



Department  
for Education

# **GCSE British Sign Language (BSL) Subject Content**

**Government consultation response**

**December 2023**

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## Executive summary

A public consultation on the proposed subject content for a new GCSE in British Sign Language (BSL) took place between June and September 2023.

The department received 717 responses to the public consultation from a mixture of individuals and organisations. The majority of responses were submitted via the online consultation form, with 10 (1%) responses sent to the department via email and one response received by post. Respondents were given the option to provide their response in BSL if they wished, but no respondents chose this option. Respondents were asked to confirm if they were responding as an individual or on behalf of an organisation. Of those that answered, 661 (94%) responses were from individuals and 39 (6%) responses were from organisations. A detailed breakdown of individual and organisational sub-categories can be found in the question analysis.

Those responding as an individual were invited to answer a question asking whether they identified as being deaf or as having hearing loss and a question asking whether BSL was their main or preferred language. Of those that responded to those questions, 160 (23%) respondents said they identified as being deaf or as having hearing loss and 65 (10%) respondents said BSL was their main or preferred language.

In general, respondents overwhelmingly agreed with the proposals in the consultation, with 94-99% of respondents agreeing to the requirements set out in questions on the subject content. In particular, parents and teachers were more in favour of the proposals when compared with other types of respondents.

Having considered all the responses to the consultation and the highly positive response to the subject content, we have made only minor changes to the final subject content for clarity. The government's response is included in this document.

# 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 proposed subject content for a new GCSE in British Sign Language (BSL). This report also includes the government's response to this consultation and should be read alongside the final content which has been published here: <https://www.gov.uk/government/publications/gcse-british-sign-language-bsl>.

Between June and September 2023, the department publicly consulted on the proposed subject content, to gauge views from a range of audiences including deaf individuals and those with hearing loss, BSL users, teachers, students, awarding organisations (AOs) and initial teacher training (ITT) providers. The proposed subject content comprised two key areas:

1. Study of the language of BSL (we proposed this to be 85% of the total qualification). This was broken down further into the following three areas:
  - a. Comprehension;
  - b. Production;
  - c. Interaction.
2. The history of BSL (we proposed this to be the remaining 15% of the qualification).

The subject content also includes annexes:

- Annex A: BSL Definitions and Parameters
- Annex B: Grammar requirements for BSL at GCSE
- Annex C: BSL vocabulary

The consultation asked for responses to be submitted via the online consultation form where possible, to enable the department to analyse responses more easily. Options were also given for responses to be submitted by post, email and importantly in BSL, should respondents have wished to do so.

Responses to the consultation have helped to inform the final version of the GCSE BSL subject content, which is published alongside this consultation response. The equalities impact assessment (EIA) has also been reviewed and updated as part of the process of analysing the responses received to the public consultation. The updated EIA is published alongside this consultation.

## Background

In 2018, the Department for Education committed to introducing a GCSE in BSL. This commitment was made following a proposal from Signature as well as campaigning by the National Deaf Children's Society (NDCS) and deaf young people, such as Daniel Jillings.

Our aim is that, by providing this new GCSE pathway, more schools and colleges will choose to teach BSL which will, in turn, increase the number of BSL users and advance equality of opportunity. The department believes this GCSE will provide students with a knowledge rich, coherent, satisfying and worthwhile course of study and will support students to progress on to further academic and vocational study, training or employment.

# Summary of responses received and the government's response

## Approach

The consultation was published on gov.uk, along with an online form for respondents to give us their views. There were 25 questions in total. With the exception of the personal information questions, the majority of the remaining questions were yes/no responses and therefore quantitative; however, there was an option for respondents to provide further information with a written response to each question if they wished. Respondents were asked to respond using the online form where possible but were able to submit responses via post, email, and in BSL (video format) if they wished to do so.

Respondents were more likely to expand on their answers where the answer to a question was 'no', i.e. the respondent disagreed with what was being asked. Where qualitative data was obtained from those respondents who answered 'yes', this was from a smaller number of written replies. This includes comments emphasising the importance of the GCSE and/or agreement for the section in question.

