

# **Analysis of Responses to our Consultation on Conditions and Guidance for AS and A Level Modern Foreign Languages (French, German, Spanish)**



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## **Executive summary**

Our consultation about the Conditions and guidance for AS and A level modern foreign languages (French, German, Spanish) took place between 26th February 2015 and 27th March 2015.

The consultation questions were available either to complete online or to download. A copy of the consultation is available at [www.gov.uk/government/consultations/as-and-a-level-reform-regulations-for-modern-foreign-languages](http://www.gov.uk/government/consultations/as-and-a-level-reform-regulations-for-modern-foreign-languages).

There were 11 responses to the consultation – 4 from individuals and 7 from organisations. All responses were in a form that matched or broadly followed the layout of the online consultation.

On the whole, respondents supported our proposed approach, but some raised concerns about our proposals for the non-exam assessment. Respondents were particularly concerned about the scope for students to take the non-exam assessment under different conditions, and the potential for some students to gain an advantage as a result.

## **1. Introduction**

This report is a summary of the views expressed by those who responded to our consultation on the Conditions and guidance for AS and A level modern foreign languages (French, German, Spanish) which took place between 26th February 2015 and 27th March 2015.

Following earlier consultations, we have already taken decisions on:

- the general design of reformed AS and A level qualifications;
- our policy and technical arrangements relating to those subjects that are due to be introduced for first teaching in 2015;<sup>1</sup> and
- the design of the reformed AS and A level qualifications in French, German and Spanish that are to be introduced for first teaching in 2016.<sup>2</sup>

This consultation focused on more technical matters – that is, on the regulatory arrangements that we must put in place to make sure that exam boards design, deliver and award reformed AS and A level qualifications in modern foreign languages in line with our policy decisions.

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<sup>1</sup> Reformed AS and A level qualifications in art and design, biology, business, chemistry, computer science, economics, English language, English language and literature, English literature, history, physics, psychology and sociology will be taught from September 2015.

<sup>2</sup> [www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016](http://www.gov.uk/government/consultations/gcses-as-and-a-levels-reform-of-subjects-for-september-2016)

## **2. Who responded?**

We received a total of 11 responses to our consultation.<sup>3</sup> Four responses were from individuals and seven were from organisations. All of the responses were from individuals or organisations based in England or Wales.

**Table 1: Breakdown of consultation responses**

| <b>Personal / Organisation response</b> | <b>Respondent type</b> | <b>Number</b> |
|---|------------------------|---------------|
| Personal                                | Teacher                | 2             |
| Personal                                | Educational specialist | 1             |
| Personal                                | Parent / Carer         | 1             |
| Organisation                            | Exam board             | 4             |
| Organisation                            | Union                  | 3             |

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<sup>3</sup> Where responses were received in hard copy we entered them into the online platform.

### **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 nine questions.

This was a consultation on the views of those who wished to participate and while we tried 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 of any specific group.

#### **Data presentation**

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

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

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 and provide analysis of the data broken down by stakeholder.

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

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

|  |
|--|
| <p><b>Question 1 – Do you have any comments on the draft Conditions for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?</b></p> |
|--|

This question referred to our draft Condition that required exam boards to comply with the Department for Education’s subject content requirements for new AS and A levels in modern foreign languages,<sup>4</sup> and with our published assessment objectives.

Seven respondents (three individuals, four organisations) did not comment on our proposals.

Of the respondents who did comment, only two (both organisations) commented directly on our proposals:

- One noted that it made sense to apply similar rules to modern foreign languages as to other subjects.
- Both expressed reservations about provisions that allow for future changes to our rules and guidance.

The remaining responses to this question focused on other issues:

- Two respondents (one individual, one organisation) commented on our proposed rules for non-exam assessment. We have analysed these comments under question 3 below.

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<sup>4</sup> [www.gov.uk/government/publications/gce-as-and-a-level-modern-foreign-languages](http://www.gov.uk/government/publications/gce-as-and-a-level-modern-foreign-languages)

- One respondent (an organisation) welcomed elements of the subject content.

**Question 2 – Do you have any comments on the draft Conditions, requirements and guidance on assessment for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

This question referred to our draft requirements and guidance covering:

- the use of vocabulary lists;
- access to texts in exams; and
- length of translation exercises.

Six respondents (three individuals, three organisations) did not comment on our proposals.

