

Pearson response to the Ofqual Consultation on AS and A level Modern Foreign Languages: Conditions and Guidance, covering French, German and Spanish  
March 2015

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Organisation details

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**Name**

Lesley Davies

**Position**

Vice President, Quality, Standards and Research

**Organisation name (if applicable)**

Pearson

**Address**

190 High Holborn  
London WC1V 7BH

**Email**

lesley.davies@pearson.com

**Telephone**

020 7190 4292

**Would you like us to treat your response as confidential?\***

If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

( ) Yes (X) No

**Is this a personal response or an official response on behalf of your organisation?\***

( ) Personal response (Please answer the question 'If you ticked 'Personal views'...')

(X) Official response (Please answer the question 'Type of responding organisation')

**If you ticked 'Personal views' which of the following are you?**

( ) Student

( ) Parent or carer

( ) Teacher (but responding in a personal capacity)

( ) Other, including general public (Please state below)

**If you ticked "Official response from an organisation/group", please respond accordingly:**

Type of responding organisation\*

- Awarding organisation
- Local authority
- School or college (please answer the question below)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question below)

**School or college type**

- Comprehensive or non-selective academy
- State selective or selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- Other (please state below)

**Type of representative group or interest group**

- Group of awarding organizations
- Union
- Employer or business representative group
- Subject association or learned society
- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

**Nation\***

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country
- Non-EU country

**How did you find out about this consultation?**

- Our newsletter or another one of our communications
- Our website
- Internet search
- Other

**May we contact you for further information?**

- Yes  No

### Question 1

**Do you have any comments on the draft Conditions for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

(X) Yes ( ) No

*If yes, please provide them here:*

We are concerned that some of the inter-awarding organisation agreements, as documented as part of the NEA process, have not been included in this document. Please see detail below in the relevant questions.

### Question 2

**Do you have any comments on the draft conditions, requirements and guidance on assessment for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

(X) Yes ( ) No

*If yes, please provide them here:*

Pearson has a query about the Interpretations and definitions section for AO1 and AO2. Bullet point 4 of AO1 (page 22) and bullet point 3 of AO2 (page 24) state: 'This assessment objective does not include assessment of the content of what is communicated in responses - this should be credited under AO3.'

This statement relates to the speaking aspect covered in these AOs but assessment of 'content' should be credited under AO4, not AO3. This statement would only be valid if 'content' referred to the quality of the language. However, 'quality' is mentioned in the next bullet, which states that 'responses in speech should always be in the target language, and should be assessed for the quality of what is communicated ...'. This bullet point does not refer to AO3. We recommend that these bullet points are amended to, 'This assessment objective does not include assessment of the content of what is communicated in responses - this should be credited under AO4.' Alternatively, if this statement is meant to refer to quality of language, it should read, 'This assessment objective does not include assessment of the quality of what is communicated in responses - this should be credited under AO3.'

## Question 3

**Do you have any comments on the draft conditions and requirements for non-exam assessment for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

(X) Yes ( ) No

*If yes, please provide them here:*

**1. It is of concern that some of the inter-awarding organisation agreements, as documented as part of the NEA process, have not been included in this document:**

In the interest of comparability of demand between awarding organisations, we would like some of the aspects agreed between awarding organisation to be included in the final conditions and guidance. These agreements are as follows and are taken directly from the latest NEA document agreed between awarding organizations.

**Stimulus cards for AS**

'There will be six stimulus cards on each sub-theme (ie twelve altogether, the same as for A level). Cards will have the title of the sub-theme and may contain a visual image and/or a written statement and/or a text stimulus and/or starter questions.'

We suggest that this be added to page 18 in the section Non-Examination Assessment beneath the section (c) 'such that all tasks are set by the awarding organisation'.

**Stimulus cards for A Level**

'There will be three stimulus cards on each sub-theme (ie twelve altogether). Cards will show the title of the sub-theme and may contain a visual image and/or a written statement and/or a text stimulus and/or starter questions.'

We suggest that this be added to page 17 under the section Non-Examination Assessment.

**Weighting of the independent research task at A level**

'The tasks will include a presentation and discussion of the individual research project (weighted at approximately 60-65%) and a discussion of one of the four sub-themes studied (weighted at approximately 35-40%).'

We suggest that this be added to page 8, section 1.5 as another bullet point beneath bullet point (b).

**2. Weighting of presentation to no more than 20% of the non-exam assessment (Section 1.30 on page 16):**

Allowing the marks awarded for the presentation to be up to 20% of the total marks is too high as the presentation can be no more than 2 minutes. This should be changed to 10% so we can allocate the majority of the marks to the longer and more significant conversation that follows the presentation.

**3. Assessment period for non-examined assessment (Section 1.25 on pages 14-15):**

Whilst Pearson agrees that the period of 5 weeks is acceptable, each individual centre should be asked to assess their full cohort within a specified period of two weeks within the 5 week window. This is in order to prevent unfair advantage or disadvantage to candidates who for example take their assessment at the end of the 5 weeks rather than at the beginning.

#### Question 4

**Do you have any views on our proposed approach to the recording of non-exam assessments for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

(X) Yes ( ) No

*If yes, please provide them here:*

In Section 1.23 on page 14, the statement allows each awarding organisation to choose whether to restrict the recordings to just audio or use both means. In line with our previous discussions with Ofqual, all awarding organisations agreed to use audio recordings only as not all centres will have the facilities to provide audiovisual recording. Allowing this flexibility would result in some learners being recorded by video and others by audio. This would lead to learners having different assessment experiences which may not be comparable and which would therefore not provide fair assessment to all candidates.

### Question 5

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**Do you have any comments on the draft conditions on access to dictionaries for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

Yes  No

### Question 6

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**Do you have any comments on the draft Guidance on assessment objectives for new A levels and AS qualifications in modern foreign languages (French, German and Spanish)?**

Yes  No

*If yes, please provide them here:*

Please see our response to Question 2.

### Question 7

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**We have not identified any ways in which our proposals would impact (positively or negatively) on persons who share a protected characteristic<sup>14</sup> (beyond those we have considered in earlier consultations). Are there any potential impacts we have not identified?**

Yes  No

### Question 8

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

Yes  No

### Question 9

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**Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?**

Yes  No