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Consultation outcome

Analysis: GCSE qualifications in British Sign Language

Updated 21 December 2023

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Summary

Ofqual consulted on assessment proposals for GCSE qualifications in British Sign Language (BSL).

This document is the summary of responses to this consultation. The consultation was open for responses between 15 June 2023 and 7 September 2023.

Ofqual received 331 responses to the consultation.

The majority of respondents strongly agreed or agreed that Ofqual's arrangements for assessing GCSEs in BSL should:

- have one set of assessments for all levels of attainment (assessments that are not tiered)
- include assessments by examination to assess students' receptive language skills and their knowledge and understanding of the history of BSL, worth 40% of the total qualification marks
- include non-exam assessment (NEA) to assess students' productive and interactive language skills (including technical accuracy), worth 60% of the total qualification marks
- have assessment objectives that address receptive, productive and interactive language skills, technical accuracy, and knowledge and understanding of the history of BSL.

Ofqual's proposal was in response to a separate consultation conducted by the Department for Education. Having considered all the responses to its consultation, Ofqual has made decisions on the proposals. [Ofqual's decisions](#) have been published at the same time as this analysis document.

Background

In 2018, the Department for Education (DfE) decided to introduce a GCSE in British Sign Language (BSL). DfE [consulted on its proposed subject content for GCSEs in BSL](#). DfE is responsible for setting the curriculum requirements and subject content for all GCSE qualifications, including for new GCSEs in BSL. Ofqual is responsible for how the subject content will be assessed and for ensuring that the assessment arrangements can support valid and

reliable results.

Ofqual consulted on [proposed assessment arrangements for GCSE qualifications in BSL](#) at the same time as DfE consulted on its proposed subject content. Ofqual's proposals reflected the proposed content on which DfE consulted.

Ofqual's consultation invited views on how DfE's proposed subject content for new GCSE qualifications in BSL should be assessed. This included the approach to tiering, the use of non-exam assessment (NEA) and the assessment objectives, which indicate the percentage of marks that must be used for each aspect of the assessment.

This consultation also included information about some additional considerations for the assessments, including how English and BSL might be used in those assessments. Interested parties were invited to comment on these considerations to help inform Ofqual's thinking in these areas. Ofqual will consider these responses as it develops the detailed rules that it considers are needed about the ways in which the qualifications must be assessed. These rules are known as the Subject Level Conditions, Requirements and Guidance.

Approach to analysis

The consultation was published on Ofqual's website in English and in BSL. It was available for response, using either the online form, or via BSL by sending Ofqual a video or videos of BSL responses to the consultation.

The main part of the consultation consisted of 4 closed questions which allowed respondents to indicate the extent to which they agreed or disagreed with the proposal. These questions used a 5-point scale (strongly agree, agree, neither agree nor disagree, disagree and strongly disagree). There were 5 open questions inviting comments on the proposals.

Two further open questions sought views from interested parties on the language of assessment and some specific assessment considerations.

The Equality Impact Assessment and Regulatory Impact Assessment sections each included a closed question asking respondents if there were any impacts that Ofqual had not identified. Respondents were asked to respond with 'yes' or 'no'. These questions were followed by open questions where respondents could identify any impacts or mitigations of impacts on equalities or regulatory considerations as a result of the proposals.

Respondents could choose to respond to questions in the consultation and did not have to respond to them all. This analysis provides the number of responses received for each question. It also provides tables of the responses to the closed questions. In some cases, percentages for individual questions do not add up to 100%. This is because results for each response category have been rounded up or down to the nearest whole number.

Respondents were asked to identify which group they belonged to, for example: teacher or student. The total numbers for each respondent group are set out in the tables in the section below, based on these descriptions. The tables use these unverified self-descriptions.

All responses to the open questions have been read in full. The key themes that emerged are presented in the detailed analysis.

A selection of respondents' comments has been included in the report to illustrate the main themes identified. Some comments have been edited for clarity, brevity and to preserve anonymity but care has been taken not to change their meaning.

Some comments fell outside the scope of the consultation proposals. Ofqual has read the comments but has not included in the detailed analysis of the proposals matters that lie beyond the scope of this consultation. Instead, these comments are summarised briefly in the section below.

Where such comments related to the expectations set out in DfE's subject content, these have been shared with DfE.

Who responded?

There were 331 responses to this consultation.

The following tables present the number of respondents by type.

Official organisational responses	Number of respondents
Academy chain note 1	<5
Awarding body or exam board	5
Employer	<5
Local authority	8
Other representative or interest group	6
Private training provider	<5
School or college	14
University or higher education institution	<5
Total	44

Personal responses	Number of respondents
Consultant	<5

Exams officer or manager	<5
Governor	<5
Other	102
Parent or carer	54
SLT – senior leadership team	17
Student	19
Student – private, home-educated of any age	11
Teacher – responding in a personal capacity	77
Total	287

This was a public consultation that asked for the views of those who wished to participate. Ofqual recognises that the responses are not necessarily representative of the general public or any specific group.

Notes

1. “Academy chain” is used in this analysis document as it was the description offered to respondents completing the online survey. It covers those responding on behalf of individual academies and groups of academies, where these form part of an Academy Trust. [↩](#)

Detailed analysis

This section reports the views, in broad terms, of those who responded to the consultation.

There were a number of over-arching themes in the comments. These themes are summarised below and are not necessarily repeated in the separate, question-specific analyses, unless there was a particular point related to that individual proposal.

Respondents were generally pleased to see proposals for the new GCSE. This was particularly the case for individuals who welcomed the opportunity for students to take a GCSE in their first or primary language.

Some respondents suggested there should be 2 GCSEs: one for new learners and one for existing BSL users. Other respondents suggested that other sign languages, such as Irish Sign Language, or sign usages such as Makaton or Sign Supported English (SSE), should be included in the GCSE, or in their own separate GCSEs.

Frequently, respondents raised comments and queries about detailed aspects of the qualification and assessment design. Many of these comments related to details that will be included in any exam board specification(s) and assessment materials. There were a number of comments about who could and who should teach and assess the qualification. Respondents expressed concerns about whether there would be sufficient trained and qualified teachers and assessors who will also be proficient in BSL.

Respondents had different levels of familiarity with and understanding of assessment in GCSE qualifications. Many respondents referred to approaches used in vocational BSL qualifications. In some cases, this might have affected how respondents viewed and understood the proposals for the GCSE.

Many respondents had different views about aspects of DfE's proposed subject content. This was particularly the case for the aspect of DfE's content focused on the history of BSL. These comments were passed to DfE, alongside all other comments on their proposals.

Question 1

Proposal: GCSEs in BSL should have one set of assessments for all levels of attainment (assessments that are not tiered).

Question: To what extent do you agree or disagree?

Question 1 response	Count	Percentage
Strongly agree	138	42%
Agree	128	39%
Neither agree nor disagree	37	11%
Disagree	21	6%
Strongly disagree	6	2%

Total number of responses	Count
Question 1: response provided	330
Question 1: no response	1
Total	331

The majority of respondents to this question, 81%, either agreed or strongly agreed that ‘GCSEs in BSL should have one set of assessments for all levels of attainment (assessments that are not tiered)’.

“We don’t believe there’s any reason for the qualification to be tiered.”
(Awarding body or exam board)

A minority of respondents to this question, 8%, disagreed or strongly disagreed with the proposal.

“Much better to have foundation and higher paper. Thus, the extension questions do not stress foundation students.”
(Teacher responding in a personal capacity)

The remaining 11% of respondents neither agreed nor disagreed.

“I think there are pros and cons to tiering, but overall, it is probably a lot fairer not to have tiering. However, to make it a reasonable alternative to learning any other language in the GCSE specifications, which are all tiered, it would perhaps be more suitable to tier students.”
(Student)

Question 2

Do you have any comments about GCSEs in BSL having one set of assessments for all levels of attainment (assessments that are not tiered)?

There were 156 responses to question 2. Some respondents noted that having one set of assessments for all levels of attainment would allow access to the full range of grades. They welcomed an approach that would avoid potentially capping the attainment of students who might otherwise be entered for foundation tier. A few respondents commented on the importance of this for deaf students.

“If it were tiered, I think there possibly might be a push on some of my (previously or currently primary) Deaf students to do the lower paper, as they might be borderline. However, this could be their chance to excel. I want them given every opportunity to do that, and not have yet another thing where they are doing differently to others.”
(Other)

Several respondents commented that one set of assessments for all levels of attainment would increase motivation and support progression, while also fostering inclusivity.

“I think it’s really important to enable student to demonstrate they could go on to further study in the subject.”

(Employer)

“I strongly agree that GCSEs in BSL should not be assessed in tiering because if it were, the students would lose their motivation and support to our Deaf community. We, the deaf community, want to encourage our communities to unite and share language.”

(Teacher – responding in a personal capacity)

Some respondents, however, expressed concern that one set of assessments (that are not tiered) might be inaccessible or too difficult for some students.

“BSL should have a tiered GCSE, the language is so complex that there are differing levels of proficiency.”

(Teacher responding in a personal capacity)

“Not all abilities are the same. Tiered system helps this. Foundation paper for students whose learning abilities aren’t high. However, they still have a basic understanding of sign language which is imperative.”

(Student)

Many respondents observed that students who use BSL as their first or primary language (BSL users) are likely to take the qualification, in addition to learners with no prior knowledge of BSL. Some of these respondents reflected on potential challenges in designing one set of assessments that would be suitable for this range of students.

“Like all language GCSEs, the exam needs to be accessible to the less able pupils. Is the exam for native BSL users or non-native? If for both, how will the level of assessment and grade boundaries be managed?”

(Teacher – responding in a personal capacity)

“The decision also depends to some extent on how much stretch and challenge is envisaged for the most-able students or the extent to which native or highly experienced BSL users (such as those who have grown up using BSL from birth or a very young age) are within the scope of differentiation for a GCSE in BSL. The greater the intent to differentiate at the extremes of ability the larger and less manageable the assessment is likely to become.”

(Awarding body or exam board)

“Whilst differentiation by outcome feels achievable, we are concerned that a one pathway for all students may mean a significant gap between those who have used BSL as a first-language

for multiple years, and those who have only recently started learning the sign language with this specification. Specifically, we are concerned that students who are new to BSL will be prevented from accessing top grades because of the gap in attainment between the 2 cohorts, and this could damage uptake of the qualification in subsequent years.”
(Awarding body or exam board)

A few respondents agreed that GCSEs in BSL should not be tiered so that they have parity with most other GCSE subjects. Other respondents suggested they should be like GCSEs in modern foreign languages, which are tiered.

“This approach provides parity with other GCSEs and seems appropriate for a new curriculum content that is going to have a mix of deaf and hearing students.”
(Local authority)

“It should (as closely as possible) replicate other language GCSEs - Spanish, French or German.”
(Parent or carer)

Some respondents had different understandings of qualification levels and the nature of GCSE assessments and grades. In these cases, responses included queries or suggestions about different grading approaches, such as those used in vocational BSL qualifications.

“GCSEs in BSL should follow the same structure or examination guideline as [other BSL qualifications]. Whereby you either pass or fail, to allow all students to converse in basic BSL, rather than some or none.”
(Other)

“It is more appropriate not to tier as a pass in BSL is a pass.”
(SLT – senior leadership team)

Question 3

Proposal: GCSEs in BSL should include non-exam assessment (NEA) to assess students’ productive and interactive language skills.

Question: To what extent do you agree or disagree?

Question 3 response	Count	Percentage
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Strongly agree	210	64%
Agree	92	28%
Neither agree nor disagree	13	4%
Disagree	11	3%
Strongly disagree	4	1%

Total number of responses	Count
Question 3: response provided	330
Question 3: no response	1
Total	331

The majority of respondents to this question, 92%, agreed or strongly agreed that GCSEs in BSL should include non-exam assessment (NEA) to assess students' productive and interactive language skills.

“As BSL is a visual language it is important to assess student’s competency in comprehension and production of BSL through face-to-face interactions in a non-exam assessment.”
(Other representative or interest group)

A minority of respondents to this question, 4%, disagreed or strongly disagreed with the proposal. A further 4% neither agreed nor disagreed.

“All elements of BSL (receptive and productive) should be assessed by exam.”
(Other)

Question 4

Proposal: Non-exam assessment (NEA) should account for 60% of the total qualification marks.

Question: To what extent do you agree or disagree?

Question 4 response	Count	Percentage
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Strongly agree	136	41%
Agree	121	37%
Neither agree nor disagree	37	11%
Disagree	31	9%
Strongly disagree	6	2%

Total number of responses	Count
Question 4: response provided	331
Question 4: no response	0
Total	331

The majority of respondents to this question, 78%, agreed or strongly agreed that non-exam assessment (NEA) should account for 60% of the total qualification marks.

