

**Analysis of Responses to our
Consultation on Changes to the
Conditions and Guidance for GCSE, AS
and A level Modern Foreign Languages**



April 2016

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Executive Summary

Our consultation about the Conditions and Guidance for GCSE, AS and A level modern foreign languages took place between 22nd February 2016 and 21st March 2016. The consultation questions were available to either complete online or to download. A copy of the consultation is available at

<https://www.gov.uk/government/consultations/gcse-as-and-a-level-reform-regulations-for-modern-foreign-languages>.

There were 30 responses to the consultation – 19 from individuals and 11 from organisations. One of the organisations did not comment directly on our proposals, but instead provided general comments on the reform of modern foreign languages.

Respondents broadly supported our proposals, but views were mixed in some areas – most notably the applicability of our rules and guidance to languages other than French, German and Spanish, our proposed approach to the length of translation exercises and extended written texts, and our proposed approach to titling Chinese qualifications.

1. Introduction

The consultation on the Conditions and guidance for GCSE, AS and A level modern foreign languages

This report is a summary of the views expressed by those who responded to our consultation on the Conditions and Guidance for GCSE, AS and A level modern foreign languages. This consultation took place between 22nd February 2015 and 21st March 2016.

Background

New GCSE, AS and A level qualifications are being introduced in England. We have consulted on and announced our policy on the general design of these new qualifications. We have also set out our policy and technical arrangements for the subjects where first courses began in September 2015,¹ and for the subjects which will be introduced for first teaching from September 2016.² This includes GCSEs, AS and A levels in French, German and Spanish.

This consultation focused on changes to the regulatory arrangements that we must put in place to make sure that awarding organisations design, deliver and award new GCSEs, AS and A levels in modern foreign languages other than French, German and Spanish in line with our policy decisions.

¹ New GCSEs in English language, English literature and mathematics, as well as new AS and A levels in art and design, biology, business, chemistry, computer science, economics, English language, English language and literature, English Literature, history, physics, psychology and sociology.

² New GCSEs in art and design, biology, chemistry, citizenship studies, classical Greek, combined science, computer science, dance, drama, food preparation and nutrition, French, geography, German, history, Latin, music, physical education, physics, religious studies and Spanish. New AS and A levels in classical Greek, dance, drama and theatre, French, geography, German, Latin, music, physical education, religious studies and Spanish.

2. Who responded?

We received a total of 30 responses to our consultation – 19 from individuals and 11 from organisations. Twenty seven of the responses were from individuals or organisations based in England, one based in Spain and two based in Italy.

Table 1: Breakdown of consultation responses

Personal / organisation response	Respondent type	Number
Personal	Teacher	14
Personal	Educational specialist	4
Personal	Student	1
Organisation	Awarding organisation	2
Organisation	Subject association or learned society	2
Organisation	Union	1
Organisation	School or college	4
Organisation	University	1
Organisation	Other	1

3. Approach to analysis

We published the consultation on our website. Respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us. The consultation included 16 questions.

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

Data presentation

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

The consultation asked 16 questions and each had a different focus. Respondents could choose to answer all or just some of the questions.

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

For these questions, we set out respondents' views using the 5-point scale. Where respondents provided further comments, we present these separately.

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

4. Views expressed – consultation response outcomes

In this section we report the views, in broad terms, of those who responded to the consultation document. We have structured this around the questions covered in the consultation document.

One respondent chose not to answer all of our questions directly, and instead submitted a mix of direct answers and more general comments about the reform of modern foreign languages. We set these out under 'Other issues' below.

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

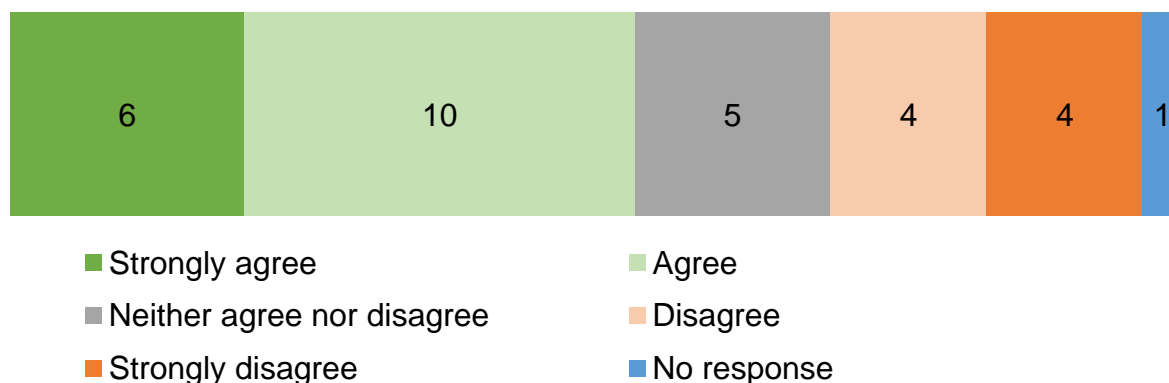
A list of the organisations that responded to the consultation is included in Appendix A.