Three (one individual, two organisations) commented on our proposed approach to vocabulary lists. All three noted that vocabulary lists are likely to be of limited value at AS and A level and one noted that existing qualifications do not use vocabulary lists.

One (an organisation) commented on our proposed rules for non-exam assessment. We have analysed these comments under question 3 below.

One (an organisation) commented on our proposed guidance on assessment objectives. We have analysed these comments under question 6 below.

**Question 3 – Do you have any comments on the draft Conditions and requirements for non-exam assessment for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

This question referred to our draft rules covering non-exam assessment. We proposed that the non-exam assessment should:

- take place over a five-week period in April and May;
- be marked by the exam board;
- be conducted either by the exam board, or by a teacher within a school;
- at AS, involve two unseen discussions on the themes studied as part of the course totalling 12–15 minutes (with a separate preparation period of 15 minutes prior to the assessment); and
- at A level, involve a short presentation of the student's independent research, followed by discussion of that research, and an unseen discussion based on a



theme studied as part of the course. The A level exam would last 21–23 minutes, including 5 minutes to prepare for the unseen discussion.

Five respondents (three individuals, two organisations) did not comment on our proposals.

Two (both organisations) commented that our proposals seemed sensible and would allow students a broader range of opportunities to demonstrate their skills.

Two (both organisations) expressed concerns about the timing of non-exam assessment. One suggested that it should be later in the year and the other suggested a longer period to complete all assessments.

One (an organisation) suggested that we should prescribe the design of tasks for the non-exam assessment in more detail.

One (an individual) commented that the length of the A level non-exam assessment seemed excessive.

One (an organisation) commented that allowing assessments to be conducted by teachers and/or external examiners could lead to different experiences for students – and that this needed to be taken into account.

**Question 4 – Do you have any views on our proposed approach to the recording of non-exam assessments for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

We proposed that all non-exam assessments should be recorded, but that we need not specify whether recordings should be audio only or audiovisual.

Six respondents (four individuals, two organisations) did not comment on our proposals.

Four (all organisations) commented that differences in the assessment experience arising from different recording methods could be unfair to students, or could lead to results that are not strictly comparable.

One (an organisation) commented that it should make no difference to the assessment which method is used, but that audiovisual recording may help deter malpractice.

**Question 5 – Do you have any comments on the draft Conditions on access to dictionaries for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

This question referred to our draft Conditions that prohibited access to dictionaries in exams and in the formal preparation time prior to the non-exam assessment.

Six respondents (three individuals, three organisations) did not comment on our proposals.

Three (all organisations) supported our proposed approach.

Two (both individuals) commented that tasks would be more realistic if students had access to dictionaries.

**Question 6 – Do you have any comments on the draft guidance on assessment objectives for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

This question referred to the draft guidance on assessment objectives which outlines how we expect exam boards to interpret the assessment objectives in terms of discrete ‘elements’ within each assessment objective, coverage expectations and key areas of emphasis in each assessment objective.

Seven respondents (all four individuals, three organisations) did not comment on our proposals. Of the four organisations that responded:

- One noted that it was not clear how the quality of students’ responses should be assessed.
- One noted that it was not clear what proportion of marks should be made available for responses in English.
- One supported our proposals, with one commenting that they would lend rigour and credibility to the subject area.
- One commented on the assessment objectives themselves, which were outside the scope of the consultation (having been the subject of an earlier consultation).

**Question 7 – We have not identified any ways in which our proposals would impact (positively or negatively) on persons who share a protected characteristic<sup>5</sup> (beyond those we have considered in earlier consultations). Are there any potential impacts we have not identified?**

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<sup>5</sup> ‘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.

Ten respondents (four individuals, six organisations) did not comment on our proposals.

The respondent (an organisation) who did comment made a general point that exams need to be designed to work for students with a wide range of disabilities.

**Question 8 – Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?**

No respondents commented on our proposals.

**Question 9 – Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?**

Nine respondents (three individuals, six organisations) did not comment on our proposals.

One (an organisation) commented that consideration needed to be given to candidates whose native language was not English.

One (an individual) commented on issues outside the scope of the consultation, which we discuss under 'Other issues' below.

### **Other issues**

One respondent (an individual) expressed concerns about the future of other languages at GCSE, AS and A level.

## **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

OCR

NASUWT

Pearson

Voice

WJEC-CBAC

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