

ANALYSIS OF CONSULTATION RESPONSES

# Conditions and requirements for the assessment of MFL GCSEs in 2021

Proposed amendments to the assessment arrangements for GCSEs in Modern Foreign Languages in 2021 in response to the coronavirus (COVID-19) pandemic

**ofqual**

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# Introduction

In June 2020, [the Secretary of State for Education wrote to Ofqual to set out the government's broad policy objectives for exams and assessments in 2020/21](#) in the context of the coronavirus (COVID-19) pandemic. He said that students taking exams or assessments in 2021 should be able to move on to the next stage of their education or employment and that the overall standard and rigour of examinations and assessments should be maintained wherever possible.

In August, following our consultation on the way some regulated GCSEs, AS and A levels should be examined in summer 2021, we published an [analysis of the 28,972 responses received and our decision document](#). This document included the assessment policy decisions relating to GCSE Modern Foreign Languages (MFL) qualifications in 2021. We did not propose any changes to the assessment of GCE (AS and A level) Modern Foreign Languages qualifications.

# Background

In order to implement the assessment policy decisions, we need to make short-term amendments to the GCSE Subject Level Conditions and Requirements for Modern Foreign Languages, which specify the way in which exam boards must assess GCSE MFL qualifications.

We published a [consultation on the proposed amendments](#), which ran between 12 October and 27 October 2020, and to which we received 193 responses. This is the summary of responses to that consultation.

Our aim was that the proposed changes to the Subject Level Conditions and Requirements should have the following impact for GCSE MFL qualifications in 2021:

## Assessment of spoken language

- to remove the assessment of spoken language from the calculation of the overall qualification result (the 9 to 1 grade)
- to put in place flexible requirements for the assessment of spoken language by teachers
- to put in place common criteria for the assessment of spoken language by teachers
- to require the teacher's assessment of spoken language to be marked on a 3 point scale – pass, merit, distinction (or not classified)
- to require each centre to provide a statement to their exam board confirming that it has taken reasonable steps to make sure there is an opportunity for the assessment of spoken language for every learner

- to require the outcome of the assessment of a learner’s spoken language to be separately reported alongside the 9 to 1 grade when results and certificates are issued

#### Use of vocabulary in assessments

- to allow exam boards greater flexibility in respect of the vocabulary which is to be used in assessments by removing the specific requirement which exists in other years, to use vocabulary not on the vocabulary list that they publish in their specification

## Approach to analysis

The consultation was published on our website and available for response using the online form, between 12 October and 27 October 2020. The consultation asked respondents to provide “any comments on the proposed changes to the Subject Level Conditions in view of the intention of those changes as outlined.”

Respondents were also asked to consider any potential equality impacts, which might “impact (positively or negatively) on students who share particular protected characteristics<sup>1</sup>”, taking into consideration that we analysed the equality impacts we had identified when we explained our assessment policy decisions in August.

All responses were therefore qualitative in nature, with open comments boxes provided in the online form to allow respondents to express their thoughts.

Not all respondents provided a response to the consultation questions, and many did not comment at length.

While this consultation focusses on the proposed Subject Level Conditions and Requirements, a minority of respondents (just over ten per cent) commented on our decision in August to remove the marks for the speaking assessment from the calculation of the overall qualification result (9-1 grade). Others suggested how the writing, reading and listening assessments could be amended. Whilst we have read all comments, those comments relating to the assessment policy decisions are not discussed in this analysis, given those decisions have been confirmed.

Comments focussing on the assessment policy decisions did not address the detail of the Subject Level Conditions, and tended to cover many of the points raised in the consultation on 2021 assessments, such as the potential effects on students whose speaking skills were stronger than their reading, writing or listening skills.

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<sup>1</sup> For the purposes of the public sector equality duty, the ‘protected characteristics’ are: disability, race, age, religion or belief, pregnancy or maternity, sex, sexual orientation, and gender reassignment.

Where we have included quotes, to illustrate the main themes identified, we have edited some for clarity, brevity and to preserve anonymity but have been careful not to change their meaning.

## Who responded?

In total, we received 193 responses. The majority of these were from teachers of modern foreign languages, as illustrated below:

Respondent type	Number
MFL teachers	150
School leaders/exams officers	30
Students and parents	4
Teaching associations	3
Exam boards	3
Other groups	3

## Detailed analysis

Comments on the proposed changes to the Subject Level Conditions in view of the intention of the assessment changes outlined.

The central question of the survey was whether respondents had any comments on the proposed Subject Level Conditions and Requirements, in view of the intention of the assessment policy decisions announced in August. While a minority of respondents did not comment on any part of the survey, the majority did provide comments here.