## 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' or 'no' and all had a free text box to give the opportunity for respondents to expand on their yes/no selection. Where both quantitative and qualitative data was received for a particular question, it is reported on together under each individual question subheading.

Respondents were not obliged to answer every question, therefore the total number of responses for each question differs from the total number of responses to the consultation as a whole. Question analysis data in this document is based only on those who responded to the question; it does not cover those who did not provide a response to a particular question. All percentages throughout the report have been rounded to the nearest whole number.

## Government response

The question analysis includes the number of respondents who agreed or disagreed with the proposals set out in the subject content. An overwhelming majority agreed with the proposals set out and as a result we have suggested only minor changes to the subject content for clarity. Respondents who wished to provide more detail had the opportunity to

do so through the comments. The government's response can be found in the sections below.

## **Study of the language**

There was strong overall support for a new GCSE in BSL, with views being expressed about the positive outcomes that would occur as a result of more people being able to use BSL in the population. There was a general consensus that the main focus of the GCSE should be on learning how to use BSL. The great majority, 98%, of respondents felt the subject content was clear, unambiguous and easy to understand. 96% of respondents felt that the level of difficulty was appropriate, given that the GCSE assumes no previous knowledge of BSL. The great majority of respondents agreed with the detailed requirements for comprehension (98%), production (99%) and interaction (99%). In light of these positive responses, we have therefore not made any changes to this section of the subject content.

## **The history of BSL**

There was a lot of support for the proposal that the GCSE include a requirement for students to demonstrate their knowledge and understanding of the history of BSL. 94% of those who responded agreed with the specific requirements on this set out in the subject content. Many expressed a view that this area was important to enable understanding of language development. Fewer than 10 respondents felt this section should include more detailed content on deaf culture and deaf history. A similar number, however, felt this section was not essential and that the GCSE should focus solely on language learning, and/or felt this content was more appropriate for a higher level of study than GCSE.

As the majority agreed with the content already in this section, and those that did not agree were split between adding more and removing the section, we have not made changes to the content on the history of BSL. We believe the existing content has enough history to give students an understanding of the background and future of the language embedded in a unique culture.

It should also be remembered that this section represents only 15% of GCSE content. To ensure that the subject content has a good level of fluency, we believe it is important for the GCSE to focus on the BSL language, which is why 85% of the content is language focused.

## **Annex A**

A huge majority, 98%, of respondents felt that the proposed terminological definitions and parameters were easy to understand, clear and unambiguous. Of the 2% who disagreed, some felt that the terminology, specifically on 'standard BSL' and 'established and productive lexicon' were not clear. We have therefore worked with our subject matter



experts, including deaf and hearing experts, to include an additional line in these definitions, which provides further clarity.

## **Annex B**

A huge majority, 99%, of respondents felt that the proposed grammar requirements were easy to understand, clear and unambiguous. Of the 1% who disagreed, some felt that the grammar was too complex. We have since made minor changes to this section, by including additional lines and using different examples for simple clarification.

## **Annex C**

96% of respondents agreed that the vocabulary list should be advisory. Of the 4% who disagreed, some felt that there should be consistency across both schools and awarding organisations, therefore suggesting that this be mandated. We have therefore decided to keep the vocabulary list as advisory.

Fewer than 10 respondents suggested reducing the number of signs. A similar number, however, suggested increasing the number of signs, whilst a small number of respondents felt the number was not relevant. Fewer than 10 respondents asked for signs to be more inclusive of individuals with a disability. We have, therefore, made minor changes to include some additional signs to the vocabulary list and remove some others. As the list is advisory, however, awarding organisations will have flexibility when selecting their signs and can choose signs which are not on the advisory list.

## **Other common themes**

Respondents were asked to provide general feedback on any topics that were not covered in the questions related to the subject content. Further data on this can be found in the question analysis on [Q23](#) below. Many respondents also provided general feedback throughout the consultation, where the response may not have been in scope for the specific question asked. We have pulled out those responses and identified some common themes and issues. These are addressed below.

