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Sally Collier
Chief Regulator
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7 May 2019

Dear Sally Collier,

Grading in MFL A level and GCSE, difficulty of MFL exam papers, and linking GCSE to the CEFR

On Wednesday, 8 May, some 150 university teachers of Modern Languages will be publishing the attached letter (ANNEX D) in which we highlight our long-term concerns about assessment in Modern Foreign Languages. We urge Ofqual to revisit and address the anomalies which have over the last ten years been the most significant cause of the decline in MFL take-up and progression in schools, and of the consequent loss of provision for the subject in the secondary and tertiary sectors.

In a recent BBC survey of secondary schools, 76% of respondents in England cited 'perceptions that the course/exams are too difficult' as the factor with the biggest negative impact on MFL provision.¹ When asked to comment on this finding, Minister of State Nick Gibb expressed confidence in the regulatory role of Ofqual. By contrast, we perceive the approach of Ofqual and the exam boards to be the currently most critical cause of the worsening crisis – a crisis that is set to intensify in the light of MFL assessment that is not fit for purpose, and a current teacher shortage which will be exacerbated by the ongoing loss of tertiary provision in Modern Languages and by the impact of the Brexit process on retention and recruitment of MFL teachers from EU countries.

We appreciate Ofqual's efforts to address the problems repeatedly highlighted by school teachers, representatives of the Higher Education Modern Languages community and other stakeholders including headteachers and subject associations since at least 2013. We similarly appreciate the extensive consultation process Ofqual has engaged in with stakeholders including HE since then, and the research Ofqual has undertaken in response to concerns. Nevertheless, our view on the basis of the evidence available to us concerning A level is that the perception articulated by schools of MFL being 'too difficult' is correct. The chief causes, in our view, are on the one hand severe grading, and on the other hand – directly linked to this – the excessive difficulty of the exam papers and specifically Paper 1. While we have not so far analysed GCSE assessment in detail, research indicates that with respect to GCSE as well, there are currently insufficient controls in place to ensure appropriate assessment. The concerns relating to A level assessment are set out in ANNEX B.

Our guiding question is whether assessment, overseen by Ofqual, meets the following criterion of the reformed A level qualification, 'to produce a rich and rewarding qualification with an appropriate level of cognitive challenge and suitable for progression to university study or to employment'.²

¹ BBC survey of secondary schools on language learning in the UK with a response rate of over 50% (27 February 2019), <https://www.bbc.co.uk/news/education-47334374> (accessed 15.2.2019); additional data courtesy of Clara Guibourg.

² The A Level Content Advisory Board, 'Report of the ALCAB Panel for modern foreign and Classical Languages', <https://alevelcontent.files.wordpress.com/2014/07/alcab-report-of-panel-on-modern-foreign-and-classical-languages-july->

Grading in MFL A level and inter-subject comparability

- **Appropriate grading:** Ofqual’s evidence set out in its Policy Decision document on severe grading (November 2018)³ shows unequivocally that it is statistically more difficult for MFL A level candidates without a native or near-native speaker advantage to gain grades in MFL equivalent to those they would gain in the majority of other subjects. Especially in the light of the plummeting number of MFL exam entries, the well-evidenced negative impact of falling entries on the health of the subject, and the relevance of that negative impact which Ofqual acknowledges in the criteria set for its inter-subject comparability research, it remains unclear why Ofqual has concluded that grading standards in MFL A level should not be adjusted. See **ANNEX A**.
- **Inter-subject comparability:** Ofqual’s conclusion in its Policy Decision document on severe grading that MFL A level grading requires no adjustment is flawed for the following reasons:
 - It is founded on a comparison with sciences which fails to take account of critical differences between the subjects including the fact that at GCSE, all three sciences are compulsory while MFL was made optional in 2004.
 - In the Policy Decision report, Ofqual takes extensive account of views expressed by examiners – including examiners’ speculative views on the social impact of grading. By contrast, substantial evidence on social impact is buried in the Technical Report and set out in detail only to prove that there are no causal links between grading and falling exam entries. This conclusion is not persuasive given the critical importance of assessment for the learner’s experience of the subject, motivation to continue with it, and incentive to choose it if its reputation for severe grading puts their university place at risk. It flies in the face of the experience of schools reported in the BBC survey.
 - It purports to take account of views sought from members of university Modern Languages departments in the course of Ofqual’s research but sidelines the relevant findings in its conclusions.
 - The Technical Report (pp. 72-77) sets out strong reservations about a grade adjustment among the exam boards, suggesting that the views of the exam boards played an inappropriately significant part in Ofqual’s conclusions.
 - The Policy Decision document does not mention the ‘native speaker’ factor which differentiates MFL from all other subjects and which was recognised by Ofqual in its partial one-off adjustment in 2017 as having an impact on grading that is difficult to quantify reliably with its normal statistical mechanisms, especially for small cohorts.

