

Analysis of Responses to our Consultation on Conditions and Guidance for GCSE Modern Foreign Languages

covering:

French

German

Spanish



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Executive summary

This consultation about the Conditions and Guidance for GCSE modern foreign languages took place between 16th December 2014 and 13th January 2015.

There were 24 responses to the consultation from individuals and organisations, 23 of which were in a form that matched or broadly followed the layout of the online consultation. The remaining response was a written submission that was not included in the quantitative data analysis, but was reflected upon within the qualitative sections. This submission was from an organisation that also responded using the online form. Fifty-two per cent of the responses were from individuals (all teachers) and 48 per cent were from organisations.¹

The consultation exercise generated a moderate number of responses, with quite an even spread of respondents agreeing or disagreeing with the proposals. The key points from the consultation responses are as follows:

- Support for the removal of bilingual dictionaries (from 64 per cent of respondents).
- A preference for mixed tier entry, expressed by 63 per cent of responses. (While this response is appreciated, a policy decision has already been made on this.²)
- Awarding organisation concern over cross-tier comparability.
- The majority of respondents did not comment on the equality impact analysis questions.

¹ These percentages include the one written responses that was not in a form that matched or broadly followed the layout of the online consultation.

² <http://webarchive.nationalarchives.gov.uk/20141110161323/http://ofqual.gov.uk/news/assessment-arrangements-new-languages-gcse>

1. Introduction

Technical consultation on the Conditions and Guidance for GCSE modern foreign languages

This report is a summary of the views expressed by those who responded to our recent consultation on the Conditions and Guidance for modern foreign languages, which took place between 16th December 2014 and 13th January 2015.

Background

New GCSEs are being introduced in England. The primary purpose of the new qualifications will be to provide evidence of students' achievements against demanding and fulfilling content and a strong foundation for further academic and vocational study and employment. If required, the qualifications should be able to provide a basis for schools and colleges to be held accountable for the performance of all of their students.

We have consulted on and announced our policy on the general design of new GCSEs, and on our policy and technical arrangements relating to those subjects that are due to be introduced for first teaching in 2015.³

We have taken decisions on the design of the new GCSEs in modern foreign languages, and these are to be introduced for first teaching in 2016.

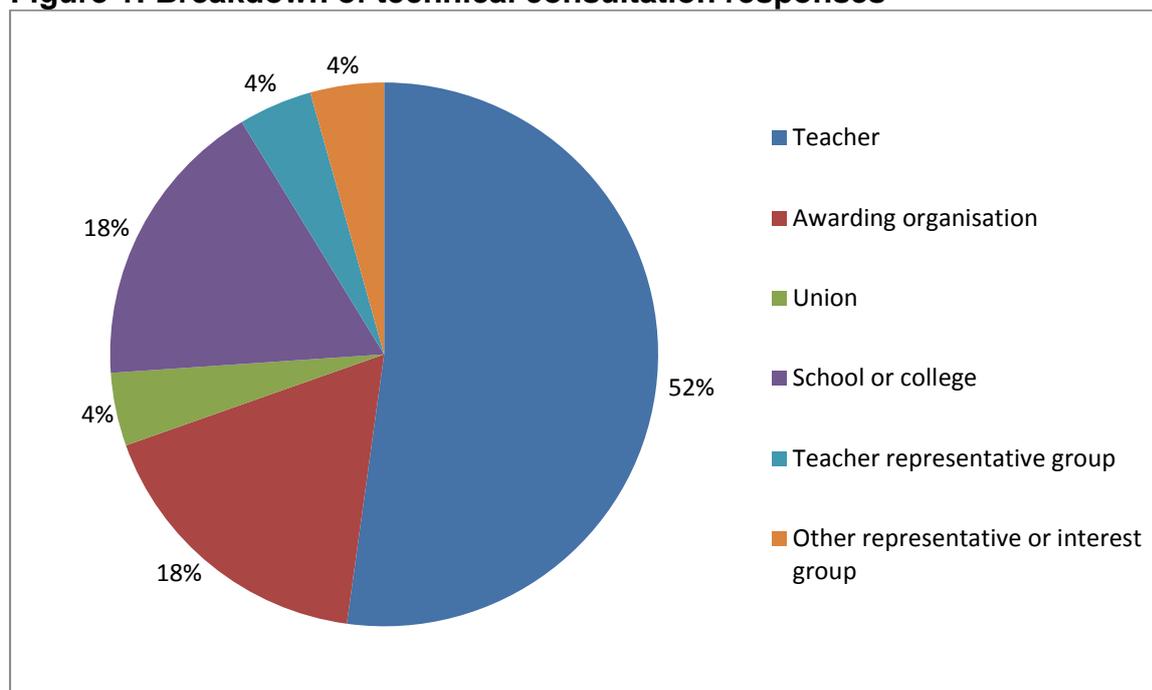
This consultation focused on more technical matters – that is, on the regulatory arrangements that we must put in place to make sure that awarding organisations design, deliver and award the new qualifications in line with our policy decisions.

³ New GCSEs in English language, English literature and mathematics will be taught from September 2015.

2. Who responded?

We received a total of 24 responses to our consultation.⁴ Twelve (52 per cent) were responding as individuals and 11 (48 per cent) were organisational responses. One additional written submission was received from an organisation that had also responded using the online form. The breakdown of responses is shown in Figure 1.

Figure 1: Breakdown of technical consultation responses



All responses received were from individuals or organisations based in England and Wales, apart from one response from another EU country.

Table 1: Breakdown of technical consultation responses

Respondent type	Respondent type	Percentage
Personal	Teacher	12
Organisation response	Awarding organisation	4
Organisation response	Union	1
Organisation response	School or College	4
Organisation response	Teacher representative group	1
Organisation response	Other representative or special interest group	1

⁴ We entered any hard-copy responses that followed the format of the consultation into the online platform.

3. Approach to analysis

The consultation was published on our website and respondents could choose to respond using an online form. The consultation included 11 questions. The questions required a yes or no response as to whether the respondent would like to comment on the issue outlined in the question. Those that responded yes were able to provide a narrative response. Respondents were also able to post or email copies of the consultation questions or provide a solely narrative response to the consultation (for example via letter).

This was a consultation on the views of those who wished to participate and while we made every effort to ensure that as many respondents as possible had the opportunity to reply, it cannot be considered as a representative sample of the general public or any specific group.

Data presentation

We present the responses to the consultation questions in the order in which they were asked.

The consultation asked 11 questions, each with a different focus. Respondents could choose to answer all or just a selection of the questions.

During the analysis phase every response to each question was reviewed. The main comments were identified and then summarised.

4. Views expressed

In this section we report the views, in broad terms, of those who responded to the consultation document. We have structured this around the questions covered in the consultation and provide analysis of the data broken down by stakeholder.

A consultation is not the same as a survey and only reflects the views of those who chose to respond. Typically these will be those with strong views and/or particular experience or interest in a topic. What follows is a fair reflection of the views expressed by respondents to the consultation.

A list of the organisations that responded to the consultation is included in Appendix A.

Do you have any comments on the draft Conditions on subject content for new GCSEs in French, German and Spanish? (Question 1)

This question referred to the draft Condition for new GCSE modern foreign languages that states that awarding organisations must ensure compliance with the content requirements. The Department for Education previously published the new content for the subject.⁵ Seventeen respondents answered no to this question (nine personal responses, eight organisational responses). Of the six respondents who did have comments, one personal response answered yes, but made no comment. Five respondents provided comments as follows:

- Support for the return of end of key stage exams.
- Concern about final exam assessment.
- Concern about the absence of a vocabulary list and the removal of dictionary use.
- Support for modern foreign languages becoming consistent with other subject groups.

Do you have any comments on the draft Guidance on subject content for new GCSEs in French, German and Spanish? (Question 2)

This question referred to the draft Guidance which outlined that:

⁵ www.gov.uk/government/publications/gcse-modern-foreign-languages

- the length of translation exercises will be a minimum of 35 words for the foundation tier, and a minimum of 50 words for the higher tier;
- the length of the extended written text in the reading assessment will be a minimum of 90 words for the foundation tier, and a minimum of 150 words for the higher tier; and
- rubrics (including any stimulus materials) will be in English, and questions may be set in the assessed language or English, as appropriate to the task.

