

Consultation on the Revised Subject Content for GCSE Modern Foreign Languages - draft to ASCL members

Response of the Association of School and College Leaders

- 1 The Association of School and College Leaders (ASCL) represents nearly 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
- 2 ASCL members fully appreciate the role languages play as part of a broad, rich curriculum. Members have been concerned for a long time about declining numbers of pupils studying a foreign language both at GCSE and at A level and we understand that there are many factors linked to this. However since the introduction of the revised GCSE for first certification in 2018, there has been a modest increase at GCSE and we recognise the importance of this in supporting the government's Ebacc ambition. The current GCSEs in all subjects have not had time to bed in properly (partly due to the pandemic), and there are undoubtedly opportunities to refine it (as with all the revised GCSEs), rather than implementing the radical proposals outlined here, which are just for GCSE French, German and Spanish. Furthermore, the proposals pertain only to French, German and Spanish and this puts them out of sync with other taught languages resulting in a two tier system which is unhelpful and undermines other languages.
- 3 We believe the question format of the consultation itself contains many closed, limiting and leading questions; in order to respond fully to this consultation, our response is presented in the format of introductory comments and detailed answers to the questions. In addition to member feedback, we also draw on teacher feedback from polling undertaken by the Association for Language Learning¹.(ALL)
- 4 We understand the scope of the review into GCSE stated: ²"any recommendations must be compatible with the MFL Pedagogy Review", and we are concerned that some of the eventual proposals do not fully reflect key aspects of the original report e.g. "reading short texts and literature" and "opportunities to interact with native speakers".
- 5 ASCL members recognise and appreciate the principle and ambition behind this consultation in trying to improve uptake and accessibility. However whilst there are some aspects we welcome in the proposals, we feel the actual detailed content within does not match the stated aims. There are associated risks and unintended

¹ <http://www.all-london.org.uk/site/index.php/all-gcse-content-review-2021-webinar-2/>

² https://www.whatdotheyknow.com/request/information_relating_to_mfl_cont#incoming-1758497

consequences which we will outline, and which could have a damaging impact on languages in the curriculum and lead to a drop in standards. We would welcome further discussions on modifications to the proposals which could be less damaging, maintain standards, command the confidence of the wider MFL community and lead to a more rewarding language learning experience for pupils.

- 6 ASCL members have always stated that there should be a reasonable expectation that a student at GCSE should receive a MFL GCSE grade that is in line with other Ebacc subjects. This remains an ongoing problem and even if these proposed changes are made to the content and pedagogy, this will not change the grade profile and outcomes at GCSE. The Secretary of State made an intervention in the 2020 and 2021 awarding process to override the status of comparable outcomes, and there is now an opportunity to remedy this historic anomaly relating to GCSE MFL outcomes.
- 7 Whilst we understand the apparent freedoms for teachers to determine the cultural input in the proposals, ASCL is very concerned about the de facto dilution of cultural content through having a word list determined by frequency; we believe this undermines the place and purpose of languages in the curriculum. Currently there is a requirement that exam boards have a theme covering culture, which means that in practice teachers will teach it and textbooks will cover it. Removing the requirement is undermining, as is the removal of the requirement for the exam boards (and hence in practice, teachers) to use authentic materials. This will result in greater reliance on textbook materials and less freedom for teachers and pupils.
- 8 We appreciate the attempt to address concerns about the current GCSE, but we believe this solution is too simplistic and rigid and will not promote pupils' self-efficacy in language learning. We believe this approach may lead to a situation where we have pupils studying a language to GCSE but lacking both the motivation and linguistic strategies to study at a higher level.
- 9 One of ASCL's key concerns about these proposals is the derivation and limitations of the corpora resulting in a defined list which is the same for both productive and receptive language. We believe this has significant implications for teachers, learners and assessments which we outline in our detailed response to the questions.
- 10 ASCL is concerned that the approach advocated is still in its developmental phase and there is a lack of evidence to support structuring a language course for young learners in this way. A pilot study to create an evidence base would be extremely beneficial along with sample papers and texts. The proposals represent a significant risk at a time when the subject is very fragile and we urge a reconsideration of some key aspects of these reforms.
- 11 ASCL members are concerned that the draft content and associated assessment implies a particular pedagogy. We do not agree that this should be within the remit of this consultation and there should be no overt prioritising of one pedagogical approach over another. The Inspectorate, when making its judgements, is careful not to prioritise one methodology over another and recognises that there is no single methodology which is effective for all pupils. There is evidence that a well sequenced curriculum can be achieved in a variety of ways to suit learner profiles, and we are concerned about the impact these proposals may have on teaching and learning.
- 12 There is a risk that this will result in overt teaching to the test at the expense of intrinsic interest and the implementation of wider curriculum objectives. The types of communication advocated in the assessment are dictation, translation (and translation of single words), guided writing within the defined word list, and the removal of a

general conversation, all of which result in very controlled tasks and an absence of 'genuine' communication.

