

ANALYSIS OF CONSULTATION RESPONSES

Assessment of revised qualifications in GCSE MFL (French, German and Spanish)

Consultation on changes to the assessment
arrangements for GCSE French, German and
Spanish

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Introduction

In November 2019, the Department for Education (DfE) announced a review of the subject content for GCSEs in modern foreign languages (MFL), in French, German and Spanish. GCSE MFL qualifications in other languages may be revised at a later date, after the revisions to French, German and Spanish have been made. These proposals would also be subject to public consultation.

Given the proposed changes to the subject content, Ofqual duly reviewed the requirements for assessing that content, which the exam boards offering GCSE MFL qualifications in French, German and Spanish must follow. We proposed some revisions to our existing requirements in order to ensure that the assessment arrangements would be appropriate to support and assess the revised content.

We consulted on our assessment proposals at the same time as the DfE consulted on its proposed new content.

This is the summary of responses to our [consultation on revised GCSE qualifications in modern foreign languages](#) that ran from Wednesday 10 March to Wednesday 19 May 2021.

In this consultation, we sought views on the following proposed assessment arrangements, for revised GCSEs in MFL (French, German and Spanish):

- revised assessment objectives (AOs), which denote the percentage of qualification marks that must be awarded for each aspect of assessment
- maintaining tiered assessments, and requiring a single tier of entry, as in the current specifications, rather than permitting mixed tier entries across the assessments
- maintaining the use of non-exam assessment (NEA) to assess speaking skills, as in the current specifications, which would count towards 25% of the total marks for the qualification

Approach to analysis

This [consultation on revised GCSE qualifications in modern foreign languages](#) was published on Ofqual's website and available for responses, using the online form, between 10 March and 19 May 2021.

The consultation included a balance of closed questions where respondents could indicate the extent to which they agreed or disagreed with the proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree) and open questions, inviting comments.

The open questions included the opportunity for respondents to identify any impacts of the proposals in relation to equalities or regulatory considerations.

Respondents could choose to respond to questions included in the consultation; they did not have to respond to them all. We have provided the total number of responses received for each question.

We have also provided tables of the responses to the closed questions and presented them as charts. In some cases, this has resulted in instances where percentages total something other than 100. This is due to the rounding of the individual percentages.

All responses to the open questions have been read in full, with the key themes that emerged presented in the discussion.

In order to fully understand the comments provided, these were read alongside the respondents' responses to the other questions in the consultation. This approach helped ensure that respondents' views were clearly understood.

Many of the comments received related to the proposed content. Our consultation related only to the assessment of that content. Any comments that referred to content have been read, and have been shared with the DfE, but are not discussed in this report.

Respondents were invited to indicate the capacity in which they were responding, by self-identifying the group to which they belong. The total numbers of respondents for each respondent group are set out in the table below, based on these descriptions. Some comments from respondents have been included as quotes in the report as illustration of the main themes identified. We have edited some quotes for clarity, brevity and to preserve anonymity but we have been careful not to change their meaning.

Who responded

We received 1130 responses to this consultation.

The following tables present the number of respondents by type.

Official organisational responses	Number of respondents
Academy chain	3
Awarding body or exam board	3
Consultant	1
Other	2
Other representative or interest group	13
School or college	30
SLT (Senior leadership team)	5
Teacher	5
University or higher education institution	4
Total	66

Individual responses	Number of respondents
Academy chain	38
Awarding organisation employee	1
Consultant	5
Employer	1
Examiner	11
Exams officer or manager	4
Governor	1
Local authority	6
Other	9
Parent or carer	5
School or college	29
SLT (Senior leadership team)	41
Student	55
Student - private, home-educated of any age	1
Teacher (responding in a personal capacity)	852
University or higher education institution	5
Total	1,064

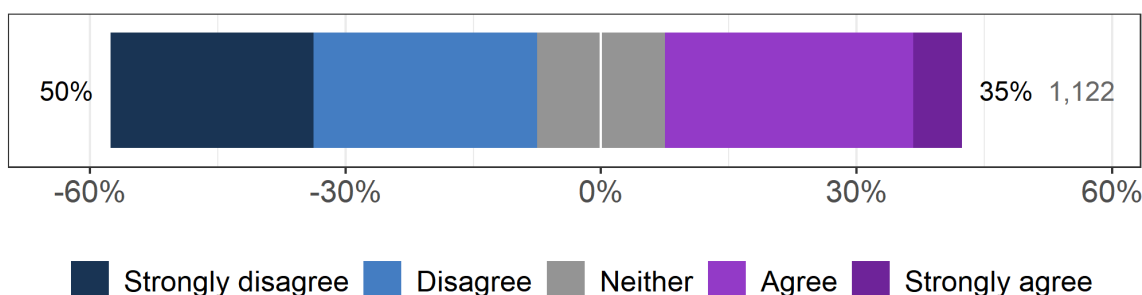
This was a public consultation which asked for the views of those who wished to participate. We were pleased to receive a large number of responses and thank everyone for responding. We recognise that the responses are not necessarily representative of the general public or any specific group.

Views expressed

In this section we report the views of those who responded to the consultation proposals.