The most widely received group of comments were those who agreed with the proposed changes (around 1 in 4 respondents), and those seeking clarification on a range of details (also around 1 in 4 respondents).

Those who agreed mainly tended to provide short comments:

“I agree with the proposal. It will take the pressure off pupils and staff in a year which is proving to be very intense.” (Teacher responding in personal capacity)

“Proposal to allow teachers to assess speaking as part of normal teaching and learning is welcomed, as is the criteria for what a pass, merit and distinction looks like. This will lessen impact on our teaching time and allow us to prepare more thoroughly for the other aspects of the exam.” (Teacher responding in personal capacity)

Some respondents provided more detailed responses:

“I am wholeheartedly in favour of this amendment. It takes pressure off pupils with rote learning, it takes pressure off teachers to spend hours and hours with pupils after school going over the rote learning by pupils to check it is okay, it takes pressure of teachers having to record their answers for them, it takes pressure off other subjects due to the time needed for conducting speaking exams which is immense if you have a large cohort of pupils. ... It will allow teachers to be more creative in the way they do activities in the classroom which contribute to the endorsed grade for pupils.” (Senior leadership team)

One modern languages teaching association suggested a number of minor amendments to the criteria, in order to separate the various elements within each category, at each level. Similarly, an exam board suggested ways to clarify the wording of the Pass, Merit and Distinction criteria, where they had received queries from teachers about some of the elements.

A few responses drew parallels with other subjects with similar assessment approaches and could see how the changes could have a positive impact:

“The mechanism of endorsement is already used in other GCSE subjects and hence will be familiar to centres. The increased flexibility this generates and the reporting mechanism for the assessment alongside a 9 to 1 grade will mean centres are spared the arrangements for speaking exams which would have proved extremely challenging to coordinate under current circumstances. It may well be seen as a positive move by teachers of MFL that speaking can now be incorporated more purposefully into all aspects of lessons. If there is a continuous assessment of speaking contributing to the endorsement it may well encourage students to be more ambitious and less reluctant to speak in the target language. Indeed, this may result in better assessment overall; language speaking exams have become somewhat of a rehearsed, artificial set piece. The requirement for a statement by the centre acknowledging the opportunities for learners to have their spoken language assessed is sensible and proportionate. We welcome the fact that speaking remains an important part of the assessment overall but agree with the decision not to change arrangements for A levels in modern languages.” (Teaching association)

Those seeking clarification raised queries on a range of aspects, with some concerned at the potential for varied implementation of the approach across different schools:

“There is no guidance on what types of formative assessment teachers should be using to test students' speaking skills across all of the criteria. The system is open for some schools to 'hazard a guess' whilst others will consciously aim to test skills in all areas before determining a speaking grade.” (Teacher responding in a personal capacity)

Other respondents felt that the flexible requirements should be more limited, with a requirement for specific tasks to be set or to submit evidence of students' performance to the exam boards, to allow them to standardise outcomes awarded to students:

“Whilst it is apparent that the requirement for the speaking assessment is very open to centres deciding on their own format, it would be useful to have more detail on the number of speaking activities which need to be undertaken and what, if any, evidence of individual performance will be required?” (Teacher responding in a personal capacity)

“Different centres may take different approaches to the "data collection", i.e. pair/group work, specific oral lessons, recordings... Some more detail needs to be given to centres/exam boards to ensure that the implementation of the criteria is consistent across centres so that no learner is treated unfairly. It is also important to specify for how long and how often "data collection" is meant to happen. These practicalities are not minor when we are dealing with 80-100 candidate cohorts. It is important that the language spoken statement is applied homogeneously nationally.” (Teacher responding in a personal capacity)

“I have some concerns about fairness of assessment across different establishments. Whilst one would hope that all teachers would act in a professional manner in assessing students and ensuring that a range of activities and themes were covered, there is the potential here for inequality of opportunity for students across the country as this is dependent on the integrity of staff in a situation which is very different to one which they have been used to.” (Teacher responding in a personal capacity)

A smaller group of respondents (1 in 10) did not agree with the proposed approach to implementing the spoken language assessment. Their comments were varied, with some focussing on the Pass, Merit and Distinction criteria, and others on the classroom implementation approach. Some of those commenting on the criteria felt that they included elements beyond those covered by the usual formal speaking assessment:

“Descriptors include elements not required in usual speaking exam. Specifically, the need to ask a variety of questions. In the usual system, a candidate is only required to ask 2 questions: 1 in role play and one in general conversation.” (Teacher responding in a personal capacity)

“The criteria required for each banding would require a lengthy conversation or presentation on the part of the pupils and moderation then by staff. Staff will struggle to assess each learner during class questioning, especially in larger classes and therefore original speaking exams would be preferable. This criteria makes it tougher on staff, as they need to mark and moderate (unlike traditional speaking exams) and puts unfair pressure on pupils as they will be assessed on speaking with no formal assessment.” (Teacher responding in a personal capacity)

“To allow each student to perform across a range of purposes and to be able to include a range of complexity is again unrealistic - we have classes of up to 30 students, we have lower ability classes where listening to others speaking over a prolonged period of time, is not useful or practical in terms of behaviour management.” (Teacher responding in a personal capacity)

When raising these concerns, some respondents made suggestions as to how the approach could be implemented:

“Rather than having to assess pupils over a range of tasks and topics, could they not just do a presentation on one topic and a short conversation on another for example.” (Senior Leadership Team).

