

**Analysis of responses to our
consultation on rules and guidance for
AS and A levels modern foreign
languages (first teaching 2018)**



April 2017

Ofqual/17/6201

Contents

Executive summary	2
1. Introduction.....	3
2. Who responded?.....	4
3. Approach to analysis.....	5
Data presentation	5
4. Views expressed – consultation response outcomes	6
Appendix A: list of organisational consultation respondents	9

Executive summary

Our consultation about rules and guidance for AS and A level modern foreign languages (first teaching 2018) took place from 3 to 31 March 2017.

The consultation questions were available to either complete online or to download. A copy of the consultation is available at www.gov.uk/government/consultations/as-and-a-level-reform-regulations-for-mfl-first-teaching-2018.

There were five responses to the consultation, four from organisations and one from an individual.

One organisation did not comment directly on our proposals, but instead provided general comments on the reform of these subjects.

Where respondents did comment on our proposals, they largely supported them, in particular noting the need to indicate the skills assessed in these qualifications.

One organisation commented on the “removal”¹ of speaking assessments in these languages, and the risk that this could devalue these qualifications.

¹ Of the languages affected by this consultation, only one (Urdu) currently assesses speaking skills at AS and A level.

Introduction

The consultation on the Conditions and guidance for AS and A level modern foreign languages (first teaching 2018).

This report is a summary of the views expressed by those who responded to our consultation on rules and guidance for AS and A level modern foreign languages (first teaching 2018), which took place from 3 to 31 March 2017.

Background

New AS and A level qualifications are being introduced in England. We have consulted on and announced our policy on the general design of these new qualifications.² We have also set out our policy and technical arrangements for the subjects where first courses began in September 2015³ and September 2016⁴, and where first courses will begin in September 2017.⁵

Following an earlier consultation, we also took decisions on the high-level assessment arrangements for the new AS and A level modern foreign language qualifications that will be introduced for first teaching from September 2018.⁶

This consultation focused on the regulatory arrangements that we must put in place to make sure that awarding organisations design, deliver and award these new AS and A levels in line with our policy decisions.

² See <http://webarchive.nationalarchives.gov.uk/20141110161323/http://comment.ofqual.gov.uk/a-level-reform/> and <http://webarchive.nationalarchives.gov.uk/20141110161323/http://comment.ofqual.gov.uk/a-level-regulatory-requirements-october-2013/>

³ New AS and A levels in art and design, biology, business, chemistry, computer science, economics, English language, English language and literature, English Literature, history, physics, psychology and sociology.

⁴ New AS and A levels in classical Greek, dance, drama and theatre, French, geography, German, Latin, music, physical education, religious studies and Spanish.

⁵ New AS and A levels in accounting, ancient history, Chinese, classical civilisation, design and technology, electronics, environmental science, film studies, geology, history of art (A level only), Italian, law, mathematics, further mathematics, media studies, music technology, philosophy, politics, Russian and statistics.

⁶ www.gov.uk/government/consultations/developing-new-mfl-as-and-a-levels-for-first-teaching-in-2018

Who responded?

We received a total of five responses to our consultation. All the responses were from individuals or organisations based in England or Wales.

Table 1: Breakdown of consultation responses

Personal / Organisation response	Respondent type	Number
Organisation	Awarding organisation	2
Organisation	Professional body	2
Personal	Subject expert	1

Approach to analysis

We published the consultation on our website and respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us. The consultation included eight questions. Four of the respondents structured their answers around these questions; one (an organisation) chose instead to provide general comments.

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

Data presentation

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

The consultation asked eight questions and each had a different focus. Respondents could choose to answer all or just some of the questions.

For some of the questions, respondents could indicate the extent to which they agreed with our proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree), as well as providing comments on our proposals.

During the analysis phase we reviewed every response to each question.

Views expressed – consultation response outcomes

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 document and provide analysis of the data broken down by stakeholder.

A consultation is not the same as a survey and the responses only reflect 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.

Appendix A lists the organisations that responded to the consultation.

Our approach to regulating AS and A level modern foreign languages

Question 1: To what extent do you agree or disagree that we should allow exam boards to develop AS and A levels in Arabic, Bengali, Gujarati, Greek, modern Hebrew, Japanese, Panjabi, Persian, Polish, Portuguese, Turkish and Urdu against either the alternative content or the MFL content?