Given the restricted vocabulary lists, assessment tasks will need to achieve a spread of marks to avoid a bunching of marks around grade boundaries; this could result in 'setting traps' for pupils by testing specific grammatical features in order to achieve this spread of marks.

- 13 Whilst we welcome the ambition in the introduction, that the revised specification will take account of the national programmes of study for Key Stage 2, we are concerned that the aspirations for language learning set out in the programme of study for Key Stages 2 and 3 regarding communicative competence, are not being followed through in the detail of this consultation. The proposals state that there are no assumptions about prior learning which in itself undermines the role of Key Stage 2.
- 14 To our knowledge no equalities impact assessment has been undertaken regarding this content, and many of the proposals, including the specified corpora, have an impact on inclusion and diversity.

With reference to your specific questions

Question 10

ASCL does not agree with the requirement that 90% of words must be taken from the top 2000 most frequently occurring words in the most widely spoken standard forms of the language. We appreciate that the aim behind this is to address the overuse of low frequency words but we believe there should be a balance between basic vocabulary and high frequency vocabulary. As it stands, the proposal results in a simplistic and rigid solution to the problem for the following reasons:-

- (a) The high frequency corpora is based on a limited Western-centric list of vocabulary. The lists contain political, technical, judicial, medical, business-centric and literary words and whilst these may be frequently occurring among certain sectors of society, they are used infrequently by young people. This reduces the number of useful and relevant words for young people by a considerable amount. A number of seemingly commonplace lexical items are excluded and we are concerned that the proposed list does not equip learners with vocabulary, grammar and content vocabulary to talk about issues that are relevant to them, nor to talk about themselves in any meaningful way.

Vivian Cook, author of 'Second Language learning' states that "*While word frequency has some relevance to teaching, other factors are also important, such as the ease with which the meaning of an item can be demonstrated ('blue' is easier to explain than 'local') and its appropriateness for what pupils want to say ('plane' is more useful than 'system' if you want to travel)*

- (b) Learners do not learn words in frequency order, starting with all frequent vocabulary. Language learners need to build a lexicon combining a mixture of high and low frequency words. Jim Milton, Emeritus Professor of Linguistics at Swansea University argues in his influential book on vocabulary learning that an effective language course "*is probably going to introduce frequent and infrequent vocabulary in roughly equal amount*". We must ensure that a well-designed course gives pupils the high frequency vocabulary alongside interesting content.
- (c) Words that are used in written texts and media are not necessarily the most high frequency for normal conversation; high frequency words are also skewed

towards grammatical items (with, they, this) rather than lexical items and this may result in a limited word list.

- (d) This restrictive corpora will generate difficulties in creating assessments which are fair, valid and reliable (e.g. the words a pupil might wish to use about their experiences may not be in the defined list so the majority of questions will need to be of a translation type.) This leads to a dull and demotivating language learning experience for pupils.

Question 11

ASCL does not agree with the requirement for foundation tier pupils to know no more than 1200 words and higher tier to know no more than 1700 words. ASCL members appreciate the intent to make the burden of teaching and learning in MFL more manageable, however we do not think this proposal is the right solution. Professor Jim Milton argues that learners need a basic threshold of at least need 2000 after 5 years of study, otherwise there is a real danger they will feel they are not making progress. NCELP also states that independent use of language starts at around 2000 words. Pupils will not have 1200 words or 1700 words of learning if the input is 1200 or 1700, they will retain considerably fewer.

The standard implied here by the proposed figures is CEFR A1 not the A2/B1 specified by the goals or stated in the DFE /Ofqual documentation. There is a strong relationship between vocabulary size and ability in MFL. This relationship is strong enough for specific vocabulary sizes to be attached to each level of the CEFR language hierarchy. The proposed figures of 1200 and 1700 will not suffice to get the necessary CEFR level and will inevitably led to a drop in standards. Learners cannot achieve the broad goals without a lot more vocabulary. A limited equivalence in the CEFR will not support the universal portability of the value of the qualification for pupils. In our view, these figures warrant greater scrutiny.

ASCL urges a complete review of this aspect of the proposal so that it meets the CEFR standard and reflects the research findings cited elsewhere

There is also a fundamental issue in conflating receptive knowledge and productive knowledge, as in all areas of learning and living, people have a greater receptive knowledge than productive. This is particularly true in languages, especially reading. We set out in subsequent sections the factors for this in the different language skills, as evidence in the feedback from ALL members referred to elsewhere.