Approach to the assessment of modern foreign languages

Question 1: To what extent do you agree or disagree that we should adopt the same approach to the assessment of GCSEs, AS and A levels in modern foreign languages, as we did for GCSEs, AS and A levels in French, German and Spanish?

As illustrated in figure 1, 16 respondents who answered this question agreed or strongly agreed with our proposed approach. Eight respondents either disagreed strongly or disagreed with our proposed approach. Five respondents neither agreed nor disagreed. One respondent answered that they strongly agreed for GCSE modern foreign languages but strongly disagreed for AS and A level modern foreign languages – this respondent's views are not included in the figures.

Figure 1 - overview of responses to Question 1



Most respondents who agreed or strongly agreed (6 organisations, 10 individuals) commented that a consistent approach was important to ensure comparability.

Most respondents who disagreed or strongly disagreed (1 organisation, 7 individuals) commented that other modern foreign languages such as Russian, Chinese, and Japanese were more difficult than European languages to learn, were given less teaching time, and were taken by large numbers of native or near-native speakers and this should be taken into account.

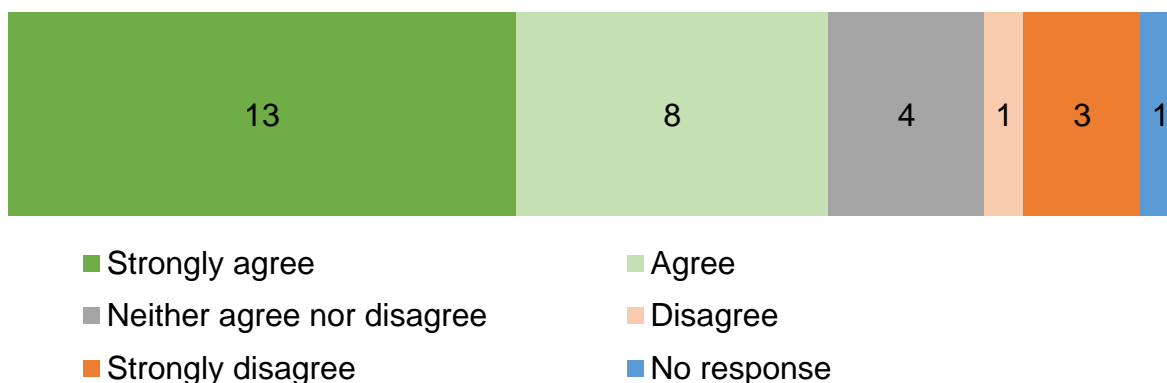
One organisation suggested that the text stating the requirement for GCSEs in languages using logographic scripts that all questions must be set in English should be included in the 'Interpretations and definitions' section of the guidance for each assessment objective, and that it is made clear in the guidance that prompts for picture cards and role plays can be set in English. The same organisation suggested that awarding organisations should be permitted to set all questions for AS and A level Chinese assessments in English and that the requirements that no more than 10% of the total marks for the qualification may be used for responses in English should not apply to AS and A level Chinese.

The organisation that strongly disagreed with the proposals for AS and A level commented that assessing the spoken form of the language was not viable for other languages because of the difficulty in recruiting senior examiners with the appropriate levels of assessment expertise.

Question 2: To what extent do you agree or disagree that we should expand the existing GCSE and GCE Modern Foreign Languages(French, German, Spanish) Conditions and Guidance documents so that they apply to other modern foreign languages?

As illustrated in figure 2, 21 respondents agreed or strongly agreed with our proposed approach. Four respondents disagreed or disagreed strongly with our approach. One respondent agreed strongly for GCSE but disagreed strongly for AS and A level – this respondent's views are not included in the figures.

