

Pearson response to the Ofqual Consultation
Reforming GCSEs in Modern Foreign and Ancient
Languages
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Standard information

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How did you find out about this consultation?	From our website

May we contact you for more information?	Yes
We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this document?	Yes
Do you have any comments or suggestions about the style of writing?	No

I. Introduction

Pearson welcomes the opportunity to contribute to this consultation on reforming GCSEs in Modern Foreign and Ancient Languages. Pearson is the world's leading learning company. Our education business combines 150 years of experience in publishing with the latest learning technology and online support. We are also part of the wider Pearson family which includes Penguin, Dorling Kindersley and the Financial Times. We provide education and assessment services in more than 70 countries. Our qualifications, courses and resources are available in print, online and through multi-lingual packages, helping people learn whatever, wherever and however they choose. Pearson currently offers GCSEs in 10 languages, all of which are also offered at A Level.

II. Executive summary

1. We have only responded in relation to MFL as we do not offer GCSEs in the ancient languages.
2. **Assessment arrangements** – We strongly agree with the proposal to externally set and mark papers in all of the four language skills. Setting tasks enables an exam board to maintain standards across all languages. This view is reinforced by Ofqual's review of controlled assessment, recent CILT/CfBT Language Trends reports and the Association for Language Learning's responses to the Department for Education consultations. Pearson's own stakeholder research also mirrors this opinion.
3. **Tiering** – Pearson agrees that all languages, in all four skills, should be tiered. Differentiation allows students of all abilities to access questions, without overburdening assessment. Tiering is even more important given the demanding nature of the new GCSE criteria. Moreover, since the English Bacc has been in place there had been an increase in Foundation tier entries for the main taught languages. This and the fact that GCSE is now largely the only qualification used means that there is an even broader attainment range of learners taking GCSE. We would question the necessity of tiering for lesser taught languages where the number of entries is low, and the proposed % of marks for overlap tasks. Ofqual proposes 20% for all skills, except speaking where 50% has been suggested. Best practice indicates that the number of common items across the whole cohort should be 25%. Under ideal conditions, this would require each tiered paper to contain 40% of common items.
4. **Availability of MFL GCSEs** – It is essential that all learners have the opportunity to learn a language and ideally there should be a 'wide range' of languages to choose from. However, we would only support the offer of any GCSE if it could be supported appropriately in the centre that offered it, for example by providing qualified teachers and teacher/examiners where needed.
5. **Financial and wider considerations** – New GCSEs will increase costs for exam boards, largely because of the proposal to tier all four skills and the introduction of external assessment across all languages and skills. There will also be financial implications for centres as they will need to invest in training for teachers because

of the changes. It is up to schools and colleges to respond as to whether they will be willing to pay higher fees for low-volume MFL GCSEs. However there are already some low volume GCSE/GCE qualifications that are priced at a higher rate. There could be implications for take-up as less able learners could struggle with the new assessments and may choose not to take a language GCSE. We do not believe any impact will be felt by those who share a protected characteristic.

III. Assessing modern foreign language GCSEs

1. *Reading skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?*

Strongly agree

Our international benchmarking research shows that although most international jurisdictions do not assess language skills externally at age 16, all of those that have a mixture of internal and external assessment choose to assess reading externally in order to make it more reliable, valid and fair. (Also see response to question 5 below). This is current practice with the exam boards that offer MFL GCSEs and remains a valid and effective form of assessment. It would be challenging for teachers to produce appropriate reading tasks at the correct level year on year and would reduce the validity and reliability of the assessment. It would also make standardisation across centres and languages very difficult.

2. *Writing skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?*

Strongly agree

Setting tasks enables an exam board to maintain standards across all languages. It prevents the problems which can occur with controlled assessment whereby teachers may over-prepare their learners for assessments which are known in advance. It also prevents learners from memorising answers they have prepared in advance which they then repeat in the exam. This makes the assessment less valid and reliable, ie the assessment becomes focussed on the ability of learners to memorise language rather than be able to produce it spontaneously. This view is reinforced by Ofqual's review of controlled assessment, recent CILT/CfBT Language Trends reports and the Association for Language Learning's responses to the Department for Education consultations. Pearson's own stakeholder research mirrors the same concerns.

