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Consultation outcome

Analysis: Rules for GCSE qualifications in British Sign Language

Updated 13 November 2025

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Summary

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

Ofqual consulted on the detailed rules that an exam board would need to follow

when designing a GCSE qualification in British Sign Language (BSL).

This document is the summary of responses to this consultation. The consultation was open for responses between 30 April and 25 June 2025.

Ofqual received 30 responses to the consultation.

The majority of respondents agreed or strongly agreed with Ofqual's proposals for a range of requirements covering:

- 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)

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

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 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.

Since December 2023 Ofqual carried out detailed work to consider the most appropriate way for DfE's subject content to be assessed. We worked with deaf and hearing BSL subject matter specialists, including those with experience of teaching deaf and hearing students who are learning BSL and students taking GCSE qualifications. We worked with awarding organisations that offer existing BSL qualifications and those that offer GCSE qualifications in other subjects.

In this consultation, Ofqual invited respondents' views on the proposed detailed rules.

Approach to analysis

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

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 9 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 7 open questions to gather comments on the proposals.

An additional 3 open questions sought views from interested parties on the specific wording of the proposed subject level conditions, requirements and guidance.

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.

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.

Due to the small number of respondents and the overall very high rate of agreement with our proposals, we believe there is limited value in trying to identify trends in how different types of respondent viewed our proposals, so we have not routinely done so. Where relevant, however, we have indicated where a particular type of respondent has made a specific point in their response(s).

Who responded?

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

There were 30 formal responses to the consultation via the online survey. These included responses from one exam board currently recognised to offer GCSE qualifications and one awarding organisation recognised to offer BSL qualifications. Responses were also provided by individuals and organisations, including teachers, schools and representative groups on behalf of individuals in the deaf and hearing communities.

Official organisational responses	Number of respondents
Academy chain	1
Awarding body or exam board	2

Local authority	2
Other representative or interest group	4
Private training provider	2
School or college	4
University or higher education institution	2
Total	17

Individual responses Number of respondents

Parent or carer	2
Student	1
Teacher	8
Other	2
Total	13

Detailed analysis

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

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.

Access needs for different groups of students, and particularly those with disabilities other than deafness or hearing loss.

Queries about the detailed design decisions that would be made by exam boards when designing specifications.

The need for Deaf and BSL first language users to be involved in all stages of the qualification, from designing the qualification and assessment through to teaching and marking.

The language and accessibility of the assessments

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

The consultation proposed setting [requirements and guidance about the language and accessibility of the assessments](#) for GCSEs in BSL. These requirements relate to how the assessments should be designed so that they are suitable for new learners and as accessible as possible for students who use BSL as their first or primary language.

Respondents were asked to what extent they agreed or disagreed with Ofqual's proposed requirements and guidance about the language and accessibility of assessments.

Response	Count
Strongly Agree	14
Agree	12
Neither agree nor disagree	2

Disagree	1
Strongly disagree	0
Not answered	1

There were 29 responses to this proposal. The majority, 90%, supported the proposal, while 3% did not and 7% neither agreed nor disagreed.

There were 17 comments, which included general support for the proposals, acknowledgement of the differing levels of English language proficiency, and access needs of different students. Some respondents raised queries about how the detailed arrangements would work in practice or made suggestions for approaches an exam board might take. 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.

One respondent said 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 the current JCQ Reasonable Adjustments and access arrangements.

Vocabulary and grammar

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

The consultation proposed setting [requirements and guidance about the vocabulary and grammar](#) in the qualification. These include the expectation for exam boards to publish a vocabulary list that visually illustrates each sign students will be expected to learn. These also require exam boards to make clear which regional variations of signs they will use in their own materials, while allowing students to use other regional variations in non-exam assessment (NEA) tasks.

Respondents were asked to what extent they agreed or disagreed with Ofqual's proposed requirements and guidance about the vocabulary and grammar in the qualification.

Response	Count
Strongly Agree	14
Agree	11
Neither agree nor disagree	3
Disagree	1
Strongly disagree	1
Not answered	0

There were 30 responses to this proposal. The majority, 83%, supported the proposal, while 7% did not and 10% neither agreed nor disagreed. There were 16 comments, which included support for the proposal and recognition of the complexities presented by the language. Respondents reiterated the importance of ensuring all vocabulary used in the assessments will be appropriate and sufficiently accessible to all students, including exam terminology used in instructions and rubrics.

There were several comments about regional variations. Some respondents raised concerns about the risk of bias towards certain regions, depending on the regional variations chosen, and the potential for any standardised approach to change the nature of the language over time. One respondent noted the lack of specific direction on how many and which region's variations should be used, saying this risks inconsistency if more than one specification is developed.

One respondent commented on the specific wording used in the consultation, drawing attention to the phrasing of "giving the meaning" of signs. They suggested instead that this should refer to giving clarification of sign meaning, for example, English translations of BSL signs or clarification via rewording of BSL.

