

Consultation on the subject level conditions content for reformed GCSE in Modern Foreign Languages

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 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 children and young people across primary, secondary, post-16 and specialist education. 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. ASCL members recognise that, despite the fact there are some similarities between the current assessment of French, German and Spanish and the proposed assessment, including elements of listening, speaking, reading and writing, and translation skills, there are however some areas of concern which may lead to unintended consequences in the teaching and assessment of these subjects, and which require further urgent clarification.
4. There is widespread agreement that the severe grading of the GCSE French, German and Spanish examination is among the key factors deterring pupils. This must surely be tackled in order to bring the grading of languages subjects into line with other EBacc subjects. This would remove the situation where pupils see that they are getting a grade lower in modern languages at GCSE than in their other subjects, and reasonably conclude that they are worse at modern languages, and schools in turn suffer in performance measures. Even if revised Subject Content were to improve standards of attainment in French, German and Spanish, the distribution of grades at GCSE would, in principle, remain the same because of "comparable outcomes".
5. Although tighter specification in assessment may on the surface be attractive to teachers and students, it is also likely to make for a very narrowly focused curriculum and lead to a demotivating experience for students. ASCL members are concerned that that turning language learning into learning a list of 1200 words might make it appear easier both to teach and learn, but it is not motivating for language learners.
6. As with any assessment, there is a requirement to have exams which are both valid and reliable, whilst at the same time the exam experience for the students of all abilities needs to be positive, in that they perceive it as accessible. This will be the challenge for

the awarding organisations following the proposed subject level conditions and guidance, given the constraints imposed. It is essential in these new assessments allow for the opportunity to reward all students for what they know understand and can do, but there are particular issues in enabling this for foundation students

7. The proposed assessment objectives have been confirmed (in Jan '22) and are: AO1 – Show understanding of what you hear (through speaking and writing); AO2 – Show understanding of what you read (through speaking and writing); AO3 – Show understanding of vocabulary and grammar. In the consultation the wording does not apparently allow for questions or prompts in English, even though subject content clearly stated that comprehension questions should be in English and speaking tasks should be unambiguous. Therefore clarification about this is required and we recommend that the confirmed assessment objectives be reworded to ensure consistency between subject content and assessment objectives.

C. Answers to specific questions

Question 1: comments on the proposed subject level conditions

8. These conditions reflect what has already been decided.
9. The changed approach to testing listening allows for the option of mixed skill testing '*assessments which target a mix of skills rather than each skill separately*'. Clarification is required as to whether pupils will be responding in English as the assessment objectives currently are open to interpretation.
10. Mixed skill testing at A Level is not a valid comparison because A level will inevitably have a skewed entry profile, therefore the requirement and challenge here for awarding organisations is to make the mixed skill testing accessible across the full ability range.

Question 2: comments on the proposed requirements

11. **Tiering** - We support the decision on tiering as we believe mixed tier entry can lead to unfair outcomes when the overlap between the tiers is not fine-tuned.
12. **Grammar and sound symbol correspondences** - We are concerned that awarding organisations may be asked to impose an artificial limit on the grammatical features being tested in any one series which may impede students from being able to demonstrate the full extent of their knowledge.
13. **Vocabulary** – Exam boards must explain how they will test the vocabulary in their assessments in each exam series and over time to ensure the same words are not repeated too often. It is understood that all words are tested on the prescribed list will include parts of speech; therefore reassurance is needed that no further limits will be applied and that there will be no artificial restriction on the use of very high frequency words e.g. 'and' or 'but'. We urge Ofqual to take a realistic and flexible approach to this requirement.
14. **Speaking assessment** – the stipulated preparation time is the same as for the currently examined GCSE of between 10 and 12 minutes. However the new requirements say 'at

least one role play' and 'at least one visual stimulus' and the new 'reading aloud' task. It therefore seems likely that more preparation time will be required to accommodate the increased number of tasks.

15. If this is the case we would welcome further clarification as to whether the 'reading aloud' task can be practised beforehand, as this could pose problems for larger centres where pupils are preparing together silently in a room.
16. The 'reading aloud' task states that there will be a determined length of text- it would be helpful if, across all awarding organisations there could be a very clear and shared interpretation of what a 'word is'.
17. **Understanding spoken extracts** – Given the stipulation of 1200 words for foundation and 1700 for higher, the ratio is that foundation candidates will have 70% of words than higher candidates have, therefore it would seem logical that in each task there should be a similar ratio. However, in the listening task for foundation level, this appears lower than expected and does not meet the ratio. We would recommend that the higher tier remains at 700-850 and that the foundation level should increase to 500 to 600 to achieve the same ratio.
18. We also think there will be a challenge around the number of words and texts; fewer words does not mean it will necessarily be easier to understand as sometimes the information repeated in a different ways aids students' understanding; we therefore believe a higher number of words may be helpful on occasions to allow for repetition, giving context and reinforcement.
19. The length of the text does not necessarily equate to how demanding something is. Sometimes a short extract a very short track with limited context and no repetition can be more demanding of comprehension.
20. We welcome the stipulation that there will be sufficient reading time; we would also recommend having sufficient pause time for students to formulate answers.
21. **Diction** - ASCL believes that there is the potential for unfairness here in relation to the number of sound symbol correspondences for each of the three languages. Awarding organisations will need clear guidance and support in adjusting the demands and expectations for French as there is a greater number of sound symbol correspondences here and this does not equate to a level playing field. Reassurance is also needed that different spelling for the same sound will be allowed e.g. 'aller allez allé'
22. **Understanding written language** - We welcome the fact that the number of words stipulated here reflect the ratio for Foundation and Higher. It is worth noting that fewer words does not necessarily equate to a better exam experience for students and sometimes natural repetition of a word can provide a helpful content, particularly for foundation students.
23. It is worth noting that there are inherent differences between languages concerning typical text length and a limit on the same number of words for each language may prove problematic e.g. 'hay' in Spanish, 'es gibt' in German and 'il y a ' in French – all meaning the same thing.
24. We are concerned about maximum number of texts which is seven for foundation and eight for higher, and recommend that this limit be removed. This maximum number of texts allowed together with the minimum number of words of 600 (F) and 850 (H) and a maximum number of words in any text of 100 (F) and 160 (H) means that by default

