

# **Analysis of Consultation on Reforming GCSEs in Modern Foreign and Ancient Languages**



September 2014

Ofqual/14/5410

# Contents

Executive summary .....	3
1. Introduction .....	5
1.1 The Consultation on Reforming GCSEs in Modern Foreign and Ancient Languages .....	5
1.2 Background .....	5
2. Who responded? .....	6
3. Approach to analysis .....	11
3.1 Data presentation.....	11
3.2 Quantitative data / closed question responses.....	11
3.3 Qualitative data / open question responses .....	12
3.4 Consultation events .....	12
4. Views expressed – consultation response outcomes .....	13
4.1 Assessing new modern foreign language GCSEs .....	14
4.2 Tiering of new modern foreign language GCSEs.....	26
4.3 Assessing new ancient language GCSEs.....	39
4.4 Tiering of new ancient language GCSEs .....	41
4.5 The availability of new modern foreign language and ancient language GCSEs .....	43
4.6 Equality impact analysis.....	53
Appendix A: List of organisational consultation respondents .....	64
Appendix B: Consultation details.....	66

## **Executive summary**

This consultation about the proposed application of our assessment and tiering principles to new GCSEs in modern foreign and ancient languages took place between April 2014 and May 2014.

The subjects considered in the consultation were all modern foreign and ancient languages currently offered at GCSE level by regulated awarding organisations.

There were 359 responses to the consultation from individuals and organisations. Most of these (346) were in a form that matched or broadly followed the layout of the online consultation. The remaining 13 were written submissions that we did not include in the quantitative data analysis, but which we reflected upon within the qualitative sections. Eighty per cent of the responses were from individuals, mostly teachers, and 20 per cent were from organisations.<sup>1</sup>

The consultation exercise generated a broad range of responses. The responses did not come from a representative sample of the population (for example, 258<sup>2</sup> of the responses came from teachers), and we therefore encourage you to look past the headline figures in each section and consider the more detailed breakdown of results by the different respondent groups.

### **Key points from the consultation**

In general, respondents agreed with the proposals in the consultation, and there were no real issues raised with the proposals on ancient languages. There were, however, several specific points in relation to modern foreign languages that met with a level of disagreement:

- Question 9 – All available new modern foreign language GCSEs should be tiered.

Although the majority of respondents (64 per cent) agreed with this proposal, concerns were raised within this and other sections of the consultation (namely in questions 12, 19 and 26) that this requirement could lead to some lower-entry modern foreign language GCSEs no longer being available. The general view of those concerned with this possibility was that they would rather have an untiered modern foreign language GCSE available, than no modern foreign language GCSE in the language concerned.

---

<sup>1</sup> These percentages include the 13 written responses that were not in a form that matched or broadly followed the layout of the online consultation.

<sup>2</sup> This figure includes three written responses that were not in a form that matched or broadly followed the layout of the online consultation.

- Question 10 – Students should be required to enter for either higher- or foundation-tier assessments but not a combination of the two.

The main argument raised by respondents against this proposal was that students tend to develop the various language skills at different rates, and that allowing students to choose the tier they view as most appropriate for their own abilities in the different skills being assessed gives them the opportunity to achieve a fair result. Additionally, concerns were raised that if the proposal were to be implemented there would be an adverse effect on students with disabilities for whom only certain language skills present real difficulties, meaning that they could be forced to enter for foundation-tier exams across the four skills when they only struggled in one or two areas. Exam boards, however, were on the whole in support of the proposal as it would allow for the removal of uniform marks, which causes distortions in grading.<sup>3</sup>

- Question 22 – A disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE.

Although there was general agreement with this proposal (64 per cent) on the basis that if a student is exempted from more than 40 per cent of the marks available, then the qualification cannot be said to give a reliable indication of a student's knowledge, skill and understanding, a substantial number of respondents suggested that exam boards should look at individual students' circumstances before coming to a decision as to whether exemptions are reasonable. This was supported by the argument that short-course GCSEs were not viable alternatives to full GCSEs and were not available for all combinations of skills.

---

<sup>3</sup> See section 4 for a more detailed analysis of the responses to this question.

## **1. Introduction**

### **1.1 The Consultation on Reforming GCSEs in Modern Foreign and Ancient Languages**

This report is a summary of the views expressed by those who responded to our recent consultation on reforming GCSEs in modern foreign and ancient languages.

Between April 2014 and May 2014, we consulted on the proposed application of our assessment and tiering principles to new GCSEs in modern foreign languages and ancient languages.

### **1.2 Background**

GCSEs taken by students in England are being reformed. New GCSEs in English language, English literature and maths are being introduced for first teaching in September 2015. These will be followed by new GCSEs in other subjects, including modern foreign and ancient languages, due to be taught from September 2016. The government<sup>4</sup> has already consulted on the content for these subjects and will publish the final content once we have taken decisions on the structure and assessment of the qualifications.

We are responsible for making sure that the new GCSEs are of a high quality and that they provide valid and reliable results. We have already consulted, and announced decisions on, the features of new GCSEs that will apply to all subjects, for example assessment principles, tiering and grading arrangements. We will consult at a later date on the regulatory requirements (such as the Conditions of Recognition) that will govern the way exam boards design, deliver and award new GCSEs in modern foreign and ancient languages. The exam boards that wish to offer new GCSEs can then develop their qualifications for accreditation in 2015 ready for teaching from September 2016.

---

<sup>4</sup> This consultation considered proposals for the reform of GCSE modern foreign and ancient language qualifications in England. Where we refer to 'GCSEs', we mean GCSEs taken in England; by 'government' and 'ministers' we mean Westminster government and Westminster ministers.

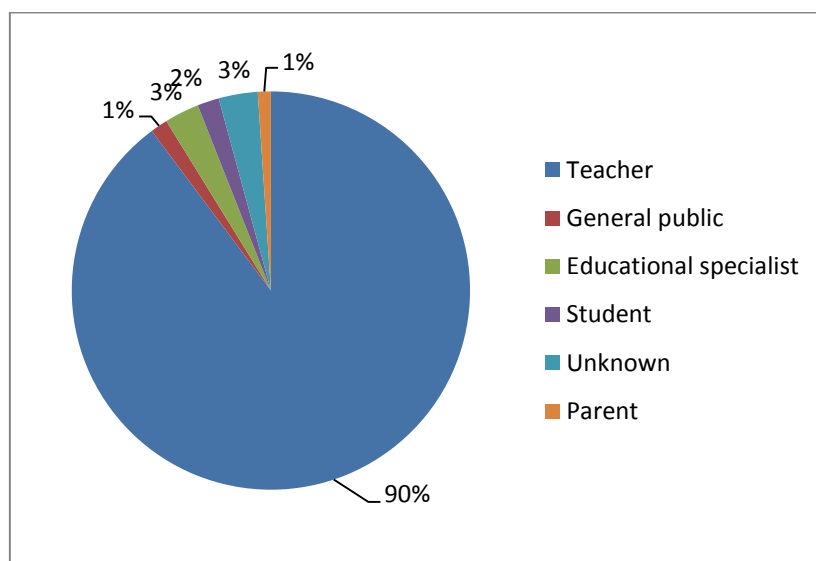
## 2. Who responded?

We received a total of 359 responses to our consultation. There were 346 responses to the consultation questions<sup>5</sup> and 13 written submissions that did not fit the format of the consultation, which we therefore considered separately.<sup>6</sup>

Of those that followed the format of the consultation, 284 (82 per cent) were responses from individuals and 62 (18 per cent) were organisation responses.

Figure 1 shows the breakdown of individual responses.

**Figure 1:** Breakdown of consultation responses from individuals



Organisation responses were either from schools (76 per cent of all organisation responses) or other types of organisations including exam boards, representative / interest groups, local authorities and universities (24 per cent). For the purposes of clarity we have separated out the two in figures 2a and 2b.

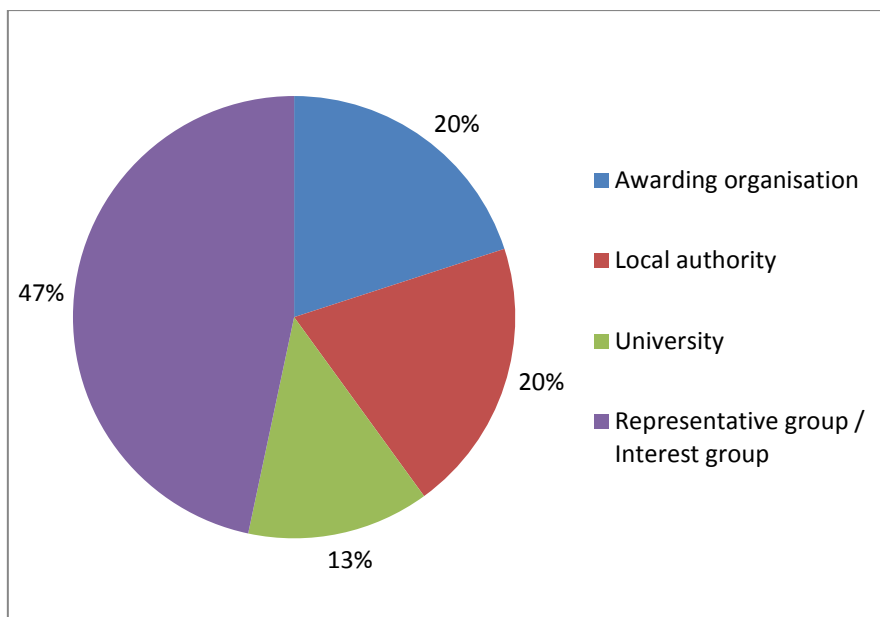
---

<sup>5</sup> Where responses that followed the format of the consultation were received in hard copy we entered them into the online platform.

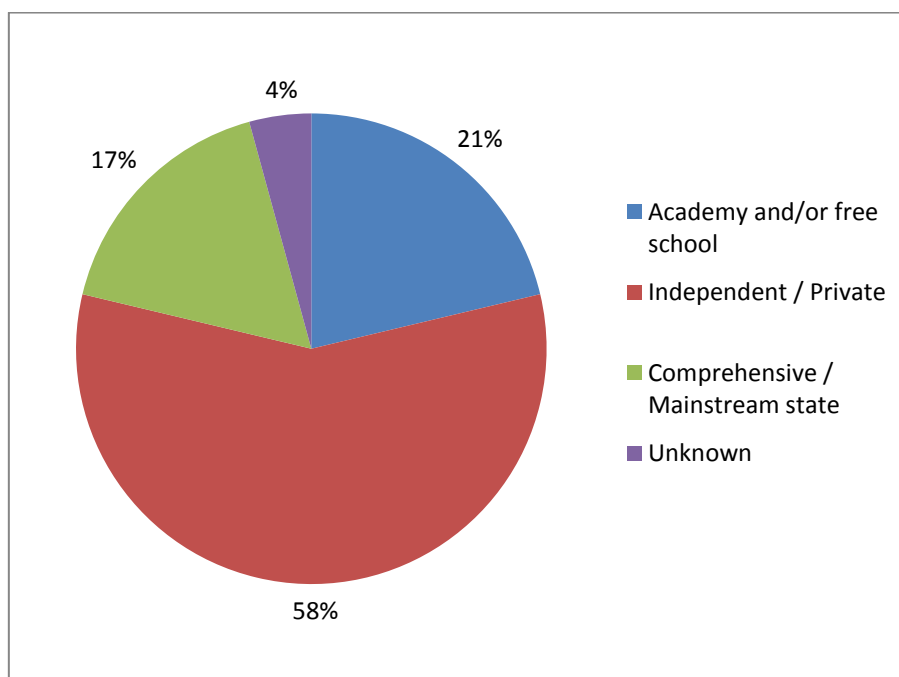
<sup>6</sup> These 13 responses are not included in the quantitative analysis that follows. See section 3 on our approach to analysis

**Figure 2:** Breakdown of consultation responses from organisations

**2a:** Excluding schools



**2b:** Only schools



The consultation was divided into six sections:

- Assessing modern foreign language GCSEs
- Tiering of new modern foreign language GCSEs
- Assessing ancient language GCSEs
- Tiering ancient language GCSEs
- The availability of modern foreign language and ancient language GCSEs
- Equality impact analysis.



Figure 3 illustrates the number of questions answered by respondents, showing whether those responses were from individuals or official responses submitted on behalf of organisations.

**Figure 3:** Number of questions answered by personal or organisation responses<sup>7</sup>

<b>Section number</b>	<b>Questions answered</b>	<b>Personal views</b>	<b>Organisation response</b>	<b>All</b>
1	1	276	58	334
	2	275	58	333
	3	276	59	335
	4	274	59	333
	5	225	48	273
	6	213	45	258
	7	272	56	328
2	8	272	57	329
	9	273	56	329
	10	271	57	328
	11	271	57	328
	12	134	27	161
3	13	240	51	291
4	14	245	53	298
5	15	262	60	322
	16	265	55	320
	17	267	54	321
	18	256	51	307
	19	138	34	172
	20	252	54	306
	21	72	25	97
6	22	262	52	314
	23	223	44	267
	24	206	41	247
	25	206	44	250
	26	222	52	274
	<b>Total</b>	<b>6,148</b>	<b>1,307</b>	<b>7,455</b>

---

<sup>7</sup> A respondent is included if they answered 'don't know / no opinion' or 'other' to any of the questions.

Figure 4 shows the breakdown of responses by country. The vast majority of replies were from England.

**Figure 4:** Consultation responses by country

<b>Country</b>	<b>Number of responses</b>
England	327
Wales	2
Scotland	3
Northern Ireland	2
Other EU country	4
Non-EU country	2
Unknown	6
<b>Total</b>	<b>346</b>

### **3. Approach to analysis**

We published the consultation on our website, along with an online form for respondents to give us their views. The consultation included 26 questions. Twenty-one of the questions were closed (quantitative), but beneath each of these, respondents were invited to provide a more detailed open (qualitative) response. The remaining five questions were open questions, inviting respondents to provide a narrative response. Respondents were also able to email or post 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.

#### **3.1 Data presentation**

We present the responses to the consultation questions in the order in which they were asked. Each section of the consultation, and therefore of this report, includes a number of agree/disagree or yes/no (quantitative) questions. Below each quantitative question there was the option for respondents to provide a more detailed open (qualitative) response, giving an opportunity for those who wanted to expand on a point to do so.

We present the quantitative and qualitative responses separately. We only summarise the main findings of the quantitative questions in the text as the tables provide a clearer and more concise view of the evidence. In contrast, the open response data require much more analysis and explanation to provide context and deeper insight into the issues raised.

Note that the qualitative summaries provided in the analysis include the 13 narrative responses to the consultation, but the quantitative summaries do not.

#### **3.2 Quantitative data / closed question responses**

The consultation asked a large number of questions across a broad range of subjects. Respondents could choose to answer all or just a selection of the questions.

In the report we refer to percentages of respondents who either agreed or disagreed with a proposal. We have arrived at these percentages by adding together the numbers who agreed and strongly agreed or who disagreed and strongly disagreed. We have expressed these figures as a percentage of everyone who answered a question on each proposal, including those who selected the 'do not know/no

opinion' options. We have discounted respondents who did not reply to the question at all.

The same applies to percentages disagreeing or strongly disagreeing with the proposal. The total percentage of those who agree or disagree will not add up to 100 per cent. The shortfall represents the number who offered a 'don't know / no opinion' or 'other' response, and can be a large proportion of respondents.

We present the data using pie charts and tables. In each case, the pie chart reflects the overall proportion of responses (corresponding with the top row in the accompanying table). Within the table, we have separated out the responses into personal and organisation responses, and then split them down further into groups.<sup>8</sup> The majority of responses to the consultation came from teachers, and so the overall figures tend to reflect their views.

### **3.3 Qualitative data / open question responses**

During the analysis phase, we reviewed every response to each question, including the 13 narrative responses to the consultation. We identified the main arguments and then summarised them in the qualitative analysis sections of this report.

### **3.4 Consultation events**

We offered to meet with stakeholder groups and alerted them to the consultation when it was launched. In the event, only one meeting took place with stakeholders interested in ancient language reform.

---

<sup>8</sup> The groups include awarding organisations, other organisations (including responses from local authorities, representative / interest groups and universities), independent schools, other schools (including academies, state schools and other schools), teachers, educational specialists and other individuals (including the general public, students, parents and others).

