

Response ID ANON-HZ7S-PW9M-S

Submitted to **Consultation on changes to the assessment arrangements for GCSE French, German and Spanish**
Submitted on **2021-05-19 09:22:35**

Personal information

What is your name?

Name:

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Position (if applicable)

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Introduction

Assessment objectives (AOs)

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

Neither agree nor disagree

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

Please state in the text box below:

The key issue here seems to be less a matter of appropriate weighting according to individual skills and more a matter of how marks are calculated, how scores are reported, what reported scores mean and how they are to be interpreted by score users (i.e. teachers, learners, school leaders and policy makers). In other words, the question of weighting is only a small component in the much more significant question about the overall validity of the proposed assessment objectives. It could be argued that the existing arrangement (i.e. 25% weighting for each of AO1-AO4) is more transparent for score interpretation purposes, given that it breaks down according to the 4 fairly well-understood skills of reading, writing, listening and speaking, which in themselves reflect a strongly communicative understanding of language knowledge and use. The revised assessment objectives (AO1-AO3), however, appear to follow a less transparent approach, in which comprehension and production, as well as speaking and writing (not to mention grammar, vocabulary, etc), are somewhat 'blended'. This approach to conceptualising the test construct may be an effort to reflect a more 'integrated skills' approach in language teaching/learning/assessment which is positive in some respects. However, the wording of the new AO1 and AO2 is somewhat confusing and ambiguous as currently expressed. Taken literally, AO1 and AO2 seem to refer only to the use of an integrated skills testing approach (i.e. 'understand and respond to' written or spoken language through speaking or writing). This makes sense in relation to testing the productive skills (i.e. 'understand and respond to' oral/written input through speaking or writing). However, testing the receptive skills (i.e. learners' understanding/comprehension in reading or listening) is likely to require the use of not just integrated reading/listening-into-writing/speaking task formats but also independent task formats (e.g. MCQ questions) of which there is no mention. Since no explicit mention is made of both integrated and independent testing formats, it remains unclear whether both testing approaches are envisaged. Are MCQ and other selected item-based task types being excluded, or are they being (re)classified as 'responding to spoken/written language in speaking/writing' (which seems counterintuitive)? It's just not clear. In short, and as currently expressed through the new AO1-AO2, there seems to be a shift from one extreme of conceptualising language competence as primarily separate, independent skills (current policy) to the other extreme of thinking in terms of only integrated skills (revised proposal); this seems both curious and confusing. In the revised approach it also remains unclear why AO2 (45%) is privileged over AO1 (35%) instead of being evenly distributed. The new AO3 introduces a 3rd assessment objective primarily concerned with knowledge of the mechanics of a language (i.e. lexicogrammar), but it's not really clear how this interfaces with AO1 and AO2. The current 4-skills-focused objectives AO1-AO4 (Listening, Speaking, Reading, Writing) are much clearer in terms of their pedagogical and assessment implications and, importantly, they allow for greater clarity in terms of score meaning and interpretation as well as flexibility for using both independent and integrated task types. Overall, there seems to be no convincing rationale put forward regarding the proposed conceptualisation and weightings for the 3 new AOs.

Tiering

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)?

Neither agree nor disagree

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)?

Neither agree nor disagree

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

Please state in the text box below:

Given the proposed change to the AOs (i.e. to blended AO1-3 instead of skill-differentiated AO1-AO4), the question of whether it is sensible to target and differentiate the difficulty levels of assessments through tiering remains open to question. It is possible that integrated assessments could create a larger difference between what weaker and stronger learners can demonstrate, and offering differentiation through tiering may help to address this. However, until information is provided concerning how task difficulty for the foundation and higher levels will be empirically established (e.g. through pre-testing?), this is very hard to judge or comment on. The proposed subject content risks becoming part of the problem here. A key distinguishing factor between the two tiers seems to be 500 more words from the frequency list for the higher tier, with 1200 words in common between the 2 tiers. In theory, however, a test item targeting one of the higher tier's extra words could easily turn out to be empirically easier than an item from the 1200 list in the lower tier exam. A frequency-based word selection does not equal item difficulty neatly. Taking a pedagogic and learner feedback view on the proposed revisions, any formative value of the scores and their meaning for the test takers, especially with regard to tiering, seems to be problematic. How will a test taker understand what their relative strengths/weaknesses are based on the blended assessment categories (AO1-3) in a tiered approach? While the four-skill distinction may be idealised, it does at least allow for easier interpretation by test takers and it is important for test scores to have meaning for test takers (and other score users), particularly in terms of progression to higher proficiency levels (i.e. A-level). In short, it is difficult to determine how a tiered approach could be appropriately or successfully implemented and to what extent some candidates might be denied opportunities to demonstrate their true level of achievement across the 4 language skills. It could be argued that the existing, more flexible tiering arrangement at least allows for this, and acknowledges the linguistic reality that individual language skills may be acquired or develop at differentiated rates.