Figure 2 - overview of responses to Question 2



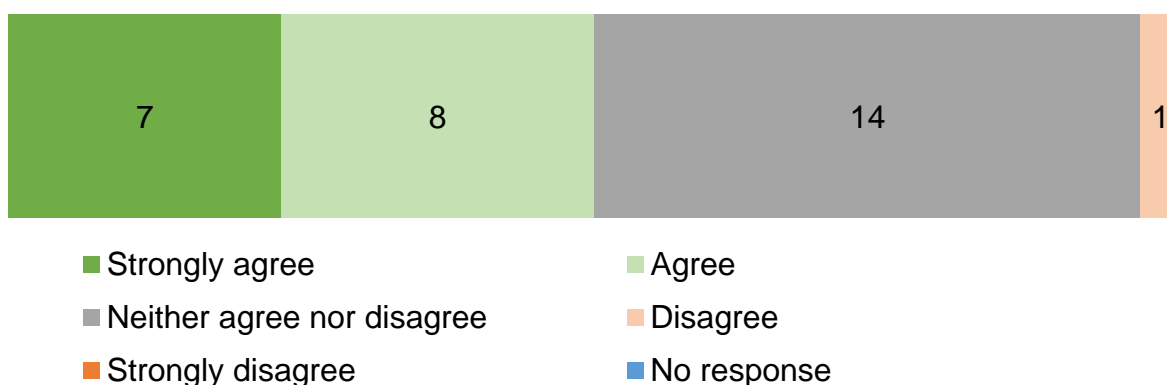
Most respondents who agreed or strongly agreed with our proposals commented that this would be important for consistency between languages. All respondents who disagreed or strongly disagreed commented that this was for the same reasons outlined in response to question 1.

The respondent who strongly agreed for GCSE but strongly disagreed for AS and A level commented that conditions and guidance for AS and A level qualifications should be developed as part of an alternative approach for languages other than French, German and Spanish.

Question 3: To what extent do you agree or disagree that we should introduce a Condition on interpretation and definition which sets out what is meant by the term ‘Modern Foreign Language’?

As illustrated in figure 3, 14 respondents agreed or strongly agreed with our proposal. Fourteen respondents neither agreed nor disagreed. Ten respondents disagreed.

Figure 3 - overview of responses to Question 3



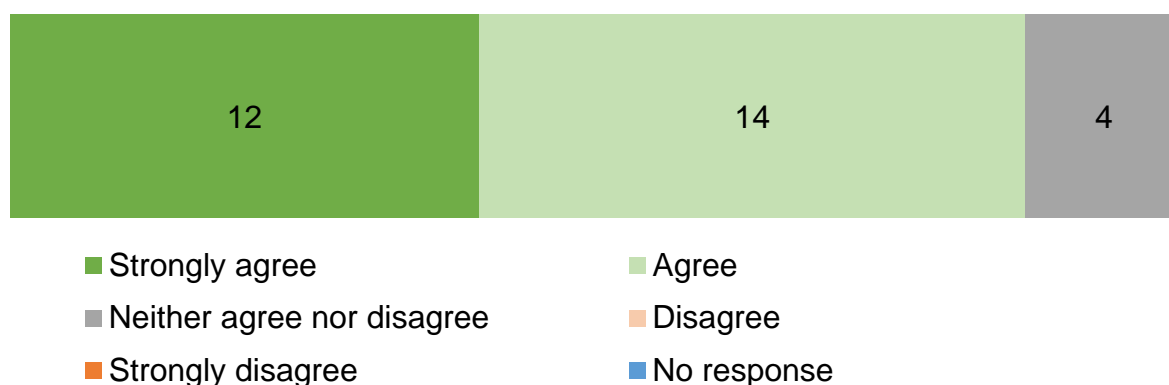
Respondents who agreed or strongly agreed with our proposal (seven organisations, eight individuals) commented that it would provide clarity. Three of the fourteen respondents who neither agreed nor disagreed, and the single respondent who

disagreed commented that the term modern foreign language was already sufficiently clear.

Question 4: To what extent do you agree or disagree with our proposed introduction of grammar requirements into the assessment requirements for GCSE, AS and A levels in Modern Foreign Languages?