## **4. Views expressed – consultation response outcomes**

In this section we report the views, in broad terms, of those who responded to the consultation document, either by submitting an electronic response or by a separate written submission. We have structured this around the main sections covered in the consultation document and provide analysis of the quantitative data broken down by stakeholder.

The consultation covered both modern foreign and ancient languages, and some respondents had views on one but not the other.

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.

Appendix A provides a list of the organisations that responded to the consultation.

## **4.1 Assessing new modern foreign language GCSEs**

**Background:** Following our summer 2013 consultation, we announced that GCSE assessments should be by exam, except where essential subject-related skills cannot be assessed in that way. This consultation was on how this principle should be applied to modern foreign and ancient language GCSEs.

We proposed the following in relation to the assessment of new modern foreign language GCSEs:

- The skills of reading and writing should be assessed by written exams, set and marked by the exam boards.
- The listening assessment should be set by the exam boards, sent to schools in an audio format, and marked by the exam boards.
- Speaking skills cannot be assessed by exams. Instead, speaking skills should be assessed using tasks set and marked by the exam boards in ways that address the weaknesses of the current assessments.
- The outcome of the speaking assessment should contribute to the overall grade of the qualification, rather than be reported as a separate grade.

Question 5 of our consultation document was aimed at exploring respondents' views on any considerations that need to be taken into account in order to make sure speaking skills are assessed in a way that is valid, reliable and fair. Question 6 was aimed at exploring respondents' views around any impact that our proposals may have on costs and likely take-up of new modern foreign language GCSEs.

### **Key messages**

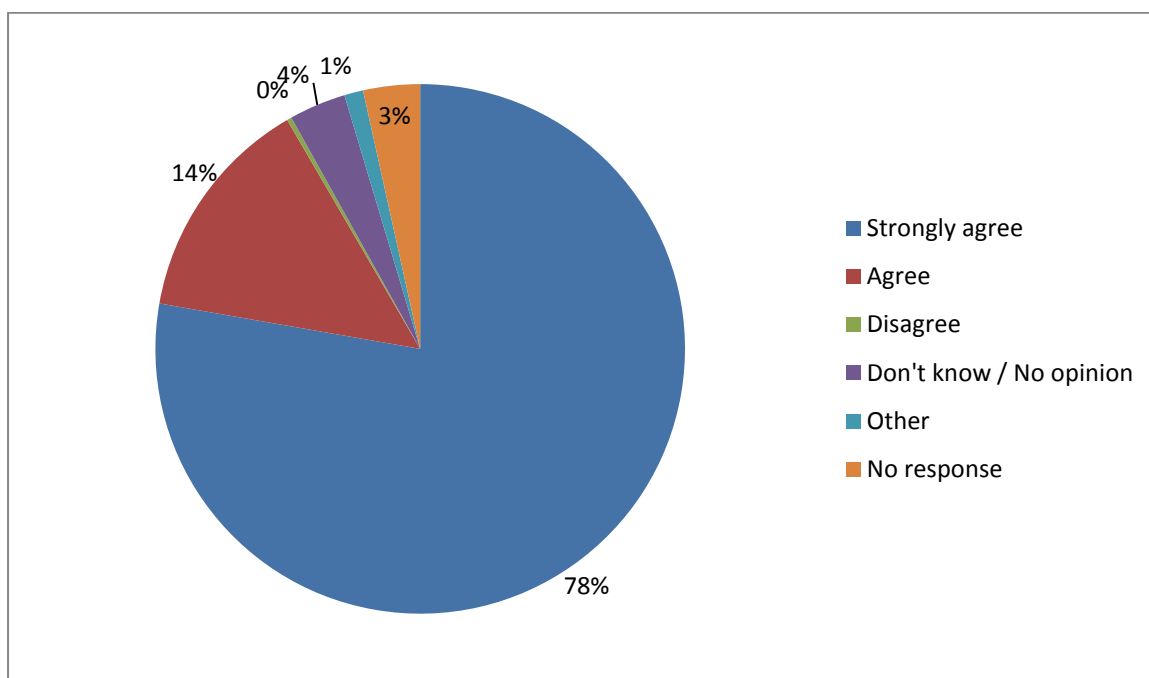
- There was clear support among respondents for the proposals on assessing new modern foreign language GCSEs.

### **Views on the proposal that reading skills should be assessed using exams set and marked by the exam boards. (Question 1)**

There was clear support for the proposal that reading skills should be assessed using exams set and marked by the exam boards, with 96 per cent of those who answered the question supporting the proposal and only one respondent against.

All awarding organisations agreed with the proposal, as did the vast majority of other respondents.

**Figure 5:** Question 1 – Reading skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?



**Figure 6:** Breakdown of question 1 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	12	12	4	269	48	1	0	346	94.9%	0.3%
Individual responses	8	8	3	222	42	1	0	284	95.7%	0.3%
Organisation responses	4	4	1	47	6	0	0	62	91.4%	0.0%
Awarding organisation	0	0	0	3	0	0	0	3	100.0%	0.0%
Other organisations	1	2	1	6	2	0	0	12	72.7%	0.0%
Independent school	3	2	0	22	0	0	0	27	91.7%	0.0%
Academy / State / Other schools	0	0	0	16	4	0	0	20	100.0%	0.0%
Teachers	8	5	3	210	29	0	0	255	96.8%	0.0%
Students / Parents / General public	0	1	0	9	10	1	0	21	90.5%	4.8%
Educational specialists	0	2	0	3	3	0	0	8	75.0%	0.0%

### **Views on the proposal that writing skills should be assessed using exams set and marked by the exam boards. (Question 2)**

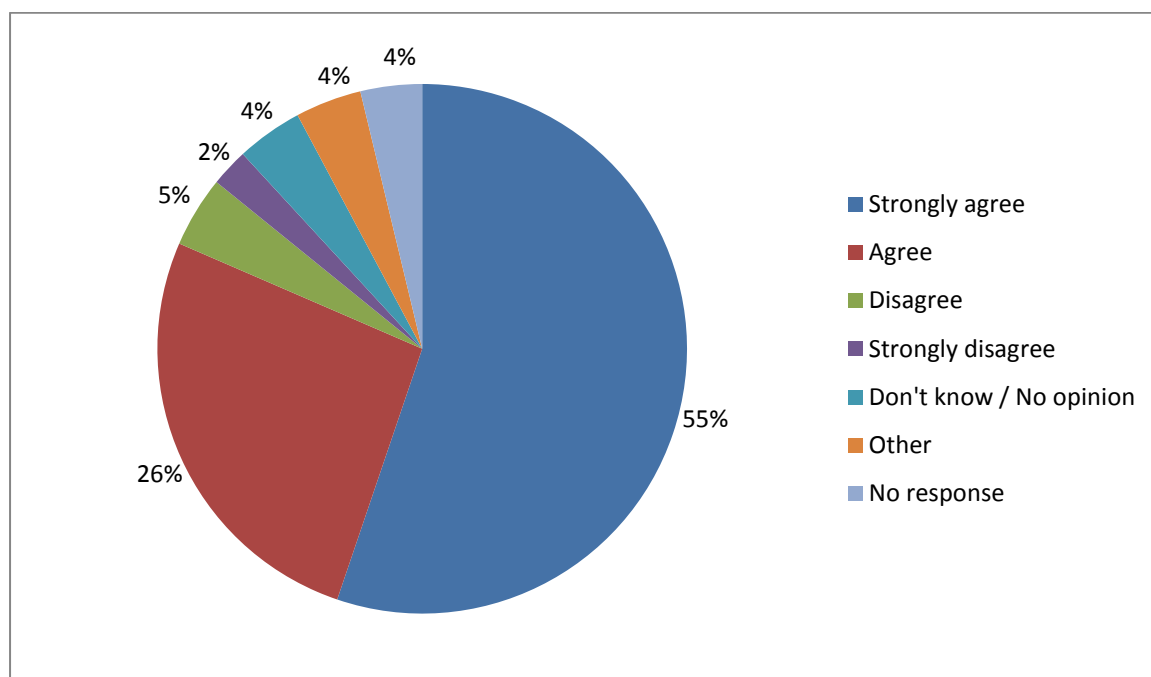
There was clear support for the proposal that writing skills should be assessed using exams set and marked by the exam boards, with 85 per cent of those who answered the question supporting the proposal and only 7 per cent against.

All awarding organisations agreed with the proposal, as did the vast majority of all other respondents.

Those who provided a reason for their agreement stated that they agreed with the removal of controlled assessment, which they felt affected teaching time and led to rote learning and dubious practices within schools. It was also felt that having all candidates taking the same exam would mean that marking and awarding would be fairer, and would reduce the burden on schools. Unseen tasks were also considered to be the best way to test a student's ability.

Those who disagreed with the proposal stated that they felt assessment by examination was artificial. They preferred the choice available under the current system, which encourages student creativity.

**Figure 7:** Question 2 – Writing skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?





**Figure 8:** Breakdown of question 2 by respondent type

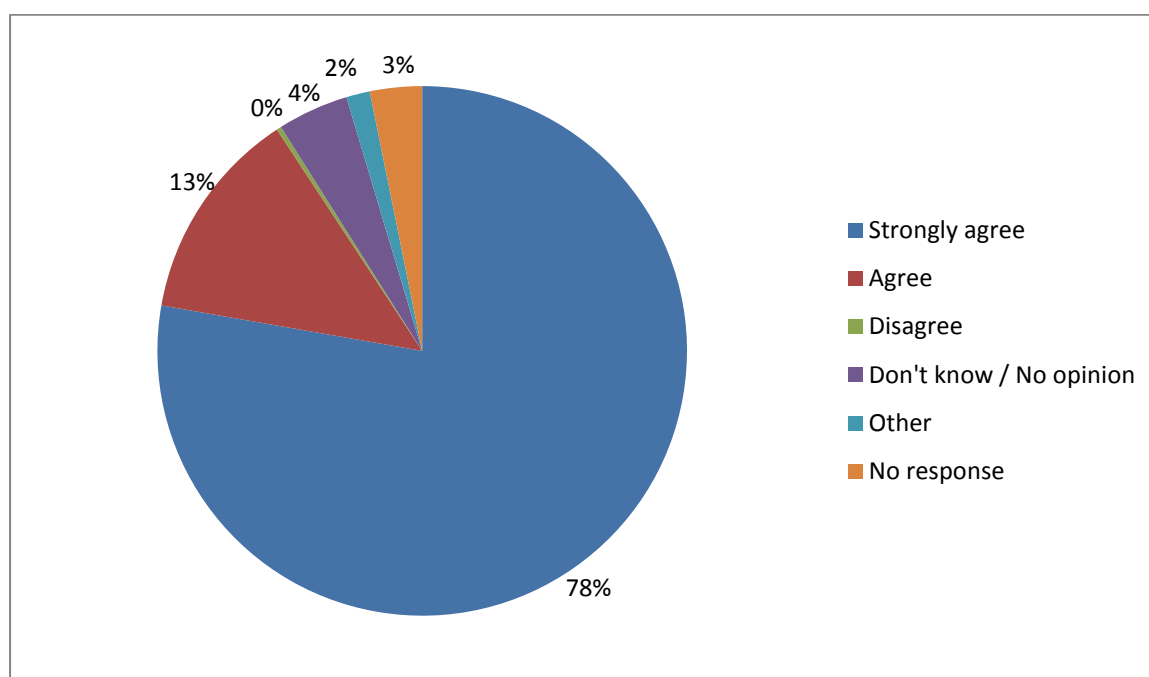
	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	13	14	14	191	91	15	8	346	84.7%	6.9%
Individual responses	11	8	13	151	81	14	6	284	85.0%	7.3%
Organisation responses	4	4	1	40	10	1	2	62	86.2%	5.2%
Awarding organisation	0	0	0	3	0	0	0	3	100.0%	0.0%
Other organisations	1	2	1	5	3	0	0	12	72.7%	0.0%
Independent school	2	2	0	21	1	0	1	27	88.0%	4.0%
Academy / State / Other schools	1	0	0	11	6	1	1	20	89.5%	10.5%
Teachers	8	7	12	140	69	13	6	255	84.6%	7.7%
Students / Parents / General public	1	0	1	8	10	0	0	21	90.0%	0.0%
Educational specialists	2	1	0	3	2	1	0	8	83.3%	16.7%

**Views on the proposal that listening skills should be assessed using exams set and marked by the exam boards. (Question 3)**

There was clear support for the proposal that listening skills should be assessed using exams set and marked by the exam boards, with 94 per cent of those who answered the question supporting the proposal and only one respondent against.

All awarding organisations agreed with the proposal, as did the vast majority of all other respondents.

**Figure 9:** Question 3 – Listening skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?



**Figure 10:** Breakdown of question 3 by respondent type

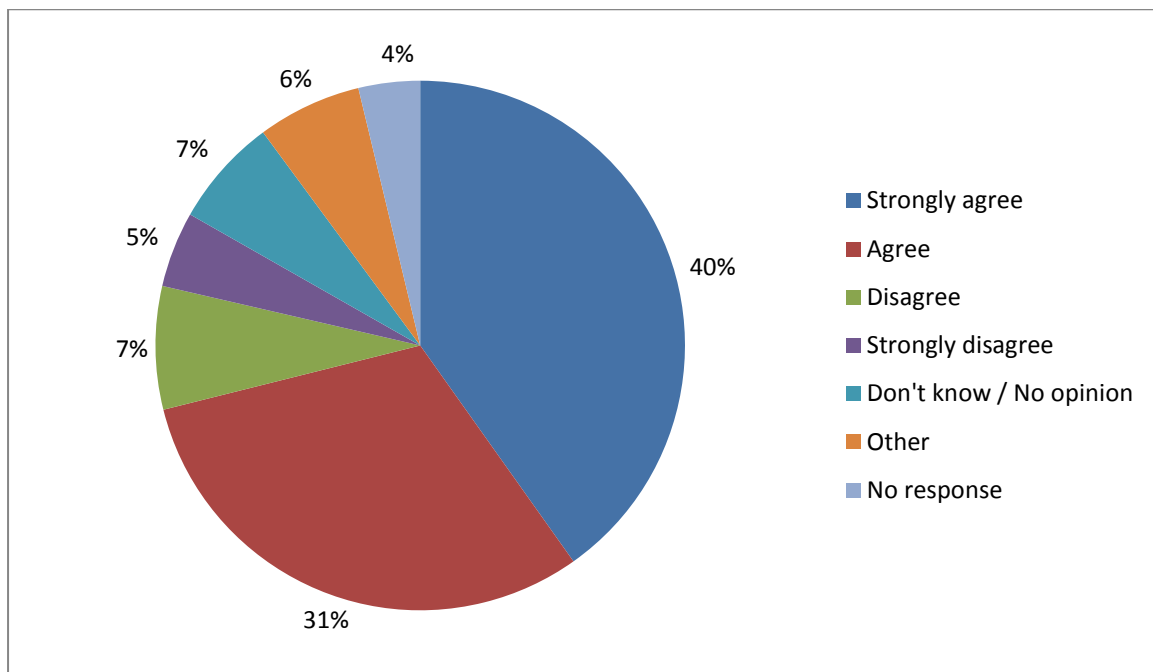
	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	11	15	5	269	45	1	0	346	93.7%	0.3%
Individual responses	8	10	4	220	41	1	0	284	94.6%	0.4%
Organisation responses	3	5	1	49	4	0	0	62	89.8%	0.0%
Awarding organisation	0	0	0	3	0	0	0	3	100.0%	0.0%
Other organisations	1	2	1	6	2	0	0	12	72.7%	0.0%
Independent school	2	3	0	22	0	0	0	27	88.0%	0.0%
Academy / State / Other schools	0	0	0	18	2	0	0	20	100.0%	0.0%
Teachers	8	6	4	207	29	1	0	255	95.5%	0.4%
Students / Parents / General public	0	2	0	9	10	0	0	21	90.5%	0.0%
Educational specialists	0	2	0	4	2	0	0	8	75.0%	0.0%

**Views on the proposal that speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam boards. (Question 4)**

There was clear support for the proposal that speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam boards, with 74 per cent of those who answered the question supporting the proposal and only 13 per cent against.

All awarding organisations agreed with the proposal, as did the majority of all other respondents.

**Figure 11:** Question 4 – Speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam boards. To what extent do you agree or disagree with this statement?



**Figure 12:** Breakdown of question 4 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	13	23	22	139	107	26	16	346	73.9%	12.6%
Individual responses	10	17	18	111	91	21	16	284	73.7%	13.5%
Organisation responses	3	6	4	28	16	5	0	62	74.6%	8.5%
Awarding organisation	0	0	0	2	1	0	0	3	100.0%	0.0%
Other organisations	1	2	1	3	5	0	0	12	72.7%	0.0%
Independent school	2	3	1	15	3	3	0	27	72.0%	12%
Academy / State / Other schools	0	1	2	8	7	2	0	20	75.0%	10.0%
Teachers	10	12	18	106	76	19	14	255	74.3%	13.5%
Students / Parents / General public	0	3	0	4	12	1	1	21	76.2%	9.5%
Educational specialists	0	2	0	1	3	1	1	8	50.0%	25.0%

**Views on the considerations that need to be taken into account to make sure students' speaking skills are assessed in a way that is valid, reliable and fair. (Question 5)**

We received 273 responses in relation to this question. There were 225 personal responses (the majority coming from teachers) and 48 organisation responses, including responses from the three exam boards who responded to the consultation.

The main themes coming from respondents' views have been summarised below under separate headings detailing the considerations to be taken into account to ensure that speaking assessments are valid, reliable and fair.

**Valid**

- There should be an unseen element to the test, which is randomised to ensure validity.
- Unseen material to be developed by senior examiners to ensure comparability across a single series, and across subsequent series.
- There should be common industry standards across exam boards on the length of assessment, preparation and supervision requirements.
- Tests should reward genuine spontaneous conversation.
- Marking should be conducted externally and be rigorously monitored.
- Topics should be both useful and interesting, with a mix of functional, transactional language, presentation and conversation.

- Speaking assessments should be conducted by teachers as this will make students more comfortable.
- Orals should be recorded, with a signed declaration by teacher and pupil that regulations have been adhered to.
- Interaction and fluency should be weighted more highly than accuracy as this better reflects real-life communication.
- Speaking assessments should be filmed rather than merely audio-recorded as this will show whether additional materials were taken into the examination and whether visual clues were given to the student.
- There should be clear time limits in place.
- Any preparation time given to students once topics are known should be under controlled conditions.

### **Reliable**

- Marking should be conducted by external examiners, and should be conducted without knowledge of the candidate's or centre's identity.
- Controlled assessment should be avoided as this leads to high numbers of grade adjustments.
- Prior choice of topic for a candidate would reduce the amount of stress that a candidate suffers, and which can lead to unreliable results.
- It is important that exam boards follow the same guidance in relation to the timing for preparation, assessment, number of tasks set and the amount of prior knowledge given to learners and teachers regarding the content of the speaking assessment.
- Once the teacher conducting the speaking assessment has seen the assessment, they should not be allowed to teach the class again.
- There should be more than one speaking assessment as a single assessment may not give a true indication of a candidate's ability.

## **Fair**

- Marking should be conducted by external examiners.
- The assessment should assess the full attainment range. There must be opportunities for weaker students to demonstrate knowledge and understanding, as well as opportunities for stronger students to be stretched.
- Eliminate teacher / student choice beforehand and any other opportunities to pre-prepare or over-prepare.
- Tasks should be clear, with transparent mark schemes.
- There should be a shorter test window, with papers only being released to centres 48 hours before the speaking assessment is to be taken.
- There should be a form to complete at the start of the speaking assessment indicating whether the candidate is a native speaker.

## **Views on how any aspects of the proposed assessment requirements might impact on the costs, and likely take-up of new modern foreign language GCSEs. (Question 6)**

We received 258 responses in relation to this question. There were 213 personal responses (the majority coming from teachers) and 45 organisation responses, including responses from the three exam boards who responded to the consultation.

The main themes coming from respondents' views have been summarised below under separate headings detailing how the proposed assessment requirements might impact on costs and likely take-up of new modern foreign language GCSEs.

### **Impact on costs**

- Exam boards will be required to employ examiners to mark every speaking assessment, whereas at present they employ examiners to moderate only a sample of work from each centre. This is likely to increase running costs for modern foreign language GCSEs, which will need to be passed on.
- If exam boards are required to provide examiners to conduct speaking assessments, this will lead to a large increase in running costs for modern foreign language GCSEs.
- The setting costs for speaking and writing assessments will increase as assessments would need to be set on an annual basis.
- Should tiering be required for all modern foreign language GCSE subjects, this will increase the number of external papers to be set (in some cases doubling

the provision). This will lead to an increase in running costs for modern foreign language GCSEs.

- As with any reformed qualification, training will have some cost implications for schools.
- Schools will save resources as teachers will no longer be required to mark speaking assessments.
- Students will only have to complete one speaking assessment rather than two, which means that schools will require fewer resources to run modern foreign language GCSEs.
- The use of technology to record speaking assessments will have some cost implications for schools.<sup>9</sup>

### **Impact on take-up**

- Changes to the curriculum, so that more questions will be asked in the foreign language and the subject will become more demanding, are likely to have a negative impact on take-up.
- With the changes to the curriculum, schools may market the qualifications to only higher-ability candidates, thus reducing take-up of modern foreign language GCSEs.
- The move to a written exam may impact negatively on take-up as exams are not popular with all students.
- If the costs of entering students for modern foreign language GCSEs increase, this may lead to schools not promoting these subjects and thus there would be a negative impact on take-up.
- If external examiners conduct speaking assessments, students may be afraid to enter for the qualification, which could impact negatively on take-up.
- As schools would require fewer resources to run modern foreign language GCSEs, this may encourage take-up.
- Changes to the curriculum could mean that modern foreign language GCSEs are viewed in a more positive light by schools and they may thus promote take-up of the qualifications.

---

<sup>9</sup> Note that schools are already required to record speaking assessments.

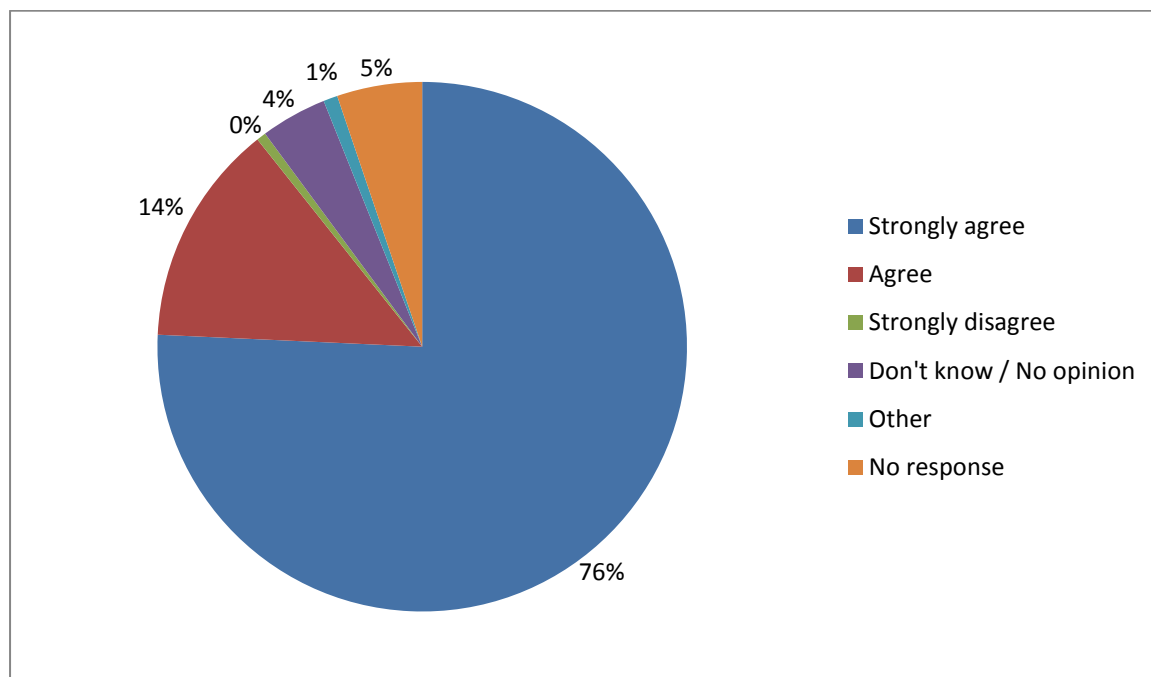
- The move away from controlled assessments will lead to increased teaching time in schools, and more interest in the subject, as controlled assessments are not popular with students, which could positively impact on take-up.
- The introduction of tiering for all modern foreign language GCSEs may lead to increased take-up in certain subjects.

**Views on the proposal that the outcome of the speaking component should contribute to a student’s overall grade. (Question 7)**

There was overall agreement with the proposal that the outcome of the speaking component should contribute to a student’s overall grade, with 94 per cent of those who answered the question agreeing with the proposal and only two respondents disagreeing.

All awarding organisations agreed with the proposal, as did the vast majority of all other respondents.

**Figure 13:** Question 7 – The outcome of the speaking component should contribute to a student’s overall grade. To what extent do you agree or disagree with this statement?





**Figure 14:** Breakdown of question 7 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	18	14	3	262	47	0	2	346	94.2%	0.6%
Individual responses	12	10	3	215	42	0	2	284	94.5%	0.7%
Organisation responses	6	4	0	47	5	0	0	62	92.9%	0.0%
Awarding organisation	0	0	0	3	0	0	0	3	100.0%	0.0%
Other organisations	2	2	0	7	1	0	0	12	80.0%	0.0%
Independent school	4	2	0	19	2	0	0	27	91.3%	0.0%
Academy / State / Other schools	0	0	0	18	2	0	0	20	100.0%	0.0%
Teachers	12	7	3	195	36	0	2	255	95.1%	0.8%
Students / Parents / General public	0	1	0	14	6	0	0	21	95.2%	0.0%
Educational specialists	0	2	0	6	0	0	0	8	75.0%	0.0%

## **4.2 Tiering of new modern foreign language GCSEs**

**Background:** On 1st November 2013, we announced that new GCSEs should be tiered only when a single set of assessments cannot in a valid and manageable way assess students across the full ability range. This consultation was on how this principle should be applied to modern foreign and ancient language GCSEs.

We proposed the following in relation to the tiering of new modern foreign language GCSEs:

- All assessments (for reading, writing, speaking and listening) in all new modern foreign language GCSEs should be tiered.
- Students should take assessments for one tier or another. Mixed-tier entries should be prohibited.
- For the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation- and higher-tier assessments.

Question 12 was aimed at exploring respondents' views on whether there were any further considerations on the tiering of new modern foreign language GCSEs.

### **Key messages**

- There was clear support for the proposal that all assessments (for reading, writing speaking and listening) should be tiered.
- There was support for the proposal that all new modern foreign language GCSEs should be tiered, although some concern was expressed by a number of respondents over how this requirement may affect the viability of some lower-entry subjects.
- There was a high level of disagreement with the proposal that mixed-tier entries should be prohibited. However, exam boards were on the whole in support of the proposal.
- There was support for the proposal that for the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation- and higher-tier assessments.

**Views on the proposal that all assessments (reading, writing, listening and speaking) in new modern foreign language GCSEs should be tiered. (Question 8)**

There was general agreement with the proposal that all assessments in new modern foreign language GCSEs should be tiered, with 69 per cent of those who answered supporting the proposal and only 21 per cent against.

Two of the three awarding organisations who responded to the consultation (AQA and Pearson) agreed with this proposal. AQA confirmed that for assessments to be optimal in terms of validity and reliability, they must be targeted around the level of the ability of the students taking the tests. Pearson confirmed that modern foreign language assessment is largely differentiated by task, and that tiering would allow students of all abilities to access questions without overburdening the assessment.

OCR disagreed with the proposal on the basis that it would be unnecessary for speaking tests, where differentiation by outcome means that the same tasks could be set for all candidates. OCR also raised concerns that requiring tiering for all new modern foreign language GCSEs could lead to lower-entry languages becoming financially unviable. However, OCR did recognise that two sets of assessments are preferable to allow both the most and least able students to demonstrate their abilities.

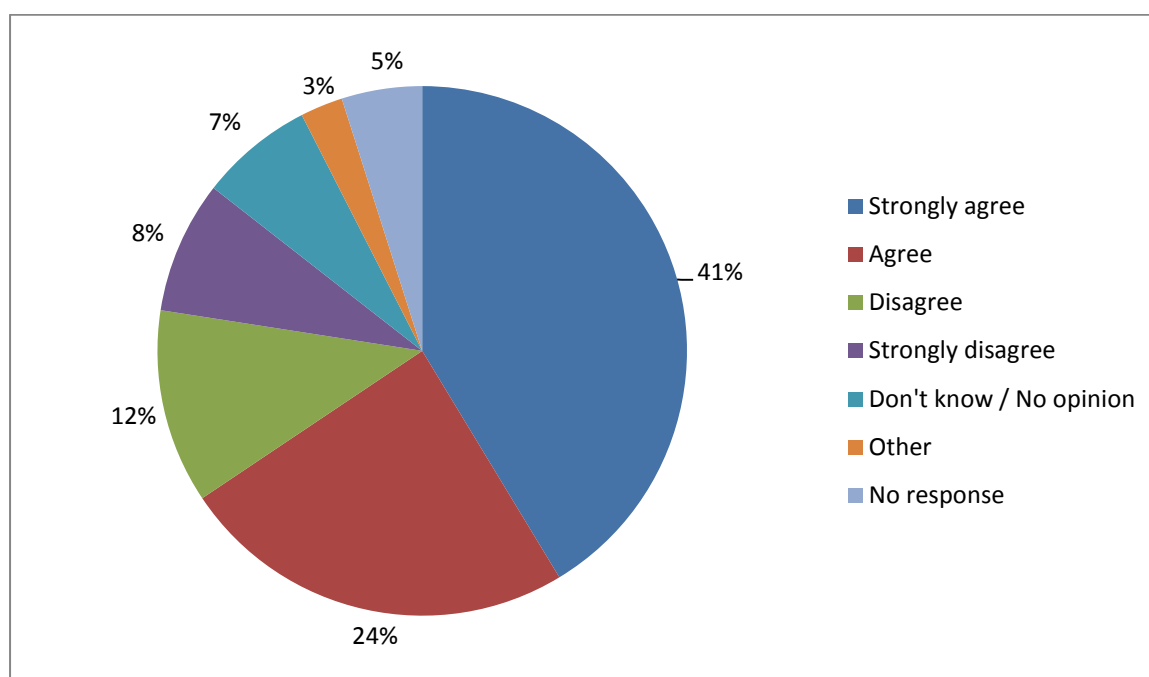
Many of the other respondents who were in agreement with the proposal confirmed that they felt tiering for all new modern foreign language GCSEs would make the qualifications accessible to students of all abilities, and that setting a single paper for all abilities would be impossible. Others raised the argument that not allowing tiering could affect the potential take-up of languages that can be seen as a hard option.

Those who disagreed with the proposal argued that offering candidates the opportunity to enter for a foundation tier limits their potential achievement. Additionally, it was argued that for borderline candidates it is difficult to decide which tier to enter them for, and that this can lead to their achievement being capped. Another argument raised was that both writing and speaking assessments can be differentiated by outcome rather than by task, and so should not be tiered.

**Suggested alternative approaches to the proposal**

- All students sit the foundation tier, and then those who wish to can go on to sit a higher-tier extension paper.
- One exam that gives students the opportunity to answer higher- or foundation-tier questions depending on their abilities.

**Figure 15:** Question 8 – All assessments (reading, writing, listening and speaking) in new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?



**Figure 16:** Breakdown of question 8 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	17	24	9	143	84	41	28	346	69.0%	21.0%
Individual responses	12	19	8	118	68	34	25	284	68.4%	21.7%
Organisation responses	5	5	1	25	16	7	3	62	71.9%	17.5%
Awarding organisation	0	0	0	2	0	1	0	3	66.7%	33.3%
Other organisations	2	3	0	1	4	2	0	12	50.0%	20.0%
Independent school	3	2	1	11	8	2	0	27	79.2%	8.3%
Academy / State / Other schools	0	0	0	11	4	2	3	20	75.0%	25.0%
Teachers	12	14	7	110	62	31	19	255	70.8%	20.6%
Students / Parents / General public	0	3	1	6	5	3	3	21	52.4%	28.6%
Educational specialists	0	2	0	2	1	0	3	8	37.5%	37.5%

**Views on the proposal that all available new modern foreign language GCSEs should be tiered. (Question 9)**

There was general agreement with the proposal that all available new modern foreign language GCSEs should be tiered, with 64 per cent supporting the proposal and only 19 per cent against.

