

Pearson response to the Ofqual Consultation GCSE English Language on Conditions and Guidance July 2015

Organisation details

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Position

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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 our proposed Condition, requirements and guidance for spoken language assessments in new English language GCSEs?

(X) Yes () No

If yes, please provide them here:

It is noted that awarding organisations will not be required to resubmit specifications for accreditation following the conclusion of this consultation. In order to ensure consistency between awarding organisations, Pearson recommends further guidance be given in the conditions and guidance document on exemplar material, presentation formats, audience, records, and inter-board standardisation – please see below for further clarification on these points.

In line with the work by the inter-board Spoken Language group to discuss arrangements for spoken language assessments, Pearson proposes inclusion of the following points:

Presentation formats

The requirements for learners to demonstrate presentation skills in a formal setting should specify that:

- learners must have previously identified the subject for their presentations;
- learners should have previously agreed the subject with their teachers;
- learners can use pre-prepared notes to assist them during their presentations but this is not a requirement;
- no word limits, page restrictions or other limitations regarding such notes should be specified;
- teachers should be advised, and should advise their students, that learners who read entirely from pre-prepared notes are unlikely to access the higher levels criteria that require learners to achieve engagement with their audiences;
- similarly, teachers should be advised, and should advise their students, that a lack of preparation is likely to preclude learners from accessing the higher levels criteria;
- presentations must be planned and organised;
- presentations may take a wide variety of forms, from talks, debates and

speeches to dialogues. The appropriate format should be determined by the teacher, in discussion with the learner;

- the format chosen should allow the learner to demonstrate their Spoken Language abilities to the fullest extent and teachers should ensure that whatever format is chosen enables learners to do this.

Audience

The requirements for learners to listen to and respond appropriately to any questions and feedback should specify that:

- learners must give their presentations to an audience;
- no requirements or limitations as to the composition and size of this audience should be specified;
- the size and composition of the audience should be determined by the teacher, in discussion with the learner;
- the size, composition of the audience and questions/feedback from them should allow the learner to demonstrate their Spoken Language abilities, in particular their ability to respond appropriately to questions/feedback to the fullest extent.

Records

Teachers are to be required to keep records of their assessments.

Inter-board standardisation

Awarding organisations are to conduct an inter-board standardisation exercise to ensure that each organisation's monitors are applying standards in a consistent way.

Question 2

Do you have any comments on our proposed Condition on marking and results in new English language GCSEs?

(X) Yes () No

If yes, please provide them here:

Monitoring requirements at the end of 1.18 on page 15 states that centres will be required to submit a sample of audio-visual recordings for review by the awarding organisations. We propose that this Condition should include the stipulation that samples will be centre-selected and conform to the JCQ NEA rules specific to English language which are currently being drafted.

Question 3

Do you have any comments on our proposed certificate requirements for new English language GCSEs?

(X) Yes () No

If yes, please provide them here:

Certificate requirements 1.24 on page 19 states that all possible results for the spoken language assessment will be reported on certificates. Pearson would recommend a clarification that this condition only applies where the candidate has already met the condition of achieving at least a grade 1 for the examined assessment and therefore being eligible to receive a certificate.

As the *Specifications in Relation to the Reasonable Adjustment of General Qualifications* document does not currently cater for endorsements to a qualification, Pearson would welcome an update to this at the earliest opportunity, so that candidates considering applying for exemption have all the information they need at the start of their course.

Question 4

Do you have any comments arising from the fact that the new Conditions and requirements proposed in this consultation will, if adopted, have the effect of revising the accreditation criterion for English language GCSEs?

Yes No

If yes, please provide them here:

We have no comments about this, however, it is urged that revised accreditation criteria are published on Ofqual's website at the earliest opportunity.

Question 5

We have not identified any ways in which our proposals for new English language GCSEs would impact (positively or negatively) on persons who share a protected characteristic. Are there any potential impacts we have not identified?

Yes No

If yes, please provide them here:

Given the requirement for all Heads of Centres to provide a spoken language statement, Pearson would welcome clarification on how awarding organisations should enforce this in cases where all candidates at a centre, for example for religious reasons, have reasonable objections to being videoed.

Question 6

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 7

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

Yes No

If yes, please provide them here:

We note that the *Specifications in Relation to the Reasonable Adjustment of General Qualifications* document currently forbids the use of British Sign Language as a reasonable adjustment to demonstrating ability to speak or listen in English. As noted in our response to Question 3, we would emphasise the need for an early update to this to ensure that candidates for whom this is relevant are fully informed at the start of their course.

Question 8

Do you have any comments on the impacts of our proposals on schools and/or awarding organisations?

Yes No