“We believe an emphasis on non-exam assessment is appropriate for this qualification.”
(Awarding body or exam board)

A minority of respondents to this question, 11%, disagreed or strongly disagreed with the proposal. A further 11% neither agreed nor disagreed.

“BSL is a practical language therefore NEA should have a higher proportion.”
(Teacher – responding in a personal capacity)

“NEA should be responsible for 50% of exam grade.”
(Student – private, home-educated of any age)

Question 5

Do you have any comments about the proposals for non-exam assessment?

There were 158 responses to this question. Many of these responses, whether from those who

agreed or disagreed reflected different understanding about the definition of an exam in a GCSE qualification. Several comments suggested respondents perceived non-exam assessment to be an informal, teacher-supported and class-based activity, or equivalent to continuous assessment taking place in class time.

“Absolutely agree! The (non-exam) classroom time with the teacher is a crucial part of the course. It offers the opportunity to ask questions. I found the classroom parts of my level 1 course really helpful. It offered the chance to practice my skills with my peers in a relaxed environment and ask the teacher for help if needed.”

(Parent or carer)

Several of these respondents supported the inclusion of NEA because some students might find formal exams challenging, particularly those with learning difficulties.

“I have struggled with exam pressure in BSL and this has affected my confidence in trying new vocabulary and being more creative in my communication - the weighting of 60% NEA would support a greater level of exploration I feel. Offering GCSE BSL would suit many pupils who normally might not choose or fully commit to studying another language. The grammar structure and new vocabulary is so daunting - BSL is much more accessible for many of my lower ability students but could potentially give them the chance to shine. Also studying the GCSE would aid employability for all of my students. I believe all students should study BSL as an additional language.”

(Teacher – responding in a personal capacity)

“People struggle in exam rooms, and the prevailing amount of specific learning difficulties such as dyslexia, dyscalculia, and co existing conditions such as anxiety, ASD and ADHD can also have an impact. This should be accounted for.”

(Student)

A few of these respondents who appeared to consider NEA a more informal activity expressed concern about the potential lack of formal assessments. Some suggested there should be exams that reflected the arrangements for vocational BSL qualifications.

“A member suggested aligning the BSL GCSE non-exam assessment structure with the format used by [other qualifications]. ... Concerns About Loss of Value: Some concerns were raised about non-exam assessment potentially diminishing the value, respect, and reliability of the language.”

(Other representative or interest group)

“Receptive skill should, like with [other BSL] courses, be taken in exam condition. For example, most BSL qualifications entail 3 exams - receptive, conversation and presentation which are all under exam conditions where the exam is between the teacher and student and is recorded and sent off to [the awarding organisation]. I feel without exams it would be too quick and easy to just pass students who perhaps are using incorrect hand shapes, signing space and or NMF

[non-manual features], syntax and grammar.”
(Other)

Several respondents commented that NEA was necessary to assess productive and interactive skills, and that a 60% weighting was appropriate.

“NEA is necessary to assess the practical elements of language learning, such as some of the productive and interactive skills. The NEA weighting is higher than in MFL [modern foreign languages] but this is because this is a different type of language. Other languages have written forms which lend themselves to exams; BSL does not.
(Awarding body or exam board)

“The 60/40 split seems like a sensible balance.”
(SLT – senior leadership team)

There were equal numbers of comments about having either a higher or lower percentage of non-exam assessment. Respondents who said the percentage of non-exam assessment should be increased cited the fact that there is no written form of BSL. They also suggested that the focus of the qualification should be on using the language and developing communication.

“Unlike other languages which have 4 components (read, write, speak, listen), BSL is a language with no written form. Skills in receptive and productive are the priority. I’d ask is a 60/40 split weighted sufficiently towards the use of the language? The non-exam assessment should have a stronger weighting than written examinations. To learn BSL, you need to practice visually, not write papers.”
(Other)

“NEA should be weighted more heavily. BSL enables communication and creates an inclusive society - this is significantly more important than theoretical understanding of its origins and history.”
(Parent or carer)

Respondents who said that 60% was too high suggested having an equal split between non-exam assessment and exams, increasing the percentage assessed by exam, or having no NEA at all. Some of these respondents argued that this was necessary to maintain standards and parity with other GCSEs, particularly other language GCSEs.

“This is a language assessment. English or any other languages will not have NEA at 60%. You can test people’s knowledge of BSL via written exams by asking them about the structure, grammars and phonic. Also ask them to write down how they will change a line from English grammar to BSL grammar for an example. Show a picture and ask them to describe it. They can take ‘oral’ exams for an example.”
(Parent or carer)

“60% non-exam assessment is too much and risks skewing the overall standard as I assume non exam assessment will be marked by individual centres...I would strongly suggest 20 to 25% non-exam assessment and the rest exam assessment. This would bring it in line with other language GCSEs and ensure standardisation of language skills.”

(Private training provider)

Many respondents commented on the details of assessments. These included suggestions about possible NEA tasks and observations about marking criteria and quality assurance procedures.

“I believe the tasks that form the current MFL GCSE speaking exams would serve a BSL GCSE very well - a roleplay to demonstrate the ability to communicate in real-world scenarios, a photocard with follow up questions and a general conversation on different themes to display the student’s range of grammar and vocabulary.”

(Teacher – responding in a personal capacity)

“I agree that GCSE BSL should include NEA to assess student’s production and interaction language skills. I do have a little concern that different schools or examination board would mark NEA differently. Please have a clear standard criteria of how to assess and mark NEA, so everyone can follow the same procedure on marking and assessing NEA.”

(Teacher – responding in a personal capacity)

Several respondents commented or raised queries about the delivery of the NEA, including who should carry out the assessments. A few of these respondents mentioned regional variations in BSL.

“I think there is also some benefit to a productive language skills assessment being undertaken or assessed by an external examiner as they can be more objective than the teacher but the student would be more relaxed and used to the signing style of their teacher.”

(Parent or carer)

“Depending on the nature of NEA rules, and if the BSL qualification proves to be popular, we are concerned about the ability of centres to fairly assess students if the BSL teacher cannot personally administer the NEA. Equally, we are concerned about the need to recruit and train suitable moderators to ensure that centre marking is in-line with NEA guidance. We are concerned about standardisation of delivery and moderation of outcomes, which will be very difficult against a backdrop of a regional language paradigm and a limited pool of existing teachers and assessors who are BSL users.”

(Awarding body or exam board)

Question 6

Proposal: GCSEs in BSL should have the 4 proposed assessment objectives.

Question: To what extent do you agree or disagree?