Access to dictionaries

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

The consultation proposed setting [a condition that says students must not have access to dictionaries during assessments](#), with supplementary guidance.

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposed condition prohibiting access to dictionaries in the assessments.

Response	Count
Strongly Agree	13
Agree	11
Neither agree nor disagree	1
Disagree	4
Strongly disagree	1
Not answered	0

There were 30 responses to this proposal. The majority, 80%, supported the proposal, while 17% did not and 3% neither agreed nor disagreed. There were 18 comments, including those expressing agreement and noting the importance of aligning with other GCSE subjects. Some respondents were concerned that the proposal meant students would not be able to access a dictionary during teaching and learning. Others commented on the potential for dictionaries to be used as exam support for students with memory issues.

Use of stimulus materials

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

The consultation proposed setting [requirements about the use of stimulus](#)

[materials](#) during the assessments.

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposed requirements and guidance about the use of stimulus materials in assessments.

Response	Count
Strongly Agree	15
Agree	12
Neither agree nor disagree	2
Disagree	1
Strongly disagree	0
Not answered	0

There were 30 responses to this proposal. The majority, 90%, supported the proposal, while 3% did not and 7% neither agreed nor disagreed. There were 14 comments, which generally supported the proposal and reflected considerations set out in the consultation. For example, the need to ensure students have sufficient time to view and respond to the extracts, including to be able to work at their own pace. Some respondents commented on the cognitive demand for students, suggesting that using a greater number of shorter extracts – rather than fewer, longer extracts – would be helpful. Some suggested using the same signers throughout to allow students to become familiar with those individuals’ approaches, as well as the importance of the signers being first language BSL users.

One respondent raised concerns that the lack of parameters for the length, number, timing and pace of extracts risks significant variation in the event that more than one specification is developed

The assessment objectives – AO3

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

section.

The consultation proposed making a small [amendment to the wording of assessment objective 3 \(AO3\)](#) to remove the explicit reference to “placement”.

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposal to make a small amendment to the wording of AO3.

Response	Count
Strongly Agree	10
Agree	9
Neither agree nor disagree	2
Disagree	7
Strongly disagree	2
Not answered	0

There were 30 responses to this proposal. The majority, 63%, supported the proposal, while 30% did not and 7% neither agreed nor disagreed. There were 16 comments, including comments from those who supported the amendment. Some respondents said “placement” is an essential aspect of understanding and using the language and, as such, should remain in the wording of the assessment objective. Others suggested that “placement” is a more commonly understood term than the longer description set out in DfE’s subject content. One respondent suggested the assessment objective should be reworded to require “appropriate use” rather than “accurate use” of vocabulary and grammar.

The assessment objectives - guidance

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

The consultation also set out the proposed detailed [guidance on how exam boards should interpret the assessment objectives](#).

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposed guidance for each of the assessment objectives.

Response	Count
Strongly Agree	9
Agree	18
Neither agree nor disagree	2
Disagree	1
Strongly disagree	0
Not answered	0

There were 30 responses to this proposal. The majority, 90%, supported the proposal, while 3% did not, and 7% neither agreed nor disagreed. There were 12 comments, including comments from those in support of the guidance.

Respondents suggested the guidance was clear and appropriate, including the clarification that marks will not be rewarded for any use of English. Others raised queries about who will conduct the assessments, suggesting that assessors must be suitably qualified and fluent in BSL to evaluate whether the assessment objectives have been met.

Two respondents commented on the use of “utterances” in AO2, noting that this word is commonly associated with spoken words or vocal statements.

Another respondent noted that the guidance for AO2 refers to a “signed sentence” and “signed text”. While the guidance confirms that “signed text” is defined in the subject content, the respondent observed it does not state that “signed sentence” is also defined and that it would be helpful to make this clear.

Two comments related to decisions that have already been made about the assessment objectives. One respondent commented on the weighting of marks for receptive and productive skills, noting there is a slightly higher emphasis on productive skills (based on the combined weighting of AO2 and AO3). Another respondent disagreed with AO1 element 1b, “Demonstrate understanding of

interactive BSL”. This was on the basis that students’ ability to demonstrate their understanding might be constrained by their ability to respond in BSL.

The structure, composition and conduct of the NEA

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

The consultation proposed setting [requirements about the structure, composition and conduct of the non-exam assessment \(NEA\)](#). The consultation proposed setting a requirement that there must be 2 NEA components that, together, address the DfE content requirements to produce and interact in BSL, as follows:

- a. a ‘BSL Portfolio’ worth 20% of the total qualification marks
- b. an ‘Interactive Assessment’ worth 40% of the total qualification marks

The consultation also proposed setting detailed requirements for each component confirming the details, guided durations and timings of tasks. They proposed that assessments would typically be delivered by centres and marked by exam boards based on recorded audio-visual evidence. Respondents were first asked if they agreed with each of the proposals, and then if they had any comments on any of the proposals for the NEA.

