

## CONSULTATION DECISIONS

# Assessment of revised qualifications in GCSE MFL (French, German and Spanish)

Proposed changes to the assessment  
arrangements for GCSE French, German and  
Spanish

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## Introduction

In November 2019, the Department for Education (DfE) announced a review of its subject content for GCSEs in modern foreign languages (MFL), in French, German and Spanish. GCSE MFL qualifications in other languages may be revised at a later date, after the revisions to French, German and Spanish have been made. These proposals would also be subject to public consultation.

Ofqual duly reviewed the requirements for assessing that content, which the exam boards offering GCSE MFL qualifications in French, German and Spanish must follow. We proposed some revisions to our existing requirements to ensure that the assessment arrangements would be appropriate to support and assess the proposed revised content.

We published a consultation seeking views on our assessment proposals at the same time as the DfE consulted on its proposed new content.

Our [consultation on revised GCSE qualifications in modern foreign languages](#) ran from Wednesday 10 March to Wednesday 19 May 2021 and received 1130 responses. A full summary and analysis of the responses has been published at the same time as this decision document.

## Summary of decisions

We have decided to implement the proposals we set out in the consultation document.

The feedback that we received from respondents will be considered as we move to the next stage of work - to draft the detailed assessment requirements for exam boards in the Subject Level Conditions and the recommended approach to complying with those requirements in the Subject Level Guidance.

The arrangements for assessing the revised GCSEs in MFL (French, German and Spanish) will therefore be based on:

- revised assessment objectives (AOs), which set out the percentage of qualification marks that must be awarded for each aspect of assessment
- continued use of tiered assessments, requiring students to be entered to a single tier across all assessments
- continued use of non-exam assessment (NEA) to focus on the assessment of speaking skills, which make up 25% of the total marks for the qualification

## Details

We proposed amendments to the AOs to reflect the proposed revised content, given the content requirements encourage a more mixed skill approach to teaching and learning. We proposed that the current approach to tiering and to assessing speaking skills using NEA should be maintained.

As presented in the [consultation analysis report](#), there was a mixed response to our proposals. The paragraphs below explain our final decisions relating to each proposal.

## Revised Assessment Objectives (AOs)

The responses to our proposed assessment objectives were mixed, with half disagreeing with the proposed AOs for a range of reasons, and around a third supporting them.

	<b>Assessment objective</b>	<b>% of marks</b>
<b>AO1</b>	Understand and respond to spoken language in speaking and in writing	35 %
<b>AO2</b>	Understand and respond to written language in speaking and in writing	45 %
<b>AO3</b>	Demonstrate knowledge and accurate application of the grammar and vocabulary prescribed in the specification	20 %

Both those respondents who supported and those who opposed the proposed AOs called for more information on the proposed AOs and their weightings, that is, the proportion of total qualification marks that must be allocated to each AO. Many respondents commented that the proposal was difficult to evaluate without knowing what assessments and tasks would look like.

Respondents supporting the proposed AOs often commented that they reflect real life language use, where skills are used interchangeably and that they would support progression to A level, given the approach to the AOs reflects those at A level.

Some respondents felt that the current separate skill approach to the AOs, all equally weighted, was clearer for students and teachers to interpret and to teach, than the revised AOs.

Some of those opposing the proposed AOs thought the change would necessarily affect the current structure of 4 assessments which focus on each of the 4 language skills separately (listening, speaking, reading, writing). However, the new AOs would not necessitate such a change. They would allow the exam boards to retain the current approach or adopt a different approach should they wish to.

We have decided to introduce the revised AOs.

It was clear that many of the concerns raised related to the lack of information about the format of the assessments. These details will be made clear in our decisions, and in our subsequent consultation on Subject Level Conditions and Guidance, where the proposed detailed requirements (and flexibilities) will be published for comment.

Some respondents queried the rationale for the higher weighting of AO2, “Understand and respond to written language in speaking and in writing”, than AO1.

