

Jocelyn Wyburd, Chair  
Email: [jmw234@cam.ac.uk](mailto:jmw234@cam.ac.uk)

Web: [www.ucml.ac.uk](http://www.ucml.ac.uk)  
Email: [ucml@soton.ac.uk](mailto:ucml@soton.ac.uk)

Glenys Stacey  
Chief Regulator  
Ofqual  
Spring Place  
Herald Avenue  
Coventry CV5 6UB

Cc: John Hopper, DfE

06 January 2016

Dear Glenys Stacey,

We are writing as colleagues involved in policy formulation and implementation in Modern Languages to request a meeting with Ofqual in the near future to discuss major concerns. UCML is leading this request with the support of colleagues from HE subject associations in languages and ALCAB panel members. Our concerns centre upon (i) the ongoing shortcomings in the grading of A levels in languages and (ii) the new GCSEs and A levels in languages, which are in the process of validation.

As you know, languages in the UK are in the midst of a crisis that threatens the subject's very existence in schools and has already led over 40 universities to discontinue language degrees since the year 2000. Currently, the most significant cause of attrition in England, in maintained and independent schools alike, is the unreliability of assessment at A level.

Ofqual has acknowledged in its Corporate Plan 2013-16 that "*relatively few A\* grades are awarded in modern foreign languages when compared with other subjects with a high proportion of A grades*". We are aware that Ofqual has been working hard, in conjunction with the exam boards and other stakeholders, to address this matter. However, the unreliability of the grading across languages continues to be a serious concern following this year's outcomes, and results in German have been particularly depressed. The severity of the issue is indicated by the fact that it prompted the Secretary of the Headmasters' and Headmistresses' Conference to alert university admissions offices to the "harsh marking of German A level compared to other subjects" at the confirmation of offers stage.

You will have seen the following articles in the press:

<http://www.telegraph.co.uk/education/educationnews/11915081/German-could-face-extinction-in-schools-heads-warn.html>

<https://www.tes.com/news/school-news/breaking-news/grading-flaws-threaten-future-german-private-schools-claim>

We believe that the underlying issues are complex and include:

- Unreliability of marking criteria leading to penalisation of risk-taking by higher performing candidates
- Norm-referencing as opposed to criterion-referencing in both the following scenarios, both of which are particularly compounded when numbers fall drastically as has happened in some languages:
  - where native or heritage speakers are disproportionately represented, making it difficult for others to achieve the best grades
  - where there is a disproportionate number of independent school educated entrants, as is now the case for most language A levels.

On this last issue, you will have seen the following article in the TES on 17<sup>th</sup> December.

<https://www.tes.com/news/school-news/breaking-news/a-quarter-pupils-taking-a-level-languages-are-privately-educated-isc>

It is clear that encouraging greater take-up would counter-balance some of these issues, however it is equally clear that current perceptions of language A levels are driving potential candidates to other subjects. This will further be compounded by A level reform as many pupils (who currently take 4 AS subjects leading to 3 A levels) will in the future take only 3 subjects forward from GCSE. We expect this to have a devastating effect on languages as pupils will not wish to risk jeopardising their university place by choosing a subject in which A level outcomes are not only notoriously unpredictable but also statistically likely to give them a lower grade than other comparable subjects. The impact on provision in schools and universities and on the health of the disciplines cannot be overstated, with devastating effects also on the skillset and competitiveness of our young people in the global economy.

We ask Ofqual to take urgent action to put appropriate measures in place that will yield fair outcomes for modern languages in the 2016 examinations, ensure that the new examinations and assessment procedures are fit for purpose, and restore confidence in modern languages as a subject in schools and universities. In order to ensure that pupils, their parents, and schools regain confidence in languages as an A level subject before it is too late, we ask Ofqual to make a public statement signalling what measures you are taking to ensure that from 2016, grading in languages will be fair, and will take account of the specific candidate profiles evidenced.

We have all welcomed the reforms and new specifications for both GCSE and A level. At both secondary and higher education level it has long been felt that the existing qualifications neither motivated take-up of our subjects, nor provided an appropriate basis for their continued study. The new GCSE specifications are in our view a considerable improvement on the previous ones. Whilst we acknowledge, too, the importance of the DfE policy on EBacc subjects (which include a language), the reformed GCSEs must provide a firm foundation for A level study and beyond. They must also motivate more pupils to want to engage with language learning. We are aware that the process of accrediting the new examinations proposed by the awarding is ongoing. However, some of us are already receiving expressions of concern from teachers that awarding bodies, while adhering to the new criteria, may not be fully embracing the spirit of radical change proposed. A number of signatories to this letter were involved in the elaboration of the new content for the A levels, through the ALCAB. Reservations expressed about the interpretation of the new GCSE criteria raise similar questions about the new A levels, and we are keen to discuss this matter with you urgently, while development and validation are still in process.

We therefore request a meeting with you and colleagues to address our major concerns.

Yours sincerely

- Jocelