



Department
for Education

French, German and Spanish GCSE subject content review

Government consultation response

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Executive summary

This public consultation on the revised GCSE subject content for French, German and Spanish took place between March and May 2021.

The aim of these reforms is to ensure that the French, German and Spanish GCSE content is clearly defined so that teachers know the body of content that examinations will draw on. The revised GCSE content will enable teachers to design courses based on the content set out in their chosen GCSE specification which are accessible and relevant for students and ensure strong foundations in the building blocks of language expertise, in particular vocabulary, pronunciation and spelling and grammar.

There were 1,644 responses to the consultation from both individuals and organisations. Most responses were submitted via the online consultation form¹ with a handful of responses, mainly from organisations, being sent to the Department for Education via email. There were 1,398 responses from individuals, the vast majority of whom were teachers, and 246 responses were from organisations, the vast majority of which were schools.

In general, respondents agreed with the proposals in the consultation, with all but one of the proposals receiving majority support. The exception was Question 15 about the suggested approach to themes and topics, which received 46% support. Trends in response emerged from a more in-depth analysis of consultation responses. In particular, teachers and schools were more in favour of the proposals when compared with other types of respondent.

Having considered all the responses to the consultation, the Government's response is summarised as follows:

Timing

- There will be a one-year delay to the implementation of the revised French, German and Spanish GCSEs, with the first teaching date now due to be September 2024 and first examinations in summer 2026. At the time of consultation, this was for first teaching September 2023 and first examination in summer 2025. This allows more time for awarding organisations to develop the GCSE specifications, working closely with the teaching profession and other experts, and more time for schools to prepare for the changes to the GCSE.

Vocabulary

- The majority of respondents agreed with greater specificity of the vocabulary to be assessed at GCSE, requiring awarding organisations to define the vocabulary length and including a high percentage of high-frequency words. The vocabulary available for selection will be widened to address concerns from some respondents that the parameters were too restrictive in some key respects:
 - The definition of vocabulary will be broadened for the foundation tier of 1,200

¹ The option for postal returns was removed because Department officials were working at home for the duration of the consultation, due to the COVID-19 pandemic.

word families² and the higher tier of 1,700 word families. The definition of word families is broader than that of individual words, and in practice, this change means the number of words on which students can be assessed is higher.

- In defining a word list, the percentage of vocabulary that awarding organisations must select from the 2,000 most frequently occurring word families in each language has been reduced from 90% to 85%. This provides awarding organisations with greater flexibility in identifying lower frequency word families when creating their specifications.
- Awarding organisations can add up to 20 additional vocabulary items of cultural, historical or geographical content (in addition to the 1,200 and 1,700 word families). These are for both foundation and higher tier, and for comprehension (listening and reading) and production (speaking and writing).
- For reading only, awarding organisations will also be able to use true and exact cognates as defined in the subject content, in addition to the 1,200 and 1,700 word families and vocabulary of cultural, historical or geographical content.

Themes and Topics

- The main concern voiced in consultation responses was about not setting any expectations on awarding organisations to list vocabulary thematically. In particular, there was concern about a possible risk that this would lead to a curriculum that lacked appropriate context, and that this might result in courses focussing on teaching vocabulary and grammar in isolation.
- In order to address this concern, the subject content now provides a clearer expectation on awarding organisations that they identify broad themes and topics as one of the ways to select and organise the vocabulary, with examples of which ones could be chosen. The choice of themes or topics will rest with awarding organisations so they will have greater freedom in defining the vocabulary; this will also ensure a wider range of specifications are available to schools and other settings.

Question types

- There was majority agreement to the proposed changes to question types. Specific concerns were raised, however, about how students would be expected to demonstrate deduction and inference skills. In response to this feedback, the subject content now requires students to infer (using knowledge of the vocabulary and grammar specified for each tier) plausible meanings of single words from outside the vocabulary list when they are embedded in the context of written sentences.

² A word family includes regular feminine and plural forms, regular adverbs or regularly conjugated forms of a verb: for example, in French, the word 'parler' (to speak) contains a number of words in the family including 'parle' (I speak); 'parles' (you speak); 'parlons' (we speak); 'parlait' (used to speak). The definition is in line with Bauer and Nation's 1993 definition (see subject content for more details).

Grammar

- There was majority agreement to the proposed changes to grammar. Given the overall support, only minor adjustments have been made to the grammar annexes for French, German and Spanish. The subject content now also includes two new technical annexes to support awarding organisations and teachers to better understand the grammar requirements, which provide:
 - Exemplification of families of regular inflected words for each language. Each example illustrates all of the forms that apply to the selected headword as per the grammar requirements (Annex D of the subject content); and
 - All forms of the required words that must be listed according to the grammar requirements (Annex E of the subject content).

Introduction

The consultation

This report is a summary of the views expressed by those who responded to the Department for Education's consultation on the new draft subject content for French, German and Spanish GCSEs

Between March and May 2021, the Department publicly consulted on four key areas of the draft subject content which included:

- Vocabulary;
- Themes and topics;
- Question types; and
- Grammar.

Responses have helped to inform the final version of the GCSE French, German and Spanish subject content.

Background

In July 2017, the Government committed to an ambition that 75% of Year 10 pupils in mainstream state-funded schools should be entered into the English Baccalaureate (EBacc) by 2022 (for examination 2024) as a stepping stone to achieving 90% by 2025 (for examination 2027).³ Despite the progress that has been made in improving EBacc entry since 2010, the low level entry for languages GCSEs remains the primary barrier to achieving this ambition. In four out of the five EBacc subject 'pillars', uptake has exceeded 80%, whilst languages uptake is currently about 46%.

Part of the lower take-up of languages can be attributed to the perceived difficulty of GCSE languages compared with other subjects, students' negative perception of languages and their general lack of motivation to learn them up to GCSE level. In a survey of secondary schools conducted by the BBC in 2019, 76% of respondents in England cited the 'perception of languages as a difficult subject' was the main reason behind a drop in the number of pupils studying for exams.⁴

In 2019 the Department announced that it would be convening an expert panel to test and develop potential changes to the subject content for French, German and Spanish GCSEs.

The proposals set out by the panel have now been consulted on and this report sets out the analysis of the consultation responses.

³ The EBacc was introduced in 2010. It is a combination of subjects at GCSE: English language and literature, mathematics, the sciences, geography or history, and a language.

⁴ Language learning: German and French drop by half in UK schools (17 February 2019), [Language learning: German and French drop by half in UK schools - BBC News](#) (accessed 14 January 2022).

Approach to analysis

The consultation was published on gov.uk, along with an online form for respondents to give us their views. There were 24 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. Due to the COVID-19 pandemic, respondents were not given the option to submit postal copies of their response.

In addition to the 1,644 responses that were received via the online form, there were a small number of responses sent directly to the Department via email. The additional comments sent in this way are not included in the quantitative analysis, as this may lead to some double counting, but they are reflected in the summary of qualitative responses.

Respondents were more likely to expand on their answers where the answer to a question was 'no'. Where qualitative data was obtained from those respondents who answered 'yes', this was from a smaller number of written replies.

Data presentation

Responses to the consultation are presented in the order in which questions were asked. With the exception of the questions about personal information, respondents were given the option of answering 'yes' (agree) or 'no' (disagree). For most, but not all questions, a free text box was provided, giving an opportunity for those who wanted to expand on their yes/no selection to do so. Where both quantitative and qualitative data was received for a particular question, it is reported on together under each individual question subheading.

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.

Question analysis

Personal information: Questions 1 to 9

Respondents were asked to state whether they were answering as an individual or on behalf of an organisation. We received a total of 1,644 answers to this question. The breakdown is as follows:

Type of response	Total	Percent
Individual	1,398	85%
Organisation	246	15%

Those who said they were responding as an individual were asked how they would describe themselves. We received a total of 1,389 answers to this question. The breakdown is as follows:

Description of individual that responded	Total	Percent
Teacher	1,173	84%
Student	56	4%
Parent/carer	15	1%
Academic	76	5%
Other ⁵	69	5%

⁵ Respondents who selected 'other' included, but were not limited to, retired teachers, language consultants and translators.

Those who said they were responding on behalf of an organisation were asked to identify the type of organisation. We received 407 answers to this question, however, only 245 of these respondents had previously selected that they were responding on behalf of an organisation rather than as an individual. The breakdown of these 245 organisations are as follows:

Type of organisation that responded	Total	Percent
School	204	83%
Subject association	8	3%
Teachers' union	0	0%
Awarding organisation	3	1%
Publishing company	2	1%
Other ⁶	28	11%

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.

⁶ Organisations that selected 'other' included, but were not limited to, universities, charities and research centres.

Vocabulary: Questions 10 to 14

Question 10

Do you agree with the requirement that 90% of words must be taken from the top 2,000 most frequently occurring words in the most widely spoken standard forms of the language?

There were 1,636 responses to this question, which were as follows.

Responses to Q10	Total	Percent
Yes	900	55%
No	736	45%

Of the respondents to this question who were teachers (1,221 respondents), 717 (59%) agreed with the proposal and 504 (41%) disagreed. Responses from students who answered this question followed a similar pattern with 33 (59%) agreeing and 23 (41%) disagreeing. However, of the 79 people who responded that identified as academics, 14 (18%) agreed with the proposals, with 65 (82%) disagreeing.

Of the 244 organisations that responded to this question, 204 identified themselves as being schools. Of these, 127 (62%) agreed with the proposal with 77 (38%) disagreeing. The eight subject associations that responded to the online form disagreed with the proposal. Of the three individual respondents that stated that they work for an awarding organisation, one agreed with the proposal and the other two disagreed. Both publishing companies that responded to this question agreed with the proposal.

Of the respondents that answered 'no', a small number did so because, despite agreeing with the principle that the words taught at GCSE should be selected based on frequency, they felt that the proposal did not go far enough. It was thought that all words eligible for teaching, and therefore assessment, should come from the 2,000 most frequently occurring words:

“At GCSE, I feel that the list of words required to be understood should be clearly defined. Therefore, all 100% should come from the most frequently occurring words. A level can then cater for expansion”.

Some felt that the parameters from which these 90% of words could be drawn from was still too high and should be reduced:

“The principle is very good, to limit the amount of words, but the amount is still too great”.

Some suggested that the proposed percentage of words that should come from the 2,000 most frequently occurring should be increased to between 95% and 98%, in order to, as one respondent said, *“allow equality for all students”*.

The majority of people who disagreed with the proposal did so because they were concerned that the words which featured in the 2,000 most frequently occurring would not

be the most relevant to the interests of students entering the GCSE course, nor would they lend themselves to effective communication in the target language. Subsequently, it was thought that this would lead to a more restrictive course:

“I think that students should be taught vocabulary to enable them to talk about what interests them, rather than an arbitrary list of most frequently used words. The vocab needed for the topics that teenage students want to talk about is not necessarily within the 2000 most frequently-occurring words.”

“I am concerned that the corpora used to compile the list of 2,000 words would not necessary be of most use for the communication needs of teenagers, nor would they be representative of a wide range of target language culture.”

Others that disagreed raised concerns that 2,000 words would be too few to base frequency selection on and said that, if this number was not increased, there would be too many important or useful words omitted from vocabularly lists, including some days of the week:

“Frequency is problematic as a criterion, leading to significant omissions and counterintuitive prioritization. It needs to be complemented by thematic clusters (cf. Oxford 3000 vocabulary list).”

Some respondents believed that the proposal would not adequately prepare students for further study but would instead increase the gap between GCSE and A level, making the transition more difficult. Others were concerned that the parameters from which vocabulary could be selected would limit the number and range of topics that students would be exposed to, including those linked to cultural knowledge. Finally, some respondents, although not necessarily opposed to the proposal, selected ‘no’ because they wanted to see the final lists in the GCSE specifications from awarding organisations before making a judgement.

