



Department
for Education

Reformed AS and A level subject content: modern foreign languages (smaller cohorts)

Government consultation response

March 2017

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Introduction

On 1 December 2016 the Department for Education published a consultation on proposed content for AS and A levels in modern foreign languages (alternative content for languages with smaller cohorts) for use in England. This applies to twelve languages: Arabic, Bengali, Gujarati, Modern Greek, Modern Hebrew, Japanese, Panjabi, Persian, Portuguese, Polish, Turkish and Urdu. The content is designed to encourage development of the knowledge and skills needed for progression to undergraduate study and employment.

The consultation invited responses on the following questions:

1. Is the requirement to apply three skills in combination suitable, and will that requirement help to secure a level of demand in the content overall which is comparable to that required for French, German, Spanish, Chinese, Italian and Russian?

Do you have any comments on the other differences described in the proposal and rationale?

2. The proposed title of the content for this qualification, modern foreign languages AS and A level (alternative content for languages with smaller cohorts), has been drafted to make a clear distinction between students who have completed qualifications based on this content and students who have completed qualifications based on the main content for modern foreign languages (which includes the assessment of speaking skills). Do you have any comments on the proposed title?

3. Do you think that any of the proposals have the potential to have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics' (disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?

4. How could any adverse impact be reduced and how could the subject content be altered to better advance equality of opportunity between persons who share a protected characteristic and those who do not share it?

The consultation closed on 18 January 2017. There were 25 responses from schools, two from further and higher education institutions, 18 from organisations including language subject associations, and 18 from teachers and other individuals with an interest in the subject.

Ofqual, the independent regulator, consulted in parallel on AS and A level assessment arrangements for these languages. Ofqual's response to that consultation is available at: www.gov.uk/government/consultations/

The Department has considered the responses and has worked with awarding organisations and Ofqual to agree the final subject content.

A full list of the organisations that responded, and did not ask for their response to remain anonymous, can be found at Annex A.

Background

The government is introducing new subject content at GCSE, AS and A level, to ensure that students are well equipped for further and higher education, and for employment. The changes we are making to AS and A levels will ensure that they remain fit for purpose, responding to the concerns of higher education institutions – that students lack some of the knowledge and skills necessary for undergraduate success¹. The new A levels are linear, which means that all examinations will be at the end of the two year course, allowing more time for teaching and for students to deepen their understanding of the subject. The AS is entirely decoupled from the A level, so that the marks do not count towards the A level grade.

New AS and A level content is being introduced in schools in four phases. New qualifications in the first two phases were introduced in September 2015 and 2016, with the third phase planned for 2017. A number of modern foreign languages, and two ancient languages, have been included in these first three phases. The fourth and final phase, with new qualifications introduced in September 2018, comprises twelve modern foreign languages and one ancient language².

The twelve modern languages are listed on page 3 above. Specifications for these languages must offer levels of demand and challenge which are broadly comparable to specifications for languages governed by the main content for modern foreign languages (French, German, Spanish, Chinese, Italian, Russian), published in 2014. The key difference is that students will not be required to demonstrate speaking skills in any of the twelve languages to which this consultation applies, in the light of particular challenges in assessing these skills, including difficulties in recruiting trained examiners with the specialist expertise. In the absence of requirements for students to demonstrate speaking skills, we proposed that students will be required to apply language skills (listening, reading, and writing) in combination, responding to spoken and written sources addressing common subject matter. This was designed to ensure that the overall standard of the qualifications is the same as A and AS levels in the more widely taught languages.

Subject content requirements become regulatory documents which set out the minimum knowledge, understanding and skills needed for AS and A level qualifications, or GCSEs.

¹ 2012 Ipsos MORI Social Research Institute, Fit for Purpose? The view of the higher education sector, teachers and employers on the suitability of A levels, <http://www.ofqual.gov.uk/files/2012-04-03-fit-for-purpose-a-levels.pdf>;

Cambridge Assessment, What are the impacts of qualifications for 16 to 19 year olds on higher education? A survey of 633 university lecturers, <http://www.cambridgeassessment.org.uk/images/116010-cambridge-assessment-he-research-survey-of-lecturers-executive-summary.pdf>.

² The ancient language is Biblical Hebrew, for which the content has been developed separately (not part of this consultation).

Subject content provides the framework for awarding organisations to create the detail of qualification specifications.