Ten respondents (nine personal, one organisation) answered no to this question, and two respondents (one personal, one organisation) did not answer the question. The 11 respondents who did have comments expressed the following views:

- Concern that translation is old fashioned and may discourage uptake of modern foreign languages.
- Support for the inclusion of translation exercise, but concern that it must be made accessible to GCSE level students.
- Support for the proposal to set known parameters for the amounts and lengths of relevant texts.
- Request for clear guidance on the language that questions will be presented in within assessments.
- Request that rubrics within the Listening paper should be in English.
- Concern about the expectations of students studying languages.
- Support for the removal of controlled assessment.

All awarding organisations commented on this question, as follows:

- Support for the word limits for translation and extended written text exercises.
- Request that the word count for the higher tier reading passage (extended written text) should be increased to a minimum of 180 words.
- Request for consistency in the subject content wording for the translation exercise in the reading and writing assessments – suggestion that both should use “sentences and/or a short passage”.
- Request for clarification of the language that should be used for rubrics – suggestion that the instructions and prompts within speaking and writing assessments should be in English.

Do you have any comments on the draft tiering Conditions or requirements for new GCSEs in French, German and Spanish? (Question 3)

This question referred to the draft Conditions and requirements which outlined the following:

- An overlapping tier model should be used, using a two-tier model (a foundation and higher tier) with each assessment falling within only one of the tiers.
- Mixed tier entry is prohibited. A Learner must only sit assessments in either the foundation or higher tier.
- Foundation tier assessments should target grades 1 to 5. Higher tier assessments should target grades 4 to 9.
- Awarding organisations must ensure that assessments in each tier allow each specified level of attainment available for that tier to be reached by a Learner who has attained the required level of knowledge, skills and understanding.
- The level of attainment indicated by grades 4 and 5 must be comparable, regardless of the tier for which the Learner is entered.

Three respondents (two personal, one organisation) answered no to this question, and one respondent did not answer the question. The 19 respondents who did have comments expressed the following views:

- Support for the tiering of each skill and the overlapping model, with comment that awarding organisations should clearly demonstrate where the boundary between foundation and higher tier skills lie.
- One awarding organisation (AQA) raised concern over cross-tier comparability, stating that this will be problematic in Speaking and Writing.
- Clarification was requested on the wording around the use of the overlapping tier model, and whether “assessment” in this context refers to one tier of a component or an individual task within a component.
- Request for clarification on other considerations around tiering (for example how tiered writing will be assessed).
- Disappointment that separate grades for each individual skill will not be reported in addition to the overall grade.
- Disappointment that the tiers for reading and listening skills will not be combined.

- Sixty-three per cent of responses demonstrated a preference for mixed tier entry.

Do you have any comments on the draft Conditions or requirements on assessment for new GCSEs in French, German and Spanish? (Question 4)

This question referred to the draft Conditions and requirements outlining the following:

- Where 'vocabulary lists' are made available by awarding organisations, assessment must not be restricted to the use of the words from those lists.
- Each Learner will have the same amount of formal preparation time for Speaking assessments (between 10 and 12 minutes).
- The Speaking assessment for foundation tier Learners, should be between seven and nine minutes. Higher tier assessment should be between 10 and 12 minutes.
- Speaking assessments should include a conversation on more than one topic, (one topic may be chosen in advance), and two further tasks.
- The Listening assessment will be 35 minutes long for foundation tier and 45 minutes for higher tier (at both tiers this includes five minutes of reading time).

