therefore update the GCSE subject content for modern foreign languages to permanently remove the expectation that students understand and respond to unfamiliar and abstract material.

Awarding organisations may still choose to use additional vocabulary if they deem it appropriate to do so for certain tasks within an assessment.

## Question analysis

This section summarises the consultation responses.

### Personal information: questions 1 to 8

Respondents were asked to state whether they were answering as an individual or on behalf of an organisation. The department received a total of 340 answers to this question.

Type of response	Total	Percent
Individual	307	90
Organisation	33	10

Those who said they were responding as an individual were asked how they would describe themselves. The department received a total of 304 answers to this question.

Description of individual that responded	Total	Percent
Languages teacher	232	76
Pupil	54	18
School or college leader	5	2
Parent / Guardian	3	1
Other <sup>1</sup>	10	3

Those who said they were responding on behalf of an organisation were asked to identify the type of organisation. The department received a total of 33 answers to this question.

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<sup>1</sup> Respondents from other categories included CEO trust lead, examinations officer, chief examiner, languages tutor, retired teacher, language education researcher, school leader, MFL lead, MFL link governor.

Type of organisation that responded	Total	Percent
School or college	28	85
Awarding organisation	2	6
Publishers	1	3
Teaching union	1	3
Multi-academy trust	1	3

Other questions that were asked within the 'personal information' section of this consultation requested respondents' names and email addresses, whether they would be content to be contacted directly about their response, and whether they would like their response to be kept confidential. There was no requirement for respondents to provide any of this information and all views were considered regardless of whether this information was given.

## Responses to the proposal: questions 9 and 10

### Question 9

**To what extent do you agree or disagree with the proposal to remove the expectation that students understand and respond to abstract and unfamiliar material (such as unfamiliar vocabulary) from the subject content for all GCSE modern foreign languages, on a permanent basis?**

The department received 346 responses to this question.

Answer	Total	Percent
Strongly agree	314	91
Agree	20	6
Do not know	1	0
Disagree	4	1
Strongly disagree	7	2

Of the 252 respondents to the above question who responded as individual teachers, 246 (98%) either strongly agreed or agreed and 6 (2%) either strongly disagreed or disagreed.

There were 55 responses from pupils which followed the same pattern, with 54 (98%) either strongly agreeing or agreeing and 1 (2%) strongly disagreeing.

28 people responded on behalf of a school or college. 27 (96%) of them either strongly agreed or agreed, and 1 (4%) disagreed.

## Question 10

**Do you have any comments about the proposal to remove the expectation that students understand and respond to abstract and unfamiliar material (such as unfamiliar vocabulary) from the subject content for all GCSE modern foreign languages on a permanent basis?**

The department received 152 comments in response to this question. Many respondents who agreed or strongly agreed with the changes commented that this change to GCSE modern foreign languages would be fairer to pupils and that it would align the subject better with other GCSE subjects by only testing on what pupils had been taught. A substantial number of respondents mentioned that the change would make the GCSEs easier and more accessible to pupils, and that this change would improve pupils' motivation.

*“As far as I know languages are the only subject required to cope with untaught/unknown content. Maybe this would help to counter the perception that languages are harder than other subjects. Students should have a reasonable expectation to be tested on what is in the spec and nothing else. Students feel they are set up to fail, that MFL exam questions are always trying to trick them rather than just asking straightforward questions.”*

*“This would be a hugely beneficial move to level the playing field, make success in languages feel like a more attainable prospect and motivate students - if they work hard (learn the vocab on the spec) they will succeed, as in other subjects. The unfamiliar vocabulary has long been a source of perceived unfairness by students (“how on earth were we meant to know that?”) and frustration for teachers.”*

*“We need to support students who work hard to learn the content we teach in lesson but respond badly to abstract and unknown vocabulary. Some previous exams contained such abstract concepts (like a tree creating energy) that the students cannot possibly understand the texts. If we are serious about boosting uptake of languages, we need to show that we are supporting all students to access the course.”*

*“There is a comprehensive vocabulary list and, to expect GCSE students to deduce meaning and understand vocabulary beyond this makes the GCSE more inaccessible for many of our students.”*

Some respondents commented that this change would reduce the advantage that they feel native speakers<sup>2</sup> have in this qualification. A number of respondents thought that this change would remove a possible advantage for pupils from higher socio-economic backgrounds, who may have been exposed outside of school to the cultures, experiences and vocabulary in that untaught material.

*“It is unfair and disadvantageous to pupils from poorer backgrounds when cultural knowledge is expected. It also means that native speakers have an even greater advantage.”*

*“It is totally unfair to include unfamiliar language, especially when they are not cognates. It only advantages native speakers.”*

Some respondents remarked that this change could improve the uptake of modern foreign languages and encourage pupils to continue their studies at A-level.

*“This would help encourage more students to develop a love for language and to move on to further study. Currently, even our top students come out of an exam feeling deflated. This impacts how they feel about a subject inherently, regardless if they find they were awarded a good mark in their results months later. It is the feeling of failure that stays with them and puts them odd studying languages further.”*

A few respondents, including pupils themselves, commented that unfamiliar material increases pupils' anxiety around examinations.