Question 6 response	Count	Percentage
Strongly agree	131	40%
Agree	160	48%
Neither agree nor disagree	23	7%
Disagree	13	4%
Strongly disagree	3	1%

Total number of responses	Count
Question 6: response provided	330
Question 6: no response	1
Total	331

The majority of respondents, 89%, agreed or strongly agreed that GCSEs in BSL should have the 4 proposed assessment objectives.

“The assessment objectives are clear and appropriate.”
(Awarding body or exam board)

A minority of respondents to this question, 5%, disagreed or strongly disagreed with the proposal, while 7% neither agreed nor disagreed.

“Does it need the history of BSL as an assessment? Receptive skills from videos and interactive conversations is quite difficult. Could this be 50% instead?”
(Teacher – responding in a personal capacity)

Question 7

Do you have any comments about the proposed assessment objectives?

There were 117 responses to this question, the majority of which related to AO4. Many of the respondents who disagreed or agreed with the proposal thought this assessment objective was unnecessary and that its weighting should be reduced or removed entirely.

“Students should not be examined about the history of BSL. They need to be able to practice it.”

(Other)

“I think the AO4 should be at least 5 to 10%, preferably using multichoice questions.”

(Local authority)

Several respondents suggested additional or alternative content for AO4. These suggestions included BSL rights and accessibility in the workplace, Deaf culture and community, personal understanding of deafness, deaf awareness, regional variations, other sign languages, and Makaton.

“It is particularly important to require students to demonstrate knowledge and understanding of the history and development of sign language. It is vital that the learning and use of the language is enhanced by understanding of Deaf culture brought to life through the lived experience of Deaf teachers. The depth of learning about Deaf culture and heritage should be taken every bit as far as the structure of the curriculum and GCSE award will allow.”

(Other representative or interest group)

“I agree with all assessment objectives, except I believe that for AO4, it would be more appropriate to focus on the knowledge of the history of the Deaf community (which would involve some level of BSL history) that would inform students about the community they are mostly likely to use BSL with.”

(Other)

Several respondents said that the assessment objectives reflected appropriate key abilities and that these were balanced appropriately.

“These seem fair, they cover all aspects that you would expect a student to cover when learning BSL and the emphasis on the higher percentages to lower also seem fair and focusing on the correct weighting.”

(Teacher – responding in a personal capacity)

“I think the objectives cover all aspects of producing and understanding language. As long as the assessments and assessors are aware of, and allow for, regional variations.”

(Other)

Some of these respondents thought that AO4 (the history of BSL) was important and supported its inclusion at a low percentage, to maintain an emphasis on communication.

“Agree! I think that the weighting for each objective is spot on. While the history of BSL is important and interesting to learn about, 15% weighting seems a fair amount for this, I think.”

(Personal – other)

“Happy with the proposed weighting here, it makes sense for students to learn about the history of BSL, however this needs to be the smallest assessment weighting as, going forward, conversational skills and vocabulary will be the most essential for working with Deaf people if this is a chosen career or pathway.”

(School or college)

Several respondents proposed changes to the weighting of the assessment objectives. Some of them suggested changes so that receptive and productive skills would have equal weighting.

“I feel the top 2 objectives should be weighted slightly higher as this is a practical skill. The others are important however the third is one that can be applied and practiced at further levels, and also in the community and the history of BSL is yes vital, but it can again be taught by the community and should not take away from the skill itself.”

(Student)

“15% for AO4 seems high when AO3 is 20%. I would take AO4 to 10% and make up the difference in AO2 so that productive skills are weighted as equally as receptive.”

(SLT – senior leadership team)

Two exam boards – one that agreed with the proposed assessment objectives and one that did not – commented on potential overlap between assessment objectives.

“These AOs cannot be exactly the same as in GCSE MFL because of the lack of a written form of the language. To a non-BSL user there seems to be overlap between AO2 and AO3 as they both focus on productive skills; these AOs are likely to be awarded on the same tasks. The inclusion of an AO4 that is similar to AO4 (such as background knowledge) in AS and A level MFL seems fair.”

(Awarding body or exam board)

“... AO1 also addresses the expectation that students should be able to ‘demonstrate

comprehension of BSL during interactive NEA tasks.’ This would appear to address the ‘understand interactive BSL’ element. Therefore, it is not clear what is meant by ‘respond to’ and how this to will be distinct from ‘understand’ ... We understand the intention to set a proportion of marks for the ability to ‘Produce BSL as rehearsed and unrehearsed language’, but it is not clear from the consultation how this differs from the intentions in AO1 (where students are required to respond in interactive BSL situations). The statement that AO2 covers the need for students to demonstrate their ability to deliver BSL individually risks a cross over with AO3 and with AO1 and subsequent double penalty or reward, that is, with their ability to deliver BSL being impacted by their accuracy and technical skill, and their delivery being the means by which they respond. AO2 is otherwise generally clear ... Whilst the intention that AO3 relates to the DfE expectation of ‘technical accuracy’ is clear, it is not necessarily as clear how marks to be allocated to AO3 relate to other AOs. For example, there appears to be an overlap in the skills for this AO with the ability to be able to perform aspects of the proposed AO1 and AO2. It would help if this were clarified in more detail.”

(Awarding body or exam board)

Question 8

Suggestion: Ofqual is considering requiring GCSEs in BSL to have assessments in both languages so that exams are offered in English and BSL.

Question: Do you have any comments about the suggestion for assessments in both languages?

There were 177 responses to this question. The majority of respondents welcomed the suggestion that exams might be offered in both English and BSL.

“I think you have managed to reach a well thought out solution, that respects all viewpoints and access needs.”

(Employer)

“I think that offering the assessment in both languages meets the needs of the widest possible number of candidates. It allows BSL users to be able to access the assessment appropriately and demonstrate knowledge without being penalised for a lack of good English and it allows BSL learners to use their first language of English to document information about the history of BSL.”

(Teacher – responding in a personal capacity)

Respondents said the suggested approach would help make the qualification more accessible and inclusive, and would reduce the need for reasonable adjustments for BSL users. Respondents explained that written English can be particularly challenging for BSL users, as well as for certain other groups of students.

“We welcome BSL users being able to take all assessments in their first language. We would be concerned over any plans for a written English paper that could restrict BSL users being able to complete this qualification.”
(Awarding body or exam board)

“We are happy as an Academy with this proposal, it would mean that the majority of our students who might have a reading age of 6 years of age will still be able to access a GCSE in their own language. It is essential for equality that they can be offered a GCSE in BSL. This will also help our students make the next steps in Post 16 where they might not meet entry requirements in English, but having a BSL GCSE will allow them to meet entry requirements going forwards.”
(School or college)

A few respondents said that the suggestion to design assessments in both languages from the outset would support the validity of the assessments.