Our interpretation of the evidence put forward by Ofqual in its Policy Decision document and Technical Report is that there is in fact a compelling case to adjust grading standards in MFL. The statement in the Policy Decision document that conclusions reached for MFL would ‘logically’ require identical conclusions for sciences (report, p. 21) is in no way persuasive since the parameters relevant to the criteria differ. For an analysis of the evidence presented in Ofqual’s Policy Decision document and detailed comment on the conclusions see **ANNEX A**.

A level exam papers in MFL

Detailed analysis of the A level exam papers for MFL set by AQA and Pearson in 2018 for German indicate that these are inappropriately difficult, exacerbating and enhancing a pattern already evident in previous years, and supporting concerns raised by teachers also for French and Spanish. Factors noted include the following, and it is reasonable to assume that these are applicable to French and Spanish as well as German:

[2014.pdf](#), p. 2

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757841/ISC_Decision_Document_20.11.18.pdf

- The level and types of difficulty suggest that the exam boards and Ofqual have not established robust measures for ensuring an appropriate level of linguistic challenge.
- The difficulties are of a kind that is likely to have a significant negative impact on language teaching, learner confidence, accessibility of marks for weaker learners, and reliability of grading.
- The type and extent of the difficulties systematically increase the advantage given to candidates with native or near-native speaker competence, a factor that is in itself found in no other A level or GCSE subject. The excessive difficulty of the exam papers requires Ofqual's urgent attention, drawing on expertise from schools and HE. For an analysis of A level exam requirements see **ANNEX B**.

It should be noted that the excessive difficulty of the texts and tasks required in the time available to candidates needs to be addressed urgently in addition to, and independently of, concerns about severe grading. The former does not explain or justify severe grading or its impact.

It should also be noted that the 2018 A level exam papers in MFL do not form a suitable benchmark for establishing appropriate grading in MFL A level in the current or future years, and should not be used as a reliable benchmark to inform the level of challenge that is appropriate at GCSE in MFL.

Ofqual's current research on GCSE grading and the proposal to link MFL GCSE grades to the CEFR

It is welcome that Ofqual is conducting research on inter-subject comparability in the GCSE in MFL and evaluating the new GCSEs. In the light of the findings set out in **ANNEX B**, it will be vital to take seriously teachers' 'concerns about some questions being too difficult, particularly in the listening and reading assessments',⁴ and to address those concerns convincingly.

The findings set out in **ANNEX B** also point to significant risks with respect to Ofqual's concurrent study aiming to 'link several grades in GCSE French, Spanish and German to CEFR to inform further discussions about performance and grading standard in GCSE MFL'.⁵ It will be important to avoid the assumption that UK language learning progress can be aligned straightforwardly with that in non-Anglophone EU countries since UK school learners face specific challenges which make progress slower. The factors and risks are outlined in **ANNEX C**.

Who is Ofqual listening to?

The comments supporting Ofqual's announcement of its decision on grading in MFL A level (21 November 2018)⁶ suggest that Ofqual is sidelining the expertise and concerns of teachers of Modern Languages at secondary and tertiary level.

- Ofqual's Dr Michelle Meadows highlights the lack of a 'uniformly compelling case to adjust grading standards' without making clear that HE experts consulted by Ofqual in the course of the relevant study considered there to be a compelling case. The findings specific to MFL are fudged in the conclusions Ofqual draws from its own evidence (see **ANNEX A**).
- Tom Bramley, Cambridge Assessment, highlights that 'Much of the concern about subject difficulty appears to be about the declining take-up of certain subjects. In my view lowering the grade boundaries is not the right way to make subjects more attractive to potential students'. This conclusion – in line with the entire Policy Decision document – indicates a failure to recognise the fundamental difference between sciences

⁴ Ofqual: Evaluating new GCSEs in French, German and Spanish, <https://ofqual.blog.gov.uk/2019/02/14/evaluating-new-gcses-in-french-german-and-spanish> (accessed 15.3.2019).

⁵ Invitation on 10 January 2019 to participate in an Ofqual CEFR linking study in March 2019.

