

Pearson response to the DfE Consultation
 GCSE and A level Reform 2016
 September 2014

Organisation details

Please tick if you want us to keep your response confidential.	
Reason for confidentiality:	

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What best describes you as a respondent?

<input type="checkbox"/> Academies	<input checked="" type="checkbox"/> Awarding organisations	<input type="checkbox"/> Colleges
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A brief introduction to Pearson

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.

A summary of the Pearson response

Pearson welcomes the opportunity to contribute to this consultation on proposed content for reformed GCSEs and A levels. We also welcome the opportunities that we as an awarding organisation have been afforded to feed in to the process of shaping these content criteria, drawing on our extensive research with Higher Education Institutions, stakeholder groups, teachers and learners.

The qualifications featured in this consultation fall into two groups:

- A levels where content criteria have been drafted on the basis of recommendations from ALCAB
- GCSE and A level qualifications where the awarding organisations have worked closely on the drafting, in collaboration with the DfE, Ofqual and groups of stakeholders / HEIs.

As our involvement in drafting the latter set of content was extensive, we are supportive of the proposed requirements as they currently stand and are not proposing further changes.

With regard to A level mathematics, further mathematics, geography and modern foreign languages, we are generally supportive of the content requirements and agree that they are broadly appropriate in light of the issues raised in the ALCAB reports. However, there are some specific elements in each subject where we have recommended changes based on our research evidence. There are also some areas where further clarification will be needed. Our concerns and subsequent recommendations are detailed in our response to question 7, but include:

- Our concern regarding the requirement in the **modern foreign languages** criteria to include an essay written in English on a literary work and the likely impact on target-language competence / skills development.
- Our request for more clarity regarding the proposed approach to fieldwork at both AS and A level in the **geography** criteria.
- In **mathematics**, our concerns about the format of the detailed content statement in terms of how it relates to the new assessment objectives being developed by Ofqual. We are also concerned that there has been a significant increase in the amount of content for AS and A level Mathematics.

As we do not offer qualifications in ancient languages or dance, we are not best placed to comment on the proposed subject content in those areas. The comments below do not pertain to those subjects.

Detailed response: section 5

Section 5 asks respondents to consider whether the revised GCSE content (Art and Design, Computer Science, Dance, Music, PE) and revised A level content (Dance, Music, PE) is appropriate, based on the level of challenge and progression opportunities afforded.

As set out in Section 3 of the consultation, Pearson teams were heavily involved in the drafting of the proposed content requirements. We worked collaboratively alongside colleagues at AQA, OCR and WJEC, as well as DfE and Ofqual colleagues, to listen to the views of stakeholder groups and a range of HEI representatives to establish new content expectations for these subjects. As well as working with stakeholders convened by the Department, we also have a detailed base of evidence of our own to draw on, including analysis of international high-performing jurisdictions, additional stakeholder engagement, and data and qualitative analysis relating to our existing qualifications. As such, we believe that the proposed subject content is appropriate across all the GCSE and A level qualifications put forward in this section of the consultation.

We would add one further note to this: the content drafting process has inevitably required a degree of compromise. It has involved finding an appropriate balance between ensuring that the content provides the best possible progression, ensuring that the skills, knowledge and understanding represented are the right ones for the subject in the eyes of stakeholders, and ensuring that we can assess these validly and reliably over the life of the qualification. In particular, content and assessment decisions are often inextricably interlinked, and where the proportion of non-examined assessment has been reduced, this has often had an impact on the choices made about content. We believe these criteria balance these different drivers as best they can. We do however look forward to receiving feedback and refinement from the broadest range of stakeholders through this consultation process.

Detailed response: sections 6 and 7

Questions 4) and 5): Is the revised A level / AS qualification content in each of these subjects appropriate in view of the issues raised in ALCAB's reports? Please consider:

- **whether the content reflects what students need to know in order to progress to undergraduate study**

a) Modern foreign languages

A level

We are supportive of changes to A levels that will facilitate better progression to a degree in modern foreign languages. While many stakeholders and teachers in our research have restated their commitment to the current A levels in terms of the content and level of demand, they have also flagged areas for improvement. These proposed subject criteria do address some of those concerns, and as such we welcome many of the changes. However, it is apparent that the proposals represent a significant shift from the current A level, and we do have concerns that the proposed design may not necessarily provide appropriate progression opportunities for all A level students.