### **Mirroring modern foreign languages (MFL)/other GCSEs**

A small number of respondents suggested that the requirements for the BSL GCSE should mirror those of MFL GCSEs. Whilst BSL is a recognised language and therefore shares commonalities with MFL GCSEs, there are clear differences. For example, the qualification will not assess speaking and listening as MFL qualifications do. We therefore do not consider that it would be practical or appropriate to mirror the requirements of MFL GCSEs. Instead, we have worked with exam boards, subject matter experts, and stakeholders to ensure the content is as rigorous and challenging as any other reformed GCSE.

## **Different levels of learning/two GCSEs**

A small number of respondents suggested that the GCSE should be tiered or that there should be two GCSEs depending on the ability of the student.

As outlined in the consultation document, we carefully considered the GCSE's target audience. Our view was that there is likely to be a diverse range of students who will wish to study the GCSE. This may include amongst others: deaf students who wish to study a qualification in their first language; hearing students who have deaf relatives and use both BSL and spoken languages at home; and students who have no prior knowledge of BSL but have an interest in studying the GCSE. We concluded that the GCSE should therefore be designed for students with no prior knowledge of BSL, but should be accessible to all students, both those who use BSL as their first language and students with little or no prior knowledge of BSL. We felt this would give all students the opportunity to develop fluency in communicating using BSL, as well as receiving a world class, credible and well-respected qualification. The consultation responses suggest the people who are interested in studying the BSL GCSE are a diverse range of people which confirms our earlier view.

We also felt that making the GCSE accessible to the widest audience would also increase the cohort of students who can enter the qualification, making it more economically viable for awarding organisations to develop specifications and offer the qualification. Other options, such as a GCSE aimed only at those with detailed prior knowledge of BSL or developing two GCSEs (one for those with prior knowledge of BSL and one for those with no prior knowledge) could result in a GCSE that is not economically viable and is therefore not developed by awarding organisations. This is because a GCSE solely for current users of BSL would likely attract a much smaller cohort of students and having two GCSEs would risk dividing the cohort.

## **Resources**

Some respondents suggested that the GCSE should specify access to resources and inclusion of deaf people in the development of the new specifications and the teaching of BSL. Whilst the department sets out its proposals and requirements for the subject content, awarding organisations and others will provide resources. Similarly, awarding bodies will be developing the new specifications and will be considering whether and how to involve BSL subject experts in this work. Finally, schools are responsible for teaching and will decide how they involve deaf people as part of the students' learning. While the department cannot enforce these arrangements, we would highly encourage them to do so.

## **Regional variation and non-manual features**

Some respondents asked the department to consider regional variations in BSL and non-manual features. The subject content already makes clear that regional variants may be

used, providing that task requirements are fully met. The content also requires students to demonstrate accurate use of BSL, including the use of accurate non-manual features (e.g. facial expression, eye contact and body position).

### **Reasonable adjustments**

A small number of responses raised the issue of accessibility to the GCSE for those with mobility and upper limb difference (use of one hand, missing fingers, hemiplegia<sup>1</sup>, facial paralysis), and also for those with a visual disability (for example, students who are blind or deafblind) and whether reasonable adjustments could be made for those individuals.

Reasonable adjustments are changes made to an assessment, or to the way an assessment is carried out, to support disabled students, including students with a learning disability, to show what they know, understand and can do in relation to the subject content. They are not intended to compensate for knowledge, skills and understanding that a student does not have, including where their disability is the reason for any gap in their knowledge, skills or understanding.

Due to the nature of BSL as a visual gestural language and which uses a two-handed alphabet – there are unlikely to be reasonable adjustments that could be made to the assessment of this qualification for these groups that would not fundamentally change the nature of the subject. We have reflected this in our Equalities Impact Assessment.

The Equality Act 2010 requires exam boards to make reasonable adjustments to assessments for disabled students. Ofqual requires exam boards to publish their arrangements for making reasonable adjustments, including how a student qualifies for a reasonable adjustment and what reasonable adjustments will be made.