3. *Listening skills should be assessed using exams set and marked by the exam boards. To what extent do you agree or disagree with this statement?*

Strongly agree

This is current practice and remains a valid and effective form of assessment. Just as for reading, it would be challenging for teachers to produce appropriate listening tasks at the correct level year on year and would reduce the validity and reliability of the assessment. It would also make standardisation across centres and languages very difficult. In a similar way to reading, the other receptive skill, our international benchmarking research shows that although most international jurisdictions do not assess language skills externally at age 16, the majority of those that do have a mixture of internal and external assessment choose to assess listening externally.

4. *Speaking skills should be assessed by non-exam assessments, using tasks set and marked by the exam board. To what extent do you agree or disagree with this statement?*

Agree

We agree with this statement with some caveats. On the positive side, the setting of speaking tasks by exam boards enables them to maintain standards across all languages and ensures validity, reliability and fairness. Also, in the same way as for writing, it prevents the problems which can occur with controlled assessment whereby teachers may over-prepare their learners for assessments which are known in advance. It also prevents learners from memorising answers they have prepared in advance which they then repeat in the exam. This makes the assessment less valid and reliable, ie the assessment becomes focussed on the ability of learners to memorise language rather than be able to produce it spontaneously.

However, the setting of all tasks and topics by an exam board prevents the learner from being able to undertake research into an area of particular interest to them which can be a strong motivational factor in MFL. We would therefore suggest that part of the content for the speaking exam be selected by the learner from a known list of topics which are included in the specification. This topic could form the context for a role play or for a section of a general conversation. This would allow learners to prepare in advance some ideas for part of their oral but would still ensure spontaneity as they would not be asked to present something they had prepared in advance. They would also not know in advance the questions they would be asked.

5. *What considerations need to be taken into account to make sure students' speaking skills are assessed in a way that is:*

Valid - Assessments should minimise the possibility of learners being able to rote learn long passages in advance that they can then repeat in an exam without necessarily understanding what they are saying. For example the purpose of the speaking assessment is to test whether learners can communicate what they

want to say and interact in the target language, expressing ideas and thoughts spontaneously and fluently. This prepares learners for 'real life' situations where the language will need to be used to initiate conversations and respond to others in unforeseen situations. Also See our response above to questions 2 and 4 relating to writing and speaking.

Reliable - i) Standardisation across exam boards, centres and languages: Our experience indicates that a return to 100% external assessment will improve reliability and reduce the high number of grade adjustments that result from controlled assessment. Research shows that it is more reliable and valid to compare and grade candidates who have taken a common paper rather than two candidates who have taken different papers. See above our responses to questions 1 and 3 in relation to reading and listening and the removal of controlled assessment. In addition, research and our current experience shows that 'blind marking' by examiners marking anonymised papers reduces bias and increases reliability. ii) Removing stress from the oral exam was one of the main recommendations of The (Dearing) Languages Review of 2006. It was stated that the uniquely stressful format of GCSE MFL oral assessment meant that it did not result in a reliable assessment of what a candidate could do, thereby resulting in a construct irrelevance variance, ie stress skewed the result. Given that Controlled Assessment which resulted from this recommendation has been removed and we are returning to the short, terminal exam, the issue of stress in the oral still needs consideration in order to produce a fair and reliable oral exam. Although stress is unavoidable given the nature of an oral exam, giving learners some prior choice of topic for part of the exam, as suggested under question 5, may help to reduce stress. iii) It is crucial to ensure that clear industry standards are set across exam boards so that each offers an assessment of the same level of demand. For example in relation to speaking, it is important to follow the same guidance in relation to the timing for preparation and assessment, the number of tasks set and the amount of prior knowledge given to learners and teachers about the content of the assessment.

Fair - The ability to assess the full attainment range: There must be opportunities for weaker students to demonstrate knowledge and understanding as well as opportunities for more able students to be stretched. This will enable more reliable grade differentiation. The requirement to assess the full attainment range in a GCSE and to have a valid and worthwhile accreditation system which recognises and values achievement at all grades, comes over strongly in Pearson's stakeholder research and is stated clearly by the Association for Language Learning in their response to the KS 4 reform consultation. It is felt vital that GCSEs can assess all levels, especially since they are now largely the only qualifications used in centres since most alternative accreditations have been removed from the curriculum.