It has been reported that currently, only 6% of students who take an A level in modern foreign languages go on to take a language-only degree¹. It is therefore vital, if we are to maintain and increase the number of students studying languages, that the A level meets the needs of all learner progression routes – namely that it is equally suitable for those choosing single-language honours degree courses as for those interested in more applied and/or less literary-based degree courses.

Our research with a broad range of HE institutions and subject stakeholders indicated the primacy of the acquisition of the following skills by the end of an MFL A level:

- 1) Knowledge and understanding of grammatical structures in order to produce accurate language, orally and in writing, which is contextually appropriate
- 2) Students' ability to increase their lexical range systematically, being able to "guess" the meaning of unknown words, and learn strategies for retaining new vocabulary
- 3) Knowledge about target-language-speaking countries, including major historical events and contemporary societal issues
- 4) Ability to read (and understand and analyse) a variety of authentic texts of different types (including quality newspapers, magazines, shorter prose)
- 5) Ability to comprehend authentic audio and audio-visual material
- 6) Ability to research and present on a topic relevant to the subjects / topics discussed in class.

We are supportive of the fact that the proposed subject criteria do include all of the above. However, in addition there is considerable emphasis placed on 'works' (i.e. literature and film) which may not be in the best interest of all candidates. There are many different language degree programmes and many do not have a literature component to their course. Looking at other international jurisdictions syllabi at this level, there is little emphasis on literature and instead a focus is placed on the broader aspects of the contemporary society. We are generally supportive of the inclusion of some literary study as part of an A level in languages, but have concerns that as currently positioned, there is too much emphasis, which has the potential to exclude any written or speaking assessment on the themes (see below).

¹ <http://www.theguardian.com/education/2014/apr/10/students-taking-languages-record-low>

Literary analysis in English

We are concerned about the particular emphasis placed on assessing critical analysis through the medium of an English essay. Whilst we recognise the desire for students to learn to apply skills associated with higher cognitive demand, for example, analysis, we feel that this can still be achieved utilising the target language. From an assessment point of view, requiring 10% (AO4) of the marks to be allocated to an essay written in English based on literature or a film leaves no possibility of including a target language essay on the themes. This means that very little of the written assessment will be carried out in the target language, and could ultimately result in more English being used within the classroom. Ofsted's 2011 report *Modern languages: achievement and challenge 2007-2010* outlined that one of the most important weaknesses and barriers preventing good language learning was insufficient use of the target language in secondary schools, yet requiring students to prepare to write essays in English could impact negatively on its use. It could also lower the level that a candidate would be able to reach in their language competence at A level. The new criteria for GCSE aim to address this by requiring additional use of the target language in rubrics and questions, and in what learners produce. There should now be the same emphasis on use of the target language at A Level in order to focus on the development of increased linguistic competence and provide a sensible progression from KS4. Some university programmes do require students to answer essays in English. However, this is not the case in all institutions, and in the recent Mori report², some students felt this contributed to a feeling that their 'language skills were actually in decline at university'. We found no examples in high performing international jurisdictions of the inclusion of a native language essay - in most university language programmes in these jurisdictions all activity is conducted in the target language.

Linked to this is our concern regarding the extent to which the criteria will equip learners for future employment using the language of study (cited as one of the main purposes of the A Level in the Draft Purpose of Study section). It is unclear how this focus on gaining a high level of language competence will balance alongside with the scope of content and focus on textual analysis.

In order to encourage grammatical accuracy, increase knowledge and understanding of the target language country, and develop learners' ability to produce writing spontaneously, we strongly recommend that the English critical analysis essay should be replaced with a target language discussion-based essay.

Themes

There needs to be further clarity on the role of the themes. In our understanding, the themes will only be used for the reading, listening, translation and possibly one part of the oral examination. Given that ALCAB have recommended themes that require a solid understanding of target-language country history, politics and so on, it is unclear why these are not being exploited to a greater extent within the assessment. Teachers and learners will dedicate significant resource to

² *Why is the uptake of Modern Foreign Language A levels in decline? A report for the Joint Council for Qualifications.* (Mori, April 2014)

understanding these themes, but will not have the opportunity to show this knowledge because of the weighting placed on the literature.