Assessment objectives (AOs)

Q1: To what extent do you agree or disagree with the proposed assessment objectives?



Question 1 response	Count	Percentage
Strongly agree	64	6%
Agree	327	29%
Neither agree nor disagree	169	15%
Disagree	294	26%
Strongly disagree	268	24%

Total number of responses	Count
Question 1: Response provided	1,122
Question 1: No response	8
Survey total responses	1,130

Thirty-five percent of respondents agreed or strongly agreed with this proposal, while 50% disagreed or strongly disagreed. Those responding in an official capacity were more likely to disagree: 30% agreed with the proposed assessment objectives, while 53% disagreed or strongly disagreed.

Q2: Do you have any comments on the proposed assessment objectives?

We received 731 comments in response to question 2. Many of the responses to this question raised common themes irrespective of whether the respondent had agreed or disagreed with the proposals in question 1. Many respondents stated that the proposal was not sufficiently detailed, and that without seeing what assessments and tasks would look like it was difficult to evaluate the proposed approach.

“Without a better description of the kind of tasks and level of demand that these would imply, it is very difficult to foresee whether these changes will be beneficial at this stage. How long will exams be? What skills will be tested in each exam? Will there be a mix of skills within each exam? How different will these be from our current delivery of the specification?” (Teacher responding in a personal capacity)

Similarly, some respondents raised concerns over parity in assessment across the languages due to certain content requirements.

“Care will be needed to ensure parity across the languages when assessing, for example, it is often easier to transcribe unfamiliar words in German and Spanish than in French due to the number of silent letters and combinations of letters which sound very similar.” (Teacher responding in a personal capacity)

Where respondents were in favour of the proposal, many commented that the proposed assessment objectives reflect real life language use.

“It is important to recognise the fact that all skills are interlinked. AO3 is a welcome addition, as an essential part of language acquisition.” (Teacher responding in a personal capacity)

“I think that these assessment objectives are more holistic than those on the present GCSE specification, and they better represent how language is used in everyday contexts more accurately, as language is not categorised into "listening, speaking, reading and writing" but rather responding and understanding.” (Teacher responding in a personal capacity)

Some respondents who agreed or strongly agreed with the proposal stated that the approach would provide good progression to A level, although perceptions of the demand of the revised GCSE qualifications differed.

“I think this provides a more rigorous examination and grammar becomes more important, which is crucial for progression to A level and which, at present, is frequently overlooked at Key Stage 3.” (Teacher responding in a personal capacity)

"It is good that there is consistency between GCSE and A level objectives. This will facilitate students' understanding of their ability to carry on with a language once they finish GCSE. My question here is that, if GCSE is being reformed to make it more accessible, what is going to happen to the current A Level. I think the step between GCSE and A level would be enormous."

(Teacher responding in a personal capacity)

Some respondents who agreed or strongly agreed with the proposal queried the detail behind the percentage weightings of the assessment objectives.

"It seems a good idea to mirror AS and A level, although an ever-dwindling cohort moves on from MFL GCSE to AS/A level. Does AO3's % 'add up' to what we currently have? 10% 'accuracy' on Speaking and Writing, but what about the further 10% here?" (Teacher responding in a personal capacity)

"I can't see the rationale for the disparity in weighting between AO1 and AO2. Why not 40/40?" (Teacher responding in a personal capacity)

Many of the respondents who disagreed or strongly disagreed with the proposed assessment objectives stated that the current separate skills focus of the assessment objectives is clearer to understand and interpret.

"In short, and as currently expressed through the new AO1-AO2, there seems to be a shift from one extreme of conceptualising language competence as primarily separate, independent skills (current policy) to the other extreme of thinking in terms of only integrated skills (revised proposal); this seems both curious and confusing... The current 4-skills-focused objectives AO1-AO4 (Listening, Speaking, Reading, Writing) are much clearer in terms of their pedagogical and assessment implications and, importantly, they allow for greater clarity in terms of score meaning and interpretation as well as flexibility for using both independent and integrated task types." (Other representative or interest group)

"The current structure of listening, reading, speaking and writing is clear for both pupils and teachers alike. The proposed structure would lead to confusion and I feel would discourage even more pupils to opt for a language at GCSE level. Recruitment is difficult enough as languages are already perceived as 'difficult' by pupils and parents alike. To change the AOs and use the suggested wording would lead to more confusion and ultimately pupils will opt out." (Teacher responding in a personal capacity)

Some respondents who disagreed or strongly disagreed stated that they would rather not change the current GCSE at all, noting that teaching of the current specifications began relatively recently (in September 2016) and the recent and ongoing disruption caused by the pandemic.

“The exams are well structured and follow a certain logic. I like to think that students are assessed in the 4 different skills which is the core of learning a language. This can be easily reflected in all lessons starting with year 7 classes. It provides a clear vision on what is the secret in learning a language. In addition, our current exam took place really for 2 years only due to Covid, therefore I think it is really unnecessary to change this again. Just when we get used to something you are changing it again. This will affect workload and add stressful planning.” (Teacher responding in a personal capacity)

A few respondents who disagreed or strongly disagreed with the proposed assessment objectives commented that the mixed skills approach would be difficult to teach.

“It makes the delivery of the syllabus more confusing for students in KS3 and KS4 whose maturity is not as high as in an A level student.” (School or college)

Some respondents also disagreed or strongly disagreed with the proposal for a separate assessment objective (AO3) to reward use of grammar and vocabulary.

“Having a grammar assessment objective will not make teaching and learning less burdensome. I do not see any advantage in having mixed skills objectives for students. However, I fear that it will make it harder for teachers to assess and predict students' whole grades. I was also hoping that the changes would make mark-schemes easier to use, but it does not look like that, if for each task I need to give marks for 2 or more objectives (which is what happens with the A level). Marking A level work requires quite a lot of time; considering that the size of GCSE groups are normally bigger than A level ones, it would create higher volumes of workload for teachers.” (Teacher responding in a personal capacity)

“Teenage language learners are motivated by the prospect of being able to communicate meaningfully in the target language (Graham et al, 2016). Teachers also believe that communication should be at the heart of what is taught and assessed for GCSE, according to responses to a survey we have conducted with 614 teachers (CML, 2020) and a more recent one with 140 teachers (CML, 2021). We therefore do not accept the inclusion of ‘AO3: demonstrate knowledge and accurate application of the grammar and vocabulary prescribed in the specification’. We believe this places unhelpful emphasis on grammatical and vocabulary knowledge as ends in themselves, rather than forms of knowledge that support meaningful communication.” (University or higher education institution)

A few respondents raised concerns about how the assessments would be structured, while some misperceived that the assessment objectives would dictate the number and structure of assessments.

“The majority of students sadly do not continue languages to a higher level - 25% each is simpler and clearer. I would like to see how it affects the papers. Dictations have always been part of my teaching but I am not sure they need to be part of an exam as such.” (Teacher responding in a personal capacity)

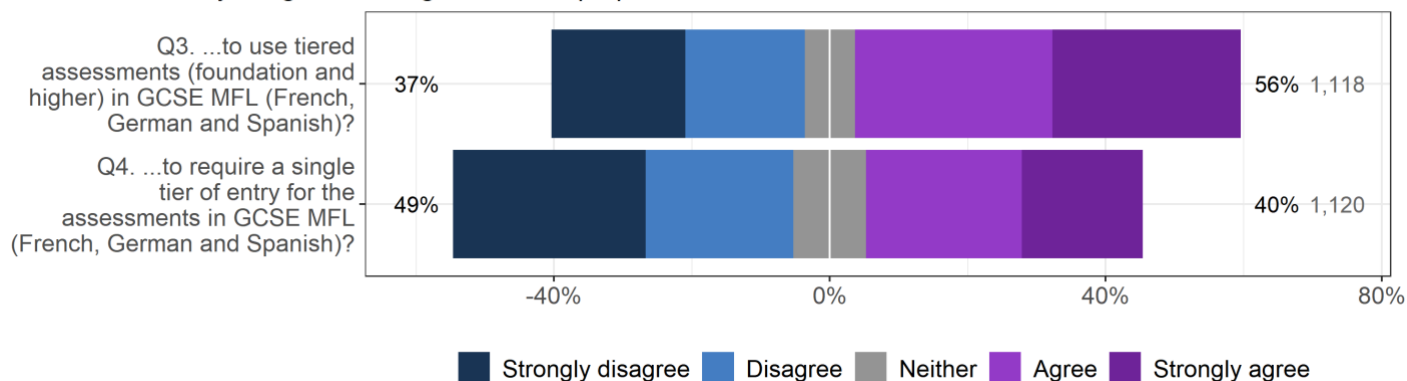
“The decision to move from 4 equally weighted single-skill papers to mixed skill papers will clearly disadvantage those deaf students who might need to be disapplied from the speaking or listening paper in order to attain the grade they deserve.” (Other representative or interest group)

Tiering

Q3: To what extent do you agree or disagree with the proposal to use tiered assessments (foundation and higher)?

Q4: To what extent do you agree or disagree with the proposal to require a single tier of entry for the assessments?

To what extent do you agree or disagree with the proposal...



Question 3 response	Count	Percentage
Strongly agree	306	27%
Agree	320	29%
Neither agree nor disagree	81	7%
Disagree	194	17%
Strongly disagree	217	19%

Total number of responses	Count
Question 3: Response provided	1,118
Question 3: No response	12
Survey total responses	1,130

Question 4 response	Count	Percentage
Strongly agree	196	18%
Agree	253	23%
Neither agree nor disagree	118	11%
Disagree	240	21%
Strongly disagree	313	28%

Total number of responses	Count
Question 4: Response provided	1,120
Question 4: No response	10
Survey total responses	1,130

Over half (56%) of respondents agreed or strongly agreed with the proposal to use tiered assessments, while 37% disagreed or strongly disagreed. Agreement was slightly lower among teachers, as just over half agreed or strongly agreed (53%) while 40% disagreed or strongly disagreed.

“I think offering a foundation tier makes language learning more accessible and attractive to students choosing MFL as a GCSE option, while the higher tier is available to engage and challenge higher attainers.” (Teacher responding in a personal capacity)

Students (77%), and those responding in an official capacity (67%) were more likely to agree or strongly agree with tiering (while 13% and 21% respectively disagreed or strongly disagreed).

More respondents disagreed than agreed with our proposal to require single tier of entry across all assessments. Of all respondents, 40% agreed or strongly agreed with the proposal to continue requiring a single tier of entry for the assessments, while almost half (49%) disagreed or strongly disagreed. Teachers followed this pattern of responses (39% agreed or strongly agreed, while 50% disagreed or strongly disagreed), as did students (39% agreed or strongly agreed, 48% disagreed or strongly disagreed).

Those responding in an official capacity were more likely to be in favour of the single tier of entry requirement (46% in agreed or strongly agreed, 38% disagreed or strongly disagreed).

“We agree with the proposal to use tiered assessments in MFL GCSE – higher and foundation tier. While we understand why teachers may not think a single tier of entry for all pupils is appropriate, we recognise the technical challenges posed by this for awarding organisations and accept that a single tier of entry per pupil is the best outcome.” (Other representative or interest group)

Similarly, the two exam boards that commented were both in favour of the proposals.

“This is the only fair way to test a student’s overall performance. Teachers are happy with the tiered assessments as long as there is parity of awarding grades at the crossover 4/5.” (Awarding body or exam board)

“We believe this is a suitable approach as it will enable exam boards to develop assessments which are appropriate for the whole cohort of learners, and which sufficiently differentiate achievement across the grade range.” (Awarding body or exam board)

Q5: Do you have any comments on the proposal to use tiered assessments (foundation and higher)?

We received 647 comments in response to question 5. Respondents fell into 4 clear groups with respect to their views on the tiering proposals:

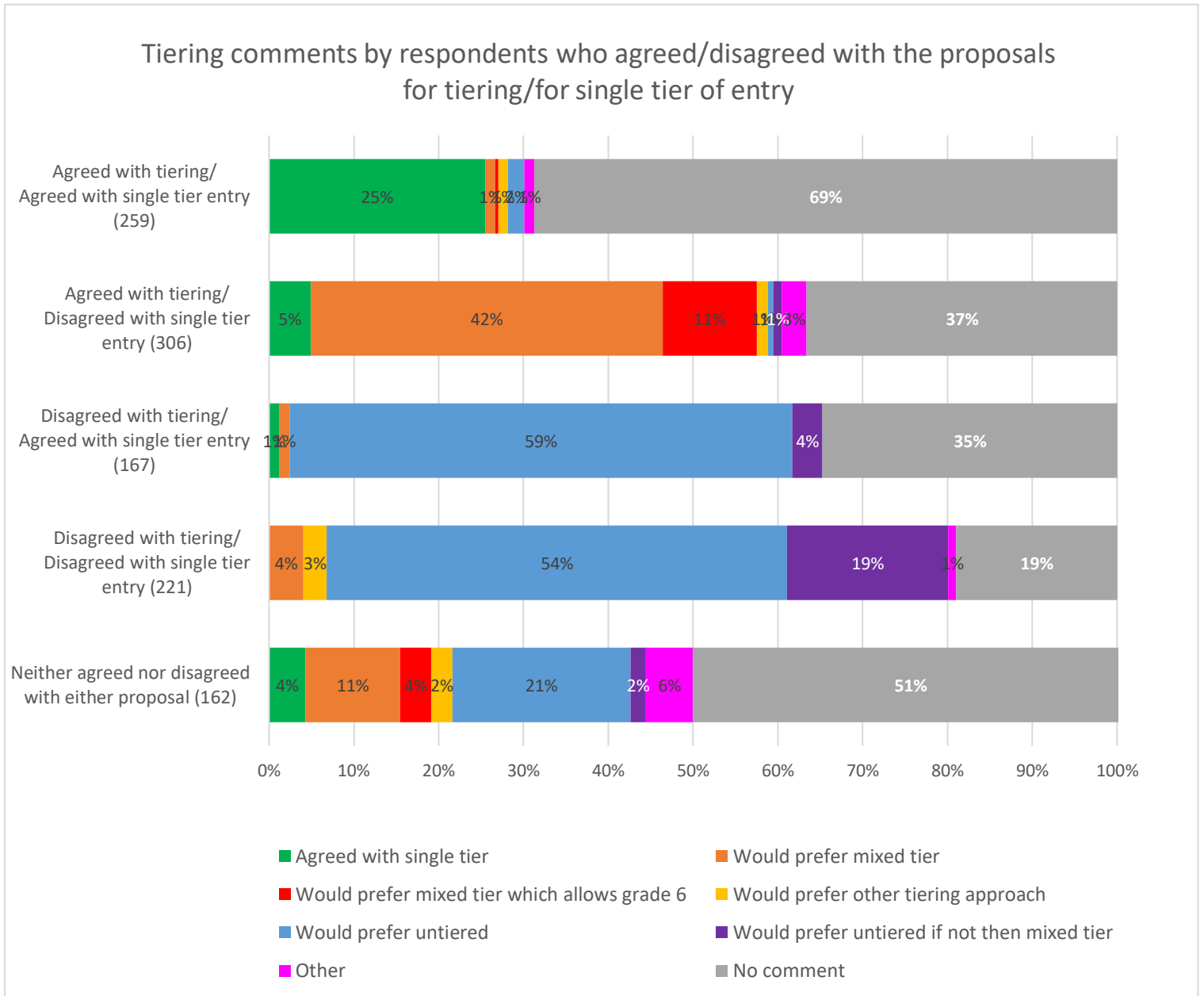
- those who agreed or strongly agreed with both the proposal to use tiered assessments and the proposed single tier of entry approach (23% of respondents)
- those who agreed or strongly agreed with tiered assessments but not with the single tier of entry approach (27% of respondents)
- those who disagreed or strongly disagreed with tiered assessments, but agreed or strongly agreed with single tier of entry (15% of respondents)
- those who disagreed or strongly disagreed with both the proposal to use tiered assessments and the proposed single tier of entry approach (20% of respondents)