The weighting of 45% for AO2 is to allow appropriate coverage of the content requirements, given that elements such as reading aloud and role play in the speaking assessment, as well as reading, writing and translation tasks, all require responses to written language, whether in speech or in writing.

AO2 is therefore weighted higher than AO1 “Understand and respond to spoken language in speaking and in writing”, which is weighted at 35%, and which only covers speaking and listening tasks.

The AO weightings, which sit across the 4 language skills, therefore support the content intention that the 4 language skills should continue to have an approximately equal focus in the revised specifications.

The proposed AOs are not intended to dictate how exam boards must structure their assessments. Assessment objectives set out the proportion of the total marks that must be allocated to each key skill or area of understanding. This helps to ensure a consistent level of difficulty across the range of exam board specifications. Exam boards can choose how to structure their assessments. Aspects of the content encourage some areas of mixed skill assessment. However, exam boards may choose to structure the assessments focusing predominantly on each of the 4 skills separately, or to assess more than one skill in a particular assessment, as is currently the case with A level assessments. The assessment of spoken language skills must remain separate however, given this will continue to be assessed through non-exam assessment (NEA), (as it is now at GCSE and at A level).

The revised AOs include AO3 which defines the required proportion of marks to be allocated to the demonstration of “knowledge and accurate application of the grammar and vocabulary prescribed in the specification”, weighted at 20% of total qualification marks. This AO replaces the current requirement that “at least 10%” of marks available for speaking and writing performance should be allocated for the demonstration of “knowledge of, and accurate application of, the grammar and structures of the language prescribed in the specification.” The current specifications vary in their approaches to achieving this minimum requirement, sometimes significantly exceeding this minimum.

The revised approach separately rewards accurate use of grammar and the application of vocabulary in AO3, rather than in AO1 and AO2, which reward language communication skills (understanding and responding, in speech and in writing). This approach will provide consistency across exam boards' specifications and will ensure that marks allocated to AO1 and AO2 are awarded for communication skills such as creative and ambitious use of language, rather than to accuracy of language.

## Continued use of tiering, with single tier of entry

The consultation asked 2 questions of respondents: the extent to which they agreed or disagreed with our proposal to continue the use of tiering, and the extent to which they agreed or disagreed with our proposal to continue to require students to be entered for all assessments at the same tier (single tier of entry).

Responses were again mixed; analysis revealed a range of positions. While some respondents agreed with the proposals in full, others suggested alternative approaches to tiered assessments.

These alternative proposed approaches included:

- using untiered assessments for all candidates
- allowing students to enter a mix of foundation and higher tier assessments
- requiring tiering for some assessments but not all
- using a core basic paper with an optional higher extension paper for each assessment

We considered these comments, reflecting on the proposed alternatives and the implications of these in relation to the following:

- accessibility of assessment to all learners
- ensuring the assessment approach best reflects the content aims
- minimising the burden of assessment for teachers and students
- ensuring the assessments lead to valid outcomes that reflect students' performance

We have decided to continue to require exam boards to use tiered assessments, with students entering the same tier for all assessments.

We believe the use of tiered assessments best ensures learners at foundation tier can access the stimulus passages in the listening and reading assessments, while those at higher tier can demonstrate their skills through focused tasks targeting higher level language skills.

The subject content has separate vocabulary requirements for each tier, which is most appropriately reflected by requiring students to enter all assessments at the same tier (single tier of entry) rather than allowing a mixed tier approach. Permitting mixed tier entry would result in students facing higher tier vocabulary for some assessments and foundation tier in others, which would be complex for students and teachers and would not support a well-balanced development of the 4 language skills.

Requiring a single tier of entry supports classroom practice by providing 2 coherent assessment routes, at either foundation tier or higher tier rather than a range of mixed routes. Lastly, we decided this approach reduces the burden on teachers by requiring one decision of entry per candidate rather than several.