The proposed method of assessing the themes across AS and A level could also pose a problem for co-teachability. If the AS assessment does allow for a critical essay on themes - as it will need to do in order to fulfil AO4 - then a greater depth of teaching will be required than for the A level cohort, who only appear to be assessed on the themes through listening and reading. We therefore propose that the assessment requirements for the themes should be the same for AS and A level.

We would also like to raise our concerns about how the narrow nature of some of the suggested ALCAB themes might impact on our ability to produce valid listening, reading and translation assessments over the life of the specification (for example, the German suggestions of 'Engagement with Nazism in German Museums and Memorial Sites' and 'The Viennese Burgtheater'). We have concerns about finding authentic listening and reading material on this subject at the right language level for the life of the syllabus. It is for this reason that broader topics related to the target language countries need to be considered.

Though we welcome the requirement to make the topics more relevant to the TL country (as it can 'spark interest in the culture and give learners further motivation to learn the language' – Mori, page 28) and we welcome the breadth of the content and the requirement to engage students with a variety of source material, we do feel that the volume of content is unfeasible in the teaching and learning time available (with the on-going need for the teaching to address the language requirements too). This is of considerable concern, given the debate about the perceived relative difficulty of languages compared to other subjects. We believe the significantly increased content burden could have a detrimental effect on take up of A level modern foreign languages.

We recommend that there should be a broader range of topics available (particularly at the beginning of the course where the language requirements and step up from GCSE are considerable) that do not require an in-depth understanding of history or politics in order for the candidate to express an opinion in the target language on a given subject, but do ensure that the learner has the opportunity to learn about the target language country whilst providing a context in which to improve their language skills.

Independent research

We do welcome the proposed requirement for independent research assessed through the oral. All stakeholders we have interviewed have emphasised that being able to carry out research into something of particular interest to the learner is both motivating and provides them with key skills for progression to both HE and employment. In the recent Mori report, speaking was revealed to be the most important skill from a learner perspective. We therefore particularly welcome the increased focus on the oral assessment.

'Personal enjoyment of using another language is of course a major determining factor in whether students choose to study a MFL. Students often choose to study modern languages with a vision of being able to speak the language foremost in

their minds. For those studying a language, being able to converse in another language gave them particular satisfaction.' (Mori, page 28)

AS level

As discussed above, we feel the volume of content requirements for AS outstrip the amount of teaching time available in the majority of centres. AS level often furnishes those learners wanting to continue into a STEM-based degree with an additional skill, and most feel that being able to speak a language will single them out when they apply for university or employment. We believe therefore that the AS needs to retain its focus on language proficiency with some contemporary understanding of the target language country. We would also see the requirement to carry out independent research as a vital skill for AS learners and would recommend retaining this feature for AS too.

b) Mathematics and c) further mathematics

Pearson agrees that the specified content for both mathematics and further mathematics broadly reflects what students need to know in order to progress to undergraduate study. This content is listed under the heading 'Detailed content statement' and we agree that ALCAB's decisions as to the most appropriate content should be adhered to.

We have some concerns about the format of the detailed content statement in terms of how it relates to the new assessment objectives being developed by Ofqual. We are also concerned that there has been a significant increase in the amount of content for AS and A level Mathematics. These concerns are detailed in our comments below.

We understand the consultation question to refer to the full content of the documents 'Mathematics GCE AS and A level subject content July 2014' and 'Further mathematics GCE AS and A level subject content July 2014'. These documents contain a number of sections in addition to the detailed content listing and we have commented on these sections below.

Unless otherwise specified, each section refers to both mathematics and further mathematics.

Purpose and aims and objectives

Pearson agrees that the purpose and aims and objectives are appropriate for both mathematics and further mathematics with the following exception.

In paragraph 3 of the further mathematics document, A level Further Mathematics is described as follows: 'It is normally taken as an extra subject, typically as a fourth A level.' Whilst this is often true, we do not believe it should be part of the purpose of A level Further Mathematics. Ideally, we would wish to see students not taking A level Further Mathematics as an 'extra' subject but as one of their three 'main' A levels.

Pearson recommends this sentence be removed from the purpose of further mathematics.