6. How might any aspects of the proposed assessment requirements impact on: the costs, and likely take-up of new modern foreign language GCSEs?

Cost implications - Notwithstanding the fact that it is the responsibility and desire of exam boards to provide the most valid, reliable and fair assessments possible, there is no doubt that aspects of the proposed assessment requirements will increase costs for exam boards. These include the tiering of all four skills (particularly if this is required for languages that have previously been untiered) and the introduction of external assessment across all languages and skills. For example, taking into account this exam board's current language portfolio, the production of external papers would double from 32 to 64 if it was decided to tier all languages in all four skills and externally assess them all.

Implications for take-up - It is felt that less able learners could struggle with the new assessments because of their increased demand and may choose not to take a language GCSE. This is because of the way the new GCSEs will be assessed, ie by terminal examination rather than controlled assessment but also due to the increased demand within the subject criteria such as the introduction of translation. Few international jurisdictions use an external form of examination at 16 for MFL and it is even rarer to externally examine the productive skills of speaking and writing.

7. The outcome of the speaking component should contribute to a student's overall grade. To what extent do you agree or disagree with this statement?

Strongly agree

Speaking a language is the core aim of learning an MFL. International research shows that curricula in a dozen countries or regions within countries recommend teachers put more emphasis on oral skills (i.e. listening and speaking skills) when they start teaching foreign languages. European research shows that aural/oral skills are the most important skills for language learning as they are skills most commonly used in classroom interaction. Pearson's stakeholder research also shows that most stakeholders see speaking and listening as relatively the more important skills from a practical, communicative point of view; to become confident speakers of the language is the main priority. From an employer's point of view, the CBI reports of 2011 and 2012 repeat the message that conversational ability is the most important language skill to have. There are therefore compelling reasons for considering speaking skills as the most important in language learning and therefore speaking should be included in the overall grade.

IV. Tiering of new modern foreign language GCSEs

8. *All assessments (reading, writing, listening and speaking) in new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?*

Strongly agree

The assessment of MFLs is largely differentiated by task. Therefore to allow students of all abilities to access questions, without overburdening the assessment duration with questions that learners cannot access or find too simplistic, some form of differentiation by paper is required. Without tiering, weaker students would be faced with challenging questions that they could not even attempt and higher-ability students would spend time answering questions well below their level of attainment. An example of this is translation, one of the most demanding elements of the new GCSEs. It would be very challenging to produce a translation to assess the whole attainment range within an untiered paper. It would also be difficult to create untiered papers in listening and reading as a range of questions is required to reliably assess a wide set of the full ability range. Moreover the new rules on tiering will ensure that aspirations are not capped at grades 4/5.

9. *All available new modern foreign language GCSEs should be tiered. To what extent do you agree or disagree with this statement?*

Agree

We believe that the the argument we have put forward for tiering in question 8 applies to all languages. However it is worth noting that some languages, such as Greek and Arabic, attract a much smaller cohort than the three main languages of French, German and Spanish and therefore have a much narrower range of ability. For example, Pearson's cohort for Greek in 2013 was just 500 compared to a French cohort of 48,000. In our experience, the cohort of learners for lesser taught languages tends to achieve higher grades than those who take a mainstream language. For example, 32% of learners who took Arabic in 2013 achieved an A* compared to 8% in French and only 13% achieved below a grade D. It may be therefore, that a Foundation level in some languages would not attract many learners.

10. *Students should be required to enter for either higher- or foundation-tier assessments but not a combination of the two. To what extent do you agree or disagree with this statement?*

Don't know

Our stakeholder research shows that teachers are generally in favour of mixed tier entry; it is felt that as languages are a mixture of skills, learners often perform differently in each one. Although currently only 10% of learners take mixed tiers we think there is a possibility this would increase once speaking and writing become terminal exams, given the more challenging nature of these productive skills. Allowing learners to choose the tier most appropriate for them in each skill might prevent aspirations being capped and allow learners to achieve the result that reflects their real ability. This latter point may have a positive impact on take-up of languages. However, we also recognise that mixed tier entry can also have adverse impacts on student achievement as students may be persuaded to enter for lower tiers on components assumed to be of greater difficulty such as speaking.

