

**Analysis of Responses to our
Consultation on Requirements and
Guidance for GCSE English Language
– Spoken Language**



July 2015

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Contents

Executive summary	2
1. Introduction.....	3
Background	3
2. Who responded?	4
3. Approach to analysis	5
Data presentation	5
4. Views expressed – consultation response outcomes	6
Other issues	14
Appendix A: List of organisational consultation respondents.....	15

Executive summary

Our consultation about revised requirements and guidance for GCSE English language took place between 4th June 2015 and 2nd July 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/gcse-reform-regulations-for-english-language.

There were 51 responses to the consultation – 34 from individuals and 17 from organisations.

Respondents raised a number of issues about the proposals on which we were consulting. Not all of these issues were directly relevant to the consultation and many respondents had misunderstood aspects of the proposals.

In particular:

- a number of teachers mistakenly thought we were proposing that all students' spoken language assessments must be recorded, rather than a sample only; and
- a number of responses returned to our policy of having two grades for GCSE English language, one for the written assessment and one for the spoken language assessment – we have already consulted on this.

1. Introduction

This report is a summary of the views expressed by those who responded to our consultation on the requirements and guidance for GCSE English language which took place between 4th June 2015 and 2nd July 2015.

Background

Reformed English language GCSEs are being introduced in England and will be taught in schools from September 2015.

We published Conditions, requirements and guidance for new English language GCSEs in April 2014. Exam boards used these rules and guidance to develop specifications and sample assessment materials for the new GCSE and we accredited these between August 2014 and October 2014.

The specifications we accredited did not include the detailed arrangements for the spoken language aspect of the qualification. We asked the exam boards to trial aspects of the arrangements for the spoken language assessments before finalising their specifications. The exam boards worked together on these trials with 28 schools. We are grateful to the schools and teachers who engaged with these trials, the outcomes of which informed the proposals on which we consulted.

This consultation focused on the additional subject-specific requirements and guidance that we proposed to put in place to secure the fair and consistent assessment of spoken language skills in new English language GCSEs in line with the government's published subject content.

2. Who responded?

We received a total of 52 responses to our consultation.¹ Thirty-four responses were from individuals and 18 were from organisations. All of the responses were from individuals or organisations based in England or Wales.

Table 1: Breakdown of consultation responses

Personal / Organisation response	Respondent type	Number
Personal	Teacher	34
Organisation	Subject association / Learned society	1
Organisation	Exam board	3
Organisation	School	6
Organisation	School association	2
Organisation	Union	2
Organisation	Equality group / Equality organisation	3
Organisation	Local authority	1

¹ 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 eight 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 eight questions and each had a different focus. Respondents could choose to answer all or just some of the questions.

Where responses did not match or broadly follow the layout of the online consultation, we have considered the issues raised under the relevant questions or under 'Other issues' below.

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.

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>Question 1 – Do you have any comments on our proposed Condition, requirements and guidance for spoken language assessments in new English language GCSEs?</p>

Our proposals were as follows:

- The Conditions, requirements and guidance should provide for spoken language to be assessed by means other than by exam (i.e. by non-exam assessment).
- In line with the subject content, a student’s ability to make a presentation in a formal setting, to listen and respond to spoken language, and to use standard English effectively in speeches and presentations should be assessed.
- Exam boards must require from each school a statement confirming it had taken reasonable steps to make sure that each of its students had completed the spoken language assessment.

Forty-three respondents commented on this question.

Many of the responses addressed wider issues about the spoken language assessment that went beyond the proposals in the Condition. These issues are summarised at the end of this report.

Four respondents asked for clarity about the nature of the formal setting for the assessment.

Two raised concerns that some students would be intimidated by having to make a presentation in a formal setting.

One welcomed the proposed formality of the setting in which the presentation would be made.

One (an exam board) suggested that students should be able to demonstrate the required skills through a debate.

One (an exam board) asked for flexibility on audience size to accommodate assessments in places such as hospitals and secure settings.

Few respondents commented on the proposed requirement on schools to confirm they had taken reasonable steps to make sure that their students took the assessment. One respondent (an individual) said that such a requirement was unnecessary and insulting to professionals working in schools.

Two (both organisations representing the interests of deaf students) suggested that the proposed statement would not be strong enough. One of these organisation also raised a concern that teachers might spend too much time on the written aspects of the qualification at the expense of supporting the development of students' spoken language skills.

One (an organisation representing the interests of students with speech, language and communication needs) welcomed the proposed statement requirement but suggested that we should individually investigate any school that did not enter a student for the spoken language assessment.

Question 2 – Do you have any comments on our proposed Condition on marking and results in new English language GCSEs?
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This question referred to our proposals that those marking the spoken language assessment must use a non-marks-based approach and a set of criteria common to all exam boards.