“Designing a bilingual examination scheme from the outset seems wise. Examining in English should not be the only option for native BSL signers, as this could easily put them at a disadvantage. I work as a BSL interpreter, so understand the difficulties of interpreting complex questions without giving information away - this should be avoided and a pre-agreed, translated examination paper should be available for all candidates to answer in either BSL or English as preferred.”
(Parent or carer)

“Whilst acknowledging that designing assessments that are comparable in English and BSL will be challenging for awarding bodies, we would strongly support a requirement for GCSEs in BSL to have assessments in both English and BSL. Designing assessment in English with a reasonable adjustment option into BSL would seem highly inappropriate for this particular qualification, and the assessments should be designed from the outset to be suitable in BSL. Allowing the use of digital assessment could greatly support awarding bodies in designing valid and comparable assessment.”
(Awarding body or exam board)

Other respondents raised questions about the practicalities and possible implications of the suggestion.

“Assessing comprehension of BSL in 2 languages would present significant challenges to exam boards as it will have a significant impact on the types of comprehension questions available... Whilst this is acknowledged in the criteria, we are not satisfied it is fully addressed and feel it would be a barrier to exam boards choosing to offer the qualification, or to develop a form of assessment sufficiently robust enough for Ofqual to deem it fit for purpose. An alternative is to offer optional routes for this part of assessment, but the comparability would be difficult to achieve... We feel this needs further careful thought before a proposal moves

forward and note that as well as the additional costs to exam boards generated through optional routes, there may be a challenge in accurately setting standards if the cohort for one route is particularly small.”

(Awarding body or exam board)

“On the whole I think it is a good thing. However, I am concerned about the removal of reasonable adjustments. It can take longer to sign questions than speak them, giving a deaf person less time on a question than a hearing person.”

(Other)

Two of these respondents suggested a mixed language approach should be considered.

“The above approach, such as requiring a BSL GCSE to have assessments in both languages so that exams are offered in English and in BSL, has the advantage of avoiding some of the challenges associated with providing reasonable adjustments where these might be needed. However, one issue which does not seem to be discussed in this section are the needs and expectations of learners who may use a mixture of English and sign language for their communication purposes (such as a multimodal approach). This is likely to be the case for some students in the Deaf community and it is not clear what options are open to them if they wish to take the BSL GCSE. Do the current proposals mean they must select one or other language (either BSL or English) and what are the implications of this for them if their usual communication mode involves both?”

(Other representative or interest group)

“I think it is a great idea to have the GCSE available in both languages so that no special arrangements are needed. However I think candidates should be able to switch languages back and forth at any point. This translanguaging approach matches what we have seen deaf young people do, given the opportunity.”

(Other)

Several respondents suggested that more, or all, of the assessments should be in BSL. In some cases, these suggestions were based on a misunderstanding about how English is used in some parts of GCSE modern foreign language exams.

“I cannot see why an exam in English is required. We don’t do this for any other language at GCSE level. I believe it’s important to preserve academic integrity so that BSL is seen as equally valid alongside all other languages.”

(Other)

“I don’t think both languages should be a requirement as the GCSE should focus solely on BSL and the promotion of connecting with the deaf community. this would hinder that.”

(Student – private, home-educated of any age)

Question 9

Suggestion: Ofqual is considering including these additional assessment expectations in the regulatory requirements.

Question: Do you have any comments about these suggested assessment expectations?

There were 132 responses to this question. Many of those responding to this question made positive comments about the suggested assessment expectations.

“As an academy for Deaf students, we are happy with these assessment expectations, we think these are fair and justifiable.”
(School or college)

“We feel that the proposals should deliver a fair assessment.”
(Other representative or interest group)

Several respondents made comments relating to language, including observations about vocabulary and regional variations.

“When talking about regional variations of signs, will centres have to pick and stick to the regional varieties of their locality and will students be marked down if they use a sign correctly but from a different region or use 2 different regional signs for the same word in the same conversation? Especially when many online and app based BSL learning resources may only use one regional form that may be different to the region that student lives in. Will there be clear guidelines on the regional uses of words?”
(Teacher – responding in a personal capacity)

“For the comprehension assessment, requiring a regional variation to be selected in the vocabulary list could potentially have a negative impact on teaching and learning, as it seems to contradict the regional basis for the teaching and learning of the language. It would be worth exploring in more detail whether this requirement is necessary, or if there are ways in which this could be avoided, or options given. In relation to the NEA, it is likely to be challenging for awarding bodies to recruit sufficient markers, and the issue of centrally recruited markers being able to fairly assess all regional variations needs to be explored in detail.”
(Awarding body or exam board)

Some respondents commented on the use of Sign Supported English (SSE) or Makaton as a reasonable adjustment and the suggestion this might not be permitted.

“This subject is British Sign Language and BSL is not signed English or signing support English speech.”

(Teacher – responding in a personal capacity)

“Some members emphasised that since this is a BSL GCSE qualification, assessments should be conducted exclusively in BSL. They argue that using other forms of sign language, like SSE [Sign Supported English], should not be accepted... Some respondents suggested that for students with minimal English skills, recording assessments could be offered as an alternative to writing theory assessments, in line with the Equality Act 2010 ... One response highlighted the importance of assessments that test knowledge and understanding of both English and BSL... Some members advocated for exams to be offered exclusively in BSL, like how Deaf learners only give answers in English for their English language exams.”

(Other representative or interest group)

A few respondents made other comments about the comprehension and the history of BSL exams. These included queries about how the comprehension exam would work in practice and whether it would privilege theoretical understanding over fluent use of BSL. Respondents commenting on the history exam suggested that exam boards should publish the facts students would need to learn and that recalling them could increase awareness, empathy and pride.

“A student could understand how BSL works without being fluent in it. And get a pass for it. Like English, you can understand how it works but only results matter, so long as you can actually use it in practice. In fact some people who do not understand it may use BSL better than those who do.”

(Parent or carer)

“Depending on the objective of the history component, some award of recall of information may be appropriate. Presumably this unit is included to increase awareness and pride in the development of BSL as well as empathy for people’s ongoing struggles. Therefore, recalling facts would allow students to develop such understanding.”

(Parent or carer)

Many respondents commented on the suggested expectations for NEA, including the possible NEA tasks.