11. *For the listening, reading and writing assessments 20 per cent of marks, and for speaking 50 per cent of marks, should be allocated to questions or tasks that are common in any series to both the foundation and higher tier assessments. To what extent do you agree or disagree with this statement?*

Disagree

Best practice indicates that the number of common items across the calibration sample (ie the whole cohort) should be 25%. Under ideal conditions, this would require each tiered paper to contain 40% of common items. Modelling of overlap questions and data has indicated that the overlap figures that Pearson will operate will be between 33-40% on each tier, these figures allowing high correlation between tiers and low equating error. These figures can depend on item types, with a high number of dichotomous items reducing the number of required linked items. A figure of 33-40% common items also allows for good construct representation across the tiers.

The position of items in an assessment can impact on the apparent difficulty of an item and therefore equating on the basis of the link items being at the end of the Foundation tier and the beginning of the Higher tier builds in a potential bias. However, placing the items in (approximately) the same positions in each tier would result in poor ramping design of item difficulty in both tests and in any case, the difficulty of surrounding items is likely to have an impact.

Pearson's position is to place the common items towards the end of the foundation paper but at a point where omission rates are sufficiently low to infer that most students will at least have the opportunity to engage with them. We do not recommend the final questions in a foundation paper will be common items.

For the Higher tier, the location of the items are less of an issue since neither fatigue nor lack of time are likely to impact on performance, given that the common items are not going to be placed at the end of the assessment.

Common assessment items should be identical in wording, mark allocation and the way in which marks are awarded. It is possible that common questions on the higher tier can lead into more difficult or demanding item parts, but easier lead in item parts on the foundation tier are not allowed as they can interfere with the subsequent item performance.

It is important to note that there is an increased risk of a security breach the higher the percentage of overlap questions.

12. *Do you have any further comments on the tiering of modern foreign language GCSEs?*

Since the English Baccalaureate has been in place there has been an increase in Foundation tier entries within the main taught languages such as French, German and Spanish. This and the fact that GCSE is now largely the only qualification used in centres since most alternative accreditations have been removed from the curriculum, means that there is an even broader range of attainment of learners taking GCSE. Without tiering, weaker candidates would be faced with challenging questions they could not attempt and stronger candidates would spend time answering questions well below their level of attainment. The increase in demand of aspects of the criteria such as translation makes tiering even more important as it would be difficult to produce a translation that could assess the whole grade range. Pearson's stakeholder research shows that in order to ensure that all students are catered for within one qualification, tiering is a positive thing. Also see response to question 5. To continue to encourage the growth of languages, particularly given the increased demand of new GCSEs, it is recommended that tiering be maintained.

V. Assessing ancient language GCSEs

13. *New GCSEs in ancient languages should be assessed wholly by examination. To what extent do you agree or disagree with this statement?*

Pearson prefers to offer no opinion on this question as we do not offer GCSEs in ancient languages.

14. *New ancient language GCSEs should not be tiered. To what extent do you agree or disagree with this statement?*

Pearson prefers to offer no opinion on this question as we do not offer GCSEs in ancient languages.

The availability of modern foreign language and ancient language GCSEs

15. *Modern foreign language GCSEs in a wide range of languages should be available in the future. To what extent do you agree or disagree with this statement?*

Agree

We agree with this statement with some caveats. Languages are an important part of the curriculum and provide essential skills for all, not only for those pursuing a career in languages. The world is always changing and we wouldn't want to prevent students from studying languages that will enable them to be mobile and seek employment internationally. We therefore think that it is essential that learners have the opportunity to learn a language and agree that ideally there should be a 'wide range' of languages to choose from. However, we would only support the offer of any GCSE if it can be supported appropriately in the centre that offers it, for example by providing qualified teachers and teacher/examiners where needed. It is also important that all learners taking a GCSE have the opportunity to be properly prepared for the assessment by having been taught the full specification, regardless of which kind of centre the language has been taught in (eg school, community group). We would not wish learners of some languages to be disadvantaged because they have not had the opportunity to be prepared appropriately. In our experience it is difficult to find qualified teachers and examiners in some languages and the wider the range and the 'newer' the languages that are put on offer, it is likely to exacerbate this issue.