As illustrated in figure 4, 26 of the 30 respondents who answered this question (18 individual, 8 organisations) agreed or strongly agreed with our proposed approach. No respondents disagreed or strongly disagreed.

Figure 4 - overview of responses to Question 4

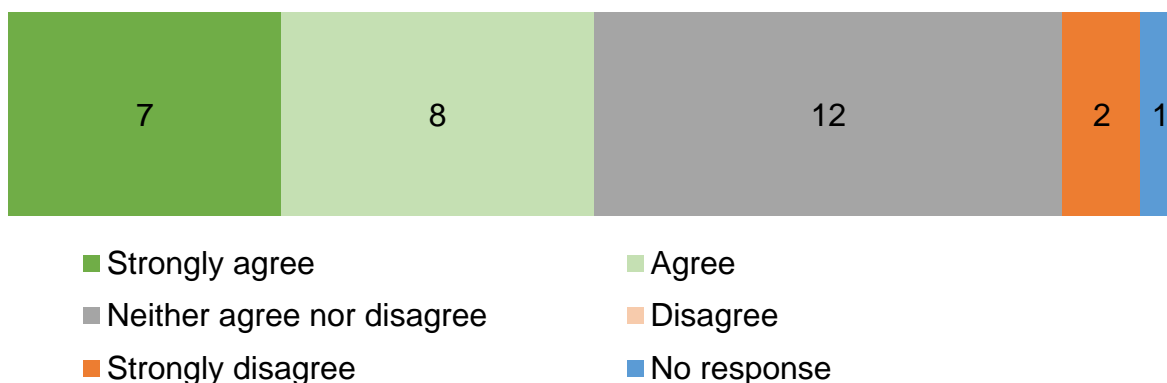


Fifteen of the respondents who agreed or strongly agreed commented that grammar was an important part of language learning. Four of the respondents who agreed or strongly agreed and one of the respondents who neither agreed nor disagreed commented that ensuring comparability of grammar may be difficult for languages that are very different to French, German and Spanish.

Question 5: To what extent do you agree or disagree with our proposal to move the guidance on the length of translation exercises in the AS and A level Guidance document from the section on guidance on assessment to the section on guidance on subject content?

As illustrated in figure 5, half of respondents who answered this question (8 individuals, 7 organisations) agreed or strongly agreed with our proposed approach, 12 respondents (8 individuals, 4 organisations) neither agreed nor disagreed and two individuals strongly disagreed. One respondent did not answer this question.

Figure 5 - overview of responses to Question 5

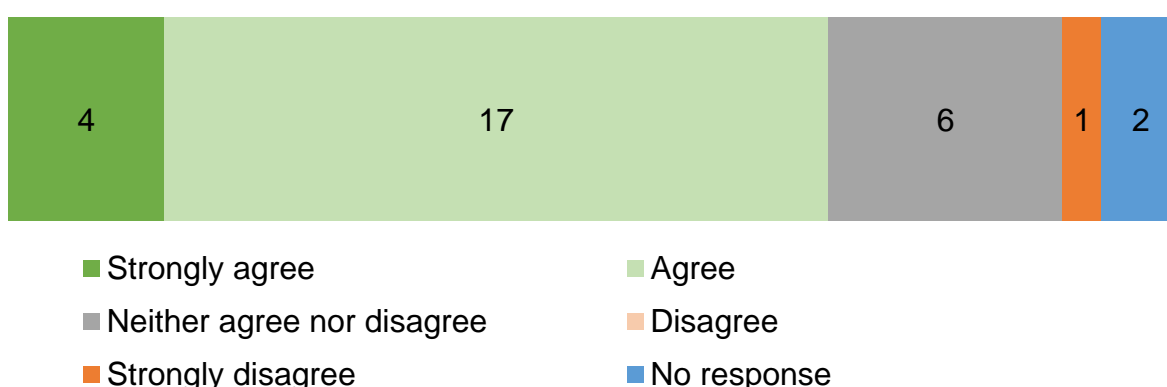


Five respondents who agreed or strongly agreed with our approach commented that it was sensible and ensured consistency with GCSE. Nine respondents who neither agreed nor disagreed provided no comment. One individual who strongly disagreed commented that the guidance should be included in both sections.

Question 6: To what extent do you agree or disagree with our proposed approach to setting additional guidance relating to the length of translation exercises at GCSE, AS and A level?