The Department for Education (DfE) is responsible for the subject content of GCSE, AS and A level qualifications. Ofqual, the independent regulator, is responsible for determining the assessment arrangements.

Summary of responses to the consultation

The responses during the consultation period, and the views expressed throughout the development process, have been important in shaping and strengthening the content. The Department has also worked closely with Ofqual to ensure that the subject content is appropriate for the purposes of regulation, and with the awarding organisations.

Many respondents provided detailed comments, while others gave more concise answers. Some respondents chose only to answer certain questions. Therefore, the numbers of responses for each question, when totalled, do not equate to the overall total number of responses.

Some issues were outside the scope of this consultation – for example, there were suggestions for providing support to the wider teaching of particular languages. This analysis only covers the issues which were in scope for the purpose of this consultation, and which were stated in the questions.

Some responses were relevant to Ofqual’s parallel consultation on assessment arrangements. These issues are addressed by Ofqual in its consultation response and are available [here](#).

Responses to question 1

As explained in the background above, in the absence of requirements for students to demonstrate speaking skills, we proposed that students will be required to apply language skills (listening, reading, and writing) in combination, responding to spoken and written sources addressing common subject matter.

The question asked: Is the requirement to apply three skills in combination suitable, and will that requirement help to secure a level of demand in the content overall which is comparable to that required for French, German, Spanish, Chinese, Italian and Russian? Do you have any comments on the other differences described in the proposal and rationale above?

There were 61 responses to this question.

	Total	% of those responding to this question
Respondents agreeing with the proposal	16	26%
Respondents disagreeing with the proposal	30	49%

Respondents unsure or unclear	15	24%
Total	61	

Summary of comments

All 30 of the respondents disagreeing with the proposed requirement said that these qualifications should include a requirement to demonstrate speaking skills. Many gave further details to support their views, as follows:

- 24 respondents considered that speaking skills are an essential part of all language study. Of those who explained further, five respondents said that speaking skills are important for progression to university and careers, and four said that speaking skills were important for communication more generally and for participation in society.
- Seven said that, without requirements to demonstrate speaking skills, these qualifications would be less demanding than the main modern foreign languages (MFL) qualifications.
- Four said that these qualifications would be more demanding than the main MFL qualifications, because of the complexity of the requirement to use three skills in combination.
- Ten expressed concern that, as a result of setting different requirements for these languages, there could be some perception that these qualifications were of lower status, or that the languages were themselves of lower status.
- Seven said that all modern language students should have the opportunity to demonstrate their speaking skills, and that the absence of an opportunity to demonstrate speaking skills would have a particular impact on students for whom English is not a first language, and who have oral skills in the language of study (skills developed at home, for example).
- Two respondents expressed concern that the level of participation in these qualifications would drop.
- One respondent said that the assessment of speaking skills was possible at GCSE, and should therefore also be assessed at AS and A level.

Responses to question 2

The question asked: The proposed title of the content for this qualification, modern foreign languages AS and A level (alternative content for languages with smaller cohorts), has been drafted to make a clear distinction between students who have completed qualifications based on this content and students who have completed qualifications based on the main content for modern foreign languages (which includes the assessment of speaking skills). Do you have any comments on the proposed title?

There were 56 responses to this question.

	Total	% of those responding to this question
Respondents agreeing with the proposal	14	25%
Respondents disagreeing with the proposal	26	46%
Respondents unsure or unclear	16	29%
Total	56	

Summary of comments

- 19 respondents commented that the title should be the same as the title for the more widely taught languages, to emphasise the equal status of the two qualifications. These respondents also considered that the content itself should be identical to that of the more widely taught languages.
- Eight respondents commented that the title would be more acceptable if the term 'alternative' were removed. These respondents commented that this term could be perceived as implying lower status.
- Two respondents commented that the title was too long or complex.
- Two respondents commented that the title was confusing or inaccurate, for example because it could seem to imply that there are two alternative content documents for languages with smaller cohorts.
- Six respondents provided suggestions for specific changes to the title.

The Government response

The government has considered the full range of responses to the consultation, from all the organisations and individuals who provided submissions. These have been an important part of the decision-making process for the final content which has now been published [here](#).