However, only one out of the three awarding organisations who responded to the consultation (Pearson) agreed with this proposal. Pearson argued that assessment is largely differentiated by task and that, for all new modern foreign languages, tiering would allow students of all abilities to access questions without overburdening the assessment. However, Pearson did recognise that some modern foreign languages attract a much smaller cohort than other languages and that a foundation tier may not be necessary for these subjects.

AQA and OCR both disagreed with this proposal. AQA confirmed that the entry profiles for low-entry languages are different than for the mainstream languages of French, German and Spanish. Many candidates have some pre-existing connection with the language, and thus the level of ability and understanding of the students taking the tests tends to differ. AQA confirmed that entries for foundation tier in low-entry languages tend to be small, and that around 20 per cent of those who take the foundation tier in these languages achieve a C, indicating that they could have performed well on the higher-tier paper anyway. AQA stated that tiered examinations are more costly for exam boards, and that a requirement for all languages, including low-entry languages, to be tiered is likely to threaten future provision. OCR also raised this argument.

The Japan Foundation echoed AQA's and OCR's concerns that the introduction of tiering for all new modern foreign languages could lead to a reduction in the number of languages offered, and argued for the retention of languages rather than tiering if this was the case. This argument was also supported by a number of other respondents.

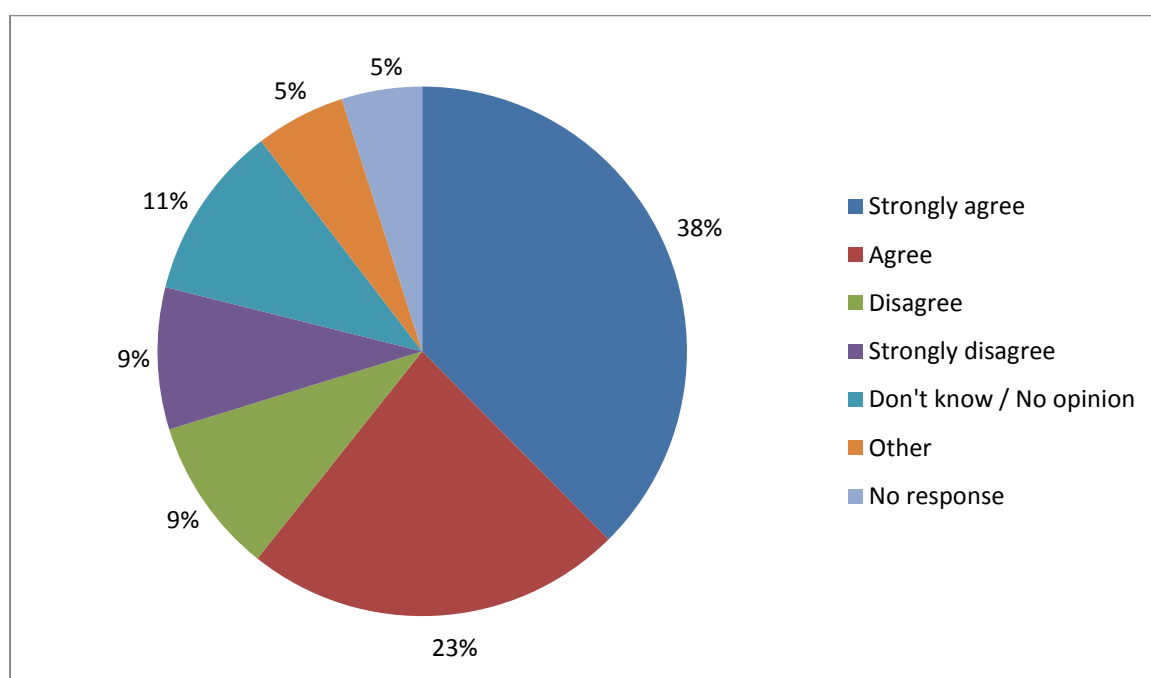
Respondents who agreed with the proposals commented that it is important for all available new modern foreign language GCSEs to be tiered on the basis that this makes them accessible for students of all abilities. Another argument was that it would be impossible to set a single paper for candidates of all abilities. Others commented that they felt tiering in all languages could encourage take-up of lower-entry languages. A number of respondents commented that they felt the same rules should apply to all languages.

Those who disagreed with the proposal argued that offering candidates the opportunity to enter for a foundation tier limits their potential achievement. Additionally, it was argued that for borderline candidates it is difficult to decide which tier to enter them for, and that this can lead to their achievement being capped.

### **Suggested alternative approaches to the proposal**

- Speaking and writing should be assessed on the same paper as differentiation tends to be by outcome and not task for these skills.
- One exam that gives students the opportunity to answer higher- or foundation-tier questions depending on their abilities.
- First-language and second-language exams should be distinguished (similar to Welsh).

**Figure 17:** All available new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?



**Figure 18:** Breakdown of question 9 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	17	37	19	130	80	33	30	346	63.8%	19.1%
Individual responses	11	31	17	108	63	29	25	284	62.6%	19.8%
Organisation responses	6	6	2	22	17	4	5	62	69.6%	16.1%
Awarding organisation	0	0	0	0	1	1	1	3	33.3%	66.7%
Other organisations	2	3	0	1	6	0	0	12	70.0%	0.0%
Independent school	4	2	1	10	7	2	1	27	73.9%	13.0%
Academy / State / Other schools	0	1	1	11	3	1	3	20	70.0%	20.0%
Teachers	11	25	16	100	58	27	18	255	64.8%	18.4%
Students / Parents / General public	0	4	1	5	5	2	4	21	47.6%	28.6%
Educational specialists	0	2	0	3	0	0	3	8	37.5%	37.5%

### Views on the proposed requirement for students to enter for either higher-tier or foundation-tier assessments, but not a combination of the two. (Question 10)

As shown in figures 19 and 20, the majority of respondents to this question (74 per cent) disagreed with the proposal that students should be required to enter for either higher-tier or foundation-tier assessments but not a combination of the two. Only 15 per cent of respondents agreed with the proposal and 12 per cent offered a 'don't know / no opinion' or 'other' response.<sup>10</sup>

The different groups expressed a range of views. Awarding organisations were the only group who supported the proposition (two in favour, with one not expressing an opinion), but the views of students was evenly split with 40 per cent in favour and 40 per cent against the proposal.

<sup>10</sup> Inconsistencies have arisen here due to rounding. Data reported in the table are reported to one decimal place. However, when discussing the data in the narrative section, this is rounded correctly to the nearest whole number (that is, the percentage disagreeing with the proposal in the table was 73.5 per cent, but this is rounded to 74 per cent; the percentage agreeing with the proposal in the table was 14.6 per cent, but this is rounded to 15 per cent; and the percentage of 'don't know / no opinion' and 'other' responses is calculated from figures in the table at 11.9 per cent, which is rounded to 12 per cent – leaving a rounded total of 101 per cent). Throughout this report, we use the precise values and round correctly, even when this results in inconsistencies like the one above.

Of the 241 responses that disagreed with the proposal, 79 per cent were from teachers. The majority of respondents did not provide a reason behind their disagreement with the proposal (74 per cent).

We received 91 free-text responses to this question from individuals and organisations. Of these responses, 58 raised similar arguments against the proposal based upon the view that the various skills required in order to learn a language develop in learners at different rates and that therefore learners often perform at different levels across the four skills. Respondents believed that allowing learners to choose the tier they viewed as most appropriate given their strengths and weaknesses would allow them to achieve the result that reflects their real abilities. Others commented that the proposal may have a disproportionate effect on students with special education needs or learning disabilities for the same reason.

### **Other arguments raised against the proposal**

- Allowing mixed-tier entry could encourage the take-up of modern foreign languages as students would not be put off studying a language when they find one skill to be particularly difficult.
- Were mixed-tier entries no longer available, teachers would be likely to err on the side of caution when entering students and this could act to cap student achievement.
- The availability of two short courses was not seen to account for the different learning and achievement profiles presented within the classroom as the current short courses do not allow for the various combinations of skills required by different students to be studied at the appropriate levels. The short course was also not seen as a viable alternative to a full GCSE.
- Although the number of students entering for mixed tiers is currently low, it was felt that this may increase as speaking and writing become terminal exams. This view was reflected by Pearson in its response.

A number of comments confirmed the view that the current system in terms of mixed-tier entry works well and should not be changed. However, some argued for even greater flexibility in terms of entry dates to allow decisions for individual students to be taken as late as possible. This would give students the opportunity to develop as far as they are able when the decision is made.

As stated above, the awarding organisations that responded to the consultation were overall in favour of the proposal to not allow students to enter for mixed tiers.



### **Issues raised by awarding organisations in support of the proposal**

- AQA considered that allowing students to mix tiers would necessitate the use of uniform marks, which is liable to compress the marks in some parts of the range and magnify them in others. This would mean that marks may have a different value in different parts on the range and compensation between the various components may be distorted. AQA argued that the aggregation of raw marks avoids distortion and is more transparent to both centres and students.
- Of those who enter for a combination of tiers, the great majority perform well enough in the foundation-tier assessment to suggest that they had the knowledge and skills expected of students taking the higher tier.
- OCR felt that mixed tiering was not necessary, as long as the grade overlap was sufficient – a view that was supported by one centre in its response.
- Although Pearson did not provide an opinion on the proposal, it did confirm that it felt that mixed-tier entry can have an adverse effect on student achievement as students may be persuaded to enter for lower tiers on components assumed to be of greater difficulty, such as speaking.
- Pearson also confirmed that at present, very few candidates (only around 10 per cent of its entry) are entered for mixed tiers.

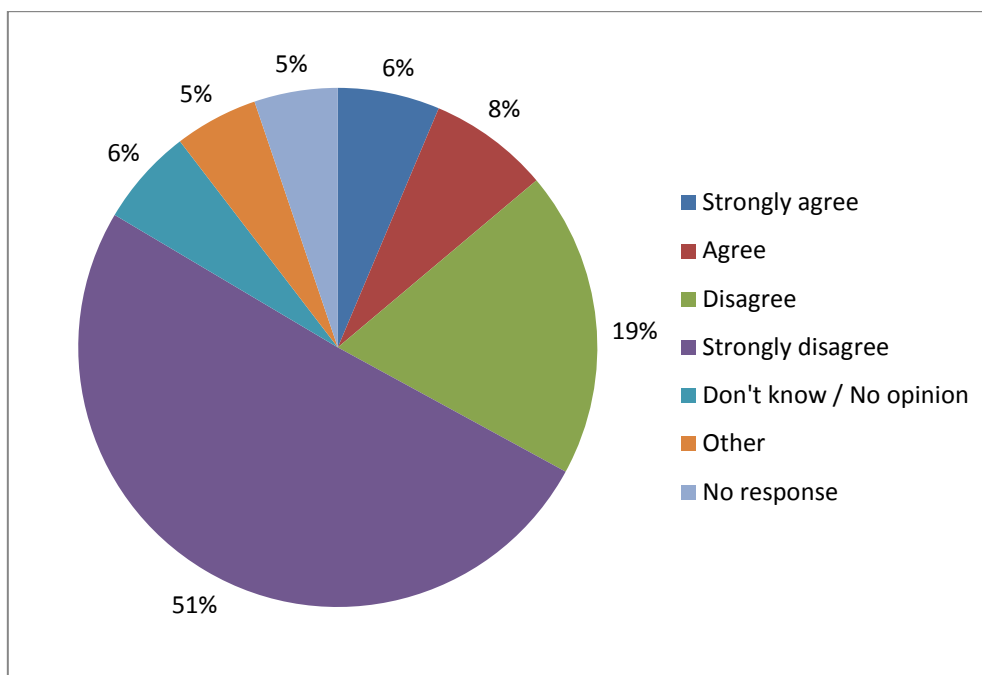
### **Other arguments raised in favour of the proposal**

- Imposing the same level of assessment in all skills makes the overall grading more reliable.
- The availability of two short-course GCSEs would mean that candidates who have a preferred combination of skills will be able to take qualifications that allow them to demonstrate their abilities.
- Allowing mixed tiers encourages low achievement as it gives children the opportunity to avoid putting effort into developing the skills that they find more challenging.
- Tiering presents difficulties for teachers in terms of teaching, resources and the timing of decision-making for entry purposes in relation to particular students.

### Suggested alternative approaches to the proposal

- Offering just one exam that gets progressively harder, so that students are judged on what they can do and all are offered the same opportunities to achieve. This would allow students to be entered for both tiers in each skill and would separate out all of the individual language skills.<sup>11</sup>

**Figure 19:** Question 10 – Students should be required to enter for either higher- or foundation-tier assessments but not a combination of the two. To what extent do you agree or disagree with this statement?



---

<sup>11</sup> One respondent suggested the Asset languages qualifications as a good example of this.

**Figure 20:** Breakdown of question 10 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	18	21	18	22	26	66	175	346	14.6%	73.5%
Individual responses	13	14	17	18	15	58	149	284	12.2%	76.4%
Organisation responses	5	7	1	4	11	8	26	62	26.3%	59.6%
Awarding organisation	0	1	0	0	2	0	0	3	66.7%	0.0%
Other organisations	2	3	0	0	2	2	3	12	20.0%	50.0%
Independent school	3	3	1	3	5	4	8	27	33.3%	50.0%
Academy / State / Other schools	0	0	0	1	2	2	15	20	15.0%	85.0%
Teachers	13	10	15	16	10	52	139	255	10.7%	78.9%
Students / Parents / General public	0	1	2	1	5	6	6	21	28.6%	57.1%
Educational specialists	0	3	0	1	0	0	4	8	12.5%	50.0%

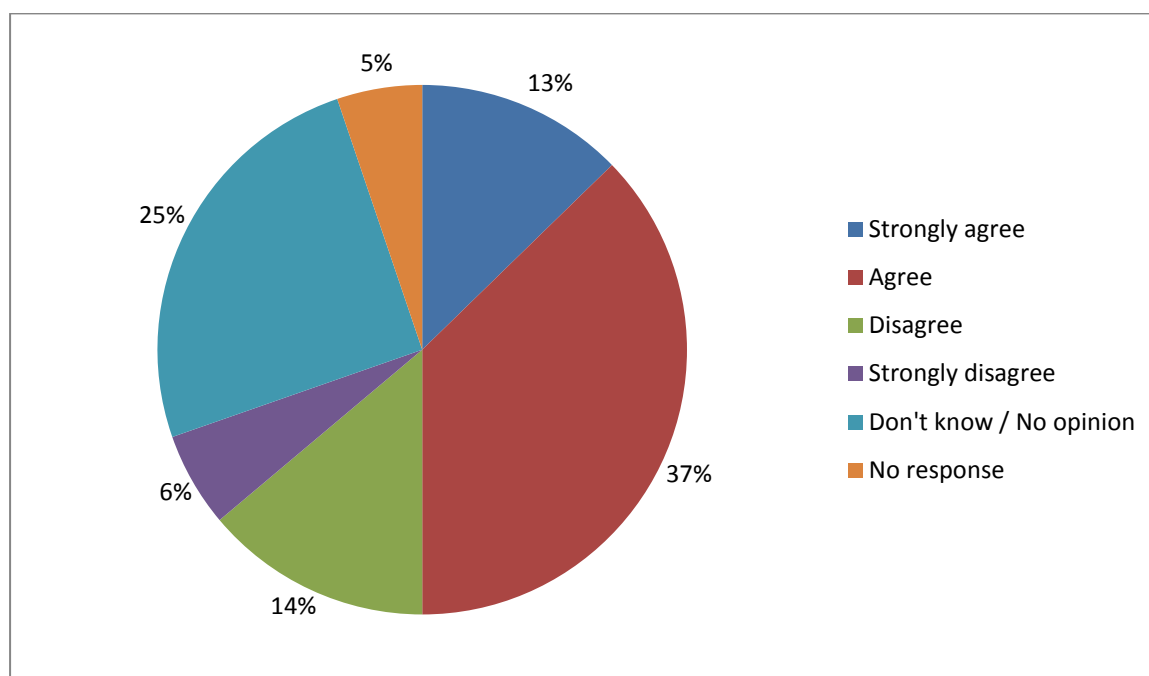
**Views on the proposal that for the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation- and higher-tier assessments. (Question 11)**

Over half (53 per cent) of the respondents supported the proposal that for the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to common questions on both the foundation- and higher-tier assessments. Twenty-one per cent of respondents were against the proposal, with the rest either not responding or stating that they had no opinion on the matter. The groups were in the main similarly split.

