ofqual

Consultation outcome

Decisions: Rules for GCSE qualifications in British Sign Language

Updated 13 November 2025

Contents

Introduction

We have produced a British Sign Language translation of the following section.

In 2018, the Department for Education (DfE) decided to introduce a GCSE in British Sign Language (BSL). DfE is responsible for setting the curriculum requirements and subject content for all GCSE qualifications, including for new GCSEs in BSL. In

December 2023, after [a public consultation](#), DfE published [subject content for GCSEs in British Sign Language (BSL)](#).

Ofqual is responsible for how GCSE subject content will be assessed and for ensuring that the assessment arrangements can support valid and reliable results. In December 2023, [Ofqual confirmed its broad assessment arrangements for BSL](#), having [consulted on them](#) at the same time as DfE consulted on the subject content.

Following detailed development work, [Ofqual launched a further consultation on the detailed rules](#) that an exam board would need to follow when designing a GCSE qualification in BSL.

The consultation was open for responses between 30 April and 25 June 2025, and received 30 responses. A [summary and analysis of the responses](#) has been published at the same time as this decision document.

Summary of decisions

We have produced a [British Sign Language translation](#) of the following section.

Ofqual has decided to implement all the proposed conditions, requirements and guidance. In 3 places, we have made minor changes to our wording in response to comments from respondents to our consultation. These changes improve the clarity of our regulatory documents but do not affect the substance of the requirements.

The requirements cover the following:

- the language and accessibility of the assessments

- vocabulary and grammar

- prohibiting access to dictionaries

- the use of stimulus materials

- the assessment objectives (wording and guidance)

- forms of non-exam assessment (the structure, composition and conduct of the non-exam assessments)

Detailed decisions

Language and accessibility of assessments

We have produced a [British Sign Language translation](#) of the following section.

Having considered the feedback we received, we have decided to make one small change to the specific wording of the guidance, but otherwise implement our proposals as set out in the consultation.

A couple of respondents said that references to Sign Supported English (SSE) in the proposals should be removed on the grounds that SSE should not form any part of the assessment of BSL. For the avoidance of doubt, there is no proposal for SSE to form part of the assessment. SSE is mentioned twice in the [draft guidance](#) when clarifying when any form of sign-use may or may not be used as a reasonable adjustment. This is because, while SSE differs from BSL and is not regarded as a language in its own right, it does make use of BSL vocabulary and finger spelling. This means that it also has the potential to undermine the valid assessment of students' understanding and use of BSL if permitted as a reasonable adjustment. We consider it important for the guidance for GCSEs in BSL to clearly indicate our expectations in relation to sign-use as a reasonable adjustment. We have decided to retain the reference to SSE but have amended the wording to state "…the use of British Sign Language or other sign-based communication support such as Sign Supported English". This will be used for the guidance that confirms sign-based reasonable adjustments are not permitted for assessments including receptive, productive or interactive skills (AO1, AO2, AO3). It will also be used for the guidance that explains the circumstances when sign-based reasonable adjustments may be permitted for the standalone assessment of the history of BSL (AO4).

One respondent observed that the proposal to allow BSL as a reasonable adjustment for the history of BSL component, depending on the exam board's design decisions, was not aligned with JCQ's Reasonable Adjustments and access arrangements. This relates to JCQ's current policy and requirements about the use

of sign language professionals, which state that students may only sign answers "where it is possible to finger spell the answers or where the answers involve single words". We do not expect this current JCQ arrangement to apply to the new GCSE in BSL. The use of BSL as a reasonable adjustment presents specific challenges in this GCSE and, for this reason, we have set specific regulations about the approach that may or may not be taken. To support the introduction of this brand-new qualification, we expect that the JCQ will wish to review its current arrangements to ensure they appropriately accommodate the expectations and unique design requirements for the new GCSE in BSL.

Vocabulary and grammar

We have produced a [British Sign Language translation](#) of the following section.

We have decided to implement all our proposed requirements and guidance as set out in the consultation.