### **Teacher supply and training**

81 respondents asked about teacher supply and the training of teachers to ensure the BSL GCSE would be taught by qualified and experienced BSL users. Of these, 29 responses stated they believed the GCSE should be taught by deaf individuals whose first language is BSL.

The department recognises the strong feelings that surround this issue. Every child deserves a good teacher, and ensuring the highest quality of teaching is paramount to the success of each school. Headteachers know this and decisions about the appointment and deployment of teachers are rightly made at their discretion. Head teachers will have a strong interest in employing the best qualified individual for a

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<sup>1</sup> A weakness or paralysis of one side of the body, usually caused by a brain injury.

particular post, taking into account relevant skills and experience as well as formal training and qualifications, so that they can make best use of their workforce. We expect that initially schools that choose to offer the GCSE will draw on existing teachers, likely those who are already fluent BSL users themselves. There may also be other ways schools could offer the BSL GCSE, for example, schools which want to offer BSL to smaller groups of students could recruit part-time BSL teachers, including deaf teachers, who are already successfully teaching BSL in other settings, such as colleges.

Individual initial teacher training (ITT) courses do not specify additional requirements above those set out in the ITT criteria which stipulate that a trainee teacher must have a degree and have attained a grade 4/C in English and maths GCSE, or equivalent. However, courses must be designed so that teacher trainees can demonstrate that they meet all of the [Teachers' Standards](#) at the appropriate level; and adhere to both the ITT criteria and Core Content Framework (CCF)<sup>2</sup>. The same would apply to any BSL ITT provision. There is, therefore for example, no statutory requirement for secondary trainee teachers to have a degree in a specified subject, as long as they meet the Teachers' Standards, including those that relate to subject and curriculum knowledge, by the end of their training.

Accredited ITT providers should, however, consider the full range of applicants' knowledge, skills, academic background and prior experience to judge whether they have the capability to undertake an ITT course and meet the Teachers' Standards by the end of their training. If, therefore, the school felt that the trainee needed to undertake additional qualifications in BSL to ensure they meet the teacher standards, it would be up to them to ensure any candidate they take on would be able to meet that expectation, in order to meet the Teachers' Standards and be recommended for qualified teacher status (QTS).

During the development of the proposed subject content and during the BSL consultation itself, we have talked to ITT providers and encouraged them to think about the training required for teachers of the BSL GCSE. We have been in contact with schools and universities that provide ITT to discuss how they could approach training excellent BSL teachers to deliver the new GCSE.

### **Teaching of BSL from a younger age**

17 respondents advised that they thought BSL should be taught earlier than GCSE level, with some believing it should be taught from primary school age. Schools are free to offer sign language programmes and teach BSL to meet the needs of their students if they

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<sup>2</sup> [Initial teacher training \(ITT\): core content framework - GOV.UK \(www.gov.uk\)](#)

wish, but it is not part of the National Curriculum. The National Curriculum is a defined set of subjects which forms part of each maintained school's wider curriculum. This leaves schools with flexibility to teach other subjects.

## Question analysis

### Personal information: Questions 1 to 11

Questions 1, 2, 3, 9, 10 and 11 are not included in the analysis as these included personal details of individuals or organisations.

#### Question 4

##### Are you responding as an individual or part of an organisation?

There were 700 responses to this question, which were as follows:

Type of response	Total	Percentage
Individual	661	94%
Organisation	39	6%

#### Question 5

##### If you are responding as an individual, how would you describe yourself?

Those who said they were responding as an individual were asked how they would describe themselves. We received 656 answers to this question. The breakdown is as follows:

Description of individual	Total	Percentage
Student	59	9%
Parent/carer	244	37%
Teacher	125	19%
Headteacher	4	1%
Other <sup>3</sup>	224	34%

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<sup>3</sup> Respondents who selected 'other' included but were not limited to deaf person, relative of deaf person, interpreter. These also include individuals who selected 'other' and categorised themselves in more than one group, for example, one individual commented that they were a parent, a student and a member of the public.

## Question 6

### Do you identify as being deaf or as having hearing loss?

There were 689 responses to this question, which were as follows:

Response	Total	Percentage
Yes	160	23%
No	529	77%

## Question 7

### Is BSL your main or preferred language?

There were 683 responses to this question, which were as follows:

Response	Total	Percentage
Yes	65	10%
No	613	90%

## Question 8

Those who said they were responding on behalf of an organisation were asked to identify the type of organisation. We received 38 answers to this question. The breakdown is as follows:

Type of organisation	Total	Percentage
Awarding organisation	3	8%
School	13	34%
College	3	8%
Stakeholder organisation	7	18%
Other <sup>4</sup>	12	32%

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<sup>4</sup> Organisations that selected 'other' included, but were not limited to charities, limited company, care providers, museum, training and consultancy company, university, educational support services.

## Subject aims: Question 12

### Are the subject aims easy to understand, clear and unambiguous?

There were 695 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	687	99%
No	8	1%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt there should be more historical and cultural references included, or felt that the aims should mirror MFL or other GCSEs.

A small number of responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to comments about teacher supply and training.

## Subject content: Questions 13 to 18

### Question 13

#### Overall is the proposed subject content easy to understand, clear and unambiguous?

There were 695 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	682	98%
No	13	2%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt there should be more historical and cultural references included. Some respondents asked for regional variations and non-manual features to be considered and just two respondents thought the subject content was ambiguous.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to comments about teacher supply and training.



## Question 14

**The GCSE assumes no previous knowledge of BSL. With this in mind do you agree that the proposed subject content is at an appropriate level of difficulty?**

There were 693 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	664	96%
No	29	4%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt there should be different levels of learning, for example, either include tiering or introduce two GCSEs; one for students whose first language is BSL and one for students who have no prior knowledge of BSL. Some respondents suggested mirroring the level of difficulty for BSL with MFL GCSE. A very small number of respondents asked for more historical and cultural references to be included.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teaching from a younger age.

## Question 15

**Paragraph 8a of the proposed subject content details the requirements for the comprehension of BSL. Do you agree with these requirements?**

There were 693 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	682	98%
No	11	2%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments, did so because they felt the terminology used was not clear, or felt different levels of learning were required, depending on whether the student's first language was BSL, or whether the student had no prior knowledge of BSL. A small number of respondents suggested mirroring the proposed requirements with MFL and/or other GCSEs and for regional variation to be considered. A very small number felt the requirements were too demanding for those who had no prior knowledge of BSL.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## Question 16

**Paragraph 8b of the proposed subject content details the requirements for the production of BSL. Do you agree with these requirements?**

There were 692 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	686	99%
No	6	1%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt there needed to be more non-manual features, such as face patterns to be included. They also wanted more clarity on the terminology used, and felt different levels of learning were required, depending on whether the student's first language was BSL, or whether the student had no prior knowledge of BSL. A small number of respondents suggested mirroring the proposed requirements with MFL and/or other GCSEs and for regional variation to be considered. A very small number felt the requirements were too demanding for those who had no prior knowledge of BSL.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## Question 17

**Paragraph 8c of the proposed subject content details the requirements for interaction in BSL. Do you agree with these requirements?**

There were 691 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	681	99%
No	10	1%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt in this particular section, students needed to have interaction with deaf people outside of the classrooms. A small number of respondents asked for reasonable adjustments to be considered where necessary, as well as including non-manual features which have been responded to in the government response section of this document. A very small number of respondents thought the requirements were too demanding for a GCSE or for private candidates, and a very small number of respondents suggested flexibility for students to choose their own topics.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## Question 18

**Paragraph 9 of the proposed subject content requires that specifications in BSL should enable students to demonstrate their knowledge and understanding of the history of BSL. Do you agree with the requirements on BSL history?**

There were 691 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	648	94%
No	43	6%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt there needed to be more historical and cultural references, but a similar number of respondents did not think this section was essential and that the focus of the GCSE should be on language learning, rather than the history of the language. A small number of respondents (under five) also asked for the inclusion of a variety of different topics – for example, deaf awareness, deaf oppression, barriers and discrimination deaf people face, lip reading, Makaton.