As illustrated in figure 6, two thirds of respondents (8 organisations, 13 individuals) agreed or strongly agreed with our proposed approach. Six respondents neither agreed nor disagreed (4 individuals, 2 organisations) and one individual strongly disagreed. Two respondents did not answer this question.

Figure 6 - overview of responses to Question 6



Most respondents who agreed or strongly agreed commented that the guidance was helpful with one individual and one organisation commenting that more detailed guidance would be preferable. The organisation suggested that guidance for all languages being offered at GCSE and AS and A level, particularly those without Roman script, would be helpful in ensuring comparability. One individual who agreed

suggested that Japanese usually takes more symbols than Chinese to write even simple sentences. Another individual commented that it was hard to know whether the proposed number of Chinese characters was fair without seeing examples of content.

One organisation that neither agreed nor disagreed commented that at GCSE more Japanese characters might be required to get an equivalent meaning in English than Chinese characters.

The individual who strongly disagreed commented that characters in Chinese and Japanese are not equivalent as Japanese has different writing systems, and translation is more challenging in Japanese than in European languages.

Question 7: Do you have any comments on the guidance that we are proposing in relation to the length of translation exercises?

Eleven respondents (7 organisations, 4 individuals) provided comments on the guidance we proposed. One individual commented that the lengths could be 25% longer, another commented that the lengths could be shorter or teaching time longer in comparison with French, German and Spanish, and three individuals commented that the lengths were appropriate. Three respondents (2 individuals and 1 organisation) commented that a larger number of Japanese than Chinese characters may be needed to get the equivalent meaning in English. The organisation suggested this was the case only at GCSE.

One individual commented that the lengths appeared to be suitable and another commented that the GCSE Chinese guidance was good.

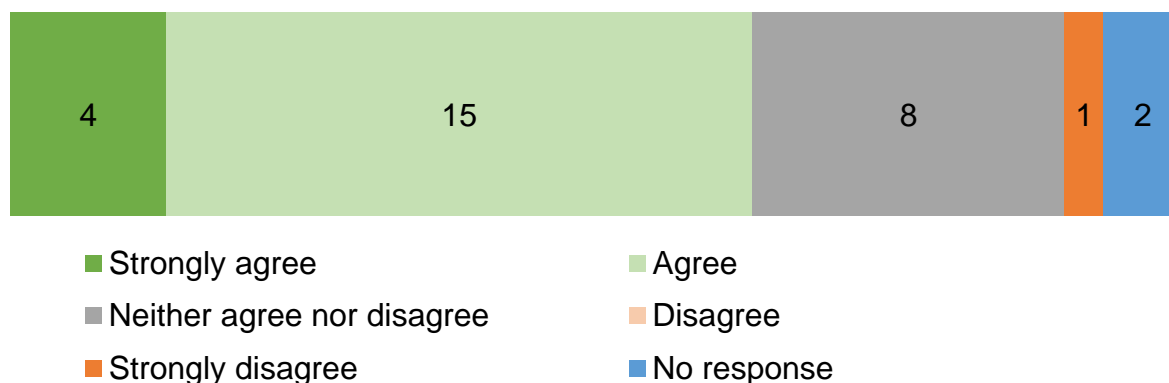
One organisation commented that guidance starting from a minimum number of words was sensible but that care should be taken to ensure that students of languages where texts are effectively shorter are not penalised because the texts are more difficult to translate precisely because they are shorter.

One individual commented that comparability across languages needed careful consideration.

Question 8: To what extent do you agree or disagree with our approach to setting additional guidance relating to the length of an extended written text in the reading assessment at GCSE?

As illustrated in figure 8, 19 respondents (8 organisations, 11 individuals) agreed or strongly agreed with our proposal. Eight respondents (2 organisations and 6 individuals) neither agreed nor disagreed. One individual strongly disagreed, and two respondents did not answer.

Figure 7 - overview of responses to Question 8



One organisation that agreed commented that guidance on the length of written texts for other languages with a non-Roman script would also be helpful. One individual that agreed commented that authentic materials of an appropriate language level in Chinese would be hard to find. Two individuals who responded referred to comments made in relation to previous questions. Two organisations that agreed commented that the guidance would prove useful to exam boards.