Respondents who responded “neither agree nor disagree” to either or both proposals comprised a smaller, fifth group, who were less likely to provide a comment and whose views were more varied than the other 4 groups.

The comments provided greater insight into respondents’ views, with a broad range of viewpoints presented; from those who agreed or strongly agreed in full to the consultation proposals, to those who felt the assessments should not be tiered at all, and then to respondents who suggested alternative methods of tiering. Respondents who suggested other approaches to tiering often stated that students should be allowed to enter for a mix of foundation and higher tier assessments, with some further specifying that a mixed tier entry approach should allow access to a grade 6. A few respondents proposed other tiering approaches, such as only tiering some of the assessments or using a structure of basic core papers plus optional higher extension papers.

Further analysis provided greater understanding of respondents' viewpoints, by relating the comments provided to their agreement and/or disagreement with the tiering proposals.

The figure below presents respondents' agreement or disagreement with the proposals to tier the assessments, and to require single tier of entry, alongside a summary of their comments in relation to tiering (where comments were provided).



The group that agreed or strongly agreed both with using tiered assessments, and with requiring a single tier of entry across those assessments were least likely to provide any comments, given they supported the proposals presented. Where these respondents did provide comments, they generally stated that they supported the proposals. These respondents often mentioned that tiered assessments improve accessibility for students taking foundation tier assessments who would be faced with more challenging tasks if the assessments were untiered.

“Tiers are difficult for teachers who have to assess students very carefully months before exams are taken, and are forced to cap students at a grade 5 rather than risk them getting a 0. However, I understand the arguments for tiers (regarding differentiation) and less able students having to sit through exams of very tricky exercises could be extremely demotivating and overload students, preventing them from achieving their potential as they might with content more accurately targeted at their level. If tiers are maintained, it's crucial that there is just a single tier of entry for simplicity.” (Teacher responding in a personal capacity)

“I believe that using tiered assessments for GCSE MFL would be of greater advantage to all GCSE MFL students as they would be able to sit an assessment/exam that would be more comfortable, and more practical, for them. If Ofqual were to introduce a single tier [untiered assessments] for GCSE MFL, then I believe that students who are not so confident in MFL are going to be at a disadvantage to those who are more confident in MFL. I believe this because, depending on the content of what the assessment/exam would include, more sophisticated students in MFL would be able to achieve an even higher grade than what they might get in a Higher paper, simultaneously I believe that less sophisticated students would achieve a lower grade than what they might get if they were to sit a Foundation paper.” (Student)

The group who agreed with using tiered assessments, but who disagreed or strongly disagreed with requiring a single tier of entry often stated that mixed tier entry would be beneficial for students with different abilities across the language skills.

“Students in my GCSE class found the single tier of entry rule to have a negative effect on them as for many they had very different ability in the different skills.” (Student)

“We fundamentally agree that tiering is needed in MFL however, in the past we have had students who were able to be successful on some higher papers, whilst needing foundation in others and this enabled them to still get a B. We wondered if a combination of both prevent students from being capped

at a level 5 when they may be capable of attaining a higher grade in some skills. (School or college)

Some respondents expressed the view that removing tiering altogether would benefit students; this was particularly frequent amongst those who were against tiering, but in favour of requiring a single tier of entry (often interpreting “single tier” as “untiered”), as well as those who disagreed with tiering and with requiring a single tier of entry.

“Why not give all students the opportunity to take the full exam? As a government body responsible for delivering exams, boxing students into a specific category which is limiting their ability to achieve is unfair, and those that end up being entered for foundation feel they are being labelled as “weak” (or something yet more pejorative). In our experience, foundation questions often prove to be more challenging for weaker candidates, as there is less supporting text to help them make informed guesses. Tasks where you just have single words effectively become a memory/vocabulary test, not a test of language knowledge, understanding or application. This is depriving them of valuable context.” (School or college)

“Languages are optional. Students are going to choose subjects where they can get the best grades. The current GCSE foundation is very difficult for students with lower abilities in the class and you can only get a 5. We have a mixed ability class because the numbers in MFL have lowered due to the government making them optional subjects. Students in a mixed ability class do not want to be given papers for foundation when others have higher papers, because this causes them to have low self-esteem. We are in a society where we are trying to be equal, why do we have to differentiate and say to some students you are not clever enough to do higher. Also, the foundation exam is really difficult and some colleges ask for 6 for a minimum, so with a 5 you are limiting them to get that grade. Some students can get a 6 and have done foundation and have got a 5 instead.” (Teacher responding in a personal capacity)

Across all groups of respondents, a few commented that an alternative approach to tiering assessments would be fairer.