Background knowledge

We believe it is important to make it clear to students that they need to have learned all the content which is assessed in the higher tier of GCSE. Although the GCSE content is not explicitly split into tiers, the bold content within the listing is expected to be taught to higher tier students only.

We recommend adding the following to the end of paragraph 6 '...and the underlined and bold print content will be assumed prior knowledge'.

Overarching themes

Pearson does not believe the status of this section is clear in that it contains some items we would have expected to be listed within the content, and some items which overlap with Ofqual's assessment objectives.

OT1 contains things like Venn diagrams (OT1.3), proof by deduction and proof by induction (OT1.4) which ought to be taught and assessed so we recommend they be moved into the detailed content listing.

Sections OT1.6, OT2 and OT3 cover the same themes as Ofqual's new assessment objectives AO2 and AO3. We believe it would be helpful to provide this information to Ofqual to assist in their technical guidance process but that including it in the content document risks causing confusion over the proportions of the assessment to be targeted at each area.

Therefore we recommend that the overarching themes be reduced to a single sentence on each of the three themes and the additional information be moved to the content listing and provided to Ofqual as detailed above.

Use of technology

Pearson believes that the extent to which the requirements about use of technology can be met are dependent on the rules for the assessments. We do not foresee access to technology other than calculators being allowed. Calculators with spreadsheet functions are expensive, around £80 minimum, which is a major change from the current requirement for a scientific calculator which costs around £5.

We recommend that this section be removed from the content document and that discussions are held with Ofqual and the JCQ regarding what are realistic expectations for technology students can be permitted and expected to have available in the assessments.

Use of data in statistics – mathematics only

Pearson is concerned about the requirement for students to have a large data set provided in advance of the assessment. For a large data set to be used as a meaningful part of the assessment, students would have to do processing work or enter data into their calculators in advance of the assessment. Students are not currently allowed to have any data stored in their calculators at the start of exams and it would be dangerous to change this rule without serious consideration about the potential for malpractice. Any processing done in advance of the assessment would be non-exam assessment which is prohibited in Ofqual's proposals. In addition, such work would be subject to the same issues around plagiarism and security that are associated with coursework and controlled assessment and there

would be a danger of promoting teaching to the data set rather than teaching the content of the course.

While it may be possible to include pre-release data in the future, we believe the risks associated with it are too great to include it in this development.

We recommend that this section be removed from the document and statistics be assessed solely by exam as Ofqual have proposed.

Detailed content statement

Pure mathematics – sections A to I – mathematics only

There are very few changes to the topics covered in the pure mathematics content. However, the content looks significantly different due to a large number of wording changes.

In the current criteria, the content is presented in the form of a list of topics, for example "Equation of a straight line..." The new listing presents the content in the form of skills by preceding the topics with one of a number of terms, for example "Understand and use the equation of a straight line..." In most cases, the terms "understand" and "use" have been used but in places a number of different terms have also been used, for example "Work with quadratic functions..." Pearson does not believe that the significance of the different terms has been made clear. We also believe that it is not possible in a written exam to distinguish between the ability to understand, use, work with or any of the other terms preceding the content topics.

Therefore we recommend that these terms be removed and the content be presented in the form of topics as it is in the current criteria.

Some of the wording changes give examples of where links can be made between topics and the type of contexts which could be used, for example A9 "...Link graphical transformations to transformations of the equation of the Normal probability curve..." and E6 "Understand and use exponential growth and decay; use in modelling, including the use of e in continuous compound interest, radioactive decay, exponential growth as a model for population growth; consideration of limitations and refinements of the models". This is helpful in terms of content exemplification but could cause confusion when included as part of the detailed content listing.

There are two problems with this approach. Firstly, since the inclusions are not an exhaustive list, there is confusion about the many links and contexts not included, why they are not included and whether they need to be taught. Secondly, there will be a requirement for complete content coverage over a specified period of time and it is not clear to what extent examples of links and contexts are part of that requirement.

Pearson recommends that these references be removed from the detailed content listing and presented separately as advice and exemplification.

The last point in each section is a statement requiring the content of the section to be used in problem solving, modelling and/or context. An example is section A11 'Use of functions in modelling, including consideration of limitations and refinements of the models'. This is already completely covered in Ofqual's revised AO3:

- 'construct, select and refine mathematical models
- interpret the outcomes of a modelling process in real world terms and recognise the limitations of a model'.