The government has decided to make two changes to the content on which we consulted, to address concerns expressed by respondents. At paragraph 4, we have included a clarification that specifications should encourage the development of speaking skills, although those skills will not be assessed. We have also amended the title of the qualification. These changes are explained in more detail below. We consider that the content requirements are appropriate for the purpose of enabling the awarding organisations to develop suitably rigorous qualifications in the relevant languages, and to equip students with the knowledge and skills they need to progress to higher education and employment.

For courses of study at AS and A level, the role of subject content documents is to establish the minimum requirements. It is then the role of the awarding organisations to develop detailed specifications and assessment materials for each subject, based on the minimum requirements established by the subject content. This should not constrain the scope of teaching in practice during courses of study, and it remains possible for teachers and students to go beyond the minimum.

Language skills requirements

We have reflected carefully on the answers to question 1. We agree that speaking skills are an essential part of all modern language study, and should be included where possible in courses of study for all modern languages. The addition at paragraph 4 of the content will clarify that the awarding organisations are expected, as part of their specifications for languages with smaller cohorts, to encourage the teaching of speaking skills - although they will not be assessed. This is consistent with the current specifications for AS and A levels in these languages, which include no requirements to demonstrate speaking skills at AS and A level (with one exception³), and our proposal will make no change in this respect.

There are practical reasons why speaking skills are not assessed as part of the AS and A level examinations in languages with smaller cohorts. The awarding organisations encounter significant difficulties in recruiting and retaining sufficient numbers of examiners who have the necessary expertise to conduct valid assessments and who also have a suitable level of expertise in the relevant language. This is particularly difficult at

³ Speaking skills are assessed as part of the current AS and A level in Urdu

AS and A level, for which the cohort sizes are particularly small. At GCSE, it remains possible to conduct a speaking assessment in these languages, because the cohort sizes are sufficiently large, and the assessment is less demanding than it would be at AS and A level. The awarding organisations are therefore more able to maintain a pool of GCSE examiners. Some respondents suggested that speaking assessment could be conducted using digital technology, and these suggestions are addressed by Ofqual as part of the response to its consultation. Ofqual have also addressed the suggestion that speaking could be assessed internally by the school, with the result mentioned alongside the candidate's exam result.

The government is clear that AS and A levels in these languages are of equal status and value to the AS and A levels in the more widely taught modern languages. In all subjects, including languages, AS and A levels are recognised and admired across the world, and we have further strengthened them to keep pace with the demands of universities and employers. Students of all languages will now be expected to demonstrate listening skills⁴, and for languages with smaller cohorts there will be a requirement to apply listening skills in combination with writing and reading, using more than one source of material on common subject matter. This will ensure that students of languages with smaller cohorts have the opportunity to meet the same overall standard as students of the more widely taught languages.

Qualification title

We have fully considered the concerns expressed in response to question 2, on the qualification title, and we have decided to make a change to the title on which we consulted. There were particular concerns about the term 'alternative', which some respondents considered to imply lower status or value, and which some respondents found confusing. The final content now has a revised title: modern foreign languages (smaller cohorts).

Many respondents expressed the view that the title should be the same as the title of the AS and A level in the more widely taught languages. This would not be a practical option because it is essential to make a distinction between the two content documents, and to signal that the content includes some important differences. The title remains clear that the overall status of the qualification is that of a modern foreign language AS and A level, and is therefore equal to that of the AS and A level in the more widely taught languages. Ofqual will consider options for the title of the qualifications as awarded to students, and as used in data recording. This qualification title will not necessarily follow the full wording of the title of the subject content.

⁴ There is at present an assessment of listening skills in five of the twelve languages with smaller cohorts, while the other seven currently have no assessment of listening skills.

Equalities analysis

In accordance with the Equality Act 2010, public bodies must have “due regard”, when making decisions, to the need to eliminate discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations, in relation to relevant protected characteristics. The AS and A level content for modern foreign languages was published in December 2014, and a full equalities analysis was published in January 2015 and is available [here](#). This remains relevant to the AS and A level content for modern foreign languages with smaller cohorts. To gather any specific evidence which could be relevant to the particular requirements that apply solely to modern foreign languages with smaller cohorts, the consultation included two equalities questions:

1. Do you think that any of the proposals have the potential to have a disproportionate impact, positive or negative, on specific students, in particular those with 'relevant protected characteristics' (disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?
2. How could any adverse impact be reduced and how could the subject content be altered to better advance equality of opportunity between persons who share a protected characteristic and those who do not share it?