*“My French listening exam was my first year ten mock. I will not forget walking into the exam room shivering, shaking, and picking my hands out of nervous habit despite how well I felt prepared. However, from the very first question, I felt hopeless, upset, and frustrated. The recording was nothing like I had heard before. Nothing I had revised. Nothing I recognised. So I understood why I got a considerably lower grade than my usual average of a grade 9. Understandably and annoyingly, this was indeed not an accurate reflection of my hard work. Therefore, I strongly agree with the proposal to remove abstract and unfamiliar material for it is unnecessarily challenging areas that are not included in the GCSE*

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<sup>2</sup> In this document, 'native speakers' is used to refer to pupils who have learned that modern foreign language outside of school to a significant extent. This may include pupils who use that language at home, for instance pupils with English as an additional language or pupils from bilingual or multi-lingual families. It may also include pupils who have lived in a country where that language is used.

*French specification which cannot be revised, thus not reflecting the hours of dedication we have shown to the subject.”*

*“While being able to make educated guesses at unfamiliar words is an extremely important skill, I believe that removing this abstract material would simultaneously make the exams fairer and less stressful for participants. Unfamiliar words in texts can sometimes be extremely difficult, if not borderline impossible to decipher, and the ambiguity around whether or not they are important can lead to further stress. Exams should be tests of what you know and what you are able to do, not of what you can guess at or how much common sense you have.”*

A small number of respondents who were in agreement with the proposed changes commented that there should be less unfamiliar material in the assessments but not necessarily none at all. A few responses to this question mentioned other reasons for agreeing, such as a better fit with the new GCSE specification for 2024 onwards, a reasonable adaptation to COVID-19 impacts, and more achievable expectations on teachers. A small minority of respondents wanted the change to go further and prevent use of unfamiliar vocabulary.

Only 9 respondents who disagreed or strongly disagreed with this proposal provided a comment on this question. The main reasons given for disagreeing were that engaging with unfamiliar material is an important language skill, and that it helps pupils prepare for further language study and real-world interactions. A few people commented the difficulty of this task is useful for stretching the highest achievers.

*“Response to unfamiliar vocabulary is a crucial test of linguistic understanding and language skills. Foreign language learners can never expect to encounter only vocabulary they have previously seen in real-life situations, so assessing the ability of a candidate to react to unfamiliar vocab sensibly; using context, inference, and common sense to deduce possible meaning, is absolutely critical to evaluating their skill as a linguist. Preparing pupils for A-Level and any real interaction in a foreign language requires that they learn how to respond to unfamiliar vocabulary.”*

Two awarding organisations responded to this question. One showed strong support for the proposals, in part due to recognising that unfamiliar material would still be permitted, but not compulsory.

*“We strongly agree with this proposal as it reflects the direction of travel with the requirements for reformed GCSEs in French, German and Spanish for teaching from 2024, and it should help make assessments more accessible in the remaining years of the current specifications. Additionally, as the proposed change is permissive rather than mandatory, an awarding body will be able to retain its existing approach should it wish.”*

The other commented on practical issues about implementing the change, such as the small number of past papers aligning with the change and the challenging timescales to edit and quality assure question papers in time for the 2023 examinations. They also asked for clarity on how to handle reading or listening material which unavoidably contains some unfamiliar vocabulary.

*“Although the vast majority of content in the listening and reading exams can be taken from the list, a freedom to include non MCV [minimum core vocabulary] words, glossed, would allow for the potential requirement to include a non MCV word for which an appropriate MCV alternative is not available.”*

A few responses fell outside the scope of this consultation and have therefore not been included in this analysis. These included comments on the role of government in education and the expectations at A-level.

## Equality impacts: questions 11 and 12

### Question 11

**Do you consider there to be any potential equality impacts on those who share protected characteristics that we have not identified?**

The department received 337 responses to this question.

Answer	Total	Percent
Yes	20	6
No	317	94

Most of the respondents who answered Yes and provided further comments mentioned that the change would be of benefit to pupils of lower socio-economic backgrounds, but this is not a legally protected characteristic under the Equality Act 2010.

A small minority referred to how this change would remove the advantage that pupils with relevant nationality or national origins may have in assessments.

*“It will tend to remove a discrimination based on race (i.e. remove a bias against those who do not have some native-speaker background in the assessed language).”*

A few respondents referred to how this change would remove an additional difficulty from students with SEND or neurodiversity.

*“Adding [unfamiliar vocabulary] to the stress [...] is just wrong when students are having to cope with other SEND needs.”*

## **Question 12**

**Do you have any suggestions for how any potential negative impacts on particular groups could be mitigated?**

The department received 15 suggestions in response to this question. Some responses confirmed that the proposed change would itself mitigate existing inequalities.

*“I think this proposal would actually be actively trying to make the accessibility more equal for all groups of candidates.”*

A few responses fell outside the scope of the subject content consultation, such how examination papers should be written more inclusively.

## **Annex A: List of organisations that responded to the consultation**

- AKS
- Ark Greenwich Free School
- Bishop Challoner Catholic College
- Desborough College
- Dixons Allerton Academy
- Downsend School
- Droylsden Academy
- The Featherstone Academy
- Firth Park Academy
- Impington Village College
- Languagenut
- NAHT
- North Halifax Grammar School
- Pearson
- Sheffield Park Academy
- Southend High School for Boys
- Venerable Bede Academy
- Washwood Heath Academy
- WJEC

14 other organisations that requested for their responses to remain confidential have been excluded from this list.



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