Seven respondents (five personal, two organisations) answered no to this question, and three respondents (one personal, two organisations) did not answer the question. The 13 respondents who did have comments expressed the following views:

- Mixed opinion about the use of vocabulary lists – with support and opposition expressed for requiring students to use words that are not necessarily provided on the list, and suggestion that foundation tier students are provided with an extended list of common words, or that only higher tier students are tested on questions not on the list.
- Concern that the number of tasks in the speaking assessment is too high.
- One awarding organisation (OCR) requested that the Conditions should be amended to specify that the recordings of the Speaking Tests that are to be provided by centres should be audio-only recordings. The reason given was that evidence from video recordings differs from evidence from audio recordings, and will not be comparable.
- Support for the timings of the Listening assessment.

- Contrasting opinions on the removal of controlled assessment (a feature of current GCSE qualifications) – with some support and some opposition.
- Request for consistency between modern foreign languages.

Do you have any comments on the draft Guidance on assessment for new GCSEs in French, German and Spanish? (Question 5)

This question referred to the draft Guidance on assessment which outlined that awarding organisations are not required to publish vocabulary lists, though any published vocabulary lists must meet the Subject Level Conditions and Requirements.

Twelve respondents (six personal, six organisations) answered no to this question, and four respondents (three personal, one organisation) did not answer the question. The seven respondents who did have comments expressed the following views:

- Concern about how vaguely defined vocabulary testing was – vocabulary lists provide concrete support for students and teachers and offer guidance on the content that teachers need to cover, and the concern is that these will not be compulsory.
- Some support and opposition for not allowing the use of a bilingual dictionary.
- One awarding organisation (WJEC) supported the proposals for the timing and marking of spoken language assessments.
- Request for clarification on the content of the written exam – whether it includes both a translation and a written piece.
- The prescription of time limits and the mechanics of assessment restrict freedom, but should promote consistency between awarding organisations.

Do you have any comments on the draft Conditions on speaking assessments for new GCSEs in French, German and Spanish? (Question 6)

This question referred to the draft Conditions which outline that:

- Speaking assessments are to be set and marked by the awarding organisation.
- Speaking assessments must be recorded.
- Speaking assessments should take place within a fixed five-week period during the last three weeks in April and the first two weeks in May.

Five respondents (one personal, four organisations) answered no to this question, and two respondents (one personal, one organisation) did not answer the question. The 16 respondents who did have comments expressed the following views:

- Nineteen per cent of responses suggested that the length of the speaking assessment should be reduced, especially for foundation tier students.
- There was mixed opinion about the number of tasks within the speaking assessment – some responses showing concern over the number and variety, while others felt that the variety promoted creativity. There was a suggestion that three tasks would sufficiently allow students time to formulate and provide their answers. Another respondent suggested that only two tasks (one for communication, one for interaction) would be better.
- Support for the external assessment of the speaking assessment.
- Support for the use of role play within the speaking assessment and for holding the speaking assessment at the end of the course.
- Support for the proposals for the timing and marking of the speaking assessment, and the method of assessment – it will test more spontaneous reactions and can be prepared without losing lesson time.
- One respondent suggested that guidance on the new assessment requirements for the speaking assessments is not sufficiently clear.

Do you have any comments on the draft Conditions on access to bilingual dictionaries for new GCSEs in French, German and Spanish? (Question 7)

This question referred to the draft Conditions which outlined that access to bilingual dictionaries will be prohibited during all modern foreign languages assessments and during any formal preparation time for such an assessment.

Eleven respondents (six personal, five organisations) answered no to this question, and one respondent (personal) did not answer the question. The 11 respondents who did have comments expressed the following views:

- Sixty-four per cent of responses supported the removal of bilingual dictionaries, and 36 per cent opposed it.
- One respondent disagreed with the removal of dictionaries during formal preparation time.
- Two of the opposing views referred to the effective use of a dictionary as a skill.

- One awarding organisation (OCR) stated that it should be specified that neither bilingual nor monolingual dictionaries are permitted.
- One respondent requested that exam boards provide glossaries, word lists or references for tasks so that pupils have the opportunity to demonstrate that they can manipulate language.

Do you have any comments on the draft Guidance on assessment objectives for new GCSEs in French, German and Spanish? (Question 8)

This question referred to the draft Guidance on assessment objectives which outlines how we expect awarding organisations to interpret the assessment objectives in terms of discrete 'elements' within each assessment objective, coverage expectations and key areas of emphasis in each assessment objective.