Points raised in favour of the proposal included the fact that the overlap would make teaching and learning easier, and that the amount of overlap seemed appropriate.

However, both Pearson and OCR disagreed with the proposal. Pearson commented that a 40 per cent overlap would be required in order to correlate between the tiers with a low equating error. OCR argued for the speaking test to be untiered as it would enable differentiation by outcome rather than by task.

**Figure 21:** Question 11 – For the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation- and higher-tier assessments. To what extent do you agree or disagree with this statement?



**Figure 22:** Breakdown of question 11 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	18	87	0	44	129	48	20	346	52.7%	20.7%
Individual responses	13	69	0	40	106	38	18	284	53.9%	20.7%
Organisation responses	5	18	0	4	23	10	2	62	47.4%	21.1%
Awarding organisation	0	0	0	0	1	2	0	3	33.3%	66.7%
Other organisations	2	5	0	0	5	0	0	12	50.0%	0.0%
Independent school	3	5	0	2	11	5	1	27	54.2%	25.0%
Academy / State / Other schools	0	8	0	2	6	3	1	20	40.0%	20.0%
Teachers	13	55	0	38	101	33	15	255	57.4%	19.8%
Students / Parents / General public	0	12	0	1	4	3	1	21	23.8%	19.0%
Educational specialists	0	2	0	1	1	2	2	8	25.0%	50.0%

## **Details of any further views respondents had in relation to the tiering of modern foreign language GCSEs. (Question 12)**

We received 161 responses in relation to this question. There were 134 personal responses (the majority coming from teachers) and 27 organisation responses.

### **Main themes from respondents' views**

- Since the reduction in the availability of alternatives, GCSEs are now largely the only qualifications used by centres. Tiering is therefore very important as modern foreign language GCSEs must be accessible to a broader range of learner abilities.
- Availability of tiered modern foreign language GCSEs is likely to increase take-up of the subjects.
- Although tiering is important for the accessibility and take-up of the qualification, there is a concern that this could lead to a reduction in the number of lower-entry languages available, which would be undesirable.
- Low-entry languages should remain untiered for costs reasons and because they cater to a different market (normally existing language users).
- Teachers find it difficult to select the correct tier for a candidate. They have to weigh up the risk of capping a student's achievement with a foundation-tier paper against the fact that the student could be put off by the higher tier paper and perform worse than they would have done on the foundation tier.
- Mixed-tier entry should be available as this gives students greater flexibility and the opportunity to demonstrate their true language ability.
- Not allowing mixed-tier entry would disproportionately impact on students with disabilities.
- Speaking and writing assessments should not be tiered as differentiation by outcome is possible in relation to these skills.
- More consideration should be given to the overlap grades as currently the highest mark available on the foundation paper is a C, which is hard to achieve because of the way that the qualification is graded.
- Intermediate tiering should be brought back.
- Tiering should be replaced by a single paper that gets progressively harder, so that students are judged on what they can do and all are offered the same opportunities to achieve. This would allow students to be entered for both tiers in each skill and would separate out all of the individual language skills.

- Tiering should be replaced by a single foundation paper sat by all candidates, with a further higher-tier paper available for candidates who are able or who wish to test themselves further.

### **4.3 Assessing new ancient language GCSEs**

**Background:** Following our summer 2013 consultation, we announced that GCSE assessments should be by exam, except where essential subject-related skills cannot be assessed in that way. This consultation was on how this principle should be applied to modern foreign and ancient language GCSEs.

We proposed the following in relation to the assessment of new ancient language GCSEs:

- Ancient language GCSEs will be assessed by examinations only.

#### **Key messages**

- There was support among respondents for the proposal.

#### **Views on the proposal that new GCSEs in ancient languages should be assessed wholly by examination. (Question 13)**

Of those who responded to this question, 53 per cent of respondents agreed with the proposal that new GCSEs in ancient languages should be assessed wholly by examination, 6 per cent were against and the remaining 41 per cent provided a 'don't know / no opinion' or 'other' response.

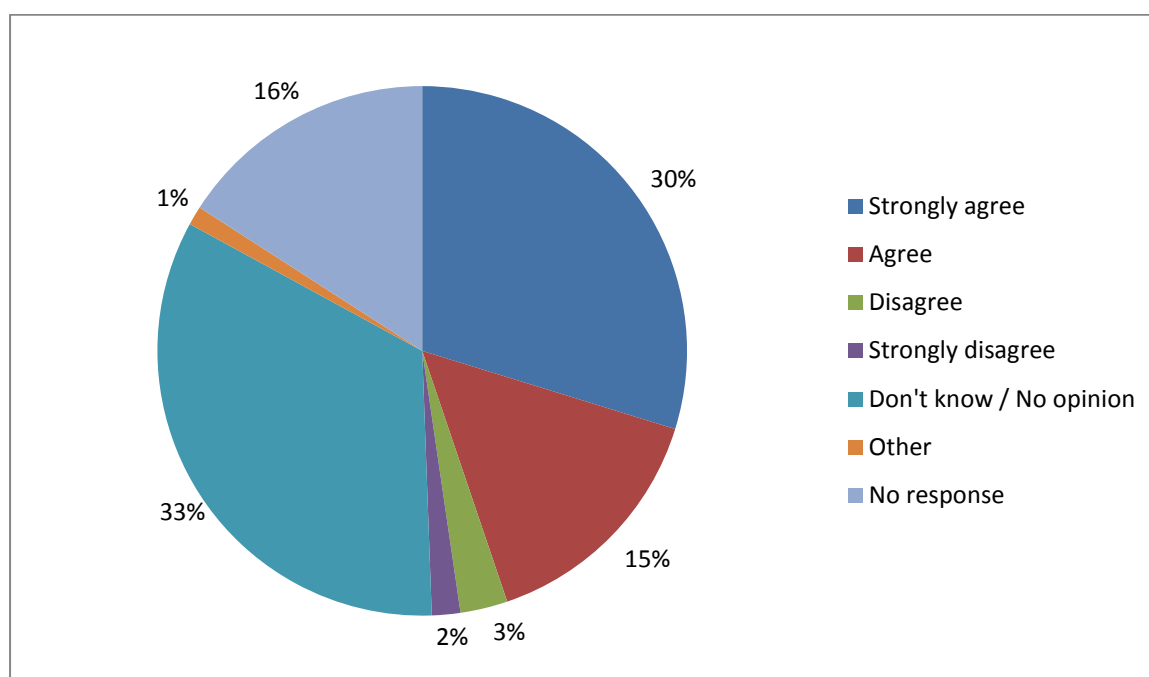
OCR, the only exam board to offer GCSEs in ancient languages, agreed with the proposal, commenting that the current arrangements work well.

Many of the respondents who were in favour of the proposal argued that assessment by examination was the fairest, most consistent and objective way to measure performance in ancient languages. Others commented that assessment by examination prepares students better for the rigour of A levels in these subjects.

#### **Suggested alternative approaches to the proposal**

- The Joint Association of Classical Teachers commented that a coursework or controlled assessment element to the course would be welcomed and may make GCSEs in ancient languages more attractive for some schools, increasing the variety of schools offering the qualification. Other respondents made similar arguments.

**Figure 23:** Question 13 – New GCSEs in ancient languages should be assessed wholly by examination. To what extent do you agree or disagree with this statement?



**Figure 24:** Breakdown of question 13 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	55	116	4	103	52	10	6	346	53.3%	5.5%
Individual responses	44	98	2	78	46	10	6	284	51.7%	6.7%
Organisation responses	11	18	2	25	6	0	0	62	60.8%	0.0%
Awarding organisation	1	1	0	1	0	0	0	3	50.0%	0.0%
Other organisations	0	2	2	6	2	0	0	12	66.7%	0.0%
Independent school	7	7	0	11	2	0	0	27	65.0%	0.0%
Academy / State / Other schools	3	8	0	7	2	0	0	20	47.1%	0.0%
Teachers	39	95	2	70	36	8	5	255	49.1%	6.0%
Students / Parents / General public	5	2	0	5	6	2	1	21	68.8%	18.8%
Educational specialists	0	1	0	3	4	0	0	8	87.5%	0.0%



## **4.4 Tiering of new ancient language GCSEs**

**Background:** On 1st November 2013, we announced that new GCSEs should be tiered only when a single set of assessments cannot in a valid and manageable way assess students across the full ability range. This consultation was on how this principle should be applied to modern foreign and ancient language GCSEs.

We proposed the following in relation to the tiering of new ancient language GCSEs:

- New GCSEs in ancient languages should not be tiered.

### **Key messages**

- Respondents who provided a response that agreed or disagreed with the proposal were split almost equally.
- OCR, the only exam board to offer GCSEs in ancient languages supported the proposal not to tier the new ancient language GCSEs on the basis that entry was only small and that the new GCSEs must not be prohibitively expensive to run.
- Arguments against the proposal included that tiering in new ancient language GCSEs would be important to retain accessibility for all students and to encourage take-up of ancient language GCSEs.

### **Views on the proposal that new ancient language GCSEs should not be tiered. (Question 14)**

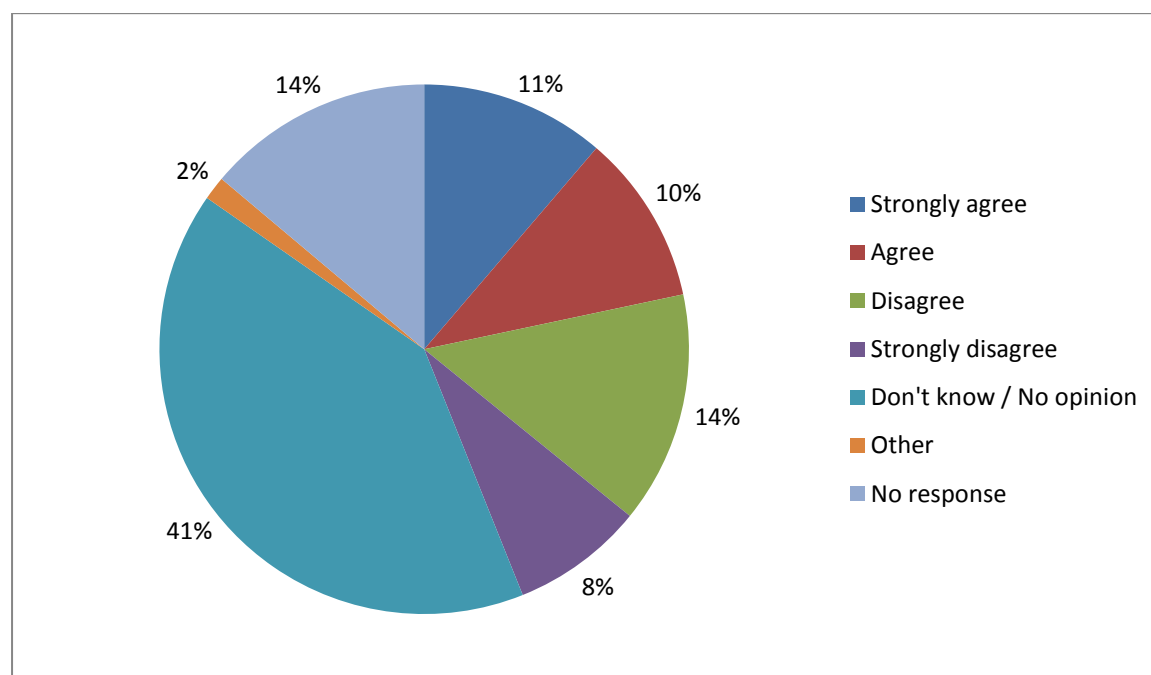
Of those who responded to this question, 47 per cent provided a 'don't know / no opinion' response to the proposal that new ancient language GCSEs should not be tiered. Of those who substantively responded, 25 per cent agreed with the proposal and 26 per cent were against.

OCR, the only exam board to respond to this question, confirmed that it supported the proposal not to tier new ancient language GCSEs on the basis that the entry was only small and that the new GCSEs must not be prohibitively expensive to run. Other respondents agreed with this argument. They additionally commented that the number of entries for the foundation tier in ancient languages was only small and that the nature of the subjects meant that they tended to attract the higher-ability candidates.

Arguments against the proposal included a response from the Joint Association of Classical Teachers confirmed that tiering in new ancient language GCSEs would be important in order to retain accessibility for all students and to encourage take-up of ancient language GCSEs.

Other arguments against the proposal included reference to the success of tiering in Latin. Eight respondents commented that all languages should be treated in the same way because the nature of the skills involved means that one exam could not be set for all abilities.

**Figure 25:** New ancient language GCSEs should not be tiered. To what extent do you agree or disagree with this statement?



**Figure 26:** Breakdown of question 14 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	48	141	5	39	36	49	28	346	25.2%	25.8%
Individual responses	39	121	4	30	30	41	19	284	24.5%	24.5%
Organisation responses	9	20	1	9	6	8	9	62	28.3%	32.1%
Awarding organisation	1	1	0	0	1	0	0	3	50.0%	0.0%
Other organisations	0	3	1	2	3	2	1	12	41.7%	25.0%
Independent school	4	8	0	3	2	4	6	27	21.7%	43.5%
Academy / State / Other schools	4	8	0	4	0	2	2	20	25.0%	25.0%
Teachers	34	114	3	25	26	38	15	255	23.1%	24.0%
Students / Parents / General public	5	5	1	3	4	1	2	21	43.8%	18.8%
Educational specialists	0	2	0	2	0	2	2	8	25.0%	50.0%

## **4.5 The availability of new modern foreign language and ancient language GCSEs**

**Background:** GCSE qualifications are made available under a market model. The Department for Education publishes the content for GCSE qualifications, and exam boards take the decision as to which qualifications they will offer.

We proposed the following in relation to the availability of modern foreign language and ancient language GCSEs:

- Modern foreign and ancient language GCSEs should be available in a wide range of languages in the future.
- Modern foreign language GCSEs for which there is low demand should be available in the future.
- Modern foreign language GCSEs should be available for students who are existing users of the language.

Question 18 sought respondents' views on whether schools and colleges would be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand. Questions 19 and 21 sought respondents' views on any steps we should take to secure the availability of GCSEs in a range of modern foreign and ancient language GCSEs in the future.

### **Key messages**

- There was clear support for the proposal that a range of modern foreign and ancient language GCSEs should remain available in the future.
- There was clear support for the proposal that low-demand modern foreign language GCSEs should remain available in the future. However, concern was expressed by some groups, including awarding organisations, that this would not be possible if the proposed tiering arrangements went ahead as this could make some low-demand languages unviable.
- There was clear support for the proposal that modern foreign language GCSEs should be available for existing users of the language.
- The majority of respondents did not think that schools and colleges would be willing to pay a higher fee to enter students for low-demand modern foreign language GCSEs.