“I don’t think a role play would work in the NEA. Introducing BSL in KS4 should not be an attempt to replicate a GCSE in MFL. It is completely different to a foreign language. BSL will be much harder than MFL for candidates. If students learn a new sign, they can’t just write it down and learn it. It doesn’t work that way in BSL. It requires far more repetition and reinforcement than learning a foreign language, so the expectations of students have to be different.”

(Other)

“Apart from the concern around recording evidence, the NEA tasks look very sensible – a good range of tasks... Where students are responding to a task through BSL, there is likely to be a need for video evidence of the student to be held for moderation purposes, so any assessment strategy should reflect relevant safeguarding concerns and suitable solutions... Is there a suggestion that visiting examiners might be allowed? This doesn’t fully overcome concerns about recording evidence: we make recordings of MFL speaking tests with visiting examiners for quality monitoring purposes.”
(Awarding body or exam board)

Respondents commented on who should teach and deliver the NEA and the importance of moderation and monitoring. Some respondents suggested these activities should be carried out by a fluent BSL user, a deaf person or someone immersed in the deaf community. Others were in favour of teachers leading activities with appropriate quality assurance.

“It would be beneficial to students if a deaf, BSL user could be utilised as part of the assessment process as, of course, in the real world, communicating with deaf people is the ultimate goal.”
(Parent or carer)

“I think this is a good idea. I think it is important quality control happens for NEAs if they are marked internally.”
(Teacher – responding in a personal capacity)

While some respondents suggested teachers should deliver and mark the NEA, a higher number said this should be done by exam boards.

“The design and delivery of the productive and interactive components will require a pool of examiners who can both conduct the exam in BSL and score it accurately according to the criteria. This will need a programme of training, standardisation and monitoring of the examiners to be put in place to ensure fair and reliable outcomes. This kind of programme is typically implemented by specialised examination providers, such as examination boards in the UK context.”
(Teacher – responding in a personal capacity)

“It would be better from an assessment validity and reliability perspective to ensure the person engaged in the interactive NEA is a native BSL user. However, this might pose manageability challenges for centres. We agree that the best solution would be for assessment outputs to always be marked by [exam board] markers wherever possible. The GCSE and A level language speaking assessments are an example of this approach currently. Assessing NEAs of this nature by internal assessment and moderation could significantly increase the need for centres to outsource marking to native BSL experts which only passes recruitment challenges onto individual schools when this challenge could be centrally managed by an awarding organisation.”
(Awarding body or exam board)

Equality impact

Question 10

Are there any potential equality impacts that Ofqual has not identified?

Question 10 response	Count	Percentage
Yes	65	20%
No	266	80%
Not answered	0	0%

There were 67 responses to this open question, including 6 from respondents who said there were no equality impacts that Ofqual had not identified. Conversely, there were 4 respondents who said there were impacts Ofqual had not identified but did not go on to name them.

About half of the comments made in response to this question related to difficulties that might be faced by students with different types of impairment, disability or learning difficulty when taking a GCSE in BSL. These comments predominantly covered one or more of 3 main types of impairment or disability. The greatest proportion related to comments about physical impairments impacting manual dexterity, which has clear implications for BSL.

“Consideration for students with specific conditions: Respondents mentioned conditions like cerebral palsy, dyslexia, Usher’s syndrome, and colour blindness, emphasising the importance of tailored accommodations for these individuals.”

(Other representative or interest group)

“Proficiency in articulating certain words/letters can be difficult for those with physical needs...”

(School or college)

“Some students have some difficulties with manual dexterity but can still produce BSL. Could there be some consideration for acknowledgement of recognisable signs that lack some precision due to a physical disability?”

(Local authority)

Some respondents identified potential impacts on students with a specific learning difficulty or special educational need or disability (SEND).

“Students with dyspraxia may need more time in assessments.”
(Other)

“Dyslexia and finger spelling also short-term memory problems”.
(Other)

“[Members] specifically mentioned concerns related to individuals on the autistic spectrum or those who experience challenges with processing information within set time frames”.
(Other representative or interest group)

A number of responses specifically identified deafblind students as a group that would be impacted by a GCSE in BSL.

“Some Deaf and blind students communicate through BSL, and they shouldn’t be excluded from this qualification.”
(Other)

“Deaf Blindness, Blind deafness, DeafBlind. These groups of people will need further adjustments.”
(Teacher - responding in a personal capacity)

A further set of responses made similar points but also suggested various adaptations that could be made to assessments in BSL. In some cases, these explicitly referred to reasonable adjustments or access arrangements for students with other impairments.

“Deafblind people use BSL, would a hands-on sign interpreter or relay interpreter be considered a reasonable adjustment to enable those with reduced vision to participate in the exams? If they are able to understand the content and can answer appropriately, should they not be eligible to sit these examinations?”
(Parent or carer)

“We cannot foresee how adaptations could be made for visually impaired students who would choose to access assessments through braille. Beyond this, we do not feel there is anything in the consultation that has a direct impact, though some challenges around other access arrangements (students who need additional time is an example) would need to be accommodated within the assessment”.
(Awarding body or exam board)

“I have dexterity issues and am now recently profoundly deaf (also a medically retired teacher) so am slowly becoming fluent in BSL. I have been able to utilise various medical aides that have been allowed in my BSL level exams. Could these not be promoted as a way for students with dexterity issues to access the qualification and not just assume they can't access it? Could you not allow students to find a way that allows them to access the qualification using medical aides that won't give them an advantage over other students who don't have the aides, but instead allows them to access the qualification at the same level?”
(Teacher - responding in a personal capacity)

There were some questions and comments about the delivery of these qualifications – in particular, making suggestions about who will teach them and how they should be assessed. In most cases it was not clear how these comments reflected an equalities impact, or what role Ofqual should have in relation to this issue. These themes were also very prevalent in responses to questions on the regulatory impact of our proposals.

“It needs to be taught by Deaf/deaf teachers and tutors with correct understanding and respect for the language and who know the language preferably as their first language or failing that someone who has been brought up with exposure to the from a very young age who fully understands and knows the language”.
(Other)

“Our query would be – what consideration have you given to who is delivering this GCSE? For example, if you are delivering a science qualification you would expect a qualified PGCE [postgraduate certificate in education] science teacher to deliver it, so for a BSL qualification - what are the qualifications and criteria the teacher is expected to have? As Deaf professionals ourselves - we wouldn't want a hearing person who has learnt some signing from a video or website to deliver this qualification, it needs to be properly validated. How can we support the wider deaf community and sponsor them to train to be teachers and deliver externally and to the wider school community?”
(School or college)

There were some comments in relation to difficulties for speakers of other languages (EAL).