Question 11

Do you agree with the requirement for foundation tier students to know no more than 1200 words and higher tier students to know no more than 1700 words?

There were 1,624 responses to this question, which were as follows:

Responses to Q11	Total	Percent
Yes	882	54%
No	742	46%

Of the respondents to this question who were teachers (1,161 respondents), 677 (58%) agreed with the proposal and 484 (42%) disagreed. Responses from students who answered this question, were split 50/50 between those that agreed (28) and those that disagreed (28). Of the academics that responded, 11 (15%) agreed with the proposal, whilst 64 (85%) disagreed.

Schools accounted for 202 of the 242 organisational responses, of which, 125 (62%) agreed with the proposal and 77 (38%) disagreed. All the subject associations disagreed and, of the three individual respondents that stated that they work for an awarding organisation, one agreed with the proposal and the other two disagreed. The two publishing companies that responded were split 50/50 between those that agreed and those that disagreed.

Some respondents disagreed with the proposal because they felt that the proposed number of words that GCSE students would be required to learn was too high, particularly at foundation tier. Some disagreed because they considered the typical number of hours dedicated within the curriculum to modern language instruction to be too limited:

“Great in theory but again the amount of words is still very high for students to retain when most have 2 hours of MFL / week.”

“I think 1200 words is a lot for Foundation Tier students to learn, even receptively. It would be demotivating for them to learn all of the words. I understand that throughout their MFL learning they would pick up the structures, but for some Foundation students, they do not remember vocabulary from lower school and need a lot of reminding of basics.

“This is still a huge volume of words, particularly at Foundation Tier. The quantity of vocabulary currently required to access even a grade 4 is excessive, particularly given that so much of it is abstract. 1700 words for the highest grades at Higher Tier is reasonable but 1200 at Foundation is too demanding.”

“I agree with putting a limit on the number of words to be understood However [sic] both the foundation and higher numbers are too high.”

There were also a number of respondents who disagreed with the proposal on the premise that they did not think the French, German and Spanish GCSEs should remain tiered. One respondent answered 'no' *"only because I would prefer not to have tier[s]. Otherwise, yes."*

However, the majority of the respondents who disagreed with the proposed requirement that foundation tier students should know 1,200 words and higher tier students should know 1,700, did so because they were concerned that students would not be exposed to a large enough vocabulary throughout their GCSE course to be able to communicate effectively in the target language:

"I am concerned that this is limiting the potential of some of our students who are able to go above and beyond the bare minimum. If we are teaching to a list, how does this create effective communicators. It feels like if this was to be implemented, we would be teaching to pass a test, rather than instil a love of language...."

Some respondents stated that it was inappropriate for the subject content to stipulate how many words foundation and higher tier students should know and considered the proposal to be unambitious, believing it could lead to a narrowing of the curriculum, including a reduction in MFL teaching time. Similarly, some respondents thought the proposal could limit students' curiosity and they would have no incentive to learn additional words by themselves:

"...The rigidity does not allow for curiosity or for students to develop a love of new words that they stumble across or to have the confidence to face and infer the meaning of unfamiliar words."

There were also concerns that requiring foundation students to know 1,200 words and higher tier students to know 1,700 words was not in line with the Common European Framework of Reference (CEFR) for languages and, as such, would put students at English schools at a disadvantage in comparison with their European peers:

"If the vocabulary were to be limited to fewer than [sic] 2000 words, it would be difficult to see how students could be enabled to reach the equivalent of CEFR Level A2, let alone B1."

Question 12

Do you agree that the vocabulary lists proposed for GCSE should set out all content required for GCSE, even though in many cases some of this may have been learnt prior to the start of the GCSE course itself?

There were 1,627 responses to this question, which were as follows:

Responses to Q12	Total	Percent
Yes	1,269	78%
No	358	22%

Of the respondents to this question who were teachers (1,166 respondents), 948 (81%) agreed with the proposal and 218 (19%) disagreed. Students followed a similar pattern with 44 (81%) in agreement and 10 (19%) in disagreement. There was a more even split among parents and carers with eight (53%) agreeing and seven (47%) disagreeing. Of the 73 academics who answered, 35 (48%) agreed and 38 (52%) disagreed.

Schools accounted for 204 of the answers to this question, of which 168 (82%) agreed with the proposal and 36 (18%) disagreed. Just one (14%) of the subject associations agreed with the approach whilst seven (86%) disagreed. Of the three individual respondents that stated that they work for an awarding organisation, one agreed with the proposal and the other two disagreed. Both publishing companies that responded to this question agreed with the proposal.

A number of respondents that agreed with the proposal did so because they felt that, owing to the patchy provision of languages prior to GCSE, it was essential for an 'ab initio' approach to be adopted by secondary schools. Some respondents also said that the proposal would help in cases where a particular language is not offered to students until Key Stage 4:

"The vocab taught prior to gcse will vary hugely from school to school and therefore the list for gcse should not assume any prior knowledge. Also there are candidates who will take an ab initio gcse and will need to know the full extent of vocab to learn."

"The present GCSE vocabulary lists do not do this and so do not provide either a comprehensive revision resource for students or a comprehensive reference list for teachers. Some students start their studies of the language ab initio at the start of the GCSE course; prior knowledge should not, therefore, be assumed..."

Others agreed because they felt there should not be a situation in which students could be tested on items in assessment that they were not expected to learn as part of the course:

"Any GCSE must contain in its specification all of the material on which the tests can be set."

"Yes, and the exam shouldn't contain other things"

"That would be helpful because students value knowing the parameters of the

course and they feel reassured which would hopefully lead to greater uptake.”

Some respondents agreed with the proposal but wanted vocabulary lists to be organised in themes or topics.

Although in a minority, those that disagreed with the proposal did so because they felt it would be demotivating for those students who had already learnt some of the content proposed for GCSE and thought that, by covering it again, it would become uninteresting:

“Repeating content to students who have already covered it elsewhere strikes me as an exercise in futility. Learning a language and its culture is about discovery and moving forward. I do not see the point on covering materials more than once in a similar fashion.”

“Won’t students who have covered significant content prior to the course find this boring? It must be possible to find ways to stretch more able students.”

“Students who take a language at GCSE never having formally studied it before normally only do so in exceptional circumstances. A curriculum should not be built around outliers.”

Others felt that dealing with unfamiliar language and being able to infer meaning from context was an important skill in language learning which should not be removed:

“Decoding unfamiliar language and working out meaning from context is a skill that sets apart the most able students. If you take this away, you will award students the top grades for rote learning vocabulary which is not a language learning skill.”

A small number selected ‘no’ because they fundamentally disagreed with the premise of providing students with a pre-defined vocabulary list.

Question 13

Do you agree that cognate words (words which are very similar or the same in English and the assessed language) should be included and counted in the defined vocabulary in a way which reflects their frequency of occurrence in the assessed language?

There were 1,614 responses to this question, which were as follows:

Responses to Q13	Total	Percent
Yes	1,086	67%
No	528	33%

Teachers accounted for 1,157 of the responses to this question with 825 (71%) agreeing and 332 (29%) disagreeing. Of the 55 students that responded to this question, 32 (58%) agreed and 23 (42%) disagreed. Of the 15 parents and carers that answered this question, six (40%) agreed and nine (60%) disagreed. Overall, a third of academics were supportive of the proposal and two thirds were not, with 23 (32%) agreeing and 48 (68%) disagreeing.

There were 241 organisational responses to this question, of which 202 were schools. Of these schools, 150 (74%) agreed with the proposal whilst 52 (26%) disagreed. Of the seven subject associations that answered this question, one (14%) agreed and six (86%) disagreed. Of the three individual respondents that stated that they work for an awarding organisation, one agreed and two disagreed. There was a 50/50 split in views between the two publishing companies.

Of those that agreed with the proposal, many did so because they felt that, by not including cognates in the word lists, students who did not have an extensive English vocabulary, including students with EAL (English as an additional language), would be unduly disadvantaged:

“A cognate word to a well-educated adult writing the exam paper is often not the same as a cognate to a 15 year old.”

“Many pupils struggle to recognise cognates due to their lack of a broad lexicon in English, it is not then fair to punish them for this in their MFL exams.”

“While I believe that using unspecified cognates in assessments can be a good way to allow higher ability students to demonstrate their skills of language and literacy, I recognise that this approach could also unfairly penalise, for example, EAL students, whose own corpora of English may not be as great as their fellow students. Therefore, on balance, I have agreed with this question.”

Others that agreed said that it was unfair that students could be examined on unspecified cognates having not had the chance to previously learn them:

“Exam boards rely far too much at [sic] tripping students up, particularly at Higher, and the more cognates included in the list, the fewer false friends they can include in the exams.”

Some respondents agreed that cognates should be included with the word list, but in doing so, thought the number of words that foundation and higher tier students should know should be increased.

Of the minority of respondents who disagreed with the proposal, most felt that, by including cognates within the word list, students would no longer be able to demonstrate deduction or inference of unfamiliar vocabulary which they considered to be an essential skill in second language learning, as well as motivating for students:

“Using cognates to understand foreign language skills should be expected in language learners, and is something which should be developed throughout the GCSE course. It is a fundamental part of receptive understanding. This skill should be part of assessment, and it should not be the case that only cognates in the specified vocabulary list should be included.”

“Students should be encouraged to develop skills to work out the meaning of new vocabulary - deciphering cognates would be part of this skill acquisition, so they would not all need to be on a defined vocabulary list.”

“I think it is important that students have to work out the meanings of words which it is possible for them to work out from context or similarity to English. This is a key part of progression into A level and the removal of them limits the extent of language that can be understood.”

Others thought that cognates would take up too much space in the word lists, which, in turn, would displace more useful words:

“I do not see any benefit to including cognates in the list as this then takes away the opportunity to add other common language that would be beneficial to the students.”

Finally, some respondents said that, by including cognates in the word lists, it would risk increasing the gap between GCSE and A level.

Question 14.1

The revised subject content expects higher tier students to read texts that may include a small number of words that fall outside the vocabulary list defined by the awarding organisation. English meanings of such words must be supplied adjacent to the text for reference. Do you agree that no more than 2% of words in any given higher tier text that fall outside the vocabulary list defined by the awarding organisation, must be included in an adjacent glossary?

There were 1,615 responses to this question, which were as follows:

Responses to Q14.1	Total	Percent
Yes	1,115	69%
No	500	31%

Of the respondents to this question who were teachers (1,160 respondents) 858 (74%) agreed and 302 (26%) disagreed. Of the 55 students who responded, 30 (55%) agreed and 25 (45%) disagreed. Responses by parents and carers followed a similar pattern with eight (53%) agreeing with the proposal and seven (47%) disagreeing. Academics were, however, against the proposal with 26 (36%) agreeing and 46 (64%) disagreeing.

Of the 201 schools that responded to the question, 142 (71%) agreed and 59 (29%) disagreed. Eight subject associations answered this question, with two (25%) agreeing and six (75%) disagreeing. All three of the individual respondents that stated that they work for an awarding organisation disagreed. Both publishing companies that answered agreed with the proposal.

Those that agreed with the proposal generally did so because they felt that it would allow awarding organisations to continue producing and using interesting texts whilst also making them more accessible for GCSE students, with some respondents stating that previous examination texts had been too complex and demoralising:

“Teachers have been deeply unhappy with the unpredictability of the listening and reading papers. Stories abound of natives (native teachers included) failing to get full marks in the current GCSE listening and reading papers. It is clear that unknown words of very low frequency have been used rather indiscriminately as the main way to differentiate students' outcomes. We know that creating a spread of awarded grades is part of the examination process. However, what we need to consider is the students' experience of taking the exam. Whilst just anecdotal evidence, I know of excellent Y11 linguists who have exited the listening and reading exams having resolved to change their A level subject choices, because of the demoralising effect of learning so much, so well, and revising so hard, just to be faced with a ton of unknown language.”