**Views on the proposal that modern foreign language GCSEs in a wide range of languages should be available in the future. (Question 15)**

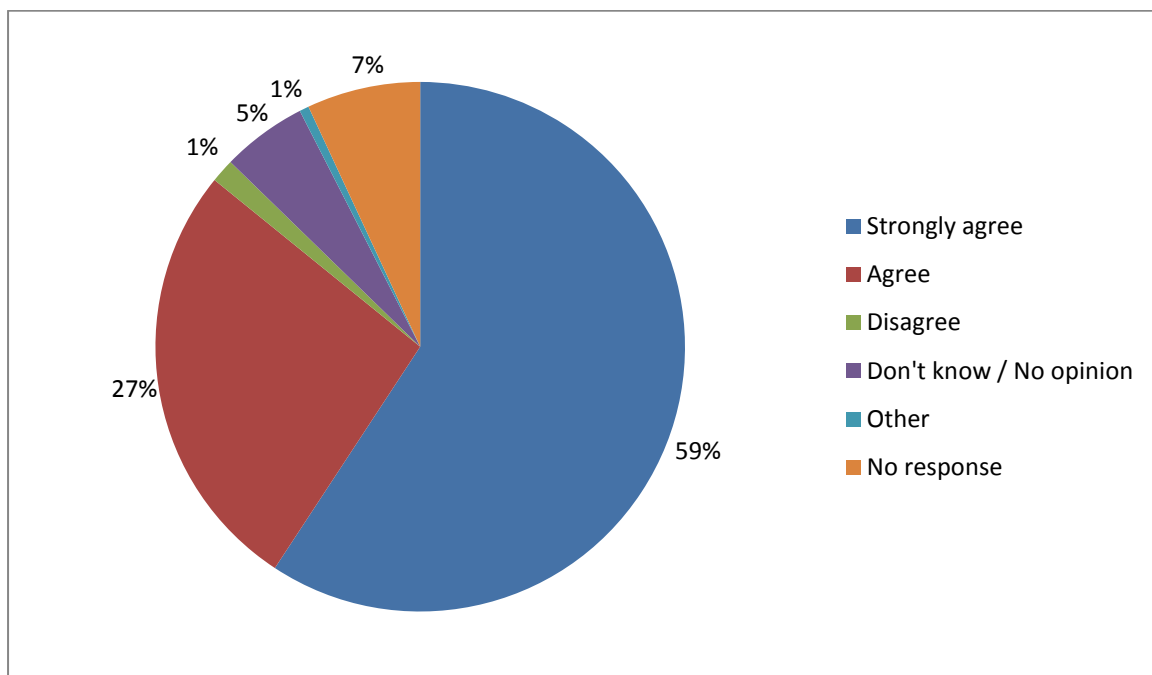
There was clear support for the proposal that modern foreign language GCSEs in a wide range of languages should be available in the future, with 92 per cent of those who answered the question supporting the proposal and only 2 per cent against.

Two awarding organisations agreed with the proposal. AQA confirmed that there was a clear need for improved language skills in order to benefit the UK's trade, prosperity and influence. Many other respondents echoed this view.

Pearson stated that languages are an important part of the curriculum and provide essential skills for certain careers, but said that centres choosing to offer the subject should ensure that learners have been prepared for the assessment properly, or they will be disadvantaged.

OCR stated that qualifications must be financially viable.

**Figure 27:** Question 15 – Modern foreign language GCSEs in a wide range of languages should be available in the future. To what extent do you agree or disagree with this statement?



**Figure 28:** Breakdown of question 15 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	24	18	2	205	92	5	0	346	92.2%	1.6%
Individual responses	16	14	2	171	76	5	0	284	92.2%	1.9%
Organisation responses	8	4	0	34	16	0	0	62	92.6%	0.0%
Awarding organisation	0	1	0	0	2	0	0	3	66.7%	0.0%
Other organisations	3	2	0	5	2	0	0	12	77.8%	0.0%
Independent school	3	1	0	14	9	0	0	27	95.8%	0.0%
Academy / State / Other schools	2	0	0	15	3	0	0	20	100.0%	0.0%
Teachers	12	14	2	152	71	4	0	255	91.8%	1.6%
Students / Parents / General public	3	0	0	13	5	0	0	21	100.0%	0.0%
Educational specialists	1	0	0	6	0	1	0	8	85.7%	14.3%

**Views on the proposal that modern foreign languages for which there is a low demand should be available in the future. (Question 16)**

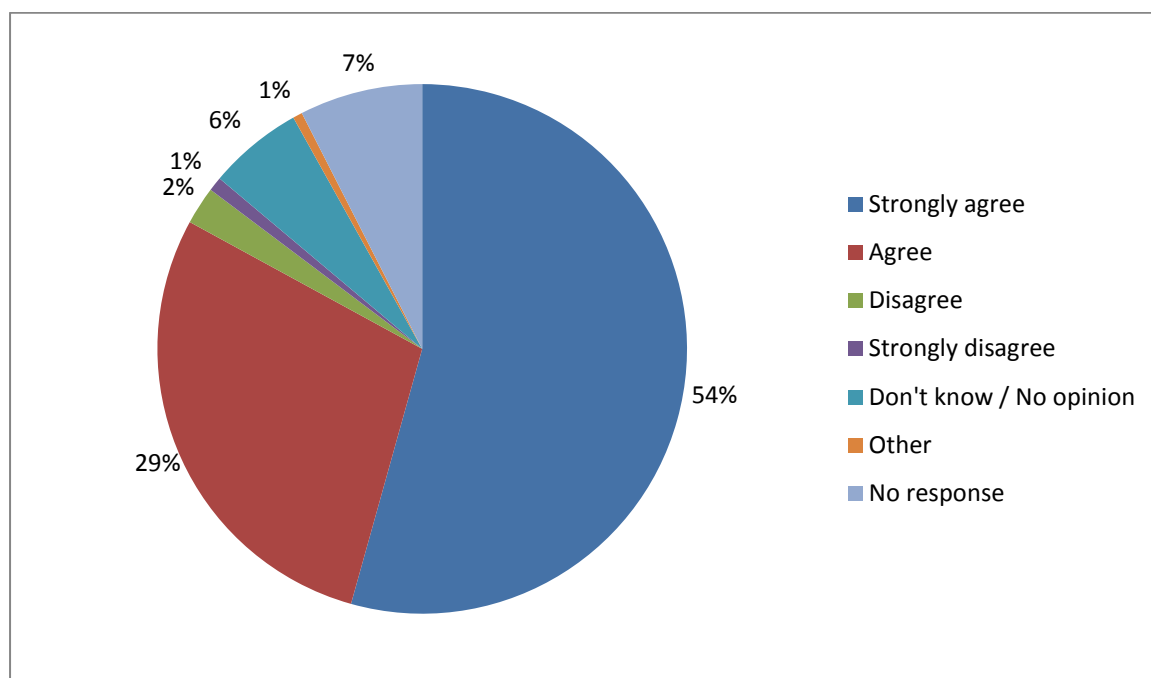
There was clear support for the proposal that modern foreign language GCSEs for which there is a low demand should be available in the future, with 90 per cent of those who answered the question supporting the proposal and only 3 per cent against.

Both AQA and OCR were supportive of the principle that GCSEs should be available in a variety of languages. However, both offered the view that qualifications should remain financially viable and that some of the proposals in this consultation could lead to a number of low-entry qualifications being threatened. Several other respondents also offered this view.

Pearson stated that languages are an important part of the curriculum and provide essential skills for certain careers, but said that centres choosing to offer the subjects should ensure that learners have been prepared for the assessment properly, or they will be disadvantaged.

Two awarding organisations agreed with the proposal. AQA confirmed that there was a clear need for improved language skills in order to benefit the UK's trade, prosperity and influence. Many other respondents echoed this view.

**Figure 29:** Question 16 – Modern foreign language GCSEs for which there is low demand should be available in the future. To what extent do you agree or disagree with this statement?



**Figure 30:** Breakdown of question 16 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	26	20	2	188	99	8	3	346	89.7%	3.4%
Individual responses	19	14	2	158	82	6	3	284	90.6%	3.4%
Organisation responses	7	6	0	30	17	2	0	62	85.5%	3.6%
Awarding organisation	0	2	0	0	1	0	0	3	33.3%	0.0%
Other organisations	3	2	0	3	2	2	0	12	55.6%	22.2%
Independent school	3	1	0	13	10	0	0	27	95.8%	0.0%
Academy / State / Other schools	1	1	0	14	4	0	0	20	94.7%	0.0%
Teachers	15	14	2	140	76	5	3	255	90.0%	3.3%
Students / Parents / General public	3	0	0	12	6	0	0	21	100.0%	0.0%
Educational specialists	1	0	0	6	0	1	0	8	85.7%	14.3%

**Views on the proposal that modern foreign language GCSEs should be available for existing users of the language. (Question 17)**

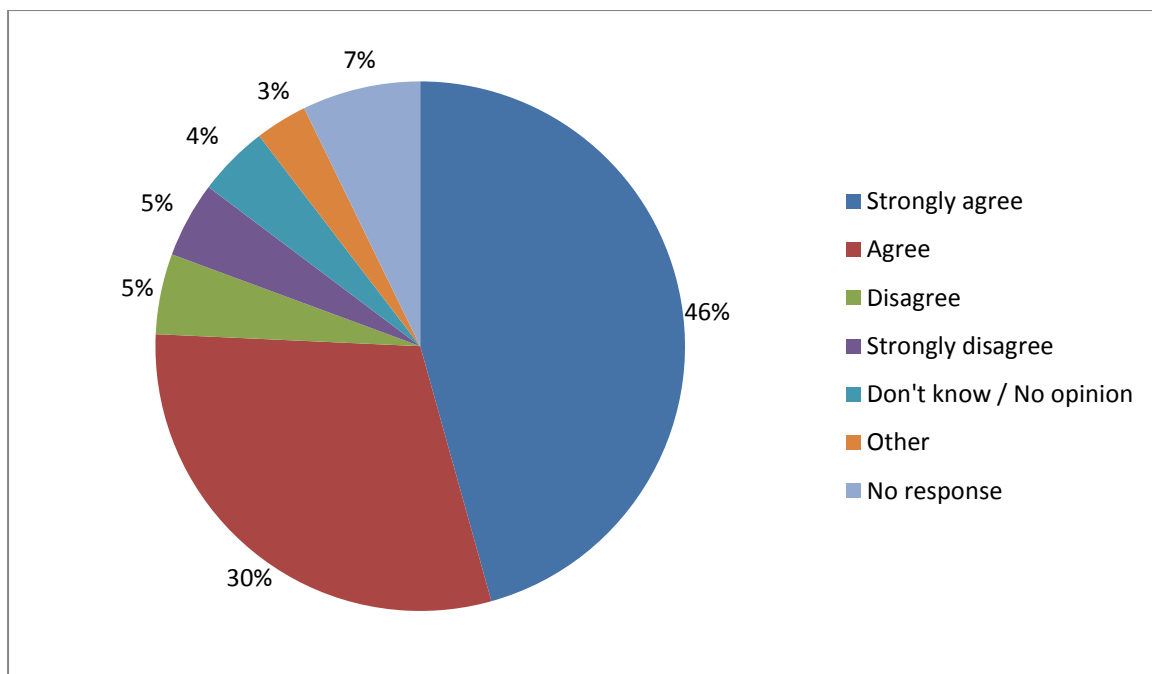
There was clear support for the proposal that modern foreign language GCSEs should be available for existing users of the language, with 82 per cent of those who answered the question supporting the proposal and only 10 per cent against.

OCR confirmed that 'existing users' would in all likelihood have varying degrees of competence. Pearson stated that there was no clear definition of what 'existing user' means and so separating out 'existing users' would be very difficult.

Many of the respondents felt that existing users should have the opportunity to gain a qualification for a language they have skill in so that they can demonstrate their abilities to employers or further educational institutions.

Those who disagreed with the proposal stated that they felt that allowing existing users to enter for modern foreign language GCSEs would make it harder for those who were not existing users to achieve good grades. Others stated that they felt separate exams should be available for native speakers.

**Figure 31:** Question 17 – Modern foreign language GCSEs should be available for students who are existing users of the language. To what extent do you agree or disagree with this statement?



**Figure 32:** Breakdown of question 17 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	25	15	11	158	104	17	16	346	81.6%	10.3%
Individual responses	17	9	11	134	88	12	13	284	83.1%	9.4%
Organisation responses	8	6	0	24	16	5	3	62	74.1%	14.8%
Awarding organisation	0	1	0	0	1	0	1	3	33.3%	33.3%
Other organisations	3	2	0	4	1	2	0	12	55.6%	22.2%
Independent school	4	3	0	8	8	3	1	27	69.6%	17.4%
Academy / State / Other schools	1	0	0	12	6	0	1	20	94.7%	5.3%
Teachers	13	9	11	121	78	11	12	255	62.2%	9.5%
Students / Parents / General public	3	0	0	9	8	0	1	21	94.4%	5.6%
Educational specialists	1	0	0	4	2	1	0	8	85.7%	14.3%

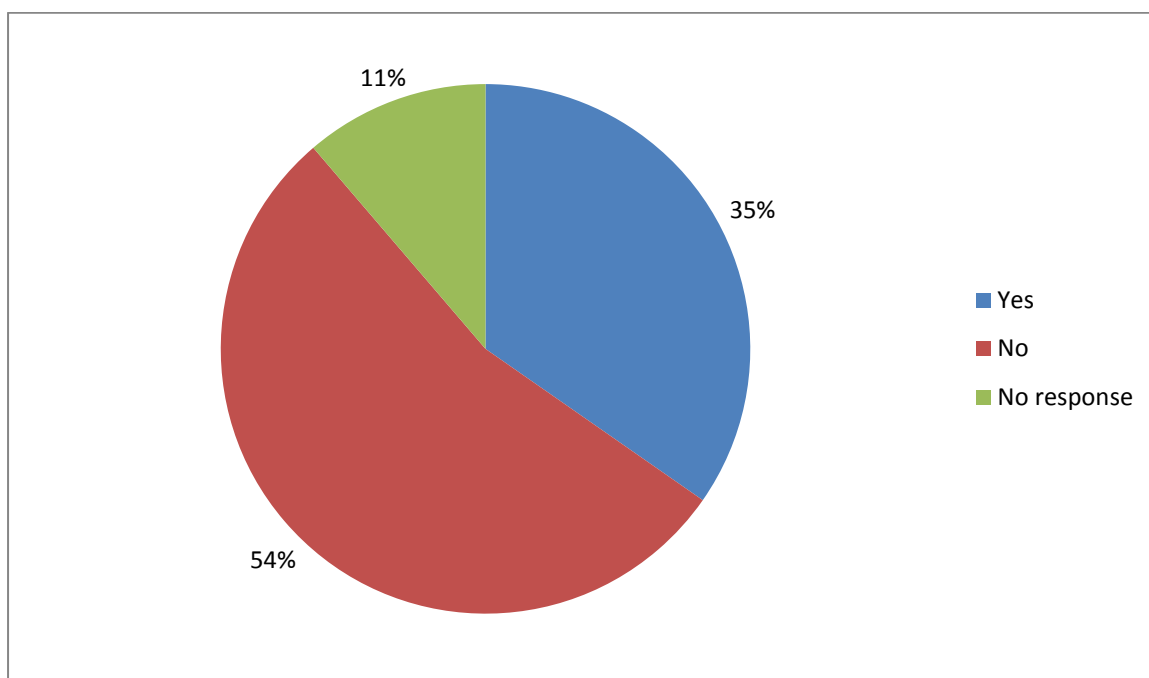
**Views on whether schools and colleges would be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand. (Question 18)**

As shown in figures 33 and 34, the majority of the respondents (61 per cent) confirmed that in their opinion schools and colleges would not be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand. The rest of the respondents (39 per cent) suggested that they would.

The majority of the respondents to this question were individuals (mainly teachers). Of the individual respondents, 63 per cent stated that they did not believe schools and colleges would be willing to pay higher fees and only 37 per cent stated that they would. However, there was a more even split across the responses received from organisations, with 49 per cent stating that they expected schools and colleges would be willing to pay a higher fee for lower-demand subjects and 51 per cent saying that they would not.



**Figure 33:** In your opinion, would schools and colleges be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand?



**Figure 34:** Breakdown of question 18 by respondent type

	No response	Yes	No	Total	Total yes	Total no
All	39	120	187	346	39.1%	60.9%
Individual responses	28	95	161	284	37.1%	62.9%
Organisation responses	11	25	26	62	49.0%	51.0%
Awarding organisation	1	1	1	3	50.0%	50.0%
Other organisations	6	3	3	12	50.0%	50.0%
Independent school	4	12	11	27	52.2%	47.8%
Academy / State / Other schools	0	9	11	20	45.0%	55.0%
Teachers	21	90	144	255	38.5%	61.5%
Students / Parents / General public	4	4	13	21	23.5%	76.5%
Educational specialists	3	1	4	8	20.0%	80.0%

**Views on whether there are any other steps that Ofqual should take to secure the availability of GCSEs in a range of modern foreign languages. (Question 19)**

We received 172 responses providing views on additional steps that we should take to secure the availability of GCSEs in a range of modern foreign languages. There were 138 personal responses (the majority coming from teachers) and 34 organisation responses, including responses from the three exam boards who responded to this consultation.