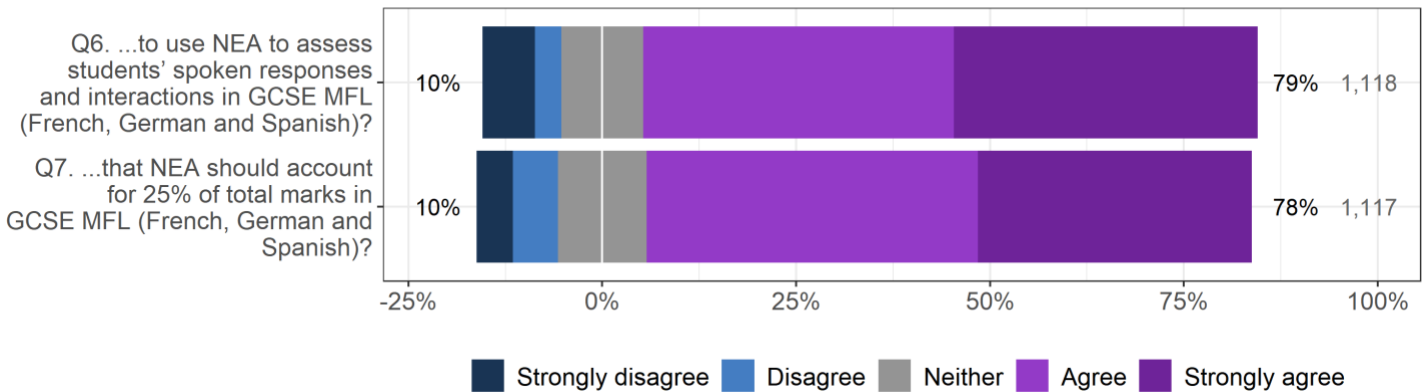
“I understand the reasons given. However, the existence of a foundation tier means that students' aspirations can be limited and they do not want to risk doing higher tier. When GCSE was first launched, students sat both foundation and higher tier papers, which seems to me to be a good way of avoiding this issue.” (School or college)

Non-Exam Assessment (NEA)

Q6: To what extent do you agree or disagree with the proposal to use NEA to assess students' spoken responses and interactions?

Q7: To what extent do you agree or disagree with the proposal that NEA should account for 25% of total marks?

To what extent do you agree or disagree with the proposal...



Question 6 response	Count	Percentage
Strongly agree	438	39%
Agree	448	40%
Neither agree nor disagree	118	11%
Disagree	38	3%
Strongly disagree	76	7%

Total number of responses	Count
Question 6: Response provided	1,118
Question 6: No response	12
Survey total responses	1,130

Question 7 response	Count	Percentage
Strongly agree	395	35%
Agree	477	43%
Neither agree nor disagree	128	11%
Disagree	65	6%
Strongly disagree	52	5%

Total number of responses	Count
Question 7: Response provided	1,117
Question 7: No response	13
Survey total responses	1,130

Agreement with the proposal to maintain the use of NEA was very high at 79%, while 10% disagreed or strongly disagreed. Agreement with the proposal to weight the NEA at 25% was just slightly lower at 78%, again with 10% disagreement.

“Speaking is a crucial element of MFL and should definitely be tested and marked by exam boards to ensure that this part of the exam is given the appropriate importance. For those going on to do A Level MFL, it is essential that speaking is an important part of the GCSE.” (Examiner)

The high level of agreement with the NEA proposals was consistent across most respondent groups, although students were less likely to agree with the proposal to use NEA (57% agreed or strongly agreed with tiering with the proposal while 19% disagreed or strongly disagreed).

Q8: Do you have any comments on the proposal to use NEA to assess students’ spoken responses and interactions?

We received 424 comments in response to question 8. Respondents were generally in favour of the proposals, albeit that some called for the speaking skills to count towards a greater percentage of the qualification total.

“Using NEA where teachers administer the exam and exam boards mark it works incredibly well. This should not change. The speaking element should also account for 25% of the final grade. It is important that the different skills, although linked, are all given equal weighting.” (Teacher responding in a personal capacity)

“I think it should be higher than 25%. Most learners at GCSE level will mostly use oracy skills when visiting the country where the target language is spoken. A greater emphasis on communication and being able to interact (both listen effectively and speak spontaneously) I think would have a positive effect on GCSE MFL provision.” (Teacher responding in a personal capacity)

A few comments suggested that the weighting for NEA should be higher because of the mixed skill tasks specified in the subject content. Given that some marks would be allocated to the demonstration of other skills in these mixed skill tasks, the weighting of marks for speaking skills would not equal 25% if the total NEA weighting was 25%.

“If the NEA includes the assessment of AO2 (respond to written language in speaking) as well as AO1 and AO3, we believe this should be reflected in NEA accounting for a higher percentage (30%) of the total marks.” (Awarding body or exam board)

“I support the principle that all 4 skills should be similarly weighted, and therefore would support keeping the weighting for NEA to be at least 25%.”