A small number of respondents (under 10) felt that 15% was too high for this section, but a similar number of respondents also felt 15% was too low.

Some responses were unrelated to this question but have been responded to in the government response section of this document.

## Annex A – BSL Terminological Definitions and Parameters: Questions 19 to 20

### Question 19

**Are the proposed terminological definitions and parameters, set out in Annex A, easy to understand, clear and unambiguous?**

There were 670 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	658	98%
No	12	2%

Of the respondents that answered 'no' or answered 'yes' and wished to give additional comments, they did so because they felt the terminology used was not clear and therefore difficult to understand.

Some respondents asked for more inclusion of historical and cultural references, semantics, and asked for regional variations to be considered.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

### Question 20

**In order to understand, produce and interact in BSL at GCSE, students will be expected to know:**

- **at least 750 signs from the established lexicon;**
- **the 26 letters of the British two-handed manual alphabet and numerals, both cardinals and ordinals (in addition to the 750 signs).**

**Do you agree with these proposed requirements?**

There were 690 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	653	95%
No	37	5%

Of the respondents that answered 'no' or answered 'yes' and wished to give additional comments, some of the respondents suggested reducing the number of signs, though an equal number of respondents suggested increasing the number of signs. Whilst a small number of respondents felt the number was not relevant.

Some respondents asked for the inclusion of regional variations, non-manual features and a small number of respondents felt the need for more key and conversational signs.

A small number of respondents raised concerns for those students who may have limited mobility and limb differences where they may not have the use of one or both their hands.

Some responses were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## **Annex B – Grammar Requirements for British Sign Language at GCSE: Question 21**

**Are the proposed grammar requirements, set out in Annex B, easy to understand, clear and unambiguous?**

There were 676 responses to this question, which were as follows:

<b>Answer</b>	<b>Total</b>	<b>Percentage</b>
Yes	667	99%
No	9	1%

The respondents that answered 'no' or answered 'yes' and wished to give additional comments did so because they felt the grammar was too complex and ambiguous. Fewer than five respondents also asked for the inclusion of examples, non-manual features and semantics. A small number of respondents suggested some rewording of sentences.

Some responses to this question were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## **Annex C – BSL Vocabulary: Question 22**

**Annex C provides a list of 1000 commonly used BSL signs from the established lexicon. The department has proposed this is an advisory list from which awarding**

**organisations can use to help select vocabulary when writing GCSE specifications.  
Do you agree that this list should be advisory?**

There were 684 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	654	96%
No	30	4%

Of the respondents that answered 'no' or answered 'yes' and wished to give additional comments, they did so because they felt there should be some flexibility in the signs used and for regional variation to be considered. Some respondents said there should be consistency across both schools and awarding organisations, and a small number of respondents wanted to mandate the list or allow for core signs to be mandated, to include signs that are inclusive, or for the list to be regularly reviewed.

Some responses to this question suggested there be access to resources, to align the list with the required number of signs, and to include deaf people in the development of the GCSE. Some responses were unclear or were unrelated to this question but have been responded to in the government response section of this document. These include but are not limited to teacher supply and training.

## **General: Question 23**

**Is there anything you would like to feedback that is not covered in the questions above?**

There were 688 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	227	33%
No	461	67%

Of the respondents that answered 'yes', 81 respondents asked about teacher supply and the training of teachers to ensure the BSL GCSE would be taught by qualified and experienced BSL users. Of these, 29 respondents stated they believed the GCSE should be taught by deaf individuals whose first language is BSL.

Fewer than 10 respondents asked for the GCSE to be accessible to all ages, as well as those with development or physical disabilities. Some respondents also asked for

inclusion of historical and cultural references, as well as deaf awareness, and a very small number of respondents asked for it to include links to Makaton.

Some responses to this question are from single respondents and are a repetition of feedback included in the previous questions above.