One individual and one organisation that neither agreed nor disagreed referred to comments made in relation to previous questions. One individual who neither agreed nor disagreed commented that languages with Arabic/Persian scripts are usually hard to write.

The individual that strongly disagreed referred back to comments made in response to previous questions and commented that setting a length without specifying what script is being referred to is unclear.

Question 9: Do you have any comments on the guidance that we are proposing in relation to the length of an extended written text in the reading assessment?

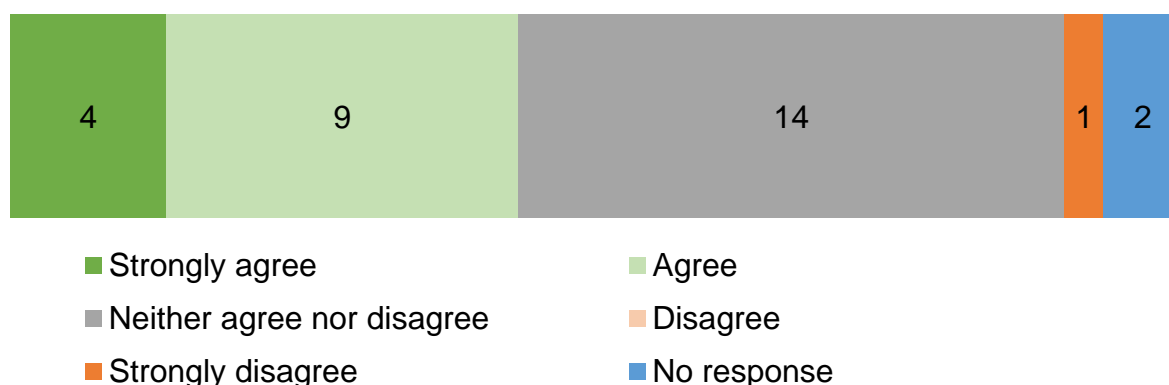
Seven respondents provided comments (3 individuals, 4 organisations). All three individuals referred back to comments made in response to previous questions as did two of the organisations. The other two organisations commented that the lengths seemed reasonable, and provided welcome challenge and preparation for more advanced study.

Question 10: To what extent do you agree or disagree that we should introduce a Condition on the titling of GCSE, AS and A level Chinese qualifications?

As illustrated in figure 10, 13 of the respondents who answered this question (six organisations, seven individuals) agreed or strongly agreed with our proposals. Fourteen respondents (four organisations, ten individuals) neither agreed nor

disagreed. One individual strongly disagreed. Two respondents did not answer this question.

Figure 8 - overview of responses to Question 10



Four organisations who agreed or strongly agreed commented that it would add clarity. One individual who strongly agreed commented that it would distinguish native and non-native speakers. One organisation that agreed suggested removing the word 'spoken' so that it was clear the title referred to listening as well as speaking assessments. The individual who strongly disagreed commented that the titling would confuse the certificate and was impractical.

Question 11: Are there any additional rules or guidance that we should introduce in relation to modern foreign languages?

Twelve respondents (6 organisations, 6 individuals) provided comments. Two individuals commented that the assessments should be aimed at non-native speakers. One of these respondents suggested a requirement for a literature essay in English. Two individuals suggested separate assessments for near-native or native speakers. One individual requested guidance on the requirement for dictation.

One individual commented that for GCSE Chinese: listening papers should not require students to read and write Chinese characters; speaking assessments should not require students to read Chinese characters; and writing assessments should either allow candidates to write answers on a computer by inputting pinyin, allow access to a dictionary or reduce the range of topics.

One organisation commented that, where provided, vocabulary lists for Chinese and Japanese should make clear that the expected vocabulary is less than is expected for European languages.

One organisation commented that rules and guidance should not prevent coherent communication from being rewarded and that attainment for all should be facilitated.

One organisation commented that vocabulary lists for lesser-taught languages should be required to help teachers of these languages.

One individual commented that there are script issues in some languages but that exam boards should be able to resolve these with the help of their language experts.

One organisation suggested the inclusion of a maximum number of words/characters in relation to translation exercises and extended texts to ensure comparability at both ends of the spectrum.