Because the NEA as proposed involves spoken responses and interactions and comprehension it is thus mixed skill testing (reading aloud, answer questions on the text). So, if the maximum for the NEA is 25%, speaking cannot be 25%.” (Teacher responding in a personal capacity)

Comments from those who disagreed or strongly disagreed with the proposal revealed some misperceptions; either that the proposals were intended to apply to this current year’s exam series (2021 assessments) only or that the NEA proposal refers to the classroom-based endorsement approach (which has only been used as an adaptation to assessments in response to the disruption caused by the pandemic, and is not proposed as a future assessment approach for these qualifications).

“I have completed my speaking endorsement already and this took me hours! We have been told from November we will have a speaking endorsement next to our grade so I will now not magically be able to improve my speaking when practising speaking over the last year and 3 months has been virtually non-existent!” (Student)

Equality Impact Assessment

Question 9: We have set out our view that our proposals would not impact (positively or negatively) on students who share a particular protected characteristic. Are there any potential impacts that we have not identified?

Question 10: Are there any additional steps we could take to mitigate any negative impact you have identified would result from our proposals, on students who share a protected characteristic?

We received 348 comments in response to question 9, and 222 in response to question 10.

Many comments focussed on students with special educational needs and disabilities (SEND), noting that the proposal to maintain the requirement for a single tier of entry across all assessments may affect these students more negatively than others, and that untiered papers, or mixed tier entry could mitigate these effects.

“The use of tiered papers disadvantages certain pupils with disabilities, notably those with hearing impairment. A pupil may struggle with the speed and length of the listening paper but be able to cope with complex tasks in reading and writing. The single tiered entry results in them being put at foundation tier to prevent them from losing out on the listening paper.”
(Teacher responding in a personal capacity)

“I fear that the insistence that candidates are restricted to a single tier of entry could be seen as discriminatory against SEND students. My experience as an MFL teacher is that there are often significant differences in a candidate's confidence level in oral / written language in particular. A dyslexic student is likely to find written French a huge challenge due to the difference between phonetics and spelling. The same candidate might nevertheless have a strong ear for the spoken language.” (SLT - Senior leadership team)

“The one tier entry narrows the potential for some students to achieve their best given that they can fall off the bottom of the grading and achieve a U grade. This is particularly true for students with links to native speakers who may be excellent at vocab recognition but lack accuracy with language production. SEND students are often sealed at foundation entry due to a lack of accuracy in their written languages. Again, a mix and match approach would be better.” (Teacher responding in a personal capacity)

Further, many respondents raised broader issues that apply to GCSE MFL qualifications, and likely other qualifications where marks are awarded for accurate spelling.

“I think there should be some kind of support/leniency towards students who are dyslexic. It is very challenging for them to access another language and keep up with all different conjugations and adjectival agreement endings.”
(Teacher responding in a personal capacity)

Other respondents raised a concern that assessments should reflect a diverse society. Whilst this is not a matter covered by this consultation, it does nonetheless relate to the ongoing public sector equality duty which applies to exam boards during assessment development, and which will apply to Ofqual at the later stage of accreditation reviews of the exam boards' proposed approaches to assessing the revised qualifications.

“Once content has been decided, text books and exam materials need to do more to reflect diversity of race, gender and sexual orientation. The vocabulary needs to be actively included - guidance needs to be sought on gender neutral language within the Romance language family and representation in terms of sexual orientation needs to be more prevalent.”
(Academy chain)

Many respondents raised equality impact concerns relating to the subject content proposals, which have been passed to the DfE for consideration.

Some comments identified impacts on students based on socio-economic grounds. These related to subject content requirements and have also been passed to the DfE.

Regulatory Impact Assessment

Question 11: We have set out our understanding of the cost implications and burdens of our proposals for schools, colleges and exam boards. Are there any other potential costs or burdens that we have not identified?

Question 12: Are there any additional steps we could take to reduce the costs or burdens of our proposals?

The consultation document identified a range of cost implications and ensuing burdens of the proposals for schools, colleges and exam boards. Four hundred and ninety-three respondents provided a comment at question 11 indicating that they believed there were other potential regulatory impacts that had not been identified in the consultation, while 406 respondents commented in response to question 12.

Many of these comments cited the cost to purchase new textbooks for schools, as well as the time required for teachers to familiarise themselves with the new specifications and to develop their resources for teaching. Some respondents suggested exam boards could provide more support to help the introduction of new specifications, perhaps drawing on existing materials to help reduce costs, although one exam board commented that this would not be possible given the changes involved.

“This proposal if realised, needs to be rolled out carefully and effectively with plenty of opportunities to attend training and plenty of model activities and exam style questions available... Ensure exam boards provide plenty of model activities and resources - I don't believe that there are enough currently or that there is enough of a training offer from exam boards with regards to their qualifications.” (Academy chain)

“Resources such as textbooks may not be compatible with the new GCSE content. My school spent a large amount of money on resources for the GCSE launched five years ago. I don't know if we could find the money again. Exam boards could publish mapping documents showing how to teach the new GCSE with the resources of the previous one.” (School or college)

“New specifications and a change in the style of assessment will make it necessary for new text books to be written and published. This would mean that schools would have to purchase new resources. In an ideal world, these could be digital resources. The current text books could be adapted to provide digital copies to schools and students.” (Examiner)

“This proposal requires an entirely revised and new set of criteria which will require a complete re-resourcing of KS4 materials for French, German and

Spanish. The existing resources which schools have will not be transferable due to the extent of the change.” (Awarding body or exam board)

Some respondents suggested that support should be provided with the cost of resources.