Language skills requirements

Linked to responses to main consultation questions 1 and 2, a number of respondents expressed concern about the requirements to study three languages skills in combination, and the absence of a requirement to demonstrate speaking skills. Some respondents said that this would be unfair on students with existing oral skills in the language of study, including students who will have developed those skills in home environments where that language is spoken.

The requirements for languages with smaller cohorts are largely identical to the requirements for the more widely taught languages. The equalities assessment published in January 2015 therefore remains applicable to the extent that the requirements are identical. In terms of the requirements which are now proposed specifically for languages with smaller cohorts, any impact on students with protected characteristics should be understood in the context of a greater impact which was probable but has now been averted - the withdrawal of all these languages at AS and A level. The content for languages with smaller cohorts, with no requirement to assess speaking skills, has made it possible for the awarding organisations to continue to offer these qualifications.

The content is designed to ensure that all students of modern languages at AS and A level have the opportunity to achieve the same overall standard. This includes students with existing oral skills developed in home environments where the relevant language is spoken, and some who are attending supplementary classes or schools with links to

communities in which those languages are spoken (the data is not available to quantify these groups of students). As explained above, practical difficulties mean that it is not possible to introduce a speaking assessment for languages with smaller cohorts. These qualifications *currently* include no requirement to demonstrate speaking skills, in all but one of the languages with smaller cohorts. The exception is Urdu, for which the current AS and A level does include a speaking assessment. The revised AS and A level in Urdu may therefore become to some extent more demanding for students with existing oral skills in the language, but we consider that it is right that Urdu should be among those languages governed by the content for languages with smaller cohorts. The numbers of students taking A level Urdu are small (in 2016, there were 436 entrants in the UK⁵).

Some respondents expressed concern that the requirements would be unfair to students with particular difficulties or disabilities, for whom writing can be more challenging than for other students. As noted above, the current AS and A levels in these languages include significant written work, and this will not be more significant as a result of the new content. Moreover, existing adjustments will continue to be made available, to support access for certain students, as for all qualifications at AS and A level.

Qualification content title

Linked to responses to main content question 2, a number of respondents expressed the view that it would be unfair to distinguish between AS and A levels in the more widely taught modern languages, and AS and A levels in modern languages with smaller cohorts. Some respondents commented on the term ‘alternative’.

Students of all languages at AS and A level will have equal access to these highly regarded qualifications. We have been clear that the content for the AS and A level in languages with smaller cohorts has been designed to secure an equal overall standard to the AS and A levels in the more widely taught languages. We have also been clear about the rationale for the differences between the content for these two closely linked qualifications.

The title of the content for languages with smaller cohorts has been designed to provide a clear indication that the content is different, as appropriate for regulatory purposes. The full title also confirms that the qualification is equal in value and status to the AS and A level in the more widely taught languages. There is no evidence that the title will have a particular, or disproportionate, impact, on any groups with protected characteristics. However, in response to concerns, we have amended the title of the content, and Ofqual will be considering options for the title of the qualifications as awarded to students, and as used in data recording.

⁵ Joint Council for Qualifications, 2016

Annex A: list of respondents to the consultation on modern foreign languages (smaller cohorts)

All Party Parliamentary Group on Modern Languages
Association of Language Learning
Association of School and College Leaders (ASCL)
Axis Educational Trust
British Council
Bury St Edmund's All Through Academy Trust
Consortium of Gujarati Schools
Coventry Local Authority
F. Chopin Polish School, Southampton
Guidant Group
Guru Nanak Sikh Academy, London
Independent Schools Modern Languages Association
Indian Education Society
Japan Foundation, London
Katharine Lady Berkeley's School, Gloucestershire
King Edward VII School, Sheffield
Leeds Jewish Free School
National Association of Language Advisers (NALA)
National Resource Centre for Supplementary Education
Polish Catholic Saturday School of John Paul II, Bristol
Polish Educational Society
Raduga Supplementary School
Rustam School, London
Spinney Hill Gujarati Parents' Association, Leicester
St Bernard's Catholic Grammar School, Slough
Swaminarayan Sunday School, Brent
The Kaetsu Educational and Cultural Centre
University Council of Modern Languages (UCML)
Voice
Watford Gujarati School



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