We made the following proposals:

- The results of the assessment should be graded pass, merit or distinction.
- A student who does not meet the criteria to be awarded one of the grades, or who did not take the assessment, should receive the outcome 'not classified' – unless they have been granted an exemption from the assessment because of their disability.
- Assessments will be marked by teachers or, where necessary and desirable, exam boards.
- Exam boards must monitor teachers' marking.

- To assist monitoring, schools must provide exam boards with audiovisual recordings of a sample of their students' assessments.

Many of the comments made in response to this question were not directly related to the proposals on which we were seeking views. These comments are summarised elsewhere in this report.

Most of the comments, both in response to this question and across all responses to the consultation, focused on the audiovisual recording of students. Many who responded mistakenly believed that the proposals would require schools to make an audiovisual recording of all students taking the spoken language assessment (rather than a sample). Eighteen respondents opposed the recording of all students for a range of reasons including costs, the burden on teachers, concerns about safeguarding and the anxiety it would cause students – in particular, disabled students and students with special education needs.

Three respondents broadly welcomed the approach to marking.

Two commented that the requirements would be too demanding, especially the proposal that a student must demonstrate achievement of each of the criteria for a grade to be awarded that grade.

Three individuals suggested the workload that the approach to marking would place on teachers would be onerous and one of these suggested that teachers would not mark properly.

One suggested that the pass, merit and distinction grades would be confusing alongside a 9 to 1 grade for the written element of the qualification.

One suggested that students who did not attempt the assessment (possibly because of the actions of their school) should not receive the same grade as a student who had attempted the assessment but failed.

Three (all organisations representing the interests of disabled students) expressed concern that the pass, merit and distinction grades would not provide sufficiently granular differentiation between students.

One described the proposal that students re-sitting the written exams for the qualification could carry forward the result of their spoken language assessment as “wonderful”.

Two (both exam boards) opposed the provision for the spoken language assessment to be marked by them rather than by teachers, as they considered it would be unmanageable and inappropriate for them to mark the assessment.

A number of respondents asked for further clarity on the application of the marking criteria and for guidance to be given to teachers on their application. They raised concerns that in the absence of such guidance, or more detailed criteria, marking could be subjective.

Three respondents (all organisations representing the interests of disabled students and students with specific communication needs) opposed the sampling approach, commenting that:

- audiovisual recordings of all students' assessments would better capture their ability to communicate, including through the use of non-verbal means;
- the recordings would aid both marking and monitoring;
- if a sampling approach is taken, there must be clarity about the nature of the sample; and
- the sample would need to include disabled students.

Others who understood that only a sample of students would have to be recorded under our proposals asked for further information about the construction of the sample. One suggested that exam boards should not be free to devise their own approach.

Question 3 – Do you have any comments on our proposed certificate requirements for new English language GCSEs?

We made the following proposals:

- A student will only be given a certificate for GCSE English language if they achieve at least a grade 1 in their written exams.
- Any outcome from the spoken language assessment including 'not classified' would be included on the certificate.
- We will consult separately on how an exemption from the spoken language assessment given to a disabled student should be reported on the certificate.
- If a student does not achieve at least a grade 1 in their written exams, they will nevertheless be issued with the result of their spoken language certificate, although not as a certificate.

Twelve respondents commented on our proposals.

Most of the comments were about the policy of reporting the outcome of the spoken language assessment in a separate grade to that for the written exams. Many

respondents challenged the policy (which had been the subject of previous consultation), but did not comment directly on how the outcome of the assessment should be reported.

Two (both exam boards) asked for early confirmation of the way that an exemption should be reported.

One suggested that students who did not achieve at least a grade 1 in their written assessments should nevertheless receive a certificate for the spoken language component of the qualification.

Two (both organisations – representing the interests of deaf students and students with speech and communication needs) argued that where a disabled student had been given an exemption from the spoken language assessment, the fact of the exemption should be recorded on the certificate but not the nature of the disability that had necessitated the exemption.

Question 4 – Do you have any comments arising from the fact that the new Conditions and requirements proposed in this consultation will, if adopted, have the effect of revising the accreditation criterion for English language GCSEs?

Nineteen respondents provided comments in response to this question.

Only four comments directly related to the accreditation arrangements:

- Two commented that schools needed certainty about the qualification as it is to be taught from September 2015.
- One welcomed our proposal not to reconsider the accreditation decisions we have already taken in respect of the qualifications.
- One suggested that while a further accreditation was not necessary, we should monitor that exam boards were properly introducing the spoken language requirements.

The other comments were, in the main, about opposition to the policy decision on which we had previously consulted to have separate grades for the written and the spoken language aspects of the qualification.

Question 5 – We have not identified any ways in which our proposals for new English language GCSEs would impact (positively or negatively) on persons who share a protected characteristic.² Are there any potential impacts we have not identified?

Nineteen respondents provided comments in response to this question.