⁶ <https://www.gov.uk/government/news/reviewing-inter-subject-comparability>

- (all three compulsory at GCSE) and MFL (none compulsory at GCSE) with respect to any relationship between subject difficulty and take-up. It also, like the Policy Decision document, fails to take account of the differing levels of support from government and other sources for sciences and MFL. Even though the social impact of grading is purportedly taken into account in Ofqual's study on inter-subject comparability, it is here side-lined as irrelevant and indeed used to undermine the case for lowering grade boundaries. Meanwhile Ofqual is aware that the MFL community across sectors and subject associations is united in considering lowering of grade boundaries to be *both* appropriate in itself *and* key for addressing attrition.
- Barnaby Lenon, chair of the Independent Schools Council, comments that 'Dumbing down A level science grades, for example, could lead to students being taken onto degree courses for which they are not equipped'. This does not apply to MFL. Ofqual's statistical evidence proves that MFL grades are more severe than average, so what is at issue is fair grading, not 'dumbing down' grades. It is also clear from Ofqual's research on the performance of native speakers that for German, at least, the one-off adjustment in 2017 did not go far enough to make grading fair for non-native speakers. Furthermore, in MFL severe grading in interaction with excessive difficulty of exam papers hinders rather than helps effective preparation for degree courses (see ANNEX B). Adjustment of MFL grade boundaries was deemed appropriate in terms of standards and unproblematic with respect to university selection by HE teachers in Ofqual's inter-subject comparability study (see ANNEX A).

The implication of these comments is that concern about declining take-up has no legitimate place in the consideration of grading standards. This fails to recognise that factors such as optionality and take-up of a subject affect the academic profile of cohorts both quantitatively and qualitatively. It also fails to take account of the fact that Ofqual's inter-subject comparability research included 'detrimental impact caused by severe grading on users of the qualification and on society at large' and 'benefits to users of the qualification and society as a whole' in the criteria relevant to its policy. One might therefore expect it to be a matter of priority for Ofqual to address grading anomalies which are regarded even beyond the subject community as causing Modern Languages increasingly to be accessible only to a social elite and to learners in top sets.

Recommendations

1. To uncouple consideration of grading in MFL from consideration of grading in sciences, and revisit the conclusions drawn from the evidence in the A level inter-subject comparability study specifically for MFL.
2. To reassess the appropriateness of grade boundaries in MFL A level, taking full account of
 - a. evidence from schoolteachers and headteachers, and
 - b. the full range of factors influencing the academic make-up of MFL cohorts
3. To revisit the statistical mechanisms used for MFL including less-taught languages in order to ensure that these take full account of the participation of native and near-native speakers in every cohort, and safeguard the interests of non-native speaker MFL candidates and their right not to be disadvantaged in any way with respect to grading by comparison with candidates in other subjects.
4. To implement robust quality control mechanisms in order to ensure that the level of difficulty of exam papers at GCSE and A level is appropriate and marks are appropriately accessible for the full range of candidates normally participating in GCSE and A level examinations.
5. To ensure that expectations in GCSE assessment are realistic with respect to factors governing the likely progress and performance of UK GCSE candidates, taking account of available teaching time and quality.
6. To undertake no formal or informal benchmarking of GCSE grades or A level grades against the CEFR until confidence in the MFL GCSE and A level has been restored in the secondary and tertiary sector.

The above recommendations should be seen in the context of the fact that the decline in language learning is now regarded as a national crisis across UK sectors:

- The DfE has launched a teacher recruitment initiative and an MFL Pedagogy initiative to improve provision for the subject, and it has long been fighting a losing battle to improve take-up in MFL via the EBacc.



- The All-Party Parliamentary Group has launched a Recovery Programme, which includes a call for severe grading to be addressed:
<https://www.dropbox.com/s/cj6kdqgl4uaz685/LanguagesRecoveryProgrammeAPPGMFL-Embargo4March.pdf?dl=0>
- The British Academy has launched 'Languages in the UK – A call for action' together with the Academy of Medical Sciences, the Royal Academy of Engineering, and the Royal Society:
<https://www.thebritishacademy.ac.uk/sites/default/files/Languages-UK-2019-academies-statement.pdf>
- The Arts and Humanities Research Council is currently investing over £16 million in research projects designed to strengthen the subject at secondary and tertiary level in its *Open World Research Initiative*.

There is compelling evidence to suggest that Ofqual's long-standing and continuing failure to address concerns raised by school teachers and university teachers since at least 2013 has played a key role in bringing about this crisis. It is also predictable that the initiatives launched by the above stakeholders will be fruitless unless Ofqual plays its part and, together with the exam boards, fully addresses the anomalies in MFL assessment for which it bears responsibility.

We would welcome the opportunity for a group of us to meet you in person to discuss our concerns and recommendations.

Yours sincerely,

A handwritten signature in blue ink that reads 'Katrin Köhl'.

Enclosures:

- ANNEX A: The case for adjusting A level grading standards in MFL
- ANNEX B: Do the new Modern Foreign Languages A levels succeed in assessing the required skills and content in the most appropriate way?
- ANNEX C: GCSE Modern Foreign Languages Inter-Subject Comparability and the role of the Common European Framework of Reference for Languages (CEFR)
- ANNEX D: Letter with 151 signatures by university teachers of Modern Languages sent to *The Guardian* for publication on 8 May 2019