The majority of comments we received about our proposals in this area concerned regional variations. We recognise and have given careful consideration to the challenges presented by regional variations. None of the responses to the consultation identified a solution that would better support DfE's subject content requirements or ensure valid, fair and reliable GCSE assessments than that set out in the draft requirements and guidance.

We have also considered the level of specificity we should impose on exam boards in relation to regional variations. Overly restricting the use of regional variations could impact on exam boards' use of existing and/or authentic resources. Requiring exam boards to include multiple regions variations of individual signs would likely increase the amount of vocabulary students must learn considerably. The decisions that are most appropriate will depend on the topics and associated vocabulary – in line with DfE's vocabulary and grammar requirements – that an exam board chooses to include. We remain of the view that exam boards should have some discretion to identify a proportionate approach for their specifications, which could see some but not all signs being given additional regional variations.

We have considered whether it would be helpful to make an amendment to our use

of the phrase 'giving the meaning' of signs. However, we judge that it is not necessary to do so. In the vocabulary and grammar requirements and the guidance on prohibiting dictionaries (section below), we refer to exam boards "providing the meanings of unfamiliar vocabulary in assessments". This language is familiar to exam boards, as it is consistent with that used in GCSE modern foreign language qualifications. It refers to providing a definition or glossary for something that is not expected to be known by students taking the assessment. It is also aligned with the wording used in the vocabulary and grammar requirements for the GCSE in BSL. In this section we also refer to students' ability to "infer plausible meanings of single signs", which reflects the precise wording used in DfE's subject content. We judge that the phrase is sufficiently clear and familiar for exam boards.

Access to dictionaries

We have produced a [British Sign Language translation](#) of the following section.

None of the feedback raised issues or evidence that caused us to reconsider our proposal, so we have decided to implement the proposed condition as set out in the consultation.

Some respondents were concerned that the proposal meant students would not be able to access a dictionary during teaching and learning, which is not the case. The condition relates specifically to access during assessments. Some respondents commented on the potential for dictionaries to be used as exam support for students with memory issues. However, given that students will be tested on their knowledge and understanding of learned vocabulary, access to a dictionary would undermine the assessment.

Use of stimulus materials

We have produced a [British Sign Language translation](#) of the following section.

We have decided to implement all our proposed requirements as set out in the consultation.

Responses were generally supportive of our proposal, and largely reflected considerations we had set out in our consultation. One respondent focused on whether tighter parameters should be introduced for the nature of stimulus materials. We considered this in detail both before and after our consultation. We have not identified a meaningful basis to specify a particular number of signs or extract duration that would be suitable for all topics. Feedback to the consultation has not set out evidence or proposals to change this view.

There are already detailed parameters in place in terms of the DfE subject content requirements, and exam boards will be expected to develop assessments that provide sufficient coverage of DfE's vocabulary and grammar requirements. In addition, given the requirements for how exam boards will be expected to design assessments that are accessible for students, we do not consider it appropriate to arbitrarily constrain their assessment design choices. We judge it important for exam boards to have some flexibility to create stimulus material that will be appropriate for the topics assessed and that enable students to demonstrate what they know, understand and can do.

The assessment objectives – AO3

We have produced a British Sign Language translation of the following section.

We have decided to implement our proposal to remove the explicit reference to "placement" in assessment objective 3. Assessment objective 3 (AO3) will now state:

> Articulate signs with accurate use of lexicon and grammar, and with appropriate use of interaction strategies.

While the majority of respondents (63%) supported the proposed amendment, this was the proposal with the lowest agreement rate overall. Respondents noted that

"placement" is an essential aspect of understanding and using the language. They also noted that "placement" is a commonly understood term.

We recognise that "placement" is an important grammatical feature of the language and have not proposed that this is removed from the expectations. Rather, the proposal reflects the fact that "placement" is already covered by the requirement of AO3 to demonstrate "accurate use of lexicon and grammar". In the assessment objective guidance, we have explained that the expectation for the accurate use of grammar refers to all of the detailed grammar requirements set out in DfE's subject content. In the guidance we have also specifically highlighted DfE's reference to "location, handshape, movement and orientation", which ensures the importance of "placement" is not overlooked. While we recognise that "placement" is a familiar and well-used term, given that we wish to align with DfE's subject content and not suggest any undue emphasis on one part of the requirements over another, we judge it appropriate to implement the updated wording as consulted upon.

