

UCML Response to OFQUAL MFL GCSE Assessment Review

4.1 Proposed assessment objectives for GCSE MFL qualifications in French, German and Spanish

AO1	Understand and respond to spoken language in speaking and in writing	35%
AO2	Understand and respond to written language in speaking and in writing	45%
AO3	Demonstrate knowledge and accurate application of the grammar and vocabulary prescribed in the specification	20%

This proposed structure and weighting of assessment objectives would, we believe, support the aims of the subject content. For example, the read aloud task (AO2) would be likely to focus on clear and comprehensible pronunciation (AO3) and require students to answer questions on the text (reading comprehension, AO2). Another requirement in the content is for students to undertake dictation exercises with credit for accurate spelling, which would assess listening and writing skills (AO1) and accurate language use (AO3).

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

We do believe that an integrated skills approach to language assessment is appropriate since it is difficult to separate these skills and use of one skill at a time rarely happens in authentic contexts. However, we do not agree that the read aloud and dictation assessment tasks proposed are appropriate since they lack authenticity and have little practical use outside an assessment environment. We would encourage the use of more creative and authentic assessment tasks which have some communicative relevance.

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

We suggest that there should be equal weighting given to AO1 and AO2 since they assess equally important areas of language competence.

4.2 Tiering

This leads us to believe that tiered assessments should be used in the revised GCSE MFL qualifications in French, German and Spanish.

Further, we are proposing that students, as now, should be entered for all assessments at the same tier..

Using mixed tier entry also created difficulties for exam boards in the maintenance of standards, as the marks achieved across foundation tier and higher tier assessments contribute differently to the final grade (as higher tier marks were more highly weighted), which led to an inconsistent profile of achievement across the papers (and assessment objectives) across the cohort.

The proposed content requirements and assessment objectives, which support the teaching and learning of the range of language skills required, lead us to propose single tier entry for the revised qualifications.

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)?

We agree with the proposal since we would want both foundation entry and higher students to achieve their potential whilst being given the opportunity to be stretched. However, consideration needs to be given not only to differential content but also to differential assessment task types. Students set to achieve GCSE Grade 9, which has been equated as low to mid CEFR B1 in all 4 language skills (OFQUAL, 2019), potentially have a far wider range of language competencies than those achieving Grade 4 (which equates to low to mid A1) and this should be represented in the assessment tasks.

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)?

It is possible for students to have a jagged language profile (e.g. high levels of oral skills if a language is used at home) and in this case a single tier of entry could prove problematic. In all other cases, a single tier of entry makes practical sense.

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

See response above

4.3 Non-exam assessment (NEA)

The assessment approach of the current GCSE MFL qualifications includes 25% NEA, in order to assess students' spoken responses and interactions. The assessment is undertaken by teachers (or the exam board where visiting examiners is offered). Each student's performance is recorded and sent to the exam board for marking...

We propose that teachers should administer the assessment of the new spoken language content and skills using exam board set tasks and that the exam boards should mark the assessments.

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)?

This seems a sensible proposal as far as it goes. However, we would like to see greater use of NEA (up to 50% in total) in other skill areas throughout the exam year in order to cater for progression within the language. It will also cater better for different types of learners.

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)?

We would like to see a higher percentage of NEA – see above

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)?

See above.

4.4 Impact of our proposals

We are required to have due regard to the need to:

1. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it

We have not identified any impacts of our proposals (positive or negative) on persons who share the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

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?

There is nothing within the proposals that would particularly impact on students in this category except perhaps for the impact on EAL learners who might find that the list of cognates for example is a problem area. We do feel that the restricted set of assessment tasks such as reading out loud and dictations are likely to discriminate against students with learning differences / dyslexia. It can also be argued that the current set of proposals will disproportionately disadvantage those students who are already demotivated – predominantly those of lower SES.

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?

See above

4.5 Regulatory Impact Assessment

Before decisions are made regarding the assessment of GCSE MFL qualifications in French, German and Spanish, we will identify and take into account the wider impact of the proposed changes including on schools and colleges and the exam boards. We are seeking your views on these issues too, in particular on the future availability of GCSEs in a range of languages and on the fees exam boards might charge and schools and colleges would be willing to pay.

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?

UCML is particularly concerned about the impact that the proposed changes would have on the availability of languages at GCSE beyond French, German and Spanish. We would not want to see an initial two-tier system with the new GCSEs being available in only three languages which then dwindles away to one tier if the burden of providing two types of examination is unacceptable to schools and exam boards. There is already little diversity in the provision of languages and we would not like to see it shrink it further. Our aim is to expand the take up of languages and the range on offer. There is already an ever-widening gap between GCSE/A level and HE in terms of diversity of languages offered.

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

No comment to make