

## **Ofqual consultation on changes to the assessment arrangements for GCSE French, German and Spanish**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 21,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. Key points**

3. As outlined in our publicly available response to the government's consultation on the subject content of GCSE Modern Foreign Languages (MFL), we understand the importance of the Ofqual consultation in informing future assessment linked to the proposals. The assessment arrangements are, de facto, largely dictated by the content consultation.
4. ASCL members are concerned that the draft content and associated assessment implies a particular pedagogy. We do not agree that this should be within the remit of this consultation, and there should be no overt prioritising of one pedagogical approach over another. The inspectorate, when making its judgements, is careful not to prioritise one methodology over another, and recognises that there is no single methodology which is effective for all pupils. There is evidence that a well-sequenced curriculum can be achieved in a variety of ways to suit learner profiles, and we are concerned about the impact these proposals may have on teaching and learning.
5. There is a risk that the assessment arrangements will result in overt 'teaching to the test' at the expense of intrinsic interest and the implementation of wider curriculum objectives. The types of communication advocated in the assessment are dictation, translation (and translation of single words), guided writing within the defined word list, and the removal of a general conversation, all of which result in very controlled tasks and an absence of 'genuine' communication.
6. These proposals only pertain to French, German and Spanish. This creates a lack of parity with other taught languages, which will be using existing thematic-based specifications and assessment arrangements. This will have a negative impact on teacher workload, on the workload of dual linguists and on those studying community

languages alongside their modern foreign language. This could have an unintended but damaging impact on pupils learning community languages as, currently, the ability to transfer exam skills and knowledge of themes from one language to another is beneficial.

7. ASCL's key concern about the assessment proposed is that it undermines the key purpose of learning a language, which is to communicate. The assessment tasks may result in overt 'teaching to the test' at the expense of developing communicative competence.

### **C. Answers to specific questions**

**Question 1: To what extent do you agree or disagree with the proposed assessment objectives for GCSE MFL (French, German and Spanish?) and**

**Question 2: Do you have any comments on the proposed assessment objectives for GCSE MFL (French, German and Spanish)?**

8. ASCL does not agree with the proposed assessment objectives for the revised GCSE. Mixed objectives are a consequence of the DfE content proposals which specify the requirement to have reading aloud and comprehension (Q19) *and* dictation (Q20).
9. ASCL disagrees with the requirement for pupils to read aloud short sentences in the written form of the language and demonstrate understanding of them. While we fully appreciate that reading aloud is a worthwhile classroom activity, and can be a valid assessment of pupils' phonic awareness, the inclusion of this in assessment is flawed. Given that pupils will be tested on prescribed words, it will not constitute a valid test of phonic awareness as the words will already be familiar to pupils. There is a risk that the assessment may not be reliable, depending on the quality of the mark scheme and the support teachers are given in applying it. This could lead to inconsistencies in interpretation if not well designed.
10. We strongly disagree with the proposal that pupils are asked questions after reading; there must be a clear opportunity to allow pupils to gain understanding of the text prior to reading it and being asked questions about it. We also seek confirmation that the questions would have to be in English.
11. ASCL disagrees with the requirement that pupils undertake dictation exercises as part of assessment. While phonics, vocabulary and grammar are important, testing these features in priority over communicative competence is flawed in our view. While not an authentic task, many language teachers already employ this cognitively challenging individual task as part of effective teaching and learning strategies, and it should be used as a valid testing strategy rather than an assessment task. Whilst it can be validly and reliably assessed, it is another example (along with the reading test) of using the assessment to imply a methodology of language teaching. We are also concerned about the impact this could have on dyslexic pupils. Care must also be taken in ensuring parity between languages, as some languages are inherently more difficult (in terms of dictation) than others.

**Question 3: To what extent do you agree or disagree with the proposal to use tiered assessments (foundation and higher) in GCSE MFL (French, German and Spanish)?**  
and

**Question 4: To what extent do you agree or disagree with the proposal to require a single tier of entry for the assessments in GCSE MFL (French, German and Spanish)?**  
and

**Question 5: Do you have any comments on the proposal to use tiered assessments (foundation and higher) in GCSE MFL (French, German and Spanish)?**

12. ASCL agrees with the proposal to use tiered assessments in MFL GCSE – higher and foundation tier. While we understand why teachers may not think a single tier entry for all pupils is appropriate, we recognise the technical challenges posed by this for awarding organisations and accept that a single tier entry per pupil is the best outcome.

**Question 6: To what extent do you agree or disagree with the proposal to use NEA to assess students' spoken responses and interactions in GCSE MFL (French, German and Spanish)?**

13. ASCL agrees with the proposal to assess pupils' spoken responses and interactions in GCSE MFL via the NEA. However, we disagree with what is in the NEA in terms of tasks. We believe an element of general conversation should be assessed, as we view this as central to the language learning experience.

**Question 7: To what extent do you agree or disagree with the proposal that NEA should account for 25% of total marks in GCSE MFL (French, German and Spanish)?**

14. We agree that the NEA should constitute 25% of the overall marks at GCSE.

**Question 8: Do you have any comments on the proposal that NEA should account for 25% of total marks in GCSE MFL (French, German and Spanish)?**

15. We would support keeping the NEA to give speaking at least 25% (spoken responses and interactions), but are unsure how this can be implemented effectively, as the proposed NEA involves mixed skill testing (reading aloud, answer questions on the text) and therefore if the maximum is 25%, speaking cannot be 25%.

**Question 9: We have set out our view that our proposals would not impact (positively or negatively) on students who share a particular protected characteristic. Are there any potential impacts that we have not identified?**

16. We believe there are potential impacts that have not been identified. It is our view that that the vocabulary list is biased / discriminatory, e.g. 'French' and 'Christian' are within the top 2,000 words, but 'Muslim' and 'African' are not.

**Question 10: Are there any additional steps we could take to mitigate any negative impact you have identified would result from our proposals, on students who share a protected characteristic?**

17. We do not think there are additional steps that Ofqual could take to mitigate any negative impact from these proposals as these changes are the result of the DfE content specification. This limits what Ofqual is able to do.

**Question 11: We have set out our understanding of the cost implications and burdens of our proposals for schools, colleges and exam boards. Are there any other potential costs or burdens that we have not identified?**

18. We do believe there are other implications to take into account. The current GCSE has only been examined since 2018 and, given the pandemic, changes are continuing to bed in. Teachers are still developing resources, commercial materials have been purchased, and curriculum development for all subjects has been a major recent school priority and investment (both in financial terms and in terms of professional learning). Implementing these proposals would mean starting this process all over again for French, German and Spanish. This would result in these subjects being out of sync with other subjects and taught languages, and mean that time and money invested in the current GCSEs would be wasted.

**Question 12: Are there any additional steps we could take to reduce the costs or burdens of our proposals?**

19. We do not think there are other steps that Ofqual can take as the DfE have stipulated key elements of the assessment in their content consultation.

**D. Conclusion**

20. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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