

ALL-PARTY PARLIAMENTARY GROUP on MODERN LANGUAGES



Chair: Nia Griffith MP (Lab); Co-Chair: Baroness Coussins (CB);
Vice Chairs: Tonia Antoniazzi MP (Lab); Lord Dykes (CB); Baroness
Garden of Frognal (LD); Lord Sherbourne of Didsbury (Con).

27 January 2021

Response to Ofqual's Consultation¹ on how GCSE, AS and A level grades should be awarded in Summer 2021 from the All-Party Parliamentary Group on Modern Languages (APPG MFL).

Background

The All-Party Parliamentary Group on Modern Languages (APPG MFL) was established in January 2008. It is a cross-party group of MPs and Peers with a common interest in language policy and issues. Full details: <http://bit.ly/APPGMFLhome>

Approximately 30,000 students take a qualification in their 'community' language every year². This situation has highlighted that this cohort may be systematically disadvantaged in gaining these qualifications.

The value of 'community' language examinations (also known as 'less taught languages') is recognised as strategically important to the country in terms of economic growth and exports; security, defence and international relations; social mobility and educational achievement of EAL pupils.³

The APPG MFL wishes to emphasise that students of 'community languages' risk missing out on receiving a qualification again this summer, following the sharp drop in entries last year; and that this has the potential of constituting a lack of fairness and equality, unless the following issues are addressed.

We base our response on the principle of fairness and the national interest. Candidates in 'community languages' must be treated in the same way as candidates in all other subjects. Equitable solutions must be found for all students.

¹ <https://www.gov.uk/government/consultations/consultation-on-how-gcse-as-and-a-level-grades-should-be-awarded-in-summer-2021>

² Alcantara Communications (2019): <http://www.alcantaracomms.com/gcse-languages-entries-2019/>

³ See: *National Recovery Programme for Languages*, APPG MFL (2019); *Languages for the Future*, British Council (2017); *Exporting is Good for Britain but Knowledge Gaps and Language Skills hold back Exporters*, British Chambers of Commerce (2013); Minutes from APPG MFL meeting on 28 January 2015 http://www.britishcouncil.org/sites/britishcouncil.uk2/files/appgmfl_15.01.28_strategyclangs_mlnotesfinal.pdf; Commons debate 24 March 2015 'Lesser-taught languages' <https://publications.parliament.uk/pa/cm201415/cmhansrd/cm150324/debtext/150324-0004.htm>; *Persuasion and Power in the Modern World*, House of Lords Select Committee on Soft Power and the UK's Influence (2014).

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1. 'Community language' entries through mainstream schools

Context:

- A majority of students entering 'community languages' exams through their mainstream school do not study the subject in the mainstream school, but in a supplementary school setting (for example Saturday schools).
- There is increasing evidence that mainstream schools are unilaterally withdrawing their students from 'community languages' exams.⁴
- A solution must be found to allow mainstream schools to submit a recommended grade to exam boards in 'community languages'.
- Requiring candidates in 'community languages' to sit an exam when candidates in other subjects are not required to do so would be unfair; any solution must be on the same basis as that for all other subjects.
- Facilitating GCSEs in 'community languages' will help mainstream schools and the DfE reach Ebacc targets.

A suggested solution, which stakeholders believe is workable, is for mainstream schools to use a portfolio, including evidence from the candidate's supplementary school or teacher, to arrive at a grade to submit to exam boards.

- **This portfolio could include:**
 - **A bank of supporting evidence (according to clear criteria), including speaking assessment;**
 - **Signatures from the candidate; the supplementary school/teacher; and the mainstream school submitting to the exam board;**
 - **Grades to be kept within a window of tolerance with reference to previous results (e.g. 2017-2019), when cohort sizes allow.**
 - **Recommended grade is submitted to the exam board on this basis.**
- **Existing robust portfolio models run by mainstream schools and supplementary schools exist already which could be used as a basis for a recommended template.⁵**
- **Exam boards must also be ready to provide criteria against which schools can match their assessment (i.e. in the form of national grade specific benchmarks), alongside training/guidance on how to assess in this context, to encourage consistency. This support and guidance should include providing assessment materials, question banks, exemplification of the type of evidence that can be used and appropriate quality assurance. Centres will need to be confident about being able to assess, and reach a holistic judgement on, the candidate's performance.**

⁴ Evidence collected by the National Resource Centre for Supplementary Education (NRCSE), January 2021.

⁵ Available from the APPG MFL and the NRCSE.