Non-Exam Assessment (NEA)

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)?

Neither agree nor disagree

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)?

Neither agree nor disagree

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)?

Please state in the text box below:

While a proposal that the NEA should account for 25% of the total marks as before seems reasonable, it is not clear how the proposed NEA to assess students' spoken responses and interactions would integrate with the other AOs 1-3 – all of which also refer to spoken language skills? What is the hypothesised relationship between the AO1 (35%), AO2 (45%) and NEA (25%) components in terms of score manipulation and interpretation - not to mention the role of spoken grammar and vocabulary which is presumably covered by AO3? Note also that spoken pronunciation is not mentioned within the AO3 wording but it is explicitly referred to in the explanatory paragraph that follows the table showing the revised AOs. This is confusing and seems to contradict the rationale given earlier for the shift to the proposed AOs.

Impact of our proposals

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?

Please state in the text box below:

It is of course essential to emphasise here the importance of conducting differential item functioning (DIF) analysis for race/ethnicity (and all other protected characteristics) in order to establish empirical evidence of equality; we assume that such analyses are already an essential part of the routine test production and validation processes for the current MFL GCSEs. However, the proposal seems to take little account of the student at the centre of the teaching/learning/assessment process in terms of possible variation in their language identity and background. There is no recognition that a student might have one of these languages as their L1 (rather than English), or another L1 altogether, or know or be learning more than one language simultaneously. MFL is

presented as a school subject in isolation – which seems a somewhat outdated perspective. The real-life complexity of modern-day language knowledge and use among school-age learners is not fully represented in this proposal; their language identity and background are likely to "impact (positively or negatively)" in a fundamental way. It is a cause for concern that any notion of contemporary multilingualism and its implications for language learning in the school/college context seems to be entirely absent from the discussion. It would not be difficult to include some discussion of this wider socio-cultural and educational background in the proposals, linked to the rationale being put forward for changes to the MFL curriculum.

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?

Please state in the text box below:

Please see the response to Question 9 above.

Regulatory Impact Assessment

Question 11 We have set out our understanding of the costs and burdens of our proposals for schools, colleges and exam boards. Are there any other potential costs or burdens that we have not identified?

Please state in the text box below:

No mention is made (or awareness suggested) in the current proposals of the potential impact (including costs) on other key stakeholders involved, beyond schools/colleges, exam boards. Additional stakeholders who will be impacted include: pupils, parents, 6th form admissions tutors, teacher educators, coursebook publishers and other materials developers, educational researchers, among many others. It is worth commenting here that language testing theory and practice have moved over the past decade or more towards centralising 'impact' as a core design principle in any test development and revision enterprise. Consideration of test impact is generally conceptualised nowadays in a sophisticated and multifaceted way and typically requires consultation with a wide range of key stakeholders. The Ofqual consultation process seems to restrict any notion of impact to 'costs and administrative burdens' as they apply to schools, colleges and exam boards. This seems both inadequate and short-sighted.

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

Please state in the text box below:

The research and practitioner community in language testing and assessment has over more than 20 years undertaken extensive theoretical and empirical investigation into test impact and washback in the context of curriculum and examination reform. There now exists a wide-ranging literature available to be consulted by policymakers and professional bodies engaged in subject content review and assessment reform and evaluation. As mentioned above, it is widely understood that impact extends far beyond 'financial costs' and 'administrative burdens'. The importance of an evidence-based/informed approach in such an endeavour cannot be overestimated. The success of any curriculum and examination reform project is partly a matter of winning hearts and minds too among the many stakeholder constituencies involved. Many UKALTA members have significant experience in consulting on/designing exam reforms for languages education across European contexts (and beyond). In the future, it would perhaps be useful to engage with these academics in order to gain expert insights into exam reform processes.

Your details

Which nation or country are you based in?

England

Other country::

How did you find out about this consultation?

Ofqual's website

Other (please specify)::

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

Which of the following best describes you?

Other representative or interest group

Type of school or college

What is your school or college type?

Not applicable

Type of organisation or interest group

What type of organisation or interest group do you represent?

Subject association or learned society

Which language(s) do you teach or study?

Please select the language(s) and the level you (or the student/s you represent) currently study or teach. Please provide a response for all languages.

Which language(s) do you teach, and at what level? - French:

Not applicable

Which language(s) do you teach, and at what level? - German:

Not applicable

Which language(s) do you teach, and at what level? - Spanish:

Not applicable

Which language(s) do you teach, and at what level? - Other language(s):

Not applicable

Other - please state which language(s):

Your data and rights

Confidentiality

Do you wish any part of your response to remain confidential?

No

If you selected 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, please state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality

Please state in the text box below:

Feedback

How easy to read did you find this consultation? Please rate from 1 to 5, where 1 is very hard to read and 5 is very easy to read.

5 - Very easy to read