The content relating to functions is listed in sections A1 to A10. Section A11 does not contain any new content and should therefore be removed from the detailed content listing.

The full list of sections to which this point applies is A11, B4, C6, D9, E6, F6, G8, H4 and I5, and Pearson recommends that these sections be removed from the content listing.

The new content requires some standard proofs, for example, D5 includes '...be able to derive $\sin^2\theta + \cos^2\theta = 1$ '. The current A level does not test standard proofs which can be learned by rote and reproduced with no understanding and this does seem to be at odds with ALCAB's stated intentions for the qualification.

The testing of this type of material is in no way problematic but Pearson recommends that ALCAB is consulted to check they intended to require assessment of standard proofs.

Statistics – sections J to N – mathematics only

In contrast to the presentation of the pure mathematics content, the statistics content includes very little detail. It cannot be compared with the current criteria content, since the current criteria do not include statistics content.

In assessing the amount of content, we have compared the proposed content with the current Edexcel A level statistics units. The proposed content includes material from S1, S2, S3 and S4. Because of the lack of detail, it is very difficult to gauge the intended scope of the proposed content statements.

Of the current S1 and S2 content, most is clearly covered in the new content. The areas of confusion are:

- correlation and regression – new content mentions 'Interpret scatter diagrams for bivariate data, including recognition of scatter diagrams which include distinct sections of the population', 'Understand informal interpretation of correlation' and 'Understand that correlation does not imply causation'. This stops short of the content in S1 which requires 'Calculation of the equation of a linear regression line...' and 'The product moment correlation coefficient, its use, interpretation and limitations'. However, it is not clear whether linear (or non-linear) regression lines are considered part of interpreting a scatter diagram. The situation is further confused in the new content section N4 which is 'Interpret a correlation coefficient as a test statistic and use it in a hypothesis test'. There is no mention of any correlation coefficient elsewhere in the new content and no clue as to which correlation coefficients students are expected to be aware of. Current GCE units include the product moment correlation coefficient (S1) and Spearman's rank correlation coefficient (S3). There are a number of other correlation coefficients which are not part of the current Edexcel units but may be expected in the new content.

- statistical distributions – the new content section M1 starts with 'Understand and use probability distributions...'. There are many probability distributions of which two are mentioned in the remaining parts of section M: binomial distribution and Normal distribution. However it does not appear to be the case that these are the only two students will be expected to know. The current GCE units cover the following (in addition to binomial and Normal), the cumulative distribution function (S1), the discrete uniform distribution (S1), the Poisson distribution (S2), the probability density function (S2) and the continuous uniform (rectangular) distribution (S2).

If knowledge of all the distributions and linear regression are expected, it can be argued the new content covers all of S1 and S2. In addition there are a number of content items which are currently in S3 and S4:

- J1 'statistical sampling' most of which is in S3
- N3 'Conduct a statistical hypothesis test for the mean of a Normal distribution...' which is in S3 with variance known and S4 with variance unknown.

With the amount of pure mathematics not significantly changed and no intention to increase the overall amount of content, the mechanics and statistics content should total around 33% of the total, meaning around 17% for each.

Since the statistics content covers around two full units and some additional material, it amounts to around 40% of an A level.

Pearson recommends that the amount of statistics content be significantly reduced to around 17% of an A level, and that clarity is provided about the scope of the content statements where necessary.

Mechanics – sections O to R – mathematics only

The new mechanics content has the same issue of lack of clarity as the new statistics content. At first sight there appears to be quite a small amount of content. However, it is difficult to find anything in M1 which could not be considered to be covered by the new content. A large part of M2 is covered with only section 2, centres of mass and section 3, work and energy apparently not covered in the new content. There doesn't appear to be any material from the other three mechanics units although there are a quite large number of topics, for example simple harmonic motion which are not necessarily excluded. Section Q6 includes '...Coulomb's model of friction...' which is not covered in any of the five current mechanics units.

With the new content covering M1 and most of M2, it amounts to roughly 25% of the current A level.

Pearson recommends that the amount of mechanics content be reduced to around 17% of an A level, and that clarity is provided about the scope of the content statements where necessary.