Other respondents felt that the logistics of monitoring students' progress would be difficult, given the continued disruption in schools due to the pandemic:

“The proposed changes will take a lot of class time and administration for teachers. I do not see how this is making it any easier for all concerned. Trying to use the new criteria whilst teaching a class of up to 30 pupils is going to be almost impossible, how can you teach at the same time as trying to assess what a pupil has said against the descriptors? This will disrupt the flow of teaching in a lesson and make lessons unmanageable. I can see each teacher having an assessment sheet per pupil to record their performance each time they speak - how can you have 30 sheets of paper in front of you and make judgements about performance whilst carrying out normal classroom activities?” (Teacher responding in a personal capacity)

“...accumulation of evidence 'over time' but the time is passing quickly and most of this term will have passed before criteria have been agreed. When are we supposed to do this? There is too little time. Taking the speaking exam would be quicker and teachers would be better prepared than this proposal.” (Teacher responding in a personal capacity)



Some respondents described the difficulties in implementing the spoken language assessment given the requirements for social distancing in schools:

“How about the suggestion that students are 'assessed' in pair and group work when schools are specifically discouraging teachers from allowing students to work in pairs/groups... We had planned to limit contact by asking students to record answers/presentations which we would then assess but it seems you want us (both teacher/student and student/student) to come together much more than might actually be recommended for safety purposes.” (Teacher responding in a personal capacity)

One exam board also raised this in relation to candidates other than private or “non-taught” candidates.

“There are increasing calls from stakeholders for there to be clarity on whether they are able to assess students in a one-off situation – not just for private or non-taught candidates, but for any candidate. Many teachers wish to have the flexibility to be able to set one assessment to decide on the appropriate endorsement level for their students, rather than having to maintain ongoing records of speaking achievement over the year. This has become particularly important based on the restrictions that Covid-19 is imposing on current classroom practice.” (Exam board)

For some schools, the proposals raised queries over how they could continue to support private candidates taking the qualification in languages not taught at the school:

“We as a school have a fair number of heritage languages for example where the students speak the language at home with parents etc, such as Russian, Gujarati, Bengali, Polish, Chinese to name but a few. We would normally send these students to another school or get a specialist in to us to sit the speaking exam with the student, but we will not be able to do this this academic year. We will not be able to do this as an endorsement either as we do not teach it.” (Exams officer)

One respondent suggested a way to support centres that offer language assessments to non-taught students:

“Some schools enter students in community languages where there is no formal teaching and will find hard to arrange speaking tests. I suggest we prepare a list of teachers which the schools can contact if needed.” (Examiner)

Some respondents felt that assessment in the classroom would not be suitable for all students, with some likely to feel uncomfortable speaking in front of their peers:

“Shy pupils will not wish to speak. We are not allowed to get close to pupils, so this will involve a silent room for lots of lessons, with all pupils being able to hear or doing it in the way we usually run actual speaking exams. Trying to fit pupils to the criteria in crowded and loud classrooms seems unworkable.”  
(Teacher responding in a personal capacity)

This point was raised by others, with some unsure how the issue could be resolved:

“Students who are resistant to speak in front of others and benefit from just the teacher being in the room with no one else - no idea how to get around this without putting great pressure on teachers and being seen as giving some students an advantage over others.” (Teacher responding in a personal capacity)

Some felt the best solution to this issue was to conduct the assessment in a one to one approach:

“I feel expecting students of any ability to 'perform' in front of peers for speaking in MFL is just not fair. Many are very nervous and even in the most sympathetic classroom will struggle. You require them to be assessed across a range of purposes - so on more than one occasion. An exam in school that is then used for assessment purposes would allow them the privacy they need to perform at their best... I feel centres should be able to run a shorter, conversation examination on a couple of topics - perhaps one prepared and one unseen to allow the weaker and more nervous to perform without an audience.” (Teacher responding in a personal capacity)

A few respondents regretted the burden that would be placed on teachers to understand and implement the approach to spoken language assessment:

“The burden on teachers to put new systems in place and assess students according to common criteria. This will require training.” (Senior Leadership Team)

## Equality impact

The consultation asked respondents whether there were any other potential equality impacts that we did not explore at the time we published the assessment policy decisions in August.