“It could be possible for people who English is not their first language may find it limiting to take part, so possible offer support in interpreting BSL in other languages”.
(Parent or carer)

“Consideration for individuals participating in learning BSL as a third language. For example, polish student, learning English alongside BSL would put them at an unavoidable disadvantage”.
(Teacher – responding in a personal capacity)

“Where spoken English isn’t a student’s first language (for example, it may be Polish or Indian), this could impact their ability to understand and comprehend the translation of English to BSL more than those whose first spoken language is English”.
(Other)

Question 11

Do you have any suggestions for how any potential negative impacts on particular groups of students could be mitigated?

There were 120 responses to this open question.

Almost half of respondents to this question made various suggestions for dispensations that could or should be provided for students with physical needs, including students who are deafblind or have difficulties with manual dexterity. Many of these comments were broad statements about the importance of ensuring adaptations are available for such students.

“Anyone no matter of their disability should be able to learn BSL. Teachers would have to adapt and find new ways to teach a blind student or a student with a dexterity issue. Everyone should get the chance to learn BSL”.
(Other)

“I assume reasonable adjustments would be considered for those candidates that have additional disabilities, for example physical difficulties that make signing unclear, or vision difficulties that mean they need support to see videos or signers”.
(Teacher - responding in a personal capacity)

“To make sure that this is accessible for first language BSL users, there needs to be the ability for awarding organisations to be flexible in their assessment approach.”
(Awarding body or exam board)

Other responses to this question suggested specific ways in which assessments could be conducted or changed to enable students with physical disabilities to access them without disadvantage.

“Relay intralingual interpreters, hands-on BSL interpreters for Deafblind BSL users.”
(Parent or carer)

“Stipulate the environment that assessment needs to take place in – reduction of sensory distraction, ability to be assessed in short bursts to support children’s physical needs. The requirement for accurate articulation needs to be able to be modified for children with physical needs”.

(School or college)

“I work with children with disabilities and many of those don’t perform signs perfectly but yet are understandable - for the exams could the mitigation not just be if the assessor can understand for those select few to which it applies”.

(Other)

There were some comments of a similar nature but which focused on the potential impacts and mitigations for students with specific learning difficulties or special educational needs and disabilities.

“Consider offering extra time as an accommodation for students who may need it”.

(Other representative or interest group)

“Autistic and ADHD pupils you need to consider impact of them having to do the exam in front of a person they don’t know. Also consider the possibility of a basic level course whereby those who can’t do the other 2 levels can still do a basic assessment for instance in understanding sign language but not necessarily being able to make the signs in response. Or vice versa”.

(Parent or carer)

“Students with dyslexia should have a reasonable adjustment to take this into account when assessing fingerspelling skills. For example, receiving (understanding) fingerspelling may be challenging for such students. It should ensure that they are not disadvantaged or put off from taking the qualification because the rest of the BSL use may be something they cherish, enjoy and excel at”.

(Teacher - responding in a personal capacity)

A few respondents expressed concerns about accessibility of these qualifications and assessments for home-educated students and private candidates who do not attend a mainstream school. They suggested that assessment centres should be available locally and at a reasonable cost, or that exams with recorded components should be made available to private candidates.

“Please consider the home education community – there are a large number of students in this group that need to be able to access assessment and exam elements to ensure they can access this qualification”.

(Parent or carer)

Of the 120 responses, 19 said there were no potential negative impacts on particular groups of

students. One respondent said that the current proposal mitigates any negative impacts.

Many responses to this question were beyond or out of scope of the consultation. For example, a few respondents suggested using Makaton as an alternative to BSL. Others suggested that there should be 2 GCSEs – one for students who are already BSL users and one for new learners.

Regulatory impact

Question 12

Are there any potential costs or burdens that Ofqual has not identified?

Question 12 response	Count	Percentage
Yes	95	29%
No	231	70%
Not answered	5	2%

Almost all respondents answered this question, with the majority (70%) answering 'no'.

A total of 231 respondents stated that there would not be any other costs or burdens.

There were 98 responses to this open question. Almost all of the comments were from respondents who answered 'yes' to the previous question, along with 3 from respondents who answered 'no' and 1 from a respondent who did not answer the previous question.

Some respondents suggested there would be additional costs and burden for awarding bodies. This included all of the 3 exam boards that currently offer GCSE qualifications and responded to our consultation.

“This qualification could be demanding and costly for both exam boards and centres given the nature of the materials required. The cost of sourcing high quality examiners and moderators in this field is an unknown, and it is possible the cost of an entry to this qualification would have to be set significantly higher than that used for other GCSEs”.

(Awarding body or exam board)

“The cost of using interpreters while designing, developing and delivering the qualification. The

qualification development and management teams will need subject matter experts and the teams will be a mix of hearing and deaf collaborators. In order to communicate effectively, the teams will need interpreters.”

(Awarding body or exam board)

“A GCSE requiring assessment in written and signed languages risks an increased cost and burden for assessing organisations if written papers had to be translated independently to be accessible. Standardised processes should be considered and/or relevant costs covered where appropriate in this exceptional circumstance. Deaf people should be involved with all stages of this process”.

(Other representative or interest group)

More than half of the comments related to funding for schools, colleges and exam boards to set up a new GCSE qualification and to recruit and train teachers. It was not clear, in most cases, how these impacts differed from those which Ofqual identified and acknowledged in its proposals.

“Lack of funding for teachers of the deaf... Unless teachers of the deaf, or members of the deaf community who have teaching qualifications, run the course in schools I’m not sure what value it will hold given that many regular teachers do not sign”.

(Parent or carer)

“Cost of running an extra subject including cost of teaching staff and resources”.

(Teacher - responding in a personal capacity)

“It seems there is an assumption that the teaching staff who may be the deliverers of this new qualification have already achieved QTS [qualified teacher status] and are already employed in schools. There seems... to be no plan to attract a stream of graduates into BSL teaching, suitably funded and so on”.

(School or college)

Many respondents made comments or suggestions about who would teach GCSE BSL and the qualifications teachers of BSL would be required to have. These comments are intertwined with the comments above relating to funding. In most cases, respondents commented to say that teachers of a BSL GCSE should be BSL users themselves.

“It needs to be a requirement that teachers have some level or qualification of BSL, or considerable experience themselves. Unqualified staff might use colloquialisms or inaccurate expression unknowingly, which would then impact students.”