16. *Modern foreign language GCSEs for which there is low demand should be available in the future. To what extent do you agree or disagree with this statement?*

Agree

Our response to this question is the same as for question 15.

17. *Modern foreign language GCSEs should be available for students who are existing users of the language. To what extent do you agree or disagree with this statement?*

Agree

There is currently no clear definition of what 'existing user' means and it would be difficult to arrive at such a definition. However, we feel that all languages should be available to all learners. As we have stated in our response to questions 15 and 16, we feel that all learners should be given the opportunity to be

appropriately prepared for a GCSE in any language, regardless of what level they are at when they start their study.

18. *In your opinion would schools and colleges be willing to pay a higher fee to enter students for modern foreign language GCSEs for which there is a lower demand?*

Don't know

This is a question best answered by schools and colleges. However, some low volume GCSE and GCE qualifications are already priced at a higher rate, which would suggest that schools and colleges will accept that they may have to pay higher fees for low volume subjects.

19. *What, if any, steps do you think Ofqual should take to secure the availability of GCSEs in a range of modern foreign languages?*

We believe that awarding organisations have a social responsibility to continue to offer subjects that are aligned to the purpose of the GCSE and GCE suite, and we are keen to ensure that such subjects are not lost from the national provision. We recommend a continuation of the current arrangements for offering a range of modern foreign languages across awarding organisations. As a result we do not intend to withdraw from offering any of our current low-demand language qualifications, unless as an outcome of the forthcoming Ofqual consultation on the GCSE and GCE brand it transpires that they are no longer appropriate as GCE or GCSE qualifications.

20. *A range of ancient language GCSEs should be available in the future. To what extent do you agree or disagree with this statement?*

Pearson prefers to offer no opinion on this question as we do not offer GCSEs in ancient languages.

21. *What, if any, steps should Ofqual take to secure the availability of GCSEs in a range of ancient languages?*

Pearson prefers to offer no opinion on this question as we do not offer GCSEs in ancient languages.

VI. Equality impact analysis

22. *A disabled student should obtain an exemption for no more than 40 per cent of the available marks for a modern foreign language GCSE. To what extent do you agree or disagree with this statement?*

Agree

23. *We have identified a number of ways the proposed requirements for new GCSEs in modern foreign languages may impact (positively and negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified?*

No

24. *We have not identified any ways by which the proposed requirements for new GCSEs in ancient languages may impact (positively or negatively) on persons who share a protected characteristic over and above those impacts that apply to the changes to GCSEs generally. Are there any potential impacts we have not identified?*

Pearson prefers to offer no opinion on this question as we do not offer GCSEs in ancient languages.

25. *Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?*

No

VII. Regulatory impact assessment

26. *Do any of the proposals or options being considered have financial or wider resource consequences, positive or negative, for:*

Schools: Yes

Moving to external assessment from controlled assessment should allow centres to dedicate more time to teaching. However the new GCSEs will have considerable financial implications for centres as they will need to invest in training for their teachers because of the considerable changes to the new GCSEs. Particular aspects that will need training include translation, the use of literary/authentic/culturally-relevant texts and closer emphasis on culture and spontaneity. Since translation exercises have not been seen in UK public examinations in MFLs for 16 year olds since O Levels were phased out in the

1980s, it is likely that the majority of the current generation of teachers have never had to teach or assess translation. Teachers will also need training on the new assessment model, ie moving to linear, external assessment of all skills as well as the introduction of tiering for all skills. This will be particularly challenging for those languages such as Arabic and Greek which have not been tiered in the past. Centres will need to invest in support for their teachers both in terms of paying for training in the new assessment but also in buying new resources for teaching the new GCSES.

Exam boards: Yes

If it is decided that there should be tiering for every language then there will be an additional cost for examination boards. There will also be an additional challenge in resourcing examiners for the external assessment.