One organisation answering in relation to Japanese provided a large number of comments:

- The more guidance provided about grammar, vocabulary and kanji the better.
- Some languages have a greater difference to European languages so criteria and guidance should be adapted to ensure the assessments are of similar difficulty.
- A and AS level should still be achievable for learners that have started from scratch in Key Stage 3 or Key Stage 4.
- The full range of formal and informal register in Japanese is too advanced for GCSE and A level students but the forms that are currently taught at GCSE should be enough to prepare them for the workplace.
- Authentic sources should be chosen carefully or adapted for use as students cannot be expected to know all the kanji at GCSE and A level. When students are faced with unfamiliar material help should be provided.

Our proposed Conditions and guidance

Question 12: Do you have any comments on our proposed amendments or additions to the Conditions and requirements for GCSE, AS or A level modern foreign languages?

Six respondents (4 organisations, 2 individuals) provided comments. One individual and two organisation referred to comments made in response to previous questions. One individual suggested looking at the Pre-U as an example of how it should be done at A level. One organisation commented that the most able candidates must be able to attain the top grades. One organisation commented that the conditions and requirements seemed fair.

Question 13: Do you have any comments on our proposed amendments or additions to the guidance for GCSE, AS or A level modern foreign languages?

Eight respondents (6 organisations, 2 individuals) provided comments. One individual asked how speaking assessments could be undertaken in supplementary schools³ or in cases where learners approach the exam after home tutoring. The other respondents all referred to comments made in response to previous questions.

Equality impact analysis

Question 14: We have not identified any ways in which the proposals for GCSE, AS and A level modern foreign languages would impact (positively or negatively) on persons who share a protected characteristic.⁴ Are there any potential impacts we have not identified?

Five respondents (2 organisations, 3 individuals) provided comments:

- One individual commented that Chinese qualifications with titles which specify whether students have been assessed in Cantonese or Mandarin might lead to racial discrimination, but did not explain their concern further.
- One individual commented that not allowing electronic input of Chinese characters disadvantaged dyslexic students.
- One organisation commented that candidates for less-taught languages who are not of the same race as native speakers are at a disadvantage.
- One organisation commented that speaking and listening components are challenging for those with hearing difficulties.
- One individual provided comments about manageability problems for schools in terms of resources, teaching time and teachers.

³ Supplementary schools offer out-of-school-hours education for children and young people. Classes often run in the evening or at weekends and are set up by local voluntary organisations or community groups

⁴ 'Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.

Question 15: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Six respondents (3 organisations, 3 individuals) provided comments. The individual who commented on the titling of Chinese qualifications in response to question 14 above, suggested not recording the endorsement in the title.

The individual who previously commented on the use of electronic input for dyslexic candidates suggested allowing electronic input.

One organisation commented that exam boards should be allowed to develop specifications that redress the balance towards non-native speakers.

Two respondents (1 organisation and 1 individual) recommended listening carefully to feedback from centres and candidates and adapting the regulations, as necessary.

Question 16: Do you have any other comments on the impacts of the proposals on students who share a protected characteristic?

Only two individuals provided comments. Both comments addressed points that the respondents had already raised above.

Other issues

One organisation provided a response that did not directly address the issues covered by the consultation questions. In response to question 1 this organisation commented that:

- The requirement for students to refer to cultural and social aspects of the countries where the language is spoken is welcomed.
- The inclusion of translation at AS and A2 is welcomed.
- April is too early for the oral examination as not all the syllabus will have been covered and there is insufficient time for practice.

In response to question 2, the organisation commented on the requirement that assessment tasks should not be restricted to the vocabulary lists, noting that other subjects do not examine material not in the specification and even if all vocabulary was contained in the specification students would be challenged.

In response to question 3, this organisation commented that the research proposal at A level is welcomed but noted concerns about the weight of the topic and the amount of work expected of students, and whether it is separate from the cultural topics studied such as literature.

In response to question 4, this organisation commented that it would be better for all students to be examined by external examiners. It recommended that Ofqual regulate so that exam boards are consistent in their use of either audio or audio-visual recording of speaking assessments. It also commented that 5 minutes was too short for the A level speaking preparation time.

In response to question 5, the organisation noted that not allowing access to dictionaries made the exam a rather artificial environment.

Appendix A: List of organisational consultation respondents

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

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

AQA

ASCL

Bolton School Boys' Division

Girls' Schools Association

Japan Foundation

Katharine Lady Berkeley's School

Pearson

St Bernard's Catholic Grammar School

St Mary's Calne

UCL IOE Confucius Institute

University Council of Modern Languages

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