One respondent suggested the assessment objective should be reworded to require "appropriate use" rather than "accurate use" of vocabulary and grammar. The expectation for "accurate use" reflects DfE's subject content expectations, and is consistent with equivalent assessment objectives in GCSE French, German and Spanish, as well as English language.

The assessment objectives – assessment objective guidance

We have produced a [British Sign Language translation](#) of the following section.

We have made 2 minor changes to the wording of the proposed assessment objective guidance for AO2 in response to feedback from respondents. We have decided to implement the remainder of the proposed guidance as set out in our consultation.

We acknowledge the potential incongruity of using the term 'utterances' when it is more commonly associated with spoken words or vocal statements. We have decided to update the AO2 guidance to address this. Rather than stating "where British Sign Language utterances are meaningful", it now states, "where Learners'

use of British Sign Language is meaningful".

We also acknowledge that while the proposed AO2 guidance confirms that the term "signed text" is defined in the subject content, the guidance does not state that "signed sentence" is also defined by DfE. We agree it would be helpful to make this clear. The AO2 guidance has been amended to state "'Signed text' and 'signed sentence' are defined in DfE's subject content, Annex A, paragraph 9".

Two comments related to [decisions that have already been made about the assessment objectives](). We have considered the additional feedback provided on these points but have not seen evidence that would require us to make changes.

In relation to AO1b and the expectation to demonstrate understanding of interactive BSL, this reflects DfE's subject content requirement for students to develop, and be assessed on, the ability to interact in BSL. To genuinely interact and have a conversation in BSL, students will need to use both their receptive and productive skills and, as such, both should be acknowledged and rewarded. As acknowledged in our previous decisions, we recognise the interplay between marks for comprehension and production in non-exam assessment (NEA) tasks. The extent of this, and any potential challenges, will vary depending on the details of the specific assessment tasks. We expect, however, that exam boards can design suitable tasks that allow students to be rewarded for the quality of their signed responses, while also identifying (and appropriately rewarding) how well they have understood the specific details of the conversation.

The structure, composition and conduct of the NEA

We have produced a [British Sign Language translation]() of the following section.

We have decided to implement the proposed requirements for the NEA as set out in our consultation.

There were some different views about the weightings for each NEA component. Some respondents suggested there should be a lower weighting for the BSL Portfolio given the potential to rehearse this, and others suggested a higher weighting. Some commented that the higher weighting for the Interactive

Assessment was appropriate given it tests students in a live interactive situation. On balance, there was no conclusive evidence that a different approach to that which we consulted on would be preferable.

One respondent queried the inclusion of a conversational task in both NEA components, and specifically in the BSL Portfolio given this is likely to be rehearsed and a conversation is inherently an interactive task. We recognise this point and note that the main assessment of a student's interactive skill will be within the Interactive Assessment. We judge it necessary, however, to retain this conversational element within the BSL Portfolio. We consider that removing this from the BSL Portfolio would reduce the opportunity for students to show what they know and can do. In addition, there must be a sufficient amount of assessment to cover the DfE content requirements, including the requirement to interact in structured and unstructured scenarios, and the range of vocabulary and grammar requirements. The assessments must also support differentiation of students across the full 9 to 1 grade range. We note that the expectations for this component were otherwise positively received. We have decided not to make any changes.

Another respondent queried the requirement for recorded evidence to capture any sound during the assessment. They noted that this could discriminate against centres or exam boards that are made up entirely of deaf people, and instead it might be appropriate to use technical tools to show if any sound or speech occurs in the videos. We understand this point relates to access arrangements in the exam board in terms of checking for irregularities in the assessment. We consider it necessary to ensure that the recorded evidence provided to the exam board reflects a full account of what takes place during the assessment. This will include seeking reassurance about the lack of interference from any speech during the assessment and enabling the exam board to consider all available evidence when marking students' performances. We do not consider that technical tools will necessarily provide the same level of reassurance, but an exam board may choose to employ these in addition to receiving the full audio-visual recording, should they wish.