Question 12

ASCL does not agree that the vocabulary lists proposed for GCSE should set out all the content required for GCSE. We appreciate the attempt to address the concern that pupils should only be tested on what is on the syllabus, but this simplistic approach has its limitations for language learning.

ASCL has some proposals to make in response to this question:

- (a) Whilst we can support a defined, agreed and relevant vocabulary list for the listening skill, we do not agree that there should be a defined word list for the receptive skill of reading. Inference is a natural, satisfying and motivating part of building receptive knowledge. Teaching pupils to infer words from contexts is a real-life skill as all language learners are taught to deal with some unexpected language; it is an essential and motivating skill in the development of linguists. The skill of inferring from a written context should be retained but be manageable and realistic; withdrawing the requirement to infer words means we are not assessing 'real' language skills. The danger is that, given the high-stakes

- accountability system we are in, teachers will feel pressurised to teach to the test and not develop this skill which ill-equips pupils for further study.
- (b) Pupils also need that knowing and using relevant words that are not on the list in the productive skills of speaking and writing is credit-bearing where they are comparable to words on the list (e.g. Muslim rather than Christian, vélo rather than voiture, etc)
 - (c) We also propose that the vocabulary in the word list should not be taken from highest frequency occurrences in general corpora but should be taken from themes and topics specified by exam boards or the DFE (or a mix, say 50:50 of the two). Pupils need a coherent structure for what they are learning and the content needs to match pupils' growing maturity. With a limited body of knowledge proposed in the specified vocabulary, it will be difficult to provide interesting, engaging content for pupils.
 - (d) When ALL members were asked if they were in favour of using a tightly controlled high frequency general corpora or finding an alternative, 91% responded that an alternative should be found i.e. either a corpus relevant to 16 year olds, from themes specified by the DFE or exam boards or 50% themes, 50% high³ frequency words.

Question 13

ASCL does not agree that cognate words should be included and counted in the defined vocabulary in the proposed way. Whilst we understand the rationale behind this; inferring words from a written context is a valuable and motivating skill in learning a language and we believe this should be retained for the reading skill.

Question 14.1

ASCL does not agree that no more than 2% of words in any given higher tier text that fall outside the vocabulary list should be in a glossary. A criticism that has been levelled is that the examinations are too hard for pupils so we understand the aim of this, however we believe there must be an allowance in reading skill for some non-glossed vocabulary, the meaning of which can be inferred through linguistic strategies See answers to the two previous questions.

Question 14.2

ASCL agrees that proper nouns such as cities or countries, not listed in the most frequent 2000 words and not deemed easily understood should be included in an adjacent glossary. This is a fair way of ensuring all pupils can access the text without assuming this geographical knowledge, which may vary considerably among pupils. The focus should be on testing the language rather than geographical knowledge.

Question 15

ASCL is very concerned about the removal of the current overarching themes and specific topics in the revised subject content. We appreciate the aim in ensuring pupils are able to manipulate language and transfer language from one context to another, however we do not agree with the complete absence of themes. There is a real risk of losing sight of the main purpose of learning a language, which is to 'communicate' in particular contexts and we will need to guard against the use of grammatical knowledge being the force of the curriculum rather than communication.

There is a danger that the absence of assessed content may lead to a dilution of content and an excessive focus on grammar rules which could result a lack of fluency and student confidence. Topics should be included which are engaging and culturally

³ <http://www.all-london.org.uk/site/index.php/all-gcse-content-review-2021-webinar-2/>

enriching for all abilities and we are concerned it may be diluted for those not intending to continue with post 16 language study, where a pressure to secure certain grades prevails. It is in danger of becoming an optional extra taught predominantly to those of socio-economically advantaged learners.

91% of ALL members were in favour of pupils knowing the range of context/themes/topics from which they were going to be tested.

The proposals may result in exam boards developing widely different themes which could be problematic for collaboration, comparison of standards and lead to an inconsistency in language learning at GCSE.

We are inevitably concerned about the cost of schools having to replace new textbooks with new themes and teacher workload in preparing their own themes. The current GCSE has only been in place since 2018 (first examination) and this new curriculum is based on a review that was published 5 years ago. It is aimed at the current Year 7 where we have a national ambition for 90% uptake of GCSE; this has significant resource and time implications for the immediate next academic year. Schools need both financial support and professional development to support the introduction of a revised GCSE.

Question 16

ASCL strongly disagrees with the principle of a high frequency vocabulary list defining the content for the revised MFL GCSE. We understand the desire to remove large portions of extraneous content but, on examination, the proposed word list contains many words which are outside of the learners' context and a reliance on the creation of topics to fit the word list. It is for example concerning that much vocabulary pertaining to young people such as 'internet connection, TV, mobile phone, text' is missing.