virtually all will need to be around 90 - 110 words in length; this removes the opportunity for shorter texts at the outset for foundation candidates. The consequence of having all longer texts may overwhelm these students and have a negative impact on motivation for their exam experience.

25. **Translation** - The 2022 specification, unlike the 2015 document, does not highlight the purpose of translating into the target language. Given the emphasis on grammar in the new subject content, and the fact that translation is often a discriminatory task, we would welcome clarification with ample exemplification from Ofqual, as to what exactly will be allowed for each language in terms of 'appropriate and sufficient rendering of meaning' for the translation exercise. It is imperative that there is a consistent approach across all awarding organisations to this.
26. **Role play instructions** - we urge explicit clarification on the requirement for unambiguous instructions in this task, i.e. for these instructions to be in English.

Question 3: comments on the proposed subject level guidance

27. **Speaking** - In the assessment of speaking, clarification is sought in the assessment objectives about ensuring that the role play instructions and visual stimuli are unambiguous. This means that if the prompts are in English or translated into English, that the pupils' response to both tasks can satisfy both AO1 and AO2.
28. **Reading** - In the assessment of reading the same clarification regarding the prompts being in English or translated into English is required. If the prompts are in the target language, this could lead to a double penalty for students if they do not understand them. It is imperative that tasks are presented in an unambiguous way.
29. **Writing** - In the assessment of writing we are concerned that if an AO chooses to test writing through a mixed skill task involving responding to written assessed language there again could be a double penalty (not understanding task, producing irrelevant assessed language. Clarification is required about ensuring there are unambiguous instructions in English for the written task.
30. **Infer meaning** - We welcome the interpretation of this task.
31. **Diction** - We understand that extracts may be adapted from a spoken extract already heard and we seek clarification and clearer guidance on what this may look like in terms of task. While dictation is frequently included as one of many phonics activities, there seems to be a research gap in understanding the effectiveness, validity, and reliability of dictation as a phonics testing tool. There is the need to ensure that this assessment format adequately assesses each learner's phonological knowledge.

Questions 4 and 5: the impact (positively or negatively) on students who share a particular protected characteristic, and possible mitigation.

32. As ASCL has raised previously, we remain concerned that the specifications for vocabulary lists could lead to a very Western-centric focus at GCSE. Based on Lonsdale and Le Bras (2009), the frequency list cited in DfE (2022b), words such as 'French' and 'Christian' are likely to be included but 'African' and 'Muslim' are not. This is especially serious in the light of current political developments in the field of social justice.

33. We are concerned about the specific needs of those with hearing or speech impairment (e.g. those who rely on lip-reading or have readers in exams), which would pose specific barriers in succeeding in this GCSE, especially with its increased emphasis on SSC through dictation and reading aloud.
34. Due to the fact the subject content has been specified by the Department for Education, we do not believe that there are any mitigations which Ofqual could take to remove the inherent bias and discrimination other than work with the DfE to change the subject content.

Questions 6 and 7: regulatory impact and possible mitigations

35. We are inevitably concerned about the cost of schools having to replace relatively new textbooks and teacher workload in preparing their own new schemes of work. The current GCSE has only been in place since 2018 (first examination) and this new curriculum is based on a review that was published 5 years ago. It is aimed at the current Year 7 where we have a national ambition for 90% uptake of Ebacc subjects; this has significant resource and time implications for the immediate next academic year. Schools need both financial support and professional development to support the introduction of a revised GCSE.
36. There will be the burden of planning change at a time when the system is overwhelmed as a result of Covid-19, as well as the highly demoralising requirement to discard many years of work which have gone into preparing theme-based materials.
37. We are concerned that there is thus a real danger that teachers will ‘teach to the test’ – and focus on knowledge (i.e. knowing words, grammar and phonics), denying pupils the chance to demonstrate, and be motivated by, what they can do in the target language even at an early stage of language learning.

D. Conclusion

38. This consultation response reflects many of the concerns about the changes to MFL content that ASCL have already raised. We hope that this response strengthens the arguments that have previously been made.
39. 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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