Many of the comments were based on the mistaken understanding that we had proposed that all students (rather than a sample) would have to be audiovisually recorded when taking the spoken language assessment. Respondents were concerned that such recordings would increase the anxiety of some students, including those on the autistic spectrum, and would be inappropriate for some students because of safeguarding, religious or cultural reasons. One respondent asked how students who were selectively mute or who had a stammer would be affected by the proposal.

Three suggested that the formality of the assessment setting could prevent some students, including deaf students, from performing to the best of their ability and sought clarification about the size and nature of the audience in front of which the presentation would have to take place.

Three (all organisations – representing the interests of disabled students and students with specific communication needs) raised concerns that the focus on spoken language in a formal setting would distort the way that spoken language skills were taught. As a result, students' day-to-day language skills could be ignored to the long-term detriment of students who needed support to develop those skills.

Some respondents requested clarification on the availability of notes to support students' recall, with some raising concerns about the ability of some disabled students to recall information during the presentation. Some also asked for clarification on the use of British Sign Language and sign-supported language in the assessment.

One raised concerns about the ability of students whose first language is not English to perform well in the assessment.

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

Eighteen respondents gave suggestions in response to this question.

Five suggested that the potential negative impact on some students could be mitigated if their assessments were recorded in audio form only, rather than audiovisually.

Two (both organisations – representing the interests of deaf and hearing-impaired students) argued that all students' assessments (rather than a sample) should be audiovisually recorded to support fair marking and monitoring.

Three suggested that any negative impact could be mitigated by controls on the nature and size of the audience to which the students made their presentation, or by removing the requirement to speak in front of an audience altogether.

A number of suggestions were made about how the assessment could be managed to reduce the potential negative impact on deaf and hearing-impaired students and others with speech and communication needs:

- the layout of the room;
- the use of sign supported language to prompt and to ask questions of students;
- access to prompt cards;
- the provision of extra time in which to complete the assessment; and
- clearer marking criteria or guidance to support teachers when assessing their students.

The importance of training and supporting teachers to teach and assess deaf and hearing-impaired students' spoken language skills was also highlighted.

Question 7 – Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?

Four respondents made comments in response to this question.

One commented that the assessment would “count for nothing” and so should be removed.

One raised concerns about the impact of the assessment on students experiencing emotional difficulties.

One sought clarification about the use of British Sign Language as a reasonable adjustment.

One expressed concerns that students with communication difficulties would not be able fully to demonstrate their skills in a 10-minute assessment and that a three-grade scale would not allow for adequate differentiation between students.

Question 8 – Do you have any comments on the impacts of our proposals on schools and/or awarding organisations?

Thirty-four respondents made comments in response to this question.

Eleven returned to the issue of the recording of the assessments, arguing that any requirement that all students would have to be audiovisually recorded would be costly, technically challenging and time-consuming.

One sought clarification on how the sample of students to be recorded for monitoring purposes would be chosen.

One raised concerns about teachers' ability to undertake the assessments and suggested that they should be provided with appropriate training and guidance – especially in how to support students to develop their spoken language skills and to assess those with specific communication needs.

Nine made more general comments about the amount of change with which schools and teachers are dealing and their preparedness to teach the new qualifications.

Four suggested that, as the outcome of the spoken language assessment is to be graded separately to that for the written exams, the outcome would be worthless. One also suggested that teachers would not therefore take the assessment seriously.

Two said the additional workload placed on teachers would be unmanageable.

One questioned the manageability of the assessment for students taking GCSE English language in one year.

Two asked about arrangements for students who needed to re-sit the current GCSE English language qualification.

Some raised concerns about the manageability of the assessments in further education colleges, in which large numbers of students might be re-sitting the qualifications in November.

Two (both exam boards) raised concerns that schools might ask exam boards to assess their students' performance in the spoken language assessment because the draft Condition does not prohibit this.

Other comments included the need for teachers to be appropriately trained and guided to support and assess students with communication needs.

Other issues

A number of respondents referred to the policy decision that the outcome of the spoken language assessment should be graded separately to that for the written assessment. This was the subject of a previous consultation and was not consulted on here. Those who commented on this policy generally suggested that the approach would devalue spoken language skills.

Appendix A: List of organisational consultation respondents

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

Below we list those organisations that submitted a response to the consultation.³ We have not included a list of those responding as an individual. However, all responses were given equal status in the analysis.

AQA

Association of Colleges

Association of School and College Leaders

Association of Teachers and Lecturers

British Association of Teachers of the Deaf

Buckinghamshire County Council

Henry Box School, Oxfordshire

Independent Schools Association

OCR

Pearson

The City of Leicester College, Leicestershire

The Communication Trust

The English Association

The National Deaf Children's Society

Wolsingham School, County Durham

³ Some organisations requested that their responses be treated anonymously. They therefore do not appear on this list.

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