The awarding organisations have stated that it is difficult to design an exam that is valid and reliable that is defined by frequency; in practice this means that pupils will be unable to answer questions about themselves (seemingly authentic tasks) as this will involve words that are not on the this particular list. The limited opportunity for self-expression will have a negative impact on student motivation.

We would support the inclusion of a revised content which is theme based and culturally interesting and relevant to 16 year olds. Many of the words on the list fall outside of this.

Question 17

ASCL agrees that where questions are designed to test comprehension of written and spoken texts in the assessed language, that they will be constructed in English. Previously the target language used in rubrics has unfairly penalised pupils who have misunderstood the question, whereas they may well have been able to respond to the question itself.

Question 18

ASCL agrees with the proposal that all the rubrics will be in English as this is fairer for all groups of pupils and does not advantage native speakers and disadvantage EAL pupils. However we must be mindful that GCSE needs to equip pupils for post 16 study as well and careful consideration will need to be given to this.

Question 19

ASCL disagrees with the requirement for pupils to read aloud short sentence in the written form of the language and demonstrate understanding of them. Whilst we fully

appreciate that reading aloud is a worthwhile classroom activity and can be a valid assessment of pupils 'phonic awareness', the inclusion of this in assessment is flawed. Given that pupils will be tested on prescribed words, it will not constitute a valid test of phonic awareness as the words will already be familiar to pupils. There is a risk that the assessment may not be that reliable depending on the quality of the mark scheme and the support teachers are given in applying it; it could lead to inconsistencies in interpretation if not well designed.

We strongly disagree with the proposal that pupils are asked questions on it after reading; there must be a clear opportunity to allow pupils to gain understanding of the text prior to reading it and being asked questions about it. Given the earlier stipulation about rubric and questions, we assume but seek confirmation that the questions would have to be in English.

Question 20

ASCL disagrees with the requirement that pupils undertake dictation exercises as part of assessment. Whilst phonics, vocabulary and grammar are important, testing these features in priority over communicative competence is flawed in our view. Whilst not an authentic task, many language teachers already employ this cognitively challenging individual task as part of effective teaching and learning strategies and it should be used as a valid testing strategy rather than an assessment task. Whilst it can be validly and reliably assessed, it is another example along with the reading test of using the assessment to imply a methodology of language teaching. We are additionally concerned about the impact this could have on dyslexic pupils. Care must also be taken in ensuring parity between languages as some languages are inherently more difficult in terms of dictation, than others.

Question 21

ASCL agrees that where pupils are expected to understand spoken extracts, these extracts will be delivered at a pace which is no faster than moderate pace. This has been a longstanding problem with the current GCSE and is very demotivating for pupils of all abilities and favours native speakers. We welcome this recommendation, however there will need to be effective transition to A Level.

Question 22

ASCL disagrees with the proposal not to include cultural content in the revised subject content and assessment. If culture is not an essential part of the GCSE, then the qualification's appeal will narrow, and it will be harder to increase uptake; culture is a major motive for language learners. The absence of any assessed themes linked to the intercultural understanding of TL countries is likely to lead to a dilution of pupils' exposure to culture. There is a danger that this omission will lead to heavier focus on examination technique at the expense of engaging, well-planned and inclusive content which reflects the cultural diversity of TL countries (as marks will only be awarded for grammar, phonics and vocabulary).

There is a risk that cultural input ends up being prioritised for those intending to study languages post 16. It is already concerning that British Council language trends data is showing a continued reduction in pupils' international experience and this absence may further disincentivise all enriching activities, such as trips, exchanges and e-twinning as these activities are unlikely to support pupils' learning of the words on the list.

As an alternative, ASCL supports an amendment to the DFE content review which has emanated from discussions we are having with the HE sector. The proposal advocates the production of an 'authentic' or 'semi-authentic' cultural learning portfolio to support

the learning of the prescribed vocabulary and grammar. The wide-ranging portfolio items would be carefully selected to support schools' systematic sequencing of vocabulary and grammar.

Question 23

ASCL neither agrees nor disagrees that the grammar annexes are comprehensive, unambiguous and easy to understand. However, it would have been helpful to have a more focussed question(s) on the proposals regarding grammar. We believe, as with the vocabulary, that there should be some grammar which is "receptive only" to provide an awareness without the pressure of using more complex grammar productively.

Question 24

ASCL does not agree that the revised subject content is unambiguous, clear and easy to understand. Whilst we appreciate the ambition behind this, we think it is wrong just to specify a word and grammar list in this way in the absence of any coherent context or theme

- 15 ASCL strongly believes that these proposals constitute a downgrading of the statement of purpose for learning a language and will lead to a decline in uptake; and we urge a halt in the process so that wider discussions can take place. In essence, these proposals represent a starting point but not an end point and we would welcome further discussion and collaboration in improving upon them.

I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

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