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In addition:

- **The deadline for entering ‘community language’ exams must be extended as far as possible to give mainstream schools time to reverse any decisions they have already made to withdraw students from these exams.**
- **We support assessment taking place as late as possible in the school year to maximise the time available to all parties involved.**
- **Guidance must be issued to mainstream schools, including clear procedures and processes to follow, to support them in facilitating these grades for their students if at all possible and minimising the impact on workload.**
- **Mainstream schools can be reminded that entering their students for community languages grades will boost their Ebacc scores.**

2. Private candidates in ‘community languages’

Context:

- Of the four suggested solutions in the consultation, we believe (c) and (d) are unfair and cannot be recommended.
 - Solution (c) requires private candidates to take an exam when non-private candidates do not, and furthermore there is a higher risk of their being exposed to COVID-19 than their peers;
 - Solution (d) is unacceptable as it does not treat these candidates equally; in addition, many students move on to another programme of study and/or institution in the Autumn thereby increasing the risk that they will never enter.
- Solution (a) may be possible, but we anticipate issues, for example:
 - Potential unfairness if private candidates are the only constituency to have to sit the papers;
 - Concerns about whether exam boards will be able to create papers, training and materials in all languages that are currently examined, and find the examiners to assess them;
 - It is unclear to what extent this solution will facilitate the speaking endorsement for community languages (i.e. who would assess the candidates, allocate levels and submit to the exam boards).
- Solution (b) would be the fairest solution, although there are concerns that not all private candidates will be able to enter through a mainstream school (evidence of widespread, pre-emptive withdrawal of candidates by mainstream schools⁶).
- Exam boards should therefore facilitate the school system for private candidates in a fair way (both access to the qualification and how it is facilitated).

⁶ Evidence collected by the NRCSE, January 2021.

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- Existing private examination centres could be deployed for private candidates, but the issue of high entry fees would need to be addressed, perhaps with a cap on fees for 2021 to avoid the system treating these candidates unfairly.
- Current deadlines for registration will need to be extended.

A suggested model, which stakeholders believe is workable, would be as follows:

- **Encourage mainstream schools to facilitate entries as described in (1) above.**
- **Facilitate entries through existing networks of private exam centres only in cases where candidates cannot enter through their mainstream school.**
- **Ensure there is a reasonable cap on fees charged by examination centres as current fees can be prohibitive and disproportionately affect candidates in 'community languages'.**
- **Use the same portfolio system as in (1) above in as many cases as possible, unless a system based on exams can be shown to provide more equitable access for candidates.**

3. General comments: equality impact

It is vital to counter the myth that 'community' language students are advantaged and that therefore these qualifications matter less in any way.

- Students typically study their 'community' language in their own time (often Saturdays).
- Even if they have some degree of oral fluency they are unlikely to have to have the grammar, vocabulary and literacy required to take an academic examination in the subject.
- The standard form of the language in the examination is often different to the dialect they may be familiar with at home.
- Many students study their 'community language' as part of their heritage but have been born and/or been growing up in the UK, or indeed be several generations removed from native speakers in their family history, and therefore do not necessarily speak the language regularly.

Take-up of examinations in 'less taught languages' should be encouraged, valued, and facilitated.

There are well over 1 million 'bilingual' students in our schools (NALDIC 2013) which indicates that this issue is relevant to many more students than the 30,000 currently taking the examinations; and that there is low take-up of the examinations among this group, which should be addressed.

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The government has shown willingness to intervene before in recognising the strategic importance of these languages (for example in securing the future of the examinations in 2015) and should not hesitate to do so again.

The APPG MFL recommends a review be undertaken to reduce systemic issues and to recognise the value of these examinations in the long term. Including:

- **Ensuring that Ofqual's External Advisory Group on Exam Grading includes an expert representative with in-depth knowledge of the supplementary school sector.**
- **Ensuring community language examination centres are treated on the same basis as mainstream schools (including relevant communications being sent to them no later than to mainstream schools).**
- **Addressing the increasing difficulty of finding affordable and available examination centres to take an exam in 'community' languages, which the present crisis has exacerbated** (reduction in the number of mainstream schools allowing external candidates; reduction in the number of FE Colleges with an MFL department; high price of private centres' fees⁷).
- **An investigation into the high fees sometimes being charged to external candidates for taking an examination and whether this needs to be regulated.**
- **Consider measures to ensure all students have access to these examinations.**
- **Consideration whether leaving the availability of these exams entirely to market forces is always appropriate. If the strategic, economic and social value of these qualifications is recognised, the government should be prepared to act to ensure their availability to candidates is guaranteed, and their up-take encouraged.**

All-Party Parliamentary Group on Modern Languages
January 2021

⁷ See, for example, testimonial from After 18 Resource Centre, Leicester, via NRCSE 20 April 2020).