In previous specifications, where mixed tier entry was permitted, this was not widely taken up. Awarding organisations found that allowing students to enter for mixed tiers made awarding fair grades more complex, because marks from higher and foundation tier assessments cannot contribute equally to the final grade given higher tier assessments are more challenging. This therefore creates a risk of a candidate achieving a grade that does not reflect their performance.

The current model of foundation and higher tier assessments, which we have decided will continue, overlaps grades 5 and 4 (and provides a safety net grade of 3 where higher tier students narrowly miss a grade 4). This means that questions targeting the overlap grades must be carefully designed and marked to make sure that students who achieve a grade 4 or 5 must perform to a similar standard, whether they are entered for the foundation or higher tier.

## Continued use of non-exam assessment (NEA), weighted at 25%

We asked 2 questions relating to NEA: whether it should continue to be used to assess spoken responses and interactions, and whether NEA should be weighted at 25% of the total qualification marks.

The response here was clear cut, with a majority of respondents in favour of both aspects of this proposal. A minority of respondents felt the weighting should be higher than 25%, given the importance of speaking.

We have decided to continue to use NEA to assess spoken responses and interactions, and that 25% of the total qualification marks should be allocated to NEA.

A few respondents suggested that a weighting higher than 25% would ensure the full 25% of marks was available for speaking skills, given that the read aloud task in the speaking assessment would likely allocate a small number of marks to

understanding written language. However, the same situation arises with the current assessment arrangements where students' reading skills are drawn on in the role play task which is part of the speaking assessment.

The revised approach recognises these complexities, as AO2 is worded to reflect the range of skills that are drawn on in a speaking assessment. This differs from the wording of the AO for the assessment of speaking in the current qualifications which states, "communicate and interact in speech".

The read aloud task, which involves understanding written language and responding in speech, will be assessed in the NEA for speaking skills, with marks awarded under AO2 "Understand and respond to written language in speaking", and under AO3 which will cover accurate pronunciation.

## Equalities impact assessment

We considered the potential impact of our proposals on persons with particular protected characteristics in our consultation, explaining that we did not consider our proposals would have any equalities impact. Nothing in the responses has changed our view.

Many of the comments focused on students with special educational needs and disabilities (SEND). These comments tended to focus on tiering. Some respondents suggested that our proposal to maintain the requirement for a single tier of entry across all assessments may negatively affect SEND students, and that untiered papers, or mixed tier entry would be better.

Some respondents commented on aspects of the required subject content (particularly the read aloud and dictation elements). We have passed these to the DfE. Other respondents raised broader issues that apply to GCSE MFL qualifications, and likely other qualifications where marks are awarded for accurate spelling, which they commented may disadvantage dyslexic students.

Whilst we understand the concerns, we could not identify mitigations that would reduce such disadvantages whilst also meeting the required outcomes for the qualifications. As discussed above in the tiering section, we consider that the current approach to tiering provides the most accessible, valid and reliable method of structuring assessments which reflect the revised subject content.



## Regulatory impact assessment

In the consultation we identified a range of cost implications and potential burdens of the proposals for schools, colleges and exam boards.

We sought views on our initial regulatory impact assessment and asked about any other potential costs or burdens we had not identified. We asked what steps we could take to reduce them.

Many comments referred to the cost for schools of buying new textbooks, as well as the time for teachers to familiarise themselves with the new specifications and to develop their teaching resources.

Some respondents suggested exam boards could provide more support to help the introduction of new specifications, perhaps drawing on existing materials to reduce costs, although one exam board said this would not be possible given the changes involved.

Some respondents called for sufficient time for teachers to prepare to teach the new specifications.

A broader issue raised by respondents was the burden of introducing new specifications at all. Some respondents stated they were happy with the existing specifications, while some called for more minor changes to the current assessments.

## Implementation next steps

We have published these decisions alongside the DfE decisions on the required subject content for revised qualifications in [GCSE MFL \(French, German and Spanish\)](#).

The next stage of Ofqual's work is to develop the detailed requirements relating to the assessments. These will form the Subject Level Conditions and Guidance. We will consult publicly on draft conditions and guidance before we finalise these documents.

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