(Teacher - responding in a personal capacity)

“BSL must be taught by native first language users of BSL, for example, Deaf people. This

means that before the GCSE can be implemented there needs to be a scoping exercise to gauge the numbers of Deaf teachers/trainers in the UK. If there are insufficient numbers then training needs to be made available to them so that they can deliver the GCSE content.”
(Other)

“I know it had been mentioned but I think the qualification needs to be delivered by [an awarding organisation offering BSL qualifications] or someone with level 6 in BSL. As a teacher, I use BSL/SSE every day and have done for a few years but I would not feel comfortable teaching it at GCSE”.
(Teacher - responding in a personal capacity)

One respondent that did not answer ‘yes’ or ‘no’ commented specifically about the barriers to deaf people gaining PGCEs.

“Re: recruitment and retention of suitably qualified and experienced individuals with expertise in BSL - The cost of making PGCE accessible so that deaf people can gain the teaching qualification needed to teach BSL in schools, colleges and centres”.
(Other)

Some respondents raised comments about approaches to teaching and learning and classroom experiences.

“Inviting vetted Deaf adults who perhaps teach sign language outside of the school environment to come in and practise with students. BSL is a language that can only be learnt well through using it. Learning in a classroom is great but the students will need practise with real life Deaf BSL users. This should be added to the curriculum”.
(Other)

“Preparing pupils for BSL GCSEs will require preparation from primary schools as well. As we start building the foundations of mathematical skills from early years, similar consideration must be given to BSL. Preparation needs to start earlier than year 7, in primary school to allow the pupils to develop and secure their BSL skills.”
(Academy chain)

A few respondents commented specifically about facilities and infrastructure in centres.

“Educational settings use assistive technology and online learning platforms as their normal ways of working - particularly post-pandemic. How will GCSE BSL be accessible across the multi modal technology platforms that are used today? Will schools need to build in additional software infrastructure for BSL learners?”
(SLT - senior leadership team)

“Filming equipment for students who need to complete assessments and track their progress through video. Video display equipment - screens to watch receptive videos.”
(Private training provider)

Question 13

Are there any steps Ofqual could take to reduce the costs or burdens of the proposals?

There were 110 responses to this open question, a few of which simply said there were ‘no steps’, or ‘no steps now’, that Ofqual could take to reduce the costs or burdens of the proposals.

Very few of the responses were clearly in scope of the consultation in terms of relating to steps which Ofqual could conceivably take to reduce costs or burden. These focused on resources that exam boards could provide to teachers.

“Short of subsidies and a centralised repository for regularly updated reference materials - which it is probably not Ofqual’s duty to provide - probably not.”
(Other)

“Share teaching materials with staff.”
(Other representative or interest group)

“Encouraging exam boards to produce lots of freely accessible resources as early as possible so schools don’t need to buy into other things in order to have resources on time!”
(SLT - senior leadership team)

A few other responses that were in scope said that the delivery of the qualification to everybody outweighed any costs or burdens.

“The BSL Act 2022 commits the UK Government to advance the use and understanding of BSL in order to secure the status and rights of BSL users in this country. Costs or burdens arising from this GCSE initiative must be met in accordance with the spirit and intentions of this legislation. It is more important that the right approach is taken to this qualification, making it accessible for all, and the relatively minor cost should be addressed in accordance with national legislative expectations”.
(Other representative or interest group)

“We strongly believe that it is more important that the right approach is taken to this

qualification, making it accessible for all, and would prioritise this over any additional cost implications”.

(Awarding body or exam board)

“The right approach’ is the most important factor here. Again, in determining ‘the right approach’, appropriately qualified and experienced Deaf people must be involved and, as far as possible, lead, in all developments relating to the BSL GCSE curriculum and the framing of exams and assessments. An over-hasty, ill-thought-through approach will incur much greater costs and burdens farther down the line, for schools, exam boards, Ofqual and, above all, for the Deaf community and those wishing to learn its language, BSL”.

(Other)

The majority of responses, however, extended beyond the scope of the consultation in that it was not clear what role Ofqual could have in taking the suggested steps. This may have stemmed from a lack of understanding of Ofqual’s role in the education system. Within this context, there were 2 predominant themes arising from responses to this question, both of which echoed comments made in response to Question 12. First, nearly half of the respondents to this question said that BSL users, deaf people or BSL tutors should teach GCSEs in BSL given the complexities and nuances associated with the language.

“Ensure deaf and native BSL users are employed for the role of teaching BSL as they are the ones who fully know the language inside out and back to front meaning less need for teaching and training on the teachers behalf as they will already know the signs and how to fully communicate using BSL”.

(Other)

“Use the Deaf community as much as possible, including CODAs”.

(Academy chain)

“It is very important that native Deaf BSL users teach this qualification, the quality of the language will be at a high and hearing people will have a higher standard of skill when using BSL”.

(School or college)

The second predominant theme, made by about a third of respondents to this question, returned to the issues of recruitment and training for teachers, and the funding available for this both centrally and within schools and colleges. Some responses also linked these issues with the importance of BSL users teaching the consultation, as discussed above.

“Fully funded training for school staff members wishing to deliver the BSL GCSE so that training costs do not need to come from existing school budgets”.

(Teacher - responding in a personal capacity)

“Extra grants might be made to schools during the preparation for the exam course and during the first round of students taking this exam (3 years) to get the exam established”.

(Governor)

“Offer subsidised training to staff to learn to deliver the course or offer subsidies to school to hire BSL fluent teachers”.

(Parent or carer)

Annex A: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation. These are the organisations that submitted a non-confidential response:

- AQA
- Association of British Sign Language Teachers and Assessors (ABSLTA)
- Blessed Edward Oldcorne
- British Deaf Association
- BSL Curriculum Working Group
- Bolton College & Nicola Rothwell – BSL Interpreting
- Caludon Castle School
- City of York Council Deaf and Hearing Support Team
- Deafness Cognition and Language Research Centre, UCL
- Deaf & Hearing Trailblazers CIC
- Egguckland Community College
- Femaura Social Enterprise Ltd
- Hartlepool Learning to Sign
- Heathlands School
- Hopwood Hall College
- Langley Mill Academy
- Leicestershire County Council
- Meldreth Primary School
- Pearson Education
- Shenfield St Mary’s
- Signature
- Simply Signed BSL
- SWAD
- The Deaf Academy
- The Nelson Thomlinson School

- The Sign Bilingual Consortium
- The Sittingbourne School
- UK Association for Language Testing and Assessment (UKALTA)
- Victoria Baptist Church
- Wakefield Council
- Wakefield Inclusion SEND Support Service
- West Kirby School and College
- Wiltshire Council, Sensory Impairment Physical and Medical Service
- WJEC

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