Four respondents (three organisations, one individual) answered this question. Of those respondents:

- two organisations strongly agreed with our proposal;
- one organisation agreed; and
- one individual neither agreed nor disagreed.

Two of the organisations who supported our proposals provided further comments to explain their position. One commented that these qualifications are valued by stakeholders; the other noted that speaking forms an essential element of learning in these languages, so it should therefore be permissible to assess it.

The individual queried whether the benefits of this approach will outweigh the costs.

Question 2: To what extent do you agree or disagree that AS and A levels based on the alternative content should have different titles from those based on the MFL content?

Four respondents (three organisations, one individual) answered this question. Of those respondents:

- one organisation strongly agreed with our proposal;

- one organisation agreed;
- one individual disagreed; and
- one organisation strongly disagreed.

The two organisations that supported our proposals both commented that it was important to distinguish between qualifications based on the different content documents, because those qualifications will assess different skills.

The organisation that strongly disagreed commented that all AS and A levels should be comparable in terms of value and rigour, and that using different titles could indicate this was not the case, creating artificial distinctions and misunderstandings.

The individual who responded suggested there should be a common format for assessing all A level languages.

Qualification titling

Question 3: Do you have any comments on the title that should be used for AS and A levels based on the alternative content?

Three respondents (all organisations) answered this question:

- two commented that our proposed title of [Language](Listening, Reading, Writing) was the best option, as this makes clear exactly which skills are being assessed; and
- one commented that all AS and A level languages should have the same title, as otherwise qualifications based on the alternative content could be seen as second-class qualifications, which would disadvantage students and undermine their achievements.

Our proposed Conditions and guidance

Question 4: Do you have any comments on our proposed Conditions and requirements for qualifications developed against the alternative content?

Three respondents (all organisations) answered this question:

- two commented that they were content with our proposed Conditions and requirements; and
- one commented that all GCE qualifications in modern foreign languages should be subject to the same rules, including the requirement to assess spoken language skills. They further commented that applying different subject content based on cohort size has no academic, technical or scientific basis.

Question 5: Do you have any comments on our proposed guidance for qualifications developed against the alternative content?

Three respondents (all organisations) answered this question:

- one commented that the guidance was appropriate for qualifications developed against the alternative content;
- one commented that in Japanese, texts used for translation would need to be significantly longer than the minimum proposed in order to achieve a comparable level of demand to other languages. They noted this was because a number of phonemes and characters are needed to make up a single word in Japanese and therefore the number of characters should be higher than, for example, the 100 words set for French, German and Spanish; and
- one commented that there was no need to have different guidance for these languages, as they should be required to follow the same approach as other AS and A level languages.

Equality Impact Assessment

Question 6: We have identified that our proposed changes to our rules and guidance should have a positive impact on persons who share a protected characteristic. Are there any potential impacts we have not identified? (Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.)

Question 7: Are there any additional steps we could take to mitigate any negative impact resulting from these proposal on persons who share a protected characteristic?

Question 8: Do you have any other comments on the impacts of the proposals on students who share a protected characteristic?

Only one respondent (an organisation) answered these questions. They commented that:

- students with certain disabilities (for example, dyslexia, dyspraxia and ADHD) might be disadvantaged if assessed solely using written examinations, and

- retaining⁷ an oral component is essential to ensure that students with such disabilities are not treated less favourably.

General comments

One organisation chose not to answer our consultation questions directly, but instead provided general comments on our proposals. They noted that:

- they understood the difficulty of assessing spoken language skills in these languages, and supported the approach taken to the alternative subject content; and
- it was important to ensure that all AS and A level modern foreign language qualifications are comparable in terms of rigour, demand and challenge.

They also sought clarity about future availability of modern foreign language qualifications in other languages.

⁷ In the context of this comment, we note that – of the languages covered by this consultation – only Urdu currently includes an assessment of spoken language skills.

Appendix A: list of organisational consultation respondents

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.

AQA

Association of School and College Leaders

Pearson

Voice the Union

We wish to make our publications widely accessible. Please contact us at publications@ofqual.gov.uk if you have any specific accessibility requirements.



© Crown copyright 2017

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit <http://nationalarchives.gov.uk/doc/open-government-licence/version/3> or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: publications@ofqual.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.uk/ofqual.

Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation

Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346