Equalities impact assessment

We have produced a British Sign Language translation of the following section.

Throughout the consultation, one of the most prevalent themes from respondents was the desire to see arrangements that will support students with additional access needs linked to other sensory or physical disabilities. In particular, respondents raised queries about how the qualification will be adapted for students with visual impairments or those who do not have sufficient manual or facial dexterity. Some suggested that the use of alternative forms of communication should be permitted, such as hands-on BSL or visual frame BSL. While these are examples of how sign language can be adapted to accommodate other disabilities, DfE's subject content for this GCSE in BSL is based on British Sign Language, which is a visual-spatial language. It sets expectations for the use of the 2-handed manual alphabet and non-manual features. Alternative forms of the language would not enable students to demonstrate the specific expectations of the subject content.

As such, and as set out in this consultation and the policy consultation, we have not identified adjustments that can be made for students who are not able to work within the parameters of the language. This is because the qualification must remain a reliable indicator of what each student can do in relation to the specific expectations of the subject content.

However, this does not necessarily mean that all students who have some sensory or physical disabilities will be completely unable to access the qualification. The exam boards are required to make reasonable adjustments where this will not affect the security and integrity of the assessment. We expect that in some cases there will be adjustments that exam boards can make.

Due to the compensatory nature of a GCSE, any student who takes the qualification may well be able to access a range of marks. For example, a student who has some limited manual dexterity may find that they are not able to access all of the marks for technical accuracy (AO3), which accounts for 20% of the total marks. However, they may be able to effectively demonstrate their ability to communicate in BSL (AO2), and fully show their receptive skills (AO1) and their knowledge of the history of BSL (AO4). It might also be possible for a student to be granted an exemption from a component of the qualification if this is the most appropriate.

Respondents also commented on other access needs, such as dyslexia, where students might need additional time. As set out in the policy consultation, exam boards must already make reasonable adjustments for disabled students to provide a fair opportunity for them to demonstrate the required knowledge, understanding and skills. These arrangements are in place and well understood by both schools and colleges and exam boards, and would continue to apply just as they do for all other GCSE qualifications.

The responses to the consultation did not identify any equality impacts that we had not already considered or which change our view about the appropriateness of the proposed regulations.

Regulatory impact assessment

We have produced a British Sign Language translation of the following section.

Respondents made a range of comments about potential costs and burdens, and many offered helpful suggestions to manage these. Frequently, these points related to the introduction and delivery of this new GCSE in BSL more generally, rather than as a direct result of the specific proposals. For example, the importance and challenge of having sufficient suitably qualified teachers and assessors, and appropriate resources.

One respondent commented on the need to have high quality audio-visual equipment and digital storage solutions. They identified the need for suitable IT interfaces between exam boards and centres to ensure the transfer of assessment materials and evidence is efficient. This arises from the proposed requirement for audio-visual evidence of both NEA components to be submitted to the exam board. While we recognise the impact of this requirement, we judge it necessary to ensure exam boards have sufficient and relevant evidence of students' assessments. This is particularly relevant given that exam boards will assess and determine marks for students based on the audio-visual recordings. The expectation for such recordings is consistent with NEA requirements in other GCSE and A level subjects, including GCSEs in French, German and Spanish, English language, and performance-based subjects such as drama and dance.

One respondent (an exam board) commented on the additional costs of recruiting, training and deploying visiting examiners. The proposed requirements provide for centres to request a visiting examiner for the Interactive Portfolio, if they think this will be in the best interests of their students. The default position, however, is that the assessments will be delivered in centres by teachers of the qualification. While we recognise there will be a cost involved for exam boards to provide visiting examiners, if requested, we consider it important to ensure centres are provided with proportionate support to deliver the assessments. We judge that the requirement to

provide visiting examiners, when requested, is not unreasonable.

The responses to the consultation did not identify any regulatory impacts that we had not already considered or which change our view about the appropriateness of the proposed regulations.

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