**Main themes from respondents' views**

- If exam boards are required to offer low-volume qualifications under the same conditions as they offer higher-volume qualifications (for example, offering them as tiered qualifications), then it is unlikely that the current level of provision would be maintained. Ofqual should therefore vary the conditions (for example, by allowing untiered modern foreign language GCSEs) in place for lower-volume languages to ensure that lower-volume language qualifications continue to be offered.
- If the requirement to tier exams comes into place for all qualifications, then the low-volume qualifications should be shared out equally between the exam boards so that one is not impacted more than others by the change.
- Ensure that low-volume modern foreign language GCSEs are not charged for at a higher rate than other GCSEs as the cost could lead to schools deciding not to enter students for the qualification. The costs should be spread across all GCSEs.

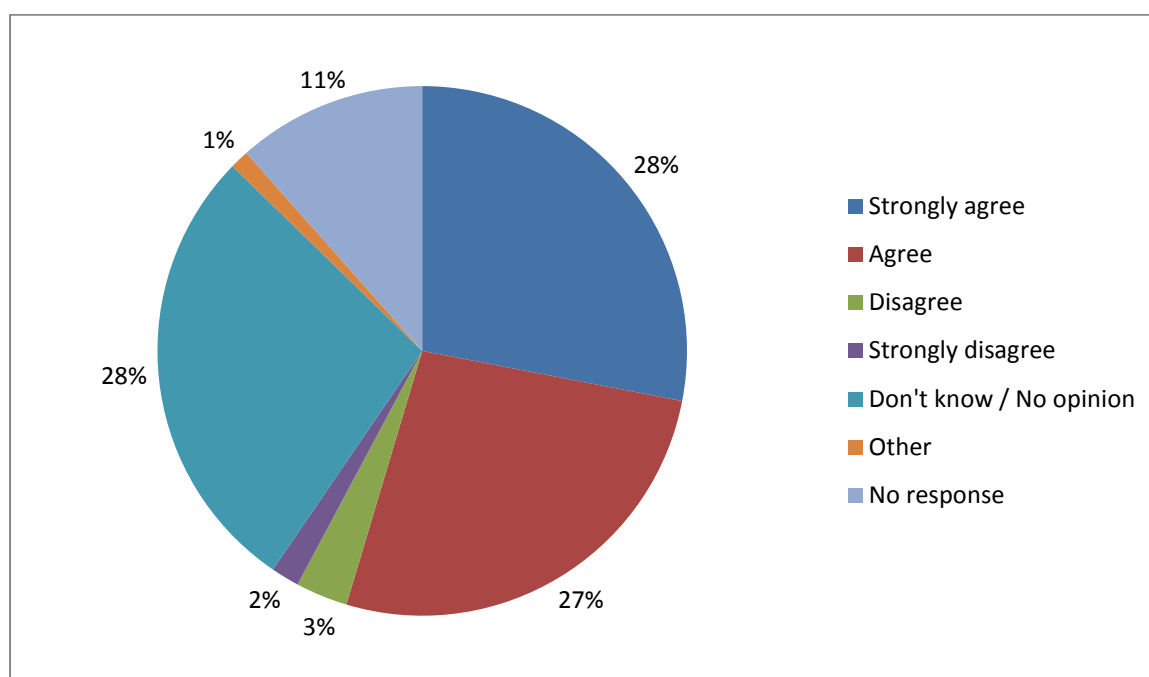
**Views on the proposal that a range of ancient language GCSEs should be available in the future. (Question 20)**

Sixty-two per cent of respondents agreed with the proposal that a range of ancient language GCSEs should be available in the future and only 6 per cent disagreed. The remaining 33 per cent of respondents provided a 'don't know / no opinion' or 'other' response. If we look at just the agree and disagree figures, the balance is 92 per cent agreeing with the proposal and 8 per cent disagreeing.

Those arguing in favour of the proposal stated that ancient languages are important culturally and historically, and help students with logical reasoning, and other languages, as they are the root of modern language. Respondents argued in favour of a broad curriculum.

Those against the proposal argued that ancient languages had limited practical use, had only a niche market, or were not as important as the learning of modern foreign languages.

**Figure 35:** Question 20 – A range of ancient language GCSEs should be available in the future. To what extent do you agree or disagree with this statement?



**Figure 36:** Breakdown of question 20 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	40	96	4	97	92	11	6	346	61.8%	5.6%
Individual responses	32	82	1	73	80	10	6	284	60.7%	6.3%
Organisation responses	8	14	3	24	12	1	0	62	66.7%	1.9%
Awarding organisation	0	2	0	1	0	0	0	3	33.3%	0.0%
Other organisations	0	1	2	6	2	1	0	12	66.7%	8.3%
Independent school	5	5	0	14	3	0	0	27	77.3%	0.0%
Academy / State / Other schools	3	6	1	3	7	0	0	20	58.8%	0.0%
Teachers	29	78	1	65	71	7	4	255	60.2%	4.9%
Students / Parents / General public	3	4	0	3	7	2	2	21	55.6%	22.2%
Educational specialists	0	0	0	5	2	1	0	8	87.5%	12.5%

**Views on whether there are any steps Ofqual should take to secure the availability of GCSEs in a range of ancient languages. (Question 21)**

We received 97 responses providing views on additional steps that we should take to secure the availability of GCSEs in a range of ancient languages. There were 72 personal responses (the majority coming from teachers) and 25 organisation responses.

**Main themes from respondents' views**

- Ensure that requirements coming out of the consultation do not lead to an increased burden on exam boards that may lead them to decide not to offer the lower-volume ancient language GCSEs.
- Financial incentives should be available for exam boards to produce qualifications in low-volume subjects.
- Ensure that the cost of entering for ancient language GCSEs is no greater than for other GCSEs, which may act to encourage take-up and thereby secure the provision of ancient language GCSEs.

## **4.6 Equality impact analysis**

**Background:** We have used a power under the provisions of the Equality Act 2010, which allows us to limit the extent to which exam boards must make reasonable adjustments to disabled students, in order to limit the percentage of marks from which a student can be exempt in a given qualification to 40 per cent. This is based on a belief that if a student is exempted from parts of the qualification that constitute more than 40 per cent of the total marks available, then the qualification cannot be said to give a reliable indication of a student's knowledge, skill and understanding.

We have identified a number of impacts (positive and negative) of the proposed requirements for new modern foreign language GCSEs on persons who share a protected characteristic. Question 23 sought respondents' views on whether they have identified any further impacts.

We have not identified any ways by which the proposed requirements for new ancient language GCSEs may impact (positively or negatively) on persons who share a protected characteristic, over and above those impacts that apply to changes to GCSEs generally. Question 24 sought respondents' views on whether they have identified any impacts.

Question 25 seeks respondents' views on whether there are any additional steps that could be taken to mitigate any negative impacts resulting from the proposals on persons who share a protected characteristic. Question 26 seeks respondents' views on whether any of the proposals or options being considered have financial or wider resource consequences for schools, exam boards or others.

### **Key messages**

- There was overall agreement with the 40 per cent limit on the percentage marks from which a student can be exempt in a given qualification, although a substantial number of respondents did suggest that exam boards should look at the circumstances of individual students before coming to a decision as to whether exemptions are reasonable.
- The vast majority of respondents did not believe there were other potential impacts on persons who share a protected characteristic that had not been identified.
- The vast majority of respondents did not identify any additional steps that could be taken to mitigate any negative impacts on persons who share a protected characteristic resulting from the proposals.
- A number of financial or wider resource consequences resulting from the proposals were identified for schools and exam boards in particular.

**Views on the proposal that a disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. (Question 22)**

Forty-two per cent of responses received in relation to this question were 'don't know / no opinion' or 'other'. Forty-three per cent of respondents agreed with the proposal that a disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. Fifteen per cent of respondents disagreed with the proposal. If we look at just the agree and disagree figures, the balance is 74 per cent agreeing with the proposal and 26 per cent disagreeing.

All of the exam boards agreed with this proposal. AQA commented that if a student is exempted from more than 40 per cent of the total marks available, then the qualification cannot be said to give a reliable indication of a student's knowledge, skill and understanding. OCR also confirmed that a range of access arrangements are available, which should help to minimise the need for a student to be exempted from more than one unit. Other respondents pointed to the availability of short-course qualifications as a suitable alternative.

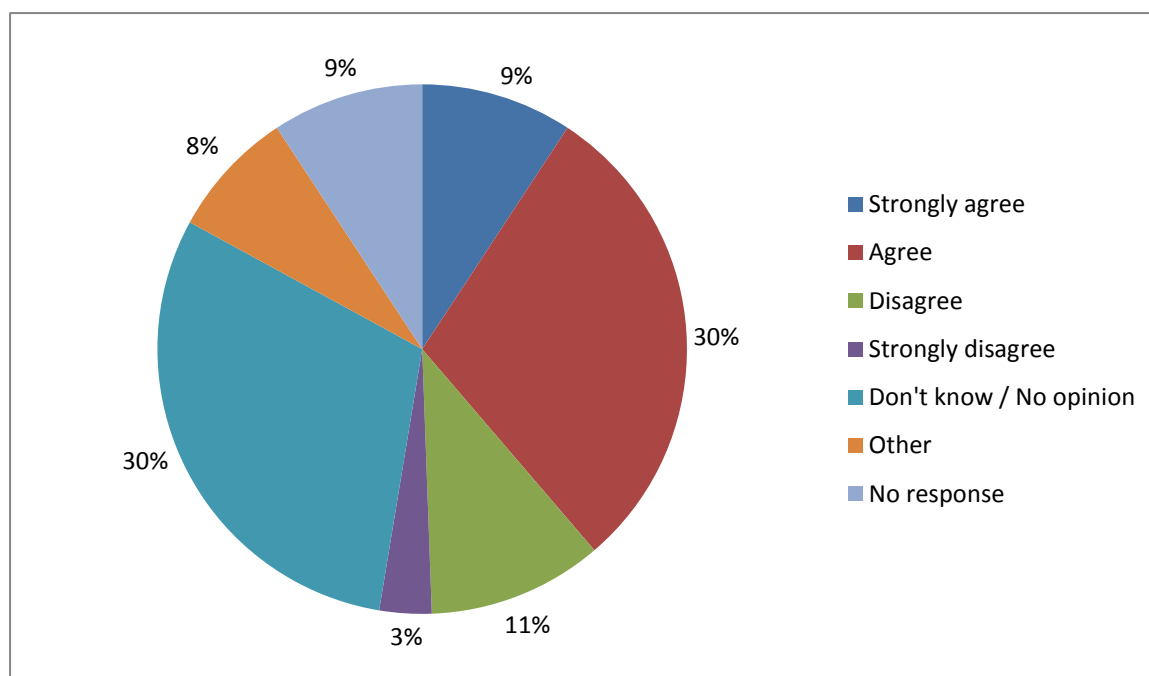
Twenty-nine respondents argued that exam boards should make decisions based on a student's individual circumstances. Another argument raised was that short-course GCSEs were not viable alternatives given that they do not allow for certain combinations of skills.

A number of responses highlighted the fact that if each skill area is to be worth 25 per cent of the marks, then stating that a student cannot be exempted for more than 40 per cent is meaningless.<sup>12</sup> In reality, the division of the skills means that a student could only be exempted from 25 per cent of the marks in new modern foreign language GCSEs.

---

<sup>12</sup> Note, however, that the 40 per cent exemption limit applies to all GCSEs, A levels and other general qualifications, and so it is constructed in this way for the sake of consistency.

**Figure 37:** Question 22 – A disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. To what extent do you agree or disagree with this statement?



**Figure 38:** Breakdown of question 22 by respondent type

	No response	Don't know / No opinion	Other	Strongly agree	Agree	Disagree	Strongly disagree	Total	Total agree	Total disagree
All	32	105	27	32	102	37	11	346	42.7%	15.3%
Individual responses	22	84	25	29	85	30	9	284	43.5%	14.9%
Organisation responses	10	21	2	3	17	7	2	62	38.5%	17.3%
Awarding organisation	0	0	0	0	3	0	0	3	100.0%	0.0%
Other organisations	4	2	0	0	4	1	1	12	50.0%	25.0%
Independent school	4	14	1	1	4	2	1	27	21.7%	13.0%
Academy / State / Other schools	2	5	1	2	6	4	0	20	44.4%	22.2%
Teachers	19	72	24	24	83	26	7	255	45.3%	14.0%
Students / Parents / General public	3	7	1	5	0	4	1	21	27.8%	27.8%
Educational specialists	0	5	0	0	2	0	1	8	25.0%	12.5%

**Views on whether there are any further potential impacts (both positive and negative) that the proposed requirements for new GCSEs in modern foreign languages may have on persons who share a protected characteristic. (Question 23)**

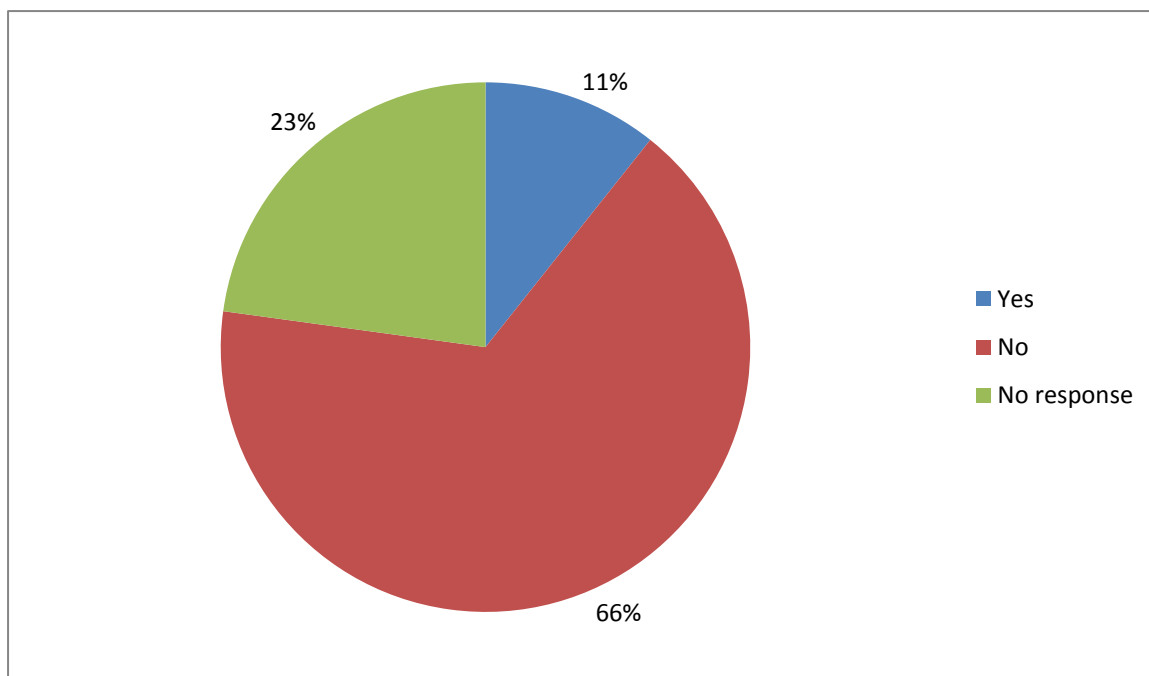
Fourteen per cent of respondents who replied to this question raised further potential impacts that the proposed requirements for new modern foreign language GCSEs may have on persons who share a protected characteristic.

**Potential impacts**

- The proposal to remove mixed tiering could have a negative impact on a range of learners, including those with disabilities who will not have the option to enter for the combination of tiers that would allow them to best demonstrate their abilities.
- Linear assessment of the various skills will impact unfavourably upon girls as a result of their preferred learning style.
- The 40 per cent maximum exemption for disabled students will impact negatively upon those with disabilities and they may be unable to access the modern foreign language qualifications.
- The increased emphasis on linear exams is likely to negatively impact on students with mental health issues.
- If the implementation of the proposals leads to a reduction of the 'lesser taught' (for example, as a result of the implementation of tiering for all modern foreign languages), then this could negatively impact on pupils of particular races or religions.



**Figure 39:** Question 23 – We have identified a number of ways that the proposed requirements for new GCSEs in modern foreign languages may impact (positively and negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?