Twelve respondents (six personal, six organisations) answered no to this question, and two respondents (one personal, one organisation) did not answer the question. The 11 respondents who did have comments expressed the following views:

- Statements within the Guidance on assessment objectives are bland and do not clearly outline the expectations on students.
- The emphasis on fluency rather than accuracy could lead to assessment becoming subjective.
- Requests for clarification on the percentage of marks allocated to knowledge and accurate application of the grammar and structures of the language prescribed in the specification, and the requirements for the range of language.
- Support for the 25 per cent allocation to each of the skill areas (speaking, listening, reading and writing).
- Request that the weighting allocated to each skill within the assessment objectives should reflect real life (listening and speaking should have the highest percentages, followed by reading and writing).
- Request for the choice of texts for the translation exercises to be relevant to the 'real world'.

5. Equality analysis

The questions below referred to the potential impacts on students who share a protected characteristic⁶ we had identified as arising from our proposed assessment arrangements.

We explained that some disabled students may be at a disadvantage relative to other students when taking speaking or listening assessments for a GCSE in French, German or Spanish. This is the case now and will remain so in the future. Similarly, some disabled students may be at a disadvantage relative to other students when their reading and writing skills are being assessed.

We also explained that:

- awarding organisations are required to consider the accessibility of their qualifications at the design stage and to remove any unjustifiable barriers;
- disabled students may have adjustments made to the way their assessments are conducted to remove or reduce this disadvantage; and
- a disabled student who is unable to attempt any part of an assessment may, as a 'last resort', be exempted from that assessment.

We have not identified any ways in which the proposed requirements for reformed GCSEs in French, German and Spanish would impact on persons who share a protected characteristic. Are there any potential impacts we have not identified? If so, what are they? (Question 9)

Twelve respondents (ten personal, two organisations) answered no to this question, and eight respondents (two personal, six organisations) did not answer the question. The three respondents who did have comments expressed the following views:

- The inability to mix tiers may disadvantage some students, especially those who are dyslexic or have phonological processing difficulties.
- Those who have speech/sight/hearing impediments may have potential difficulties in completing all four assessment disciplines.

Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who

⁶ For the purposes of the public sector equality duty, the protected characteristics are disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.

share a protected characteristic? If so, please comment on the additional steps we could take to mitigate negative impacts. (Question 10)

Ten respondents (eight personal, two organisations) answered no to this question, and nine respondents (two personal, seven organisations) did not answer the question. The four respondents who did have comments expressed the following views:

- More detailed guidance should be provided for those who ‘invigilate’ students with a protected characteristic.
- Mixed tier entry should be allowed, which would aid those students with specific learning needs.
- Students with specific learning needs should be allowed extra time.

Have you any other comments on the impacts of the proposals on persons who share a protected characteristic? (Question 11)

Nineteen respondents (ten personal, nine organisations) answered no to this question, and two respondents (one personal, one organisation) did not answer the question. The two respondents who did have other comments expressed the following views:

- Limiting the exemption to a maximum of 40 per cent could effectively disqualify a candidate from sitting a GCSE in modern foreign languages at all, if their protected characteristic prevents completion of two out of four of the assessment elements.
- Support for allowances for those who are hearing impaired, but concern that there seems less comment on those who are speech impaired.

Appendix A: List of organisational consultation responses

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

Below we list those organisations that submitted a response to the consultation.⁷ We have not included a list of those responding as an individual, however all responses were given equal status in the analysis.

Abbot's Hill School, Hemel Hempstead

AQA

ASCL (Association of School and College Leaders)

The Ashcombe School, Surrey

Challney High School for Girls, Bedfordshire

Edgbaston High School, Birmingham

OCR

Pearson

Voice: The union for education professionals

WJEC-CBAC

⁷ We haven't included organisations that asked for their responses to be treated anonymously.

Appendix B: Consultation details

The consultation questions were available either to complete online or to download.

A copy of the consultation is available at:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/387691/gcse-modern-foreign-languages-consultation-on-conditions-and-guidance.pdf

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