Respondents were asked to what extent they agreed or disagreed with the proposed requirement that there are 2 NEA components.

Response	Count
Strongly Agree	11
Agree	13
Neither agree nor disagree	5
Disagree	1
Strongly disagree	0

Not answered	0
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There were 30 responses to this proposal to have 2 NEA components, weighted at 20% and 40% of the total qualification marks. The majority, 80%, supported the proposal, while 3% did not and 17% neither agreed nor disagreed.

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposed detailed requirements about the “BSL Portfolio”.

Response	Count
Strongly Agree	8
Agree	17
Neither agree nor disagree	3
Disagree	1
Strongly disagree	0
Not answered	1

There were 29 responses to the proposed requirements for the BSL Portfolio. The majority, 86%, supported the proposal, while 3% did not and 10% neither agreed nor disagreed.

Respondents were asked to what extent they agreed or disagreed with Ofqual’s proposed detailed requirements about the “Interactive Assessment”.

Response	Count
Strongly Agree	10
Agree	17
Neither agree nor disagree	1
Disagree	1
Strongly disagree	0

There were 29 responses to the proposed requirements for the Interactive Assessment. The majority, 93%, supported the proposal, while 3% did not and 3% neither agreed nor disagreed.

There were 14 comments in response to the proposed requirements for the NEA, including those setting out support for the expectations. This included positive comments about the coverage of formal and informal settings, and flexibility to enable students to demonstrate what they can do.

There were some different views about the weightings for each component, with some respondents suggesting there should be a lower weighting for the BSL Portfolio given the potential to rehearse this, and others suggesting a higher weighting. Some commented that the higher weighting for the Interactive Assessment was appropriate given it tests students in a live interactive situation. 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.

Several respondents raised queries about the detailed expectations in centres and the need to employ appropriate, suitably qualified assessors who are fluent Deaf signers and able to apply the assessment criteria. One 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. They suggested that instead it might be appropriate to use technical tools to show if any sound or speech occurs in the videos.

The draft subject level conditions, requirements and guidance

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

Having sought views on the purposes and content of the proposed detailed rules,

we then sought views on the specific wording of Ofqual’s subject level conditions, requirements and guidance for GCSEs in BSL. We expected this section to primarily be of interest to the exam boards who will need to use these documents to develop qualifications.

We did not repeat the Likert questions for each section but instead offered respondents the opportunity to raise comments if they wished.

There were 14 comments about the draft wording of the subject level conditions, and 13 comments each about the draft wording of the subject level requirements and the draft wording of the subject level guidance. The comments were generally positive and all of the points raised were ones that had been considered in other questions.

Equalities impact assessment

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

The consultation set out draft regulations that seek to ensure assessments are appropriate for students who are learning the language, and which maximise the accessibility of assessments for students who use BSL as a reasonable adjustment.

Respondents were asked if there were any potential equality impacts that Ofqual had not identified, and if so what they were. They were also asked to give suggestions for how any potential negative impacts on particular groups of students could be mitigated.

Response	Count
Yes	9
No	20
Not answered	1

There were 29 responses to the equality impact assessment, with 20 respondents answering ‘no’ when asked if there were any potential equality impacts Ofqual had not identified. Ten respondents described the negative impacts the respondent had identified, and 13 offered suggestions on mitigations.

A prevalent theme throughout the responses was the desire to see arrangements that will support students with additional access needs linked to other sensory or physical disabilities. 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.

Respondents also commented on other access needs, such as dyslexia, where students might need additional time.

Regulatory impact assessment

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

In the consultation, Ofqual identified and considered possible activities resulting from its proposals that might give rise to additional costs and burdens for awarding organisations, schools, colleges and other exam centres. It also considered, where relevant, any activities that might not take place and which could deliver savings.

Respondents were asked if there were any potential costs or burdens that Ofqual had not identified.

Response	Count
Yes	11
No	19
Not answered	0

There were 30 responses to the regulatory impact assessment, with 11 respondents

answering 'yes' when asked if there were any costs or burdens Ofqual had not identified. Fourteen comments were provided, and 13 offered suggestions on steps Ofqual could take to reduce the costs or burdens associated with the proposals.

The majority of comments focused on the need to recruit and train suitably qualified individuals with expertise in BSL, both within exam boards and in centres. Many suggested the importance of individuals being Deaf and/or first language BSL users, while others commented on the importance of having fully qualified teachers with PGCEs. Respondents suggested prioritising upskilling of existing Deaf teachers and assessors to become qualified GCSE teachers and assessors. Respondents also suggested collaboration with organisations who already offer BSL courses to support the production of resources and development of teachers and assessors.

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.

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