**Figure 40:** Breakdown of question 23 by respondent type

	No response	Yes	No	Total	Total yes	Total no
All	79	37	230	346	13.9%	86.1%
Individual responses	61	27	196	284	12.1%	87.9%
Organisation responses	18	10	34	62	22.7%	77.3%
Awarding organisation	0	1	2	3	33.3%	66.7%
Other organisations	6	2	4	12	33.3%	66.7%
Independent school	8	2	17	27	10.5%	89.5%
Academy / State / Other schools	4	5	11	20	31.3%	68.8%
Teachers	52	24	179	255	11.8%	88.2%
Students / Parents / General public	6	3	12	21	20.0%	80.0%
Educational specialists	3	0	5	8	0.0%	100.0%

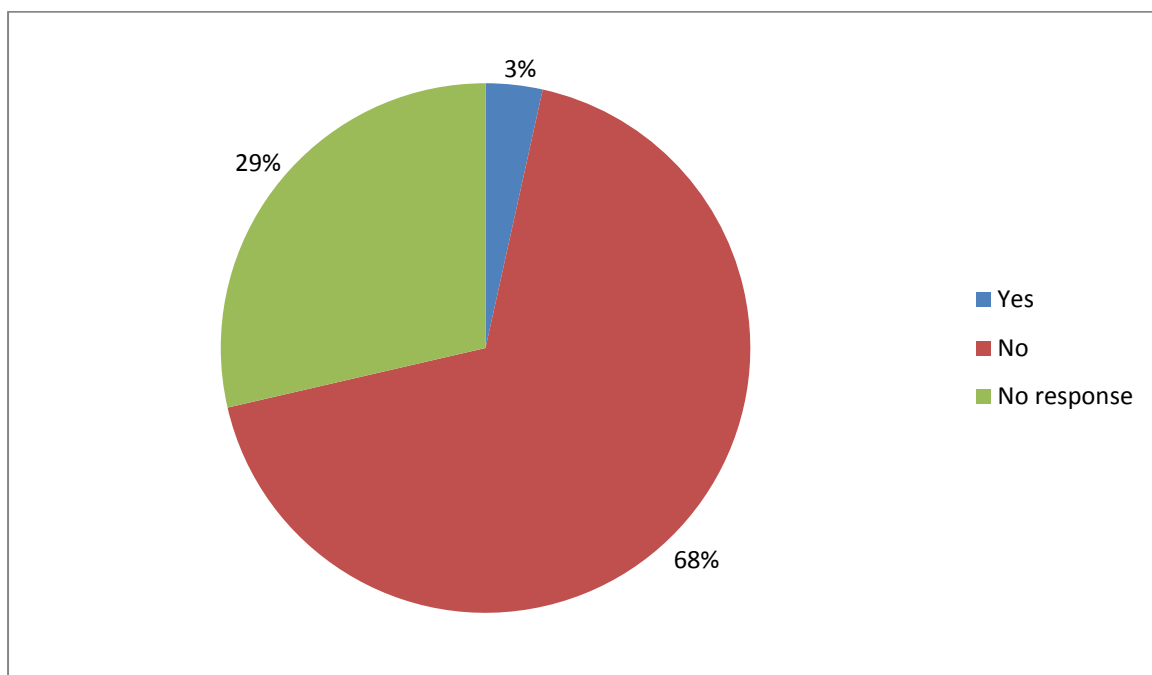
**Views on whether there are any potential impacts (both positive and negative) that the proposed requirements for new GCSEs in ancient languages may have on persons who share a protected characteristic, over and above those impacts that apply to the changes to GCSEs generally. (Question 24)**

Only 12 respondents indicated that the proposed requirements for new ancient language GCSEs would have a potential impact on persons sharing protected characteristics over and above those impacts applying to GCSEs generally.

**Summary of views**

- Laptop users are severely impeded in Classical Greek literature examinations where they are required to type in the Greek alphabet. IT equipment is not always available to them to provide for this need.
- If the proposals lead to a reduction of low-volume ancient language GCSEs, this could have a significant impact on those of a particular race or religion associated with the low-volume ancient language GCSEs affected (for example, Biblical Hebrew).

**Figure 41:** Question 24 – We have not identified any ways by which the proposed requirements for new GCSEs in ancient languages may impact (positively or negatively) on persons who share a protected characteristic over and above those impacts that apply to the changes to GCSEs generally. Are there any potential impacts we have not identified?



**Figure 42:** Breakdown of question 24 by respondent type

	No response	Yes	No	Total	Total yes	Total no
All	99	12	235	346	4.9%	95.1%
Individual responses	78	9	197	284	4.4%	95.6%
Organisation responses	21	3	38	62	7.3%	92.7%
Awarding organisation	2	0	1	3	0.0%	100.0%
Other organisations	4	2	6	12	25.0%	75.0%
Independent school	9	0	18	27	0.0%	100.0%
Academy / State / Other schools	6	1	13	20	7.1%	92.9%
Teachers	69	6	180	255	3.2%	96.8%
Students / Parents / General public	6	3	12	21	20.0%	80.0%
Educational specialists	3	0	5	8	0.0%	100.0%

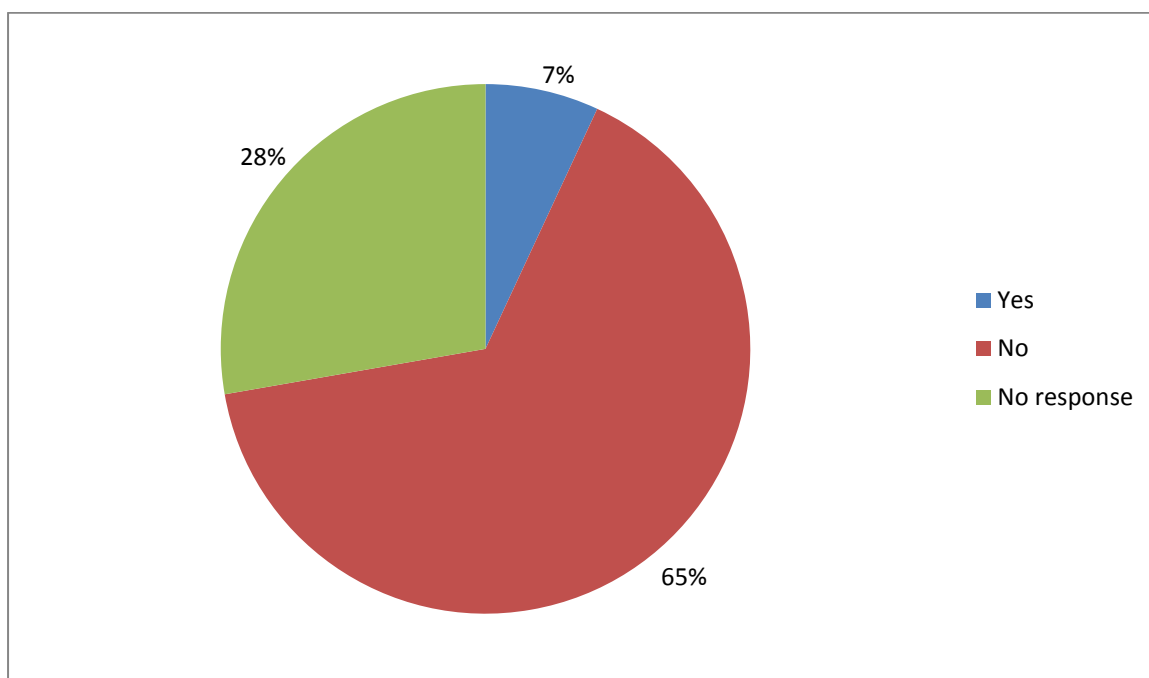
**Views on whether there are any additional steps Ofqual could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic. (Question 25)**

Only 24 respondents indicated that there were additional steps that we could take to mitigate any negative impacts resulting from the proposals in the consultation on persons who share a protected characteristic.

**Summary of views**

- The proposal for a maximum 40 per cent exemption should be reconsidered because the alternatives (for example, short-course qualifications) do not allow for learners with particular disabilities to achieve a language qualification as certain skill combinations are not available.
- The increased emphasis on exams in modern foreign and ancient language GCSEs will impact negatively on pupils with mental health difficulties, and controlled assessment should be reconsidered as an alternative.

**Figure 43:** Question 25 – Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?



**Figure 44:** Breakdown of question 25 by respondent type

	No response	Yes	No	Total	Total yes	Total no
All	96	24	226	346	9.6%	90.4%
Individual responses	78	16	190	284	7.8%	92.2%
Organisation responses	18	8	36	62	18.2%	81.8%
Awarding organisation	0	1	2	3	33.3%	66.7%
Other organisations	5	5	2	12	71.4%	28.6%
Independent school	7	0	20	27	0.0%	100.0%
Academy / State / Other schools	6	2	12	20	14.3%	85.7%
Teachers	67	14	174	255	7.4%	92.6%
Students / Parents / General public	8	2	11	21	15.4%	84.6%
Educational specialists	3	0	5	8	0.0%	100.0%

## **Regulatory impact assessment**

### **Views on whether any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for schools, exam boards or others. (Question 26)**

We received 274 responses providing views on whether any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for schools, exam boards or others. There were 222 personal responses (the majority coming from teachers) and 52 organisation responses, including responses from the three exam boards who responded to this consultation.

The main themes coming from respondents' views have been summarised below under separate headings for schools, exam boards and others.

#### **Main themes from schools**

- The proposed assessment requirements in relation to speaking and writing assessments would remove teacher assessment and thus increase available teaching time and resources available within schools.
- There will be a need for further training for teachers as a result of the changes to new GCSEs and particularly in relation to language GCSEs where translation exercises are being introduced for the first time in around 16 years. This will require paying for teacher training.
- There is often little teaching time budgeted for language GCSEs and the introduction of translation exercises will place an increased burden on the teaching time in many schools.
- More time will be required on the school timetable for teaching new language GCSEs.
- There will be a need for new resources for teaching the new GCSEs (for example, textbooks and online resources).
- There will be potential higher charges for new language GCSEs, which will impact on school budgets.
- If lower-entry language GCSEs are charged for at a higher rate, they may only be accessible to certain schools, creating disparity between institutions.

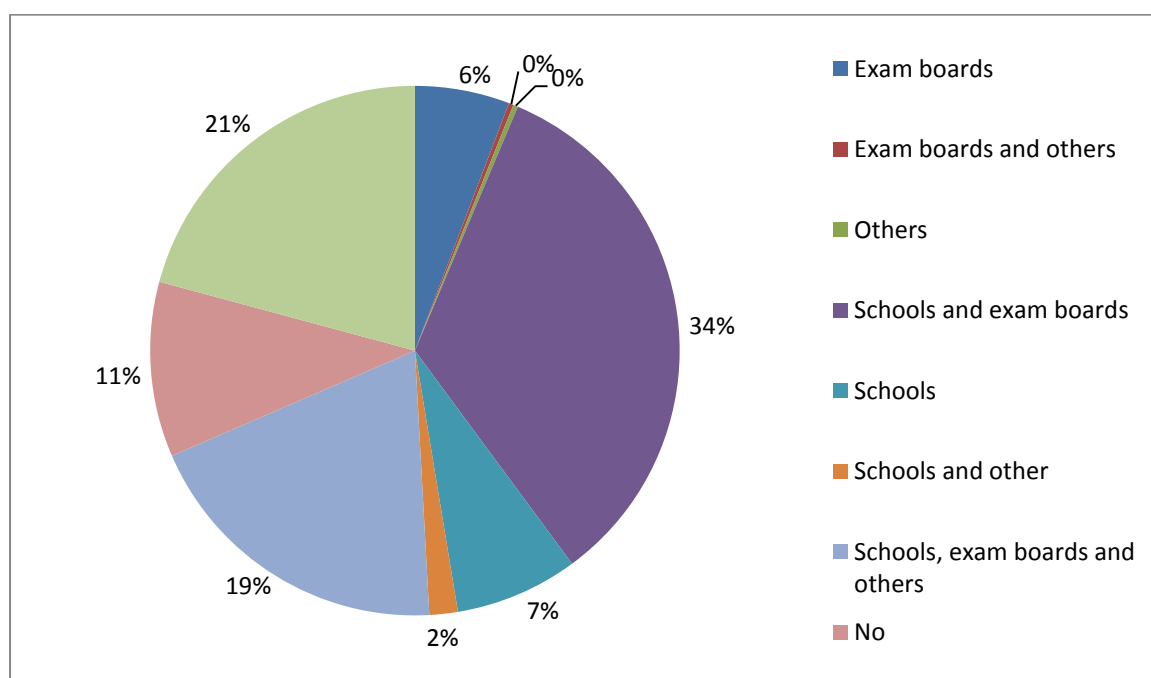
### Main themes from exam boards

- The move to external assessment from controlled assessment would increase the costs to exam boards of running language assessments.
- The move to tiered assessments for all modern foreign language GCSEs will increase the costs for exam boards and may well make some low-entry language qualifications unviable.

### Main themes from others

- The risk that low-entry languages could no longer be available could impact on the ability of a future society to work internationally and it may reduce employment opportunities.

**Figure 45:** Question 26 – Do any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for schools, exam boards and/or others?



**Figure 46:** Breakdown of question 26 by respondent type

	No response	Exam boards	Exam boards and others	Others	Schools and exam boards	Schools	Schools and others	Schools, exam boards and others	No	Total
All	72	20	1	1	116	26	6	67	37	346
Individual responses	62	16	1	0	94	14	5	58	34	284
Organisation responses	10	4	0	1	22	12	1	9	3	62
Awarding organisation	0	0	0	0	3	0	0	0	0	3
Other Organisations	1	0	0	0	3	5	1	1	1	12
Independent school	6	3	0	0	7	4	0	5	2	27
Academy / State / Other schools	3	1	0	1	9	3	0	3	0	20
Teachers	52	15	1	0	90	13	5	50	29	255
Students / Parents / General public	9	1	0	0	1	0	0	7	3	21
Educational specialists	1	0	0	0	3	1	0	1	2	8

## **Appendix A: List of organisational consultation respondents**

When completing the questionnaire, we asked respondents 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.<sup>13</sup> We have not included a list of those responding as an individual but all responses were given equal status in the analysis.

Alcantara Communications LLP	National Governor's Association
All Party Parliamentary Group on Modern Languages	OCR
AQA	Parklands High School, Lancashire
Association of Language Learning	Pearson
Association of School and College Leaders	Pocklington School, Yorkshire
Beacon Community College Academy, East Sussex	Signature
Bolton School, Girl's Division, Gtr Manchester	Society for Italian Studies
Buckinghamshire County Council	South Bromsgrove High, Worcestershire
Chancellors School, Hertfordshire	St Benedict's School London
Dr Challoner's Grammar School, Buckinghamshire	St Julie's Catholic High School, Liverpool
Durham County Council – Education Development Services County Durham	St Margaret's School, Hertfordshire
Edgbaston High School, Birmingham	The Ashcombe School, Dorking, Surrey

---

<sup>13</sup> Some organisations requested that their responses be treated anonymously and so we have not included the names of their organisations on this list.



European Schools	The Derby High School, Gtr Manchester
Exeter School, Devon	The Hill Wood School, Coventry
Glenalmond College, Perth & Kinross, Scotland	The King's School, Chester, Cheshire
Haslingden High School, Lancashire	The King's School, Worcester, Worcestershire
Huntington School, York	Tonbridge School, Kent
Japan Foundation	University of Cambridge – Faculty of Education
Joint Association of Classical Teachers	University of Oxford
KCS Wimbledon, London	University of Salford – University Council of Modern Languages
Kent College, Kent	Victoria High School, Cumbria
Kings College London	Voice, The Union for Educational Professionals
Linton Village College, Cambridgeshire	Yarm School, Stockton-on-Tees
Lord Wandsworth College, Hampshire	

## **Appendix B: Consultation details**

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

A copy of the consultation is available at <http://comment.ofqual.gov.uk/modern-foreign-and-ancient-languages>

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

Published by the Office of Qualifications and Examinations Regulation in 2014

© Crown copyright 2014

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, visit [The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)

This publication is also available on our website at [www.ofqual.gov.uk](http://www.ofqual.gov.uk)

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

2nd Floor  
Glendinning House  
6 Murray Street  
Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346