Here the majority of responses related to factors outside of the focus of this consultation; the policy decision to remove the marks for the speaking assessment from the 9 to 1 grade, wider factors such as the ongoing effects of COVID-19, and the potential for these to negatively affect certain groups of students more than others.

Many of these responses noted the differential impact of school and college closures on students' ability to learn in the classroom and be assessed. In particular, students who were mentioned as potentially most at risk of disadvantage included those:

- without access to the internet or computers at home – particularly students from lower socio-economic backgrounds:

“I think most disadvantaged students with no access to a laptop lost a lot of learning for 6 months.” (Teacher responding in a personal capacity)

- with special educational needs, including students with dyslexia who might be more affected by the change in the assessment approach for speaking in 2021:

“People with speech language and communication needs might not contribute in class that much, so the teacher might give a lower grade than the student actually deserves.” (Student)

“A minority of students - for example those with dyslexia, or those brought up speaking the target language bilingually at home - are able to complete the speaking element to a much higher level than the written papers and ordinarily this would rightly have a positive impact on their grade.” (Teacher responding in a personal capacity)

A few respondents commented that the proposals were helpful given the extraordinary circumstances:

“Better to follow this proposal as some schools (smaller / independent) might be better equipped to give pupils extra sessions. We are simply not allowed to do this (no mixing with pupils + vastly reduced lunchtime) so pupils have no chance to practise with teachers and would therefore be at a disadvantage when compared with schools which perhaps can do this.” (Teacher responding in a personal capacity)

One teaching association provided helpful suggestions on how teachers could minimise inequality in the implementation of the spoken language assessment:

“Avoid questions which have expectations of particular experience, for example, holidays, restaurant visits, happy, stable family life, a home to describe, shopping experiences and social experiences such as live events.”

(Teaching association)

## Regulatory impact

The consultation asked respondents to consider whether there were additional activities associated with our specific proposals to change the Subject Level Conditions and Requirements for GCSE MFL which were not identified and considered as part of the policy consultation process. In this section, the most detailed responses we received came from those we regulate, namely, the exam boards that offer GCSE MFL qualifications.

A few key considerations were raised by exam boards relating to the regulatory requirements set out in the Subject Level Conditions. These included the requirement for an exam board to “take reasonable steps to ensure that no Learner has access to a dictionary”, which one board felt may not be possible where the assessment of speaking would take place during classroom.

Similarly, two exam boards queried the requirement for an exam board to have in place arrangements to ensure that, as far as possible, the criteria are understood by assessors and accurately and consistently applied, given that in the spoken language assessment, the assessors will be the classroom teachers, who would not be subject to the usual standardisation and moderation activities applicable to exam and oral assessment markers. The board also sought confirmation that there would be no requirement for exam boards to receive nor review evidence of students’ speaking performances.

One exam board suggested that we could use different terminology and refer to the spoken language assessment as an “endorsement” to clarify the distinction between an “assessment”, where mark schemes are applied by exam board markers and the “endorsement” for 2021, applied by classroom teachers.

One exam board raised the requirement for a statement from each centre to confirm it “has taken reasonable steps to secure that each Learner...has had the opportunity to take a spoken language assessment”, seeking clarification as to whether the spoken language assessment was a compulsory element of the course of study or whether it was optional, given concerns raised around implementation difficulties and preferences for individual assessment among certain students.

The exam board further sought to clarify whether teachers could share with a learner their “working at” level for spoken language, given the Subject Level Conditions state that teachers can share the criteria, if they wish. The board had received queries from teachers uncertain about whether this information could be shared with students, given the requirement in summer 2020 to keep centre assessed grades confidential until the final results day.

## Annex A: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation.

These are the organisations that submitted a non-confidential response:

- Association for Language Learning (ALL)
- AQA
- Association of School and College Leaders (ASCL)
- Blackfen School for Girls
- Bruton School for Girls
- Claydon High School
- Clifton High School
- Delta Trust
- Fitzharrys School
- Glenthorne High School
- Kingswood School, Bath
- National Association of Language Advisers (NALA)
- Pearson
- Raynes Park High School
- St John's School
- Swire Chinese Language Centre, Oxford
- The Blue Coat School, Oldham
- The John of Gaunt School
- The Norton Knatchbull School
- Truro High School
- WJEC



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Earlsdon Park  
53-55 Butts Road  
Coventry  
CV1 3BH

0300 303 3344

[public.enquiries@ofqual.gov.uk](mailto:public.enquiries@ofqual.gov.uk)

[www.gov.uk/ofqual](http://www.gov.uk/ofqual)