“Subsidise the purchase of new textbooks and ensure that exam boards produce plenty of material suitable for training and assessing students.” (Teacher responding in a personal capacity)

“Every MFL department should be given some sort of voucher, once more is known about the structure of the assessment.” (Teacher responding in a personal capacity)

Some respondents who commented on the time required for familiarisation with the new qualifications also called for sufficient preparation time to be allowed in advance of changes being introduced.

“Resources should be provided well in advance to changes. Exam board MFL Advisors should visit each school and offer training to MFL staff.” (Teacher responding in a personal capacity)

“Schools will have to create new resources again, only four years after the previous GCSE change. That will take a long time. It also takes longer than a year for schools to prepare their students for a new GCSE format. It should take a very minimum of three years after receiving sample material, to adapt curriculums, resources and teaching, to give a real chance to students to achieve their full potential, knowledge and skill-wise, in the exams. If this happens, it would be even better to have the full 5 years to prepare for the new format, especially given that this one is completely different from what we've ever done at GCSE level. Give schools the time to implement the changes... Do not rush deadlines.” (School or college)

One exam board also raised potential wider, knock-on effects of changing the content for these three languages at GCSE.

“This will also involve costs for new course builds... given the KS4 level content builds on what has been taught prior. Therefore, all KS3 level content will need to be changed... For awarding organisations who offer more than the GCSE in French, German, and Spanish, the likelihood that the GCSEs in other languages will be aligned with this revised content brings a significant additional burden at the time when this is announced.” (Awarding body or exam board)

A broader issue raised by respondents was the burden of introducing new specifications at all. Some respondents stated they are happy with the existing specifications, while some called for more minor adaptations to the assessments.

“This change would impact negatively on students who are currently learning to manipulate the language in varied way with cultural input as well as literature and grammar. The range of vocab and structures used in our current exam is fantastic and the course and exam process are engaging and varied. They also answer to the varied needs of students. I fully and utterly disagree with a change which would be so detrimental to language students.” (Teacher responding in a personal capacity)

“It seems absolutely ludicrous to now change the whole course again. New resources mean hundreds of hours planning lessons to fit them, rather than time much better spent on updating and improving what we already have...Do not change the exams in such an extreme and absurd manner.” (Teacher responding in a personal capacity)

“Don’t change the exams - just consider the complexity of the listening and reading exams.” (Teacher responding in a personal capacity)

A few respondents noted a concern as to the potential effect on the teaching workforce of making changes.

“At the age of 57 I feel the introduction of yet another specification may accelerate my retirement. In my department of 8, there are 4 of us of a similar age, who feel very much the same. Driving teachers out of the profession could be a cost/ burden... In addition to this increase in work load, training usually has to be done after school, which is to say in our own time. The thought of absorbing and implementing a whole new specification makes me feel nothing but despair. The MFL Pedagogy Review Report devotes only one small paragraph to suggesting that skills should be taught together rather than in isolation, which is very sensible, but does not necessitate re-writing all the exams.” (Teacher responding in a personal capacity)

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:

- Alleyne's Academy
- AQA
- Association for German Studies in Great Britain and Ireland
- Association for Language Learning
- Association of School and College Leaders
- BATOD (British Association of Teachers of the Deaf)
- Beaumont School
- Beverley Grammar School
- Christopher Whitehead Language College and Sixth Form
- Committee of Linguistics in Education
- Coventry City of Languages
- Dame Alice Owen's School
- Dartford Grammar School
- Durrington High School
- Glenthorne High School
- Gordon's School
- Hackney Education
- HEQA - the Home Educators' Qualifications Association
- Hitchin Boys' School
- Hornsea School & Language College
- King's Ely
- King's College School, Wimbledon
- Loughborough Grammar School
- Merchant Taylors' School, Northwood
- National Association of Language Advisers
- New Mills School
- Newcastle Royal Grammar School

- Nicholas Postgate Catholic Academy Trust
- Oxford German Network (of German teachers in Oxfordshire)
- Pearson
- Queen's College London
- Redbridge Community School (Southampton)
- Creative Multilingualism, Oxford University
- Sidcot School
- Silverdale School
- Sir William Borlase's Grammar School
- Society for French Studies (leading subject association for French in UK and Ireland)
- St Bede's Catholic College
- St Helen St Katharine
- Stretford High School
- Sutton Grammar School
- Torquay Girls' Grammar School
- The British Academy
- The Grey Coat Hospital
- The Judd School
- The National Deaf Children's Society
- The University of Bristol
- Townley Grammar School
- UCL IOE Confucius Institute for Schools
- UK Association for Language Testing and Assessment (UKALTA)
- University Council for Modern Languages
- Uxbridge High School
- Withington Girls' School
- WJEC
- Wolverhampton Grammar School
- Wrekin College



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