## Equalities: Question 24 to 25

In accordance with the Equality Act 2010, Ministers must have “due regard”, when making decisions, to the need to eliminate unlawful discrimination; advance equality of opportunity; and foster good relations, in relation to protected characteristics. The Department for Education has been taking this requirement into account in developing the proposed draft subject content. The relevant protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

### Question 24

**Do any of the proposals have the potential to have a disproportionate impact positive or negative, on specific groups, in particular those who share a 'protected characteristic' (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?**

There were 687 responses to this question, which were as follows:

Answer	Total	Percentage
Yes	105	15%
No	582	85%

The respondents that answered ‘yes’ thought it disadvantaged individuals with limited mobility in their hands, who have development disabilities, or who have a visual disability, and therefore asked to consider reasonable adjustments.

Some responses to this question are from single respondents and are a repetition of feedback included in the previous questions above. Some responses, however, were unrelated to this question, but have been responded to in the government response section of this document. These include, for example, the suggestion to teach BSL from a younger age – this has been addressed in [other common themes identified within the consultation](#).

## Question 25

How could the proposed subject content of the GCSEs be altered to:

- **better eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;**
- **better advance equality of opportunity between persons who share a protected characteristic and those who do not;**
- **better foster good relations between people who share a protected characteristic and those who do not.**

This was an open question with space provided for respondents to provide evidence to support their response. There were 208 responses to this question, of which 69 responses included general support for the importance of the GCSE and/or the subject requirements. 34 respondents suggested having deaf teachers teach the GCSE could help better advance equality, whilst 15 respondents thought including more historical and cultural references and deaf awareness would help foster good relations between deaf and hearing students. 19 respondents stressed that the GCSE should be accessible to all, including those of all ages, and with disabilities.



## Next steps and timing

Having considered all the responses to the consultation and the highly positive response to the subject content, we have made only minor changes to the final subject content for clarity. It has been amended, where appropriate, as a direct result of feedback received from the consultation. These amendments include:

- an additional line in the definition of ‘standard BSL’, and of ‘established and productive lexicon’, a technical change that provides clarity on who it is used by, and ensures we give a more accurate definition;
- some minor changes for clarification to the grammar section; and
- adding a small number of signs to the indicative vocabulary list which forms Annex C of the subject content, specifically including signs that refer to individuals with a disability and an addition under ‘race’, to ensure the list is more comprehensive.

Final versions of the GCSE subject content and equalities impact assessment are published alongside this consultation response.

Now that the final subject content is published, Ofqual, the independent regulator, will develop and publicly consult on the detailed assessment requirements. After Ofqual has consulted on and published these detailed assessment requirements, awarding organisations will be able to develop their qualification specifications. These specifications will set out for teachers in more detail what students will study. Specifications developed by awarding organisations will need to be accredited by Ofqual. Where suitable qualifications have been developed, the aim is that accredited specifications will be available to schools who wish to offer the GCSE from September 2025.

## Annex A: Organisational responses

39 organisations responded to this consultation<sup>5</sup>, many of the names can be found below.

### **Awarding organisations:**

AQA

Pearson

WJEC

### **Other organisations**

Bedfont Primary School

Benjamin Britten Academy of Music

British Deaf Association (BDA)

BSL courses

BSL Curriculum Working Group

Choice support

Deafness Cognition and Language (DCAL) Research Centre

Deaf Umbrella Ltd

First Class Support

Grwp Llandrillo Menai

Hearing dogs for deaf people

Northern Counties School

Reigate Park Primary Academy

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<sup>5</sup> Where organisations responded to the consultation and are not included in the list, they have either not included their organisations name, said they were responding as an individual, or asked for their details/responses to remain confidential. Their responses, however, have been included in the quantitative data set out above in the report.

Richard Cloudesley School

Royal Association for Deaf People

Sensory Kids

Sherbrook Primary School

Signalong The Communication Charity and Meadow High School

Sir Tom Finney Community High School

Sound Training Solutions

St. Crispin's School

The Sign Bilingual Consortium

Uxbridge College



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