Balance of applications content – mathematics only

There is no evidence to suggest statistics is more valued in higher education than mechanics.

Pearson recommends that care is taken to ensure that the amount of statistics content is equal to the amount of mechanics content.

Formulae and statistical tables

The content document for GCSE Mathematics included the formulae which could be provided during the assessments, as do the current criteria for A level. Since the new GCSE allows significantly fewer formulae to be given in the assessments, it is reasonable to assume there may be changes to what is allowed for AS and A level.

The AS and A level content document does not specify which formulae and statistical tables should be provided. Our current booklet of formulae and statistical tables is over 30 pages long. If the number of formulae provided is to be reduced by a significant amount it will have a significant implication for teaching time which would need to be reflected in the overall amount of content.

Pearson recommends that the formulae to be provided during assessments be specified. We recommend the same formulae as currently given. Any reduction in the amount of formulae would need to be reflected by a reduction in the total amount of content.

d) Geography

Pearson agrees that the content reflects what students need to know in order to progress to undergraduate study and is appropriate in light of the issues raised in the ALCAB report.

We support the requirement to develop specifications with a balance of human geography and physical geography and the requirement for students to develop an understanding of human and physical processes in order to better understand contemporary geographical issues. We agree that an understanding of people and environment questions and issues is an important characteristic of geography, and therefore we are in favour of the requirement for A level geography to include a significant proportion of this in the non-core content. We support the increased emphasis on developing qualitative and quantitative data skills and the explicit reference to these skills in the subject criteria.

Pearson strongly supports the assessment of A level fieldwork through an independent investigation as this will support students in preparing for undergraduate study of geography. However we think the requirement in paragraph 24 to assess A level fieldwork through external examinations needs clarifying for awarding organisations. In particular, we need clarification on the expected weighting of A level fieldwork in assessments. The proposal to assess A level fieldwork within external examinations appears to contradict the findings of the ALCAB report which stated that 'the only appropriate method of assessment for fieldwork at A level is through a non-examination based independent investigation'. The proposed A level fieldwork skills in paragraph 23 include practical skills such as observing and recording phenomena in the field. We believe that a written examination of practical fieldwork skills is not a valid method of assessment.

We recommend that fieldwork at A level is assessed through the non-examined independent investigation only and not also through additional exam questions.

If fieldwork is assessed in both, this will give a greater weighting to fieldwork overall than the Ofqual consultation proposed last year. We think this will impact on the ability of awarding organisations to implement the core and non-core content and geographical skills within the guided learning hours for A level qualifications.

Pearson supports the attempt to build in more depth study into GCE Geography qualifications and we agree that A level should focus on a limited number of topics in depth. However we are concerned about the number of option sub-themes as this may lead to a high level of optional questions in examinations. There is also an imbalance in the number of sub-themes available for physical and human geography.

We recommend a reduction down to three options in each of the physical and human core.

AS level

Pearson agrees that the content reflects what students need to know in order to progress to undergraduate study and is appropriate in light of the issues raised in the ALCAB report.

Pearson supports the requirement in paragraph 22 to assess AS fieldwork knowledge, understanding and skills within external examinations. We recommend that the minimum assessment weighting should be 15%, in line with GCSE. The maximum assessment weighting should be 20%, in line with A Level.

Question 6: Is the revised modern foreign languages content, covering assessment of all four skills (reading, writing, speaking and listening), applicable to all languages currently available for study at AS and A level?

The content requirements for French, German and Spanish are considerable, and these languages are often well resourced in centres, both in terms of accompanying resources and teaching staff. For some of the lesser taught languages, it is unclear how the same content demands could be met with far less support and resourcing. It would be particularly difficult to find a range of works and themes at the appropriate language level for some languages (Chinese / Arabic) equal to those specified for French, German and Spanish. The study of the non-Roman languages in particular requires the additional step of mastering a different alphabet, and as such, taught candidates would be unlikely to have the range of vocabulary that learners of French would if faced with a Literature requirement.

We agree that all four skills should be assessed at AS and A level in all languages. However, further work on the content requirements and means of assessment (i.e. the themes and works) is required. We do not believe that the content as it currently stands can be applicable to all languages.