“It's important that students are given the opportunity to show what they know and not be "caught out" by language that they were not expected to know in the first place.”

“I think that this is a good inclusion - especially noting the complexity of some of the texts that have appeared in GCSE exams over recent years.”

Some that agreed with the proposal did, however, qualify their answer by stating that it remained important for higher tier students to be exposed to a certain number of unfamiliar words so that they can learn the skill of inference.

Among those that disagreed, some respondents said that all words that had not been previously taught should have their English meaning provided in an adjacent glossary (sometimes called 'glossed') and that this should not be limited to 2%. Others said that if a word had not been previously taught then it should not feature in examinations, regardless of whether it was glossed:

"I believe that all words outside of the defined vocabulary should be given to students in English. In the current digital age, if a situation arose in a foreign country whereby a person did not understand a word, they would be able to look it up, so why would we make them guess in an exam, when this would never happen in a real world situation."

"There shouldn't be any words in an assessment that haven't previously been studied. The point of the assessment is to assess and grade their capabilities which come from what has been studied so how can you include in an assessment, something that has not been studied?"

Similarly to question 13, the vast majority of respondents who disagreed did so because they felt that students should be faced with unfamiliar vocabulary so that they can learn the skill of deduction and inference through linguistic strategies. They considered the proposed approach to be unambitious and not reflective of real-life scenarios:

"I think that it is important to encourage students to develop the skill of inferring the meaning of unknown words from surrounding ones and from the broader focus of the piece of text."

"How are we going to stretch and challenge - and indeed motivate - high ability learners if there is no longer a need to use one's powers of deduction ? Where is the enjoyment in deciphering a text in which one knows all the words, either because they were on a narrow prescribed list or because they are provided?"

"I do not think this offers enough challenge for high ability students which may well be demotivating and have a follow on impact on uptake of languages at A level. In addition, it widens the gap between GCSE and A Level."

Others said that, by limiting the percentage of glossed words in any given higher tier text to 2%, awarding organisations would not be afforded sufficient scope to select authentic and meaningful texts:

"This seems to me an admission that the proposal vocabulary specification can only create artificial, inauthentic text, entirely unlike the reality of the communication contained in the broad aims of the proposals."

Some respondents also raised concerns that this would risk increasing the gap between GCSE and A level, and some respondents also disagreed with the proposal that language GCSEs would remain tiered.

Question 14.2

All proper nouns (such as cities or countries) that are not listed in the most frequent 2,000 words and are not deemed to be easily understood, can be included in an adjacent glossary. Do you agree that such words can be included in an adjacent glossary?

There were 1,629 responses to this question, which were as follows:

Responses to Q14.2	Total	Percent
Yes	1,423	87%
No	206	13%

Of the respondents to this question who were teachers (1,167 respondents), 1,033 (89%) agreed with the proposal and 134 (11%) disagreed. Of the 56 students that replied, 48 (86%) agreed and eight (14%) disagreed. 15 parents and carers responded to this question with ten (67%) agreeing and five (34%) disagreeing. A total of 71 academics answered this question, of which 57 (80%) agreed and 14 (20%) disagreed.

There was a total of 204 schools that answered this question, with 184 (90%) agreeing and 20 (10%) disagreeing. Of the eight subject associations that responded, seven (88%) agreed and one (13%) disagreed. Of those who responded on behalf of a subject association, two agreed and one disagreed. Both publishing companies agreed with the proposal.

Themes and topics: Questions 15 and 16

Question 15

Do you agree with the proposal not to require overarching themes and specific topics in the revised subject content?

There were 1,622 answers to this question, which were as follows:

Responses to Q15	Total	Percent
Yes	749	46%
No	873	54%

Of the 1,160 teachers that responded to this question, 557 (48%) agreed with the proposal and 603 (52%) disagreed. 47% of the students who responded agreed whilst 53% disagreed. There was a similar pattern among parents and carers, of whom seven (47%) agreed and eight (53%) disagreed. Of the academics that responded to this question, 23 (32%) agreed with the proposal whilst 50 (68%) disagreed.

Of the 204 schools that responded to this question, 96 (47%) agreed with the proposal and 108 (53%) disagreed. Of the eight subject associations that responded, two (25%) agreed and six (75%) disagreed. All three individual respondents that stated that they work for an awarding organisation disagreed with the proposal. One of the publishing companies agreed with the other disagreeing.

Although there was no option for further comment on this question in the online consultation, we were able to identify some qualitative data regarding themes and topics from other areas of the consultation, most notably, from responses to question 24. This qualitative data, however, relates exclusively to those who selected 'No'. For those that agreed, there is no qualitative data supporting why they did so.

Of primary concern among those that disagreed was that the proposal not to require overarching themes and specific topics in the revised subject content could lead to a curriculum that lacked sufficient context, risking reducing courses to individual words and grammatical structures in isolation:

“Language learning does not happen in isolation - it is always topic-bound. I agree that students find it difficult to transfer their knowledge of vocabulary and grammar between topics, but this can be addressed through quality teaching, encouraging students to apply previous knowledge to new situations. The topic-free proposals place too much emphasis on knowledge of grammar and 'neutral' high-frequency vocabulary which is devoid of context; I would argue that the topic context provides the motivation and stimulation for students to understand and produce language.”

“I understand the attempt to make the MFL GCSE more accessible, however I believe that it is vital for language to have a context and therefore themes and topics should remain.”

There were also concerns that students would become demotivated if they were not learning content within the context of defined themes and topics that were of interest of them:

“I welcome the proposals to make the GCSE more accessible. However, I worry that the removal of topics would be demotivating for the majority of students, particularly less able students.”

Some respondents were worried that, by allowing individual awarding organisations to compile their own themes and topics, it would lead to a lack of parity between awarding organisations which could result in challenges when creating comparable qualifications. Linked to this, there was also some concern that there would be a more limited choice of resources for teachers to draw upon, given that awarding organisation’s materials would be relevant to their own specification only:

“By not having any clear themes or topics, but instead a very restricted list of 1700 words, there will be no consistency across different schools and/or exam boards as to how and what is taught, other than this short list of words and some grammar!”

“If it is expected that exam boards will put these in place themselves, the result will be that students will still be studying themes (and learning the specific vocabulary required for this) but each exam board will be different which leaves schools with fewer resources : text books / past exam questions / online shared resources etc. which will be relevant to our students.”

Some respondents thought that the proposal to move away from themes and topics would not adequately prepare students for A level on the basis that the latter contains a large amount of thematic and topic specific vocabulary.

Question 16

Do you agree that teaching and assessment will instead be informed by the vocabulary specified for teaching given that, due to its high frequency, this vocabulary can cover a range of topics?

There were 1,630 answers to this question, which were as follows:

Responses to Q16	Total	Percent
Yes	856	53%
No	774	47%

Of the 1,165 teachers that responded, 654 (56%) agreed with the proposal and 511 (44%) disagreed. Just under half (49%) of students who answered this question agreed with 51% disagreeing. Seven (47%) parents and carers agreed and eight (53%) disagreed. Of the 75 academics who responded, 13 (17%) agreed whilst 62 (83%) disagreed.

Of the 203 schools that responded to this question, 114 (56%) agreed with the proposal whilst 89 (44%) disagreed. Eight subject associations that answered this question disagreed with the proposal as did the three individual respondents that stated that they work for an awarding organisation. Both publishing companies that responded agreed.

Question types: Questions 17 to 22

Question 17

Do you agree that, where questions are designed to test comprehension of written and spoken texts in the assessed language, they will be constructed in English?

There were 1,625 answers to this question, which were as follows:

Responses to Q17	Total	Percent
Yes	1,347	83%
No	278	17%

Of the respondents to this question who were teachers (1,165 respondents), 1,015 (87%) agreed with the proposal whilst 150 (13%) disagreed. Of the 56 students that responded, 26 (46%) agreed and 30 (54%) disagreed. Of the 15 parents and carers that responded, 11 (73%) agreed and four (27%) disagreed. Of the 73 academics who answered, 48 (66%) agreed whilst 25 (34%) disagreed.

Of the 204 schools that responded to this question, 170 (83%) agreed and 34 (17%) disagreed. Of the eight subject associations that answered, five (63%) agreed with the proposal and three (38%) disagreed. The three individual respondents that stated that they work for an awarding organisation agreed with the proposal. There was a 50/50 split in views between the two publishing companies.

Question 18

Do you agree that all rubrics will be in English?

There were 1,626 answers to this question, which were as follows:

Responses to Q18	Total	Percent
Yes	1,306	80%
No	320	20%

Of the 1,166 teachers responding to this question, 973 (83%) agreed with the proposal and 193 (17%) disagreed. There was a 50/50 split between students who agreed with the proposal (28) and those that disagreed (28). Of the 15 parents and carers that responded, 11 (73%) agreed with the proposal and four (27%) disagreed. Of the 74 academics that responded, 53 (72%) were in agreement whilst 21 (28%) disagreed.

204 schools responded to this question with 161 (79%) agreeing and 43 (21%) disagreeing. Five of the eight subject associations (63%) agreed with the proposal with three (38%) disagreeing. The three individual respondents that stated that they work for an awarding organisation agreed with the proposal. One of the publishing companies that answered this questions agreed whilst the other disagreed.

Question 19

Do agree with the requirement for students to read aloud short sentences from the written form of the language and demonstrate understanding of them?

There were 1,619 answers to this question, which were as follows:

Responses to Q19	Total	Percent
Yes	956	59%
No	663	41%

The largest group of respondents to this question was teachers. Of the 1,161 teachers that answered this question, 681 (59%) agreed and 480 (41%) disagreed. Of the 54 students who responded to this question, 41 (76%) were in agreement with the proposal, whilst 13 (24%) disagreed. Eight (57%) of the parents and carers who answered this question agreed and six (43%) disagreed. Of the 74 academics that answered this question, 43 (58%) agreed and 31 (42%) disagreed.

There were 241 organisational responses to this question. Schools accounted for 202 of these, of which 128 (63%) agreed with the reading aloud proposal and 74 (37%) disagreed. Of the eight subject associations that responded to this question, two (25%) were in agreement and six (75%) were in disagreement. All three individual respondents that stated that they work for an awarding organisation disagreed with the proposal. Both publishing companies that answered this question agreed.

Although there was no option for further comment on this question, we did identify some qualitative data regarding the proposal requiring students to read aloud from other areas of the consultation, most notably, from questions 22 and 24. This qualitative data, however, does not include information on why people agreed with the proposal.

A number of respondents who disagreed with the reading aloud requirement and wished to expand on their answer, said that students studying French would be disproportionately penalised compared to those studying German and Spanish because it is a less phonetic language:

“In French these elements would be much more difficult than in German and Spanish due its more complex pronunciation rules.”

As well as citing the difficulty of French when reading aloud, some respondents also had concerns surrounding equity, saying that students with dyslexia and poor speech patterns in their mother tongue would be disadvantaged.

Others who responded to this question thought that, although reading aloud could be a useful classroom activity, any form of assessment in which they are used would be at risk of being unreliable:

“Dictation and reading aloud are excellent activities when learning but not for assessment, it is much more important for students to focus on spontaneous speech and comprehension”

“I disagree with the requirement for pupils to read aloud short sentence [sic] in the written form of the language and demonstrate understanding of them. Whilst we fully appreciate that reading aloud is a worthwhile classroom activity and can be a valid assessment of pupils ‘phonic awareness’, the inclusion of this in assessment is flawed given that pupils will be tested on prescribed words, it will not constitute a valid test of phonic awareness as the words will already be familiar to pupils. There is a risk that the assessment may not be that reliable depending on the quality of the mark scheme and the support teachers are given in applying it.”

A number of respondents also raised concerns that reading aloud exercises are not effective in fostering, nor measuring, students’ spoken communication skills:

“I do believe reading aloud ... activities [are] only of moderate use to the wider targets of learning a language, which is allowing pupils to communicate effectively. They are too narrowly focused on the accuracy of pronunciation and spelling, which are valuable skills, but not essential qualities to make yourself understood in a language.”

“I do not understand how testing reading aloud will work, nor how it is a good test of students’ abilities to speak to communicate. I agree that reading aloud [is a] useful classroom activity for improving students’ abilities to speak and listen, but [it is] not the end point.”

Question 20

Do you agree with the requirement that students undertake dictation exercises from short spoken extracts, with credit for accurate spelling?

There were 1,628 answers to this question, which were as follows:

Responses to Q20	Total	Percent
Yes	849	52%
No	779	48%

Teachers accounted for 1,165 answers to this question, with 617 (53%) agreeing and 548 (47%) disagreeing. Of the 56 students who answered this question, 39 (70%) agreed with the proposal whilst 17 (30%) disagreed. Of the 14 parents and carers that responded, nine (64%) agreed and five (56%) disagreed. Of the academics responding to this question, 33 (45%) agreed and 41 (55%) disagreed.

Similarly to teachers' responses, of the 204 schools that responded, 108 (53%) agreed with the dictation proposal and 96 (47%) disagreed. Of the eight subject associations that responded, two (25%) agreed and six (75%) disagreed. All three individual respondents that stated that they work for an awarding organisation disagreed with the proposal. Both of the publishing companies that answered this question agreed.

Although over half of the people who responded to this question agreed, there is no qualitative data explaining why they did so. There were, however, clear themes emerging amongst those respondents who disagreed, some of which were the same or similar to those that appeared in response to question 19. A majority thought that requiring students to undertake dictation exercises would make Spanish and German easier than French, and could have an adverse effect on take-up. Many said that this was because French is less phonetic than the other languages:

"I only say no because of the disparity between languages: German is easier to read aloud than French because it (German) is written how it is pronounced whereas French has a lot of silent letters - something extra to teach. I teach both languages to A level so am not biased against or towards one language or the other but mention it as something which needs to be considered"

"Dictation seems to be like a major step back in time and is an element that would doubtless prevent many of my students from continuing with French and can therefore only be described by me as discriminatory and elitist"

Similarly to the reading aloud proposal in question 19, some respondents raised concerns over equity in relation to dictation exercises, particularly amongst those with dyslexia and special educational needs and disabilities:

"The layout of the new assessment framework appears less accessible and inclusive to lower-ability learners. The prospect of assessing students on their ability to... understand dictation will put off a significant number of learners who struggle with special educational needs."

Question 21

Do you agree that, where students are expected to understand spoken extracts, these extracts will be delivered at a pace which is no faster than a moderate pace?

There were 1,633 answers to this question, which were as follows:

Responses to Q21	Total	Percent
Yes	1,571	96%
No	62	4%

Of the respondents to this question who were teachers (1,170 respondents), 1,138 (97%) agreed with the proposal and 32 (3%) disagreed with the proposal. Of the 56 students that responded, 53 (95%) agreed and three (5%) disagreed. All 15 parents and carers that answered this question agreed with the proposal. Of the 73 academics who responded to this question, 64 (88%) agreed and nine (12%) disagreed.

Of the 202 schools that answered this question, 193 (96%) agreed and nine (4%) disagreed. Of the eight subject associations that responded to this question, six (75%) agreed with the proposal and two (25%) disagreed. Of the three individual respondents that stated that they work for an awarding organisation, two agreed with the proposal with one disagreeing. Both of the publishing companies that answered this question were in agreement.

Question 22

Do you agree that, whilst students will continue to learn about the culture of the countries where the language is spoken, cultural content will not be specified or tested in the revised subject content?

There were 1,626 answers to this question, which were as follows:

Responses to Q22	Total	Percent
Yes	1,050	65%
No	576	35%

Teachers accounted for the majority of responses to this question (1,163) with 815 (70%) agreeing and 348 (30%) disagreeing. Of the 55 students who responded, 27 (49%) agreed whilst the other 28 (51%) disagreed. Responses were similar for parents and carers, with 47% agreeing and 53% disagreeing. Answers from academics differed significantly from the other groups with 15 out of 75 (20%) in agreement with the proposal and 60 (80%) disagreeing.

Of the 244 organisations that responded to this question, 204 were from schools. Of these schools, 141 (69%) agreed with the proposal and 63 (31%) disagreed. All eight subject associations that responded to the online form disagreed with the proposal. The three individual respondents that stated that they work for an awarding organisation, all agreed with the proposed approach. Responses from publishing companies were split evenly, with one agreeing and the other disagreeing.

Some of the respondents that agreed with the proposal did so because they felt it would foster parity across all students, regardless of the cultural knowledge that they had prior to embarking on a language course. They stated that it would not be fair for students, particularly those who might be disadvantaged, to be penalised on the basis that they had not had the opportunity to be exposed to certain cultural aspects of countries where the target language was commonly spoken.

“Very much agree with this. Not all students have a geographical/cultural understanding of the world and the TL-speaking areas of the globe. I appreciate the importance of them acquiring this knowledge, but given timetable constraints we as MFL teachers do not always have time to do this overtly!”

“A lot of my disadvantaged students have little knowledge of Spanish culture to start with and it puts them at a disadvantage.”

Others felt that to prescribe what cultural content should be taught would result in less of a focus on linguistic outcomes which would negatively affect language learning:

“Culture is vital to language teaching, but specifying it within the assessment objectives would inevitably lead to less focus on language. At this level, cultural knowledge provides the context for language learning, not knowledge in its own right. I would actually argue that the balance is wrong at University level too, and that far too much of the learning directs students to read about the history, culture,

literature of the target language country in ENGLISH. This should not be necessary to this extent at degree level. Perhaps if we were able to focus the GCSE purely on linguistic outcomes (with culture as the natural 'unassessed' context) we might in future years be able to adapt university courses, too!"

Some thought that it would be too difficult to prescribe cultural knowledge in the content for each language:

"I feel that although this is important it's very difficult for a teacher to ascertain exactly what is being assessed. It's a shame but sometimes cultural knowledge can be very obscure and country/region dependent."

There was a strong consensus on the importance of culture in language learning itself.

The vast majority of those that disagreed with the proposal not to specify cultural knowledge within the subject content, did so because they felt that cultural awareness was integral to learning a second language and that cultural knowledge could not, and should not, be separated from this:

"I believe that a language is shaped by its culture so it's impossible to separate them. The understanding of the vocabulary will come hugely from understanding the culture. How can students learn food without understanding the food that certain countries eat?"

There were also a high number of respondents who said that, by not specifying what cultural knowledge should be taught, teaching of culture risked falling by the wayside and teachers would no longer feel the need to teach it:

"My concern is that cultural content is an integral part of language learning and the risk is that if it is not included in examined content that it may disappear in the objective of being exam ready."

Many respondents who disagreed with the proposal also said that learning the culture of the target language country was key to motivating students in second language acquisition and, in some instances, was the only reason for students choosing to study a language:

"A cultural appreciation and understanding is necessary for motivation. In my view, without this, learning a language becomes a mathematical exercise - learning lists and patterns - rather than the practical, communicative activity that is [sic] should be."

"Cultural awareness of the target language country/ies is extremely important. This knowledge helps motivate learners engage with the language learning process more so than anything else."

Some people also raised concerns surrounding the UK withdrawal from the European Union and felt that we should be placing more emphasis on cultural knowledge in language courses than ever before:

"Surely in a world post Brexit we need to promote cultural awareness and understanding, not ignore it."

"... Language is a form of culture and the UK should really be taking advantage of

improving cultural appreciation of different nations. This could eradicate racism, xenophobia and other forms of discrimination as well as broadening the capacity of education of a child.”

There were also a number of respondents who agreed that cultural content should not be tested but that it should be specified in the content:

“I agree that it should not be tested but I do not agree that cultural content should not be specified - the curriculum should include guidance on cultural content to be covered in the course.”

Grammar: Question 23

Question 23

Do you consider the grammar annexes to be comprehensive, unambiguous and easy to understand?

There were 1,588 answers to this question, which were as follows:

Responses to Q23	Total	Percent
Yes	1,180	74%
No	408	26%

Of the respondents to this question who were teachers (1,146 respondents), 865 (75%) agreed and 281 (25%) disagreed. Of the 50 students who responded, 41 (82%) agreed and nine (18%) disagreed. Parents and carers accounted for 15 responses, with ten (67%) agreeing and five (33%) disagreeing. Of the 65 academics who responded, 39 (60%) agreed and 26 (40%) disagreed.

Of the 241 organisations that responded to this question, 204 were schools, with 165 (81%) agreeing and 39 (19%) disagreeing. Seven subject associations answered this question of which three (43%) agreed and four (57%) disagreed. Of the three individual respondents that stated that they work for an awarding organisation, one agreed and two disagreed. Both publishing companies that responded agreed.

Of the 1,180 who agreed, there were 32 respondents who wished to expand on their answer. Some of these written responses were intended to either caveat or qualify the respondents' initial 'Yes' answer.

Some examples of instances where respondents who agreed but wished to add to their answer are:

"Better than the current lists that mention far too many grammatical requirements quite vaguely - the problem persists, however, and this consultation does not address it, that there is not enough time to cover the whole list of grammar requirements."

"Yes, as long as grammar is integrated and there are no specific grammar exercises.."

"Yes but it used to be possible in the legacy GCSE to enter pupils for different levels in different skill areas. This should still not be beyond the ability of assessors to design.."

Whilst some respondents agreed to the grammar annexes being comprehensive, unambiguous and easy to understand, it did not necessarily follow that they agreed with their appropriateness. Some examples of instances where respondents wished to qualify their response include:

“They are easy to understand but will not prepare pupils for further learning beyond KS4. The gap between GCSE and A-level will widen and pupils will not be prepared for the demands of A-level MFL.”

“Some of the grammar cannot be tested because there is not the vocabulary available on the list to test it, so it becomes meaningless and abstract when divorced from context and use.”

“But very narrow. do not adequately prepare students for A level”

The majority of respondents who disagreed did so because they felt there was a risk that adherence to the grammar set out in the annexes would lead to too much focus on the teaching of grammatical structures and rules rather than necessary communication skills, which many considered to be the most important aspect of a language course:

“Grammar knowledge is not essential in being able to communicate effectively and can sometimes impede communication as the fear of making grammar mistakes can lead to reluctance to learn languages.”

“Too much focus on grammar will put students off taking the subject to GCSE level. At GCSE perfect grammar should not be essential. Communication is the key.”

“With the focus being primarily on grammar here, this ignores the fact that grammatical errors may occur, but communication is still valid. Going into lots of in depth grammar may disadvantage the weaker students as many cannot cope with the intricacies of advanced grammar but are still able to communicate effectively.”

There were a number of respondents who disagreed because they thought that the grammar annexes should be clearer on what students should be expected to know both receptively and productively and wished for the two to be listed separately:

“As with the vocabulary lists, I believe there should still be some grammar points which are “receptive only” so there is still an awareness with no pressure for students to reproduce certain grammar points themselves.”

“Some receptive knowledge of more complex structures can be fine, without students needing to use those structures themselves.”

“There should be “receptive only” elements to the grammar to reflect the way language is learnt.”

Other respondents disagreed because they considered the grammar annexes to be too ambitious or extensive, too challenging, or too linguistically complex, particularly for foundation tier students:

“The amount of grammar that is supposed to be studied is comparable to one year of studying at initio level at university. I don’t believe that that amount of grammar and detail is necessary at this stage, and I would recommend to focus on quality over quantity.”

“The Grammar Annexes are extremely difficult to understand, even for a graduate of languages. They are also far too demanding for a GCSE student.”

“The grammar content is fine, but the words used, such as 'pre/-postnominal', 'demonstrative adjectives', and 'derivational morphology' are very difficult to understand for students and perhaps even some teachers!”

Other reasons why respondents disagreed included because they thought that ‘more advanced’ grammar points were required, or they thought there was disparity between the grammar lists and the vocabulary lists.

General: Question 24

Question 24

Do you consider the revised subject content to be comprehensive, unambiguous and easy to understand?

There were 1,575 answers to this question, which were as follows:

Responses to Q24	Total	Percent
Yes	805	51%
No	770	49%

Of the respondents to this question who were teachers (1,139 respondents), 590 (52%) agreed and 549 (48%) disagreed. Of the 49 students that responded, 33 (67%) agreed and 16 (33%) disagreed. Parents and carers accounted for 15 responses, of whom nine (60%) agreed and six (40%) disagreed. Of the 63 academics who answered this question, 21 (33%) agreed and 42 (67%) disagreed.

Of the 201 schools that responded to this question, 105 (52%) agreed and 96 (48%) disagreed. Of the seven subject associations that answered this question, three (43%) agreed and four (57%) disagreed. Of the three individual respondents that stated that they work for an awarding organisation, two agreed and one disagreed. Both publishing companies that responded agreed.

Of the 805 who agreed, there were 30 respondents who wished to expand on their answer. Most of these respondents intended their additional comments to caveat or qualify their response.

Some examples of those who agreed with the question but wished to add to their response include:

“Please ensure things are 'current,' modern and up-to-date for teenagers of ALL classes and backgrounds nowadays, e.g. social media, sports and music vocabulary and questions on these in assessments, rather than questions on skiing, exotic holidays and helping the poor! MFL GCSE students will come from all walks of life, and EAL students often make up a big proportion of GCSE cohorts too.

“The broad principles seem OK, but I would need to see how these work in practice for individual languages before being sure about this question.”

“I hope that the new freedom afforded examination boards by the removal of specified themes and topics will result in pupils studying more meaningful content”.

Whilst some respondents agreed to the subject content being comprehensive, unambiguous and easy to understand, it did not necessarily mean that they agreed with the review proposal. Thus, some respondents who wished to qualify their response said:

“It is easy to understand, but not something that I agree with or that will lead to effective GCSEs in MFL.”

“However, I do not agree with the revised content. Students develop a love of the language by using language that is relevant to them, not language that is too formal or business-like. To speak a language to a decent level, students have to learn a lot of vocabulary and grammar over the years. Restricting that learning and creating a ‘dry’ list of vocabulary that is not relevant to many young people would stifle their love of learning.”

“But I think it is underestimating what many students are actually capable of, and it will lead to the death of A Level languages, as students will be inadequately prepared for the transition to language study in the sixth form.”

The majority of those that disagreed did so because they wanted more information in the subject content, particularly in relation to themes and topics. Examples of these responses are:

“While I understand the intent of the changes to content, there is no specificity as to how the content will be arranged - what topics will be covered. I understand that there is a move away from the current structure around themes/modules, but nevertheless some structure of content is necessary, and this is not explained.”

“After teaching syllabus’ based on topics for many years, it will be interesting to see how the themes are set and the linkage between themes and vocabulary. Currently I have not seen enough detail to be able to truly comment.”

“If the revised subject content is constructed around vocabulary, it can be far from clear. It needs to be focused within topics and over-arching themes. By trying to change this you are creating confusion by how this is to be taught and delivered. Teachers have been used to teaching by topic/ theme and making links between topics/themes - now is not the time to change this!!!”

A number of respondents who disagreed did so on the basis that they wanted to see much more detail that one would typically find in specifications developed by awarding organisations. This included a desire to see fully worked vocabulary lists, and although not within the remit of the Department, example questions and mark schemes:

“We need to see a clear defined vocabulary list so that the subject content is easy to understand. How do the top 2,000 words relate to GCSE students?”

“It will not be entirely clear until we have the final vocabulary / grammar lists, course resources, example schemes of work and know what the GCSE assessments look like. Until then we will be making assumptions about what we consider to be the intended changes. I would, however, consider myself to have a reasonable understanding of the revised subject content.”

Others felt that the impact the proposed changes could have on teaching and assessment needed to be made clearer:

“I am not at all clear about how this subject content will be taught and how the learning materials can be sourced to ensure the subject is motivating and engaging.”

“I foresee a challenge for teachers to understand how best to teach a range of

vocabulary, topics and cultural aspects if these aspects are not prioritised in the subject content.”

“It will be useful for teachers to understand what needs to change now and what can evolve later; and make it easy for them to transition because this will ultimately deliver a better experience for the pupils if the teacher isn't spending lots of time revisiting existing lesson plans.”

Some respondents disagreed because they considered the subject content to be inaccessible and cited the complex language that is used as the reason. Others stated that more clarification needed to be provided about how the proposals affected what would be required from students. And some felt that there was scope for the revised content to be more specific which, they said, could be undertaken by providing more examples.

Organisational Responses

In addition to the 1,644 responses to the online consultation form, a small number of organisations submitted their response directly to the Department. These written responses have not been included in the quantitative data set out above, except in a small number of cases where an organisation also provided similar written responses to the online form as well. A summary of these submissions is included in this section.

Two organisations provided written submissions only and did not respond to the online consultation form: Association of School and College Leaders, and the All-Party Parliamentary Group on Modern Languages. Qualitative data provided by key organisations via the online consultation who did not send in a separate written submission are also included here, for completeness.

Where the format of an organisation's response to the consultation is question by question, they have been set out below in the same format. In instances where an organisation has submitted a general response with no specific reference to individual questions, they have been set out by themes later on in this section.

Question 10

Do you agree with the requirement that 90% of words must be taken from the top 2,000 most frequently occurring words in the most widely spoken standard forms of the language?

AQA

AQA disagreed with this question because they thought the 90:10 split between high and low frequency words did not reflect prior research into frequency-based approaches to vocabulary in second language acquisition. AQA proposed that the ratio of high-frequency and low-frequency vocabulary should be 80:20 at the very least. They felt that the current 10% permitted limit for words not in the high-frequency corpora was inadequate, particularly when considering the obligatory words as per the grammar annexes. AQA also commented on the key vocabulary that fell outside of the 2,000 most frequently occurring, citing, for example, 'geography' in Spanish.

Association for Language Learning (ALL)

The Association for Language Learning disagreed with this question. There was disagreement to replacing a theme-based approach with a high frequency approach as well as disagreement on the parameters from which these high frequency words should be selected. Following a questionnaire of the ALL membership, the most popular approach to compiling word lists was to use a 50:50 mix of high frequency words that that could be used in line with specified themes. They also wished to see the frequently occurring words being drawn from corpora relevant to 16 year old pupils.

Association of School and College Leaders (ASCL)

ASCL disagreed because, although they appreciated the intention behind the proposal, they felt the parameters from which vocabulary could be selected was overly simplistic and rigid. ASCL stated that using a high frequency corpora would result in a western-centric word list that would not necessarily be of the most relevance to young people. They also

raised concerns about the number of commonplace or important words that risked being excluded from the word lists owing to their frequency, which could reduce pupils' ability to talk about themselves in a meaningful way.

As part of their response to this question, ASCL disagreed with the proposed 90:10 split between high and low-frequency words, believing that pupils should be introduced to high and low frequency in a 'roughly' equal amount. They were also concerned that high frequency words are largely comprised of grammatical items rather than substantial lexical items, and they feared this would result in a more limited wordlist. Finally, they were concerned that the proposed approach could invalidate assessments, as well as creating a dull and demotivating course for pupils.

Committee for Linguistics in Education (CLiE)

CLiE disagreed with this question on the basis that they considered it to be 'not aspirational' and were concerned that it risked leading to a 'lowering of standards'. They questioned whether using a frequency approach would prepare pupils effectively for authentic use of the target language and were concerned that it could lead to lower student satisfaction. Finally, similarly to ASCL, they raised concerns about some useful and important words that could be omitted from the list owing to their frequency and thought that this could lead to a lack of comparability across French, German and Spanish.

National Association of Language Advisers (NALA)

NALA disagreed with this question because they thought that prescribing a word list based on frequency would not cater to the interests or needs of the majority of GCSE students. In addition, they felt that creating a content which focuses on high-frequency vocabulary would not allow for meaningful interactions and communication. NALA believed that the proposal in relation to vocabulary could have a negative impact on language uptake after GCSE as students would not be sufficiently prepared for more advanced study. They were of the opinion that this would further negatively affect teacher supply. Finally, they were concerned that the proposal could lead to a Western-centric approach to language learning.

Pearson

Pearson disagreed with this question because they had concerns about the suitability of the vocabulary contained within the recommended corpora. The recommended corpus in each language is dictated by the sources from which each corpus has been drawn. Pearson said that the recommended German corpus included national and regional newspapers and academic texts, the French corpus contained transcripts of governmental debates and theatre monologues, and the Spanish corpus contained lectures, sermons and encyclopaedias, which mostly date back to the 1990s. Owing to this, they believe that selecting 90% of the words from the 2,000 most frequent will not be useful, relevant, motivating or age-appropriate for GCSE-aged students.

They also had concerns about the 90:10 split between high-frequency and low-frequency words. Their view was that, although language communication clearly involves a substantive amount of high frequency words, as these are skewed towards grammatical items, meaning itself is reliant on the less frequent words or 'content words'. As such, they were of the view that a more appropriate balance would be a ratio of at least 80:20 high to low-frequency words. Finally, they also commented on the 'common' vocabulary that fell

outside the top 2,000 most frequently occurring words, for example 'Monday' in German.

University Council of Modern Languages (UCML)

UCML disagreed with this question on the basis that they believed that it would not take into account the language that young people would want to use in order to express their interests, therefore reducing motivation. They were also concerned that parameters from which vocabulary could be selected would lead to limitations on the range and use of age-appropriate authentic texts, which UCML consider to be vital to communication in the target language.

WJEC

WJEC disagreed with this question due to concerns about the origins of the list of the top 2,000 most frequently occurring words. They felt that these lists would include some vocabulary that is inappropriate for GCSE and would omit some vocabulary that they consider to be useful. They were also concerned that the proposed approach could lead to inconsistencies across French, German and Spanish. They noted their preference towards having a range of broad themes to be prescribed rather than a vocabulary list.

Question 11

Do you agree with the requirement for foundation tier students to know no more than 1200 words and higher tier students to know no more than 1700 words?

AQA

AQA disagreed with this question because they were of the view that if students had a maximum vocabulary of 1,200 or 1,700 words, it would not be sufficient to be able to communicate effectively outside of the prescribed list. AQA felt that if teaching and learning were to be restricted to mostly high-frequency words, it would result in a reduction of motivation among students as it could inhibit their ability to communicate, particularly about topics that are engaging for them. Furthermore, AQA responded that the proposal is not sufficiently in line with the CEFR and will place language learners in England at a disadvantage when compared to their peers globally. Finally, AQA raised concerns over the potential negative effect that the proposal could have on teaching and learning, stating that it risked encouraging rote learning over communication.

Association for Language Learning (ALL)

The Association for Language Learning disagreed with question 11, citing their answer to question 10 as the reason, particularly given that they considered the question was predicated on the proposal to replace a theme-based approach by a high frequency approach – which they fundamentally rejected.

Association of School and College Leaders (ASCL)

ASCL did not agree on the basis that they thought that learners need a basic threshold of at least 2,000 words after five years of study to feel like they are making progress in the target language and to be able to use it independently. ASCL was concerned that pupils will not have 1,200 words or 1,700 words of learning if the input is 1,200 or 1,700; they will retain considerably fewer.

ASCL was also concerned that the number of words that students should know by the time of their GCSE was not in line with the CEFR and could lead to a drop in standards. They commented that there was a strong relationship between vocabulary size and ability in MFL and learners would not be able to achieve 'the broad goals' without 'significantly more vocabulary'. ASCL wished to see 'greater scrutiny of these figures'.

ASCL believed that the proposals did not sufficiently differentiate between receptive knowledge and productive knowledge, noting that people have greater receptive knowledge than productive, particularly in reading.

Committee for Linguistics in Education (CLiE)

CLiE disagreed as they thought that the apparent reduction of vocabulary that students would be expected to learn would have a negative impact on motivation and self-efficacy, as well as increase levels of boredom and frustration. They were also of the opinion that the suggested vocabulary would 'barely reach A2 CEFR level'. They did not believe that the proposal would have the intended effect, but would instead not improve learning outcomes, not improve proficiency and would not prepare young people to talk about their lives and identity. In addition, they wished to see a distinction between active and passive vocabulary.

National Association of Language Advisers (NALA)

NALA disagreed with this question on the basis that they thought an assessment of 1,200 or 1,700 mostly high-frequency words at Key Stage 4, would lead to a disconnect at Key Stages 2 and 3, resulting in a reduction in teaching time at these key stages. They called for more clarity about what is meant by a 'lexical item' in the draft subject content document and were concerned that conjunctions of irregular verbs would have a 'significant impact' on the scope of the vocabulary lists.

Pearson

Pearson disagreed with this question for a number of reasons. Firstly, they were concerned that requiring students to know 1,200 or 1,700 words was an insufficient number to create assessments which are not problematically predictable over time. Secondly, Pearson was concerned that the number of words being proposed for foundation and higher tier was not in line with the CEFR, which they say deems 1,500 to 2,500 words appropriate for GCSE foundation tier (or A2 level) and 2,500 to 3,500 words for GCSE higher tier (or B2 level). Pearson stated that they believed learners with knowledge of between 1,200 to 1,700 words would be working to A1 level within the CEFR and therefore would be behind their peers globally. They also said that whilst they would 'not be against adjusting the demand of the GCSE' they consider the proposed number of words to be learnt to be too few which could lead to a limitation in proper communication. Finally, Pearson raised concerns regarding diversity and inclusion of the word lists based on the proposal in the question. They are concerned that awarding organisations will not be able to include all of the vocabulary that relates to a diverse set of learners in texts and other assessment materials, thus creating issues with diverse representation and inclusive practice.

University Council of Modern Languages (UCML)

UCML disagreed because they thought it lacked aspiration and was likely to be limiting for the best students if they would not be rewarded for having more extensive vocabulary knowledge. They thought that students should be encouraged to engage with unfamiliar

texts in order to increase their motivation and sense of progression. Additionally, UCML were unclear as to why students were required to demonstrate both receptive and productive knowledge of all words on the list at both foundation and higher tiers since, as stated, research shows that receptive knowledge is likely to be greater than productive knowledge.

WJEC

WJEC disagreed with this question because, although they recognised it was important to consider ways of making French, German and Spanish qualifications more accessible for all, they thought that the number of words that students would be required to learn was insufficient. They thought that for general understanding, learners need to know around 2,000 words in a language and more than 2,000 to become independent communicators.

Question 12

Do you agree that the vocabulary lists proposed for GCSE should set out all content required for GCSE, even though in many cases some of this may have been learnt prior to the start of the GCSE course itself?

AQA

AQA disagreed because they believed that the vocabulary as currently prescribed for each tier would make the inclusion of all words from prior learning unworkable. They were concerned that the 10% of words proposed in the consultation that can come from outside the 2,000 most frequently occurring words, would be taken up by lexical items such as days of the week or numbers. They were also concerned that students would not be motivated if they had to re-visit basic vocabulary items from prior study.

Association for Language Learning (ALL)

The Association for Language Learning disagreed, citing their answer to question 10 as the reason, particularly given that they considered the question was predicated on the proposal to replace a theme-based approach with a high-frequency approach.

Association of School and College Leaders (ASCL)

Although recognising the intention behind this proposal – to ensure students can only be tested on what they have learnt – ASCL felt that the solution was overly simplistic and limiting. They thought that there should not be a defined word list for the receptive skill of reading, given that inference is a motivating aspect of building up receptive knowledge. ASCL were of the view that ‘withdrawing the requirement to infer words means we are not assessing ‘real’ language skills’ and the proposal would encourage teachers to ‘teach to the test’.

ASCL thought that students should be given credit in instances where they use a word that is not on the list, but that that is comparable to one on the list, citing the example of *voiture* (car) and *vélo* (bike) in French.

In response to this question, ASCL proposed afresh that, rather than vocabulary being selected on the basis of high-frequency, it should be taken from themes and topics that are specified by either awarding organisations or the Department, at roughly a 50:50 mix of high- and low-frequency words.

National Association of Language Advisers (NALA)

NALA disagreed with this question. They thought that it would increase the risk that some school leaders would use ‘the narrow prescription of vocabulary lists to justify reduction of learning hours in modern languages’. They were also concerned that it would reduce the number of students studying languages post-16.

Pearson

Pearson did not agree with the approach proposed because they thought it was inappropriate to limit students’ productive use of language to those words on the vocabulary list and not credit them for producing additional language. They thought that if students were learning the same language that they had already learnt in Key Stage 3,

their motivation and interest in the subject would be adversely affected. They also raised concerns that awarding organisations would no longer be able to differentiate on the basis of range of language and expression.

University Council of Modern Languages (UCML)

UCML disagreed with the proposal. They stated that although beginner language needed to be taken into account by making clear what is to be learnt, it could not be presumed that learners would reach the same levels of linguistic competence as the students who have been learning the language for longer. They thought that students should be able to build on previously acquired knowledge, which would in turn lead to a sense of progression and increased motivation. UCML also thought that lexical items chosen for GCSE should be of relevance and interest to young people, and the corpora from which words can be selected will not always be up to date.

WJEC

WJEC disagreed with question on the basis that they would prefer for a range of broad themes to be prescribed for each qualification rather than a vocabulary list.

Question 13

Do you agree that cognate words (words which are very similar or the same in English and the assessed language) should be included and counted in the defined vocabulary in a way which reflects their frequency of occurrence in the assessed language?

AQA

AQA disagreed with this question because the number of cognates for French, German and Spanish would differ significantly, and the inclusion of cognates at different ratios in vocabulary lists would lead to a lack of comparability between the languages. From an assessment perspective, they said that cognates are not helpful from a differentiation perspective and if a large number are included within the word lists, it would negatively impact on the ability of awarding organisations to design tasks which provide the necessary discrimination between students' level of ability.

Association for Language Learning (ALL)

The Association for Language Learning disagreed, citing their answer to question 10 as the reason, particularly given that they considered the question to be based on the proposal to replace theme-based content with a high-frequency words approach.

Association of School and College Leaders (ASCL)

ASCL disagreed on the basis that they believed inferring words from a written context is a valuable and motivating skill in learning a language and believe it should be retained for the reading skill.

Committee for Linguistics in Education (CLiE)

CLiE disagreed as they thought the skill of recognising cognate words should be 'fostered in students', and that this would subsequently increase self-efficacy. They were concerned that the proposal could result in negative consequences, whereby the independence of students would be reduced.

National Association of Language Advisers (NALA)

NALA disagreed as they were unclear whether it was referring to frequency of occurrence in English or in the assessed language. They felt that there were assumptions being made that candidates would all have the same breadth of vocabulary in English. They also commented that what constitutes a cognate varies widely from one language to another.

Pearson

Pearson disagreed because, although they had no objection to the inclusion of cognates in principle, they had concerns regarding the strain that the inclusion of these could have on the number of items that could be included in the word lists. They also noted that the number of cognates that had to be included would vary across the languages, particularly in German.

University Council of Modern Languages (UCML)

UCML disagreed with this question because they felt a degree of linguistic challenge should be built into the curriculum so that 'weaker students are able to achieve their potential and stronger students are stretched in order to achieve theirs'. They thought that the strategy of inference should be encouraged for all students and expected for some.

WJEC

WJEC agreed with the proposal but did not provide further comment.

Question 14.1

The revised subject content expects higher tier students to read texts that may include a small number of words that fall outside the vocabulary list defined by the awarding organisation. English meanings of such words must be supplied adjacent to the text for reference. Do you agree that no more than 2% of words in any given higher tier text that fall outside the vocabulary list defined by the awarding organisation, must be included in an adjacent glossary?

AQA

AQA disagreed on the basis that, for the purposes of assessment design, words that are glossed cannot be tested in an examination. AQA said that glossing would not address the issues they raised in previous questions which arise from the requirement for 90% of the words assessed to come from the 2,000 most frequently occurring in the language. As such, they believed that the allocation of only 2% glossing capacity would not be sufficient to enable awarding organisations to produce stimulus texts that fit the vocabulary contained in the top 2,000 words, and that also have sufficient content to test and differentiate across the ability range. They were also concerned that glossing texts could disrupt students' cognitive processes and, therefore, invalidate certain aspects of assessment.

Association for Language Learning (ALL)

The Association for Language Learning disagreed, citing their answer to question 10 as the reason, particularly given that they considered the question was based on the proposal to replace theme-based content with a high-frequency words approach.

Association of School and College Leaders (ASCL)

ASCL disagreed on the basis that they thought there should be room for non-glossed vocabulary in reading, so that inference through linguistic strategies can be demonstrated.

Committee for Linguistics in Education (CLiE)

CLiE disagreed as they considered the ability to deduce meaning from context to be an important skill, that learners enjoy demonstrating. They also raised concerns that by glossing all unlisted words, differentiation could be achieved only through the inclusion of trick questions, which would have a negative effect.

Pearson

Pearson disagreed because, although they have no objection to the principle of glossing and considered 2% to be an appropriate amount that would not provide excessive distraction in an assessment, they still think it would be challenging to create texts with the limited number of words available. They said that 'it is not always possible to replace a lower frequency word with a higher frequency word and maintain the integrity of the text'.

University Council of Modern Languages (UCML)

UCML agreed, however, they qualified their response by saying that any glossary should not be adjacent to the text but rather should be found at the end of the document so that a level of linguistic challenge is retained.

WJEC

WJEC disagreed because they thought that if words were to be included in a glossary, it would not be appropriate to target them in assessing candidates' understanding. They also said that it would limit the comprehension tasks possible.

Question 14.2

All proper nouns (such as cities or countries) that are not listed in the most frequent 2,000 words and are not deemed to be easily understood can be included in an adjacent glossary. Do you agree that such words can be included in an adjacent glossary?

AQA

AQA agreed but, similarly to their answer in the previous question, wished to note that glossing can be distracting for students.

Association for Language Learning (ALL)

The Association for Language Learning agreed because they felt that it would lead to more valid assessments, given that there would be no presupposition of geographical knowledge.

Association of School and College Leaders (ASCL)

ASCL agreed on the basis that they considered it to be a way of making the qualification more accessible because geographical knowledge would no longer be assumed, which could vary among pupils.

Committee for Linguistics in Education (CLiE)

CLiE agreed but added that the content of such lists would need to be carefully considered.

National Association of Language Advisers (NALA)

NALA disagreed.

Pearson

Pearson agreed because they thought it would be helpful in terms of being able to use any glossing allowance for those words which are most crucial for understanding the text and which are not on the vocabulary list.

University Council of Modern Languages (UCML)

UCML agreed but referenced their answer to question 14.1 as qualification.

WJEC

WJEC agreed.

Question 15

Do you agree with the proposal not to require overarching themes and specific topics in the revised subject content?

AQA

AQA disagreed as they did not consider it possible to create a coherent and logical course without the inclusion of themes and topics. AQA set out their view that a word frequency-based approach can be used in combination with themes selected by GCSE MFL teachers and learners, and that this would work best if words could be selected from the 3,000 most frequently occurring. They also set out their view that this proposal could lead to an increased gap between GCSE and A level, given their belief that themes or topics informed by high-frequency vocabulary are unlikely to be linked to post-16 study.

Association for Language Learners (ALL)

The Association for Language Learners disagreed with, and noted their concern about, this question. A poll conducted by ALL resulted in over 90% of its members strongly rejecting this approach. There was a preference among their membership that there should be a common set of shared themes between awarding organisations so as to promote 'collaboration, comparison of standards, transferability of textbooks'; without which examinations were unlikely to remain valid and reliable.

Association of School and College Leaders (ASCL)

ASCL disagreed with, and noted their concern about, the proposed removal of themes and topics, as they felt the main purpose of learning a language was to 'communicate in particular contexts'. They thought that in continuing with the proposed approach, grammatical knowledge would be the primary focus of the course, rather than communication. Furthermore, ASCL was concerned that the removal of themes could result in awarding organisations developing such different themes as to be problematic for collaboration and comparison of standards at GCSE.

ASCL was also concerned about the cost implications of removing themes and topics, as existing texts books would have to be replaced, and they thought that this proposal meant that teachers would have to prepare their own themes.

Committee for Linguistics in Education (CLiE)

CLiE agreed with the removal of themes and topics from the subject content and said that they believed it would give teachers more freedom to design lessons appropriate to their pupils. They also felt that it would remove the potential for topic-related bias. They made it clear, however, that teaching should still include content, proposing that literature and culture be added to the subject content.

National Association of Language Advisers (NALA)

NALA disagreed.

Pearson

Pearson disagreed. Whilst they welcomed the freedom to create their own content, they

felt that, if a word frequency-based approach was to be used, it should be combined with a thematic approach. They consider topics to be an important part of a GCSE course, as topics contextualise the language that is being taught. Pearson thought that for general communication to be possible, it has to be about something specific.

University Council of Modern Languages (UCML)

UCML agreed, in principle, as they felt it afforded teachers the freedom to choose what to teach in relation to the needs and interests of their learners. They did, however, qualify their answer by saying that, if themes and topics are no longer to be required as part of the subject content, then they will need to be replaced with 'authentic and stimulating content of various kinds'.

WJEC

WJEC disagreed.

Question 16

Do you agree that teaching and assessment will instead be informed by the vocabulary specified for teaching given that, due to its high frequency, this vocabulary can cover a range of topics?

AQA

AQA disagreed because they felt that the proposed vocabulary content would not result in learners being able to communicate effectively. They stated that the parameters from which vocabulary could be selected would make the design of a coherent and motivating teaching course based around relevant and interesting themes and topics 'extremely challenging'. They raised concerns that prescriptive list of words would drive teaching and learning in the classroom and, consequently, there would be a risk that teachers would not teach outside the defined vocabulary and grammar lists. They said that this would encourage rote learning rather than communication. AQA also thought that by having teaching and assessment informed by vocabulary, their ability to differentiate between students based on ability, which is an important part of an awarding organisation's role, would be compromised.

There was also concern that the proposal would lead to students being rewarded for having a good memory and being able to learn the words in the lists in the specification, rather than for their linguistic skills and understanding. This, they say, would have further implications when it comes to differentiation, as well as for predictability of assessments over time.

Association for Language Learning (ALL)

The Association for Language Learning disagreed, citing their answer to question 15 as their reason for doing so.

Association of School and College Leaders (ASCL)

ASCL disagreed because they thought the proposed word lists would include a number of words which are not relevant to young learners, and subsequently, there would be a reliance on the creation of topics to fit the word list. ASCL would welcome the inclusion content which is theme-based and culturally interesting and relevant to 16-year-olds.

Committee for Linguistics in Education (CLiE)

CLiE disagreed, citing their answer to question 11 as their reason for doing so.

National Association of Language Advisers (NALA)

NALA disagreed.

Pearson

Pearson disagreed on the basis that the proposed parameters from which vocabulary can be selected would cover a range of topics at a superficial level, as well as serving to reduce students' communication skills in the assessed language. Rather than frequency, Pearson believed that vocabulary should be formed based on topics that will interest GCSE-aged

students. They were concerned that the approach would move the vocabulary lists too far away from what students need to know and make the transition between GCSE and A-level more demanding.

Pearson also commented on the motivational effect that topics can have on students and said that, without them, it would no longer be possible to demonstrate 'narrative threads' spanning a number of lessons. They were also concerned that the prescription of a vocabulary frequency approach to both teaching and assessment would risk imposing a specific pedagogy within the subject criteria, which could have an impact on teachers' freedom to deliver the course content according to their preferred teaching approaches.

University Council of Modern Languages (UCML)

UCML disagreed on the basis that the approach does not necessarily take into account effective communication, or the ability to communicate in a variety of contexts.

WJEC

WJEC disagreed.

Question 17

Do you agree that, where questions are designed to test comprehension of written and spoken texts in the assessed language, they will be constructed in English?

AQA

AQA agreed but wished to see some clarification on the wording. They said that this would ensure clarity for awarding organisations and Ofqual on the expectation.

Association for Language Learning (ALL)

The Association for Language Learning agreed on the basis that 'removing mixing skills in this way will remove the double penalty that invalidates assessment'.

Association of School and College Leaders (ASCL)

ASCL agreed because, in the past, they felt that the target language used in rubrics has unfairly penalised pupils who have misunderstood the question, when they might have responded more accurately if they had understood it.

Committee for Linguistics in Education (CLiE)

CLiE disagreed because, despite recognising the danger of penalising candidates for misunderstanding instructions, they felt that there was a 'cognitive cost of code switching for those learners who do not switch regularly'.

National Association of Language Advisers (NALA)

NALA agreed.

Pearson

Pearson agreed on the basis that it would allow for the assessment of the language skill that students are actually being tested on.

University Council of Modern Languages (UCML)

UCML disagreed, although they did recognise that it was unfair to penalise a student who has misunderstood the question and goes on to give the wrong answer. They suggested an alternative solution, which was to gloss the question in English before the question is put in the target language. The hope, according to UCML, would be that higher achieving students become accustomed to seeing all rubrics in the target language before moving on to further study.

WJEC

WJEC agreed.

Question 18

Do you agree that all rubrics will be in English?

AQA

AQA agreed.

Association for Language Learning (ALL)

The Association for Language Learning agreed, citing their answer to question 17 as their reason for doing so.

Association of School and College Leaders (ASCL)

ASCL agreed, stating that it was 'fairer for all groups of pupils and does not advantage native speakers and disadvantage EAL pupils'. They did, however, comment that this could have some negative effects for pupils who go on to further study.

Committee for Linguistics in Education (CLiE)

CLiE disagreed, citing their answer to question 17 as their reason for doing so.

National Association of Language Advisers (NALA)

NALA agreed.

Pearson

Pearson agreed because they thought it would remove barriers for students in understanding what they are being asked to do, particularly as they gain no credit for their understanding of the rubrics in the mark scheme.

University Council of Modern Languages (UCML)

UCML disagreed, citing their answer to question 17 as their reason for doing so. They did, however, add that this might be relevant for the foundation tier in order to maximise the chance of comprehension.

WJEC

WJEC agreed.

Question 19

Do you agree with the requirement for students to read aloud short sentences from the written form of the language and demonstrate understanding of them?⁷

AQA

AQA disagreed because they thought that the task type was seeking to test too many competencies rather than focusing on a specific skill, such as pronunciation and intonation. AQA believed that this mixed skill approach can be problematic because some students may have strong speaking skills, without well-developed literacy. They also were of the view that, for students to process text as they read, it would be inappropriately challenging at this level of study, particularly for foundation tier students.

Association for Language Learning (ALL)

The Association for Language Learning disagreed as they believed that requiring pupils to read aloud would force the need for mixed skill testing and, subsequently, force Ofqual to move to mixed skill assessment objectives rather than the four separate skills as is the case currently. They expressed concern that the subject content was straying into how content was to be assessed.

Association of School and College Leaders (ASCL)

ASCL disagreed because, given the words to be tested will be prescribed, it would not constitute a valid test of phonics awareness as the words will already be familiar to students.

Committee for Linguistics in Education (CLiE)

CLiE disagreed because they felt that it would result in negative effects for teaching and they did not consider it to be a valid test of accuracy with phonics, as students would already know which words they would be tested on. They also thought that some teachers could be disadvantaged if there was insistence upon one accent, such as Spanish teachers from South America.

National Association of Language Advisers (NALA)

NALA disagreed.

Pearson

Pearson disagreed and wished for more clarity on the approach. They said that the implication was that students would be reading aloud individual sentences, which they said would present challenges for assessment, in particular, differentiation of performance. As such, they thought that it would be preferable if students were required to read aloud short paragraphs so that performance could be assessed holistically and with more scope for differentiation. Pearson also thought that the proposed requirement was at odds with

⁷ This question has been amended for clarity in this report; the original consultation question was as follows: *“Do agree with the requirement for students to read aloud short sentences from the written form of the language and demonstrate understanding of them?”*

certain aspects of the subject aims within the content. Finally, they raised concerns that French was significantly different in terms of level of demand when assessing sound-spelling correspondence which would make it more difficult in comparison with German and Spanish.

University Council of Modern Languages (UCML)

UCML disagreed because, although they thought it was a useful teaching and learning technique, they did not consider it to be an authentic language technique and, as such, should not form part of the assessment.

WJEC

WJEC disagreed.

Question 20

Do you agree with the requirement that students undertake dictation exercises from short spoken extracts, with credit for accurate spelling?

AQA

AQA agreed but wanted to note that the linguistic transparency of a language will have an impact on the difficulty of dictation exercises across different languages. They said that there could be regional differences in pronunciation across different countries where languages are spoken internationally and wanted this to be considered for the purposes of teaching and assessment.

Association for Language Learning (ALL)

The Association for Language Learning agreed with this question, citing their answer to question 19 as their reason for doing so.

Association of School and College Leaders (ASCL)

ASCL disagreed because they felt that rather than prioritising the testing of communicative competence, dictation served to test only students' phonics, vocabulary and grammar accuracy. They were also concerned about the negative impact this requirement could have on students with dyslexia, and raised further concern that it could lead to a lack of parity between languages.

Committee for Linguistics in Education (CLiE)

CLiE disagreed.

National Association of Language Advisers (NALA)

NALA disagreed.

Pearson

Pearson disagreed, citing some of the reasons they provided in their response to question 19. They also stated that it would be difficult to undertake an assessment in dictation in a realistic context. They restated that dictation would be more demanding for students of French than for Spanish and German.

University Council of Modern Languages (UCML)

UCML disagreed as they did not think dictation exercises would appropriately assess grammatical and communicative competence. They were also concerned that students with dyslexia may be unduly disadvantaged by this requirement. Finally, they were unsure how dictation could differentiate between different levels of competence.

WJEC

WJEC disagreed.

Question 21

Do you agree that, where students are expected to understand spoken extracts, these extracts will be delivered at a pace which is no faster than a moderate pace?

AQA

AQA agreed that speaking extracts should be delivered at no faster than a moderate pace.

Association for Language Learning (ALL)

The Association for Language Learning agreed that speaking extracts should be delivered at no faster than a moderate pace.

Association of School and College Leaders (ASCL)

ASCL agreed with the question on the basis that the current speed of listening tests is very demotivating for pupils of all abilities and favours native speakers.

Committee for Linguistics in Education (CLiE)

CLiE neither agreed nor disagreed but commented that the speed of delivery should not fall below 120 words per minute otherwise there would be a risk that the speech rate is artificially slow.

National Association of Language Advisers (NALA)

NALA agreed.

Pearson

Pearson agreed on the basis that speaking at a moderate pace is appropriate for this level of qualification.

University Council of Modern Languages (UCML)

UCML agreed but qualified their answer by saying that the speed of delivery should be natural rather than 'artificially slow'.

WJEC

WJEC agreed.

Question 22

Do you agree that, whilst students will continue to learn about the culture of the countries where the language is spoken, cultural content will not be specified or tested in the revised subject content?

AQA

AQA agreed.

Association for Language Learning (ALL)

The Association for Language Learning agreed that students should continue not to be marked on their cultural knowledge but disagreed that cultural content would not be specified within the subject content. In relation to the latter, they said that authentic materials should be required and that there should be themes that included culture.

Association of School and College Leaders (ASCL)

ASCL disagreed on the basis that, in their view, the removal of specific cultural knowledge from the subject content would narrow the appeal of languages, reduce motivation of pupils studying the GCSE and, ultimately, reduce uptake. ASCL proposed an alternative which involved the 'production of an 'authentic' or 'semi-authentic' cultural learning portfolio to support the learning of the prescribed vocabulary and grammar. The wide-ranging portfolio items would be carefully selected to support schools' systematic sequencing of vocabulary and grammar.

Committee for Linguistics in Education (CLiE)

CLiE disagreed because they considered language and culture to be intrinsically linked and essential to the GCSE course. They thought that not requiring cultural knowledge to be assessed would lead to it becoming neglected in teaching and learning. They were concerned that without a focus on culture, the words and phrases that students learn and produce would not have any meaningful context.

National Association of Language Advisers (NALA)

NALA disagreed on the basis that they thought it would undermine the reasons why languages are taught; which they considered to be 'allowing pupils to communicate meaningfully in the target language, to foster curiosity and develop understanding about the cultures and countries where the language is spoken'. They believed that the proposal was not conducive to these objectives. NALA was concerned that there would be considerable risk that cultural knowledge would be limited to superficial aspects of a country if students were not assessed on it.

Pearson

Pearson agreed and added that teaching and learning and assessment should take place in the cultural context of the target language countries and communities, but linguistic competence should be the focus both in the classroom and for assessment. Therefore, they were of the opinion that there should be no assessment of specific cultural knowledge.

University Council of Modern Languages (UCML)

UCML disagreed, stating that specifying cultural knowledge in the content would not make it more burdensome for teachers nor would it necessarily detract from teaching time to practise the language. They felt that learning about other cultures helps motivate language learning at GCSE and, without it, students may not 'continue to the next stage of education'.

WJEC

WJEC agreed.

Question 23

Do you consider the grammar annexes to be comprehensive, unambiguous and easy to understand?

AQA

AQA did not agree with the proposed grammar annexes because they thought that the terminology used would not be easy for teachers to understand. They were concerned that, without clarification, the proposed grammar lists in the annexes could lead to awarding organisations interpreting them in different ways.

AQA suggested that irregular forms are set out in full in a grammar list, to which a single entry can be included in a vocabulary list. They said that this would allow for a more appropriate use of the allotted space in such a list, with multiple entries of irregular forms then being placed in a grammar list for reference.

Association for Language Learning (ALL)

The Association for Language Learning disagreed with the proposed grammar annexes on the basis that they felt there should be receptive only elements to reflect the way the language is learnt.

Association of School and College Leaders (ASCL)

ASCL neither agreed nor disagreed with the proposed grammar annexes but commented that there should be some grammar that is receptive only.

Committee for Linguistics in Education (CLiE)

CLiE neither agreed nor disagreed with the proposed grammar annexes but commented that they were clearer for some languages compared with others and thought that there would be benefits to a re-write in collaboration with grammar experts.

National Association of Language Advisers (NALA)

NALA did not agree with the proposed grammar annexes as they considered them to be too complex and 'extremely dry'.

Pearson

Pearson disagreed that the grammar annexes were clear and easy to understand and called for more clarification on a number of points of terminology. They also questioned the approach of limiting the imperfect, inflectional future and conditional tenses to the singular only at foundation tier, thus restricting the coverage of actions of more than one person to the present tense.

University Council of Modern Languages (UCML)

UCML did not agree with the proposed grammar annexes as they thought that, although it was useful to see the inclusion of both morphological and syntactic knowledge, they did not believe grammatical and lexical knowledge alone could determine the shape and content of a GCSE curriculum.

WJEC

WJEC did not agree because, although they considered the proposed grammar annexes to be comprehensive and useful, they thought that there was a potential problem with accessibility. They considered the terminology to be highly specialised and thought that it could be misinterpreted by teachers.

Question 24

Do you consider the revised subject content to be unambiguous, clear and easy to understand?

AQA

AQA did not agree that the draft subject content was sufficiently clear and easy to understand.

Association for Language Learning (ALL)

The Association for Language Learning disagreed because of the rejection among the majority of members to the proposals, believing that this reduced the emphasis on communication.

Association of School and College Leaders (ASCL)

ASCL disagreed on the basis that, although they recognised the intention behind the review, they thought it was the incorrect approach to just specify a word and grammar list in the absence of any contexts or themes.

Committee for Linguistics in Education (CLiE)

CLiE stated that the content was clear but were concerned by the fact that it was to be determined by high-frequency vocabulary. They thought that this could demotivate learners and were of the opinion that cultural knowledge should be included, noting that culturally specific vocabulary may not be among the most frequent words.

National Association of Language Advisers (NALA)

NALA disagreed and said that the draft proposals were open to a number of different interpretations. Overall, they thought that the revised content would not lead to strong practice of language learning in Key Stages 2 and 3 and would lead to reduced uptake at GCSE and A-level, and also thought that any associated teaching would reduce engagement of pupils.

Pearson

Pearson did not agree that the draft subject content was sufficiently clear and easy to understand.

University Council of Modern Languages (UCML)

UCML considered the subject content to be unambiguous and easy to understand but could not agree to content that consisted of a precise list of grammar and vocabulary to be taught. Although they recognised the importance of this aspect of language learning, they felt the content did not address to communicative element of second language acquisition.

WJEC

WJEC agreed that the content was clear and easy to understand.

Other organisational responses

We set out a summary from two organisation has submitted a general response but with no specific responses to the individual questions in the consultation.

The All-Party Parliamentary Group on Modern Languages (APPGML)

The All-Party Parliamentary Group on Modern Languages issued a public statement in response to the consultation alongside a petition to seek support for their statement. This campaign had over 1,050 signatories. Organisations included the Independent Schools' Modern Languages Association (ISMLA), the Association for Language Learning (ALL) and Alliance of Modern Languages, Area Studies and Linguistics Subject Associations UK (AMLUK). The statement included matters that were directly related to the GCSE consultation as well as some matters outside of the scope of the consultation. The statement was organised under four themes:

Evidence

The APPGML raised concerns about basing the GCSE course on the 2,000 most frequently occurring words, as well as not distinguishing between productive and receptive knowledge of vocabulary. They were also concerned that the subject content appeared not to specify both communicative skills linked to assessment, and culture linking to intercultural competence.

The APPGML stated that the approach was likely to create problems for awarding organisations in terms of discriminating between candidates and said it could lead to greater unpredictability of grading. They thought that the proposed subject content had not accounted for the motivational factors involved in second language acquisition, nor whether the approach is suitable for other languages outside of French, German and Spanish.

The APPGML remarked that there had not been an evaluation of the ongoing MFL Hubs Pedagogy pilot, and that insufficient time had passed to assess its impact.

Finally, they were concerned that the proposals were not in line with the CEFR and, therefore, they thought that the proposals were moving away from established practice internationally.

Standards and take-up

The APPGML stated that the proposed number of words that foundation and higher tier students should know was too limited and considered that this represented a lowering of standards. They also stated that this was because students learn as little as 20% of input, especially when thematic input is limited.

They expressed concern that the proposals risked removing key motivational elements of the GCSE, which they said would negatively affect take-up of languages at GCSE. Finally, they thought that a 'drop in linguistic and cognitive demand' would result in an increased gap between GCSE and A-level, causing lower take-up at post-16 study.

Implications

The APPGML was concerned that the proposals appeared to be moving away from communicative skills, inference skills, and cultural content, which they thought should be at the heart of any MFL GCSE. They thought that the proposals could ‘disincentivise genuine interactions with native speakers and the countries where the languages are spoken’.

They also said that the proposals could ‘complicate cooperative partnerships with Embassies and Cultural Institutes’. Finally, they raised concerns that the proposals were not in line with the statutory requirements for the national curriculum at Key Stages 2 and 3, the subject for A-level, or the recommendations of the MFL Pedagogy Review published by the Teaching Schools Council in 2016⁸.

Timing

The APPGML expressed concern with the timing of the review. They said that schools were reporting significant disruption to MFL due to the COVID-19 pandemic, as well as disruption to language assistants, educational visits, exchanges and teacher recruitment due to post-EU changes.

The British Academy

The submission from the British Academy started with their commitment to cultural studies across humanities and social sciences. As such, they consider cultural learning to be an essential pillar of the study of a language. They believed languages to be the most suitable subject in the curriculum for the development of intercultural awareness. The British Academy stated that, among other aspects, learning about cultures is a major motive of student language learners. They were therefore concerned that, if cultural learning is not ‘baked into’ the GCSE, then the qualification’s appeal will narrow, and it will be harder to increase uptake.

The British Academy welcomed the review saying that it was an opportunity to ‘help fix England’s decades-old languages problem’. They said that the current GCSE approach to culture via themes ‘has some drawbacks’ in not stimulating and engaging Key Stage 4 learners as much as the curriculum for other Key Stage 4 subjects. They also thought it had the potential to demotivate learners and lead to less effective teaching, as well as require learners to devote disproportionate energy to learning certain specialised vocabulary items.

They considered it necessary for a GCSE language course to include meaningful, engaging and varied cultural input whilst also ‘accelerating the acquisition of the prescribed vocabulary and grammar’.

In terms of the review’s proposals, the British Academy was concerned that, if cultural learning was not to be assessed, then it would be treated as an ‘optional extra’, because ‘marks will be awarded for vocabulary, phonics, and grammar alone’. They think that this will result in the cultural component tending to be taught more to socio-economically advantaged learners. They also raised concerns that the proposals would make it impossible for the awarding organisations to specify meaningful and engaging cultural

⁸ The MFL Pedagogy Review report can be found here: <https://tscouncil.org.uk/mfl-report-2016/> (accessed 14 January 2022)

material, resulting in less interesting cultural learning than at present. Finally, they thought that by not including the assessment of culture within the content, the progression from GCSE to A-level would be made more difficult.

The British Academy called for meaningful cultural learning to take place in language GCSEs. They wished to see this take place at foundation tier as at higher tier level, with 'appropriate adjustment of level'. They also wanted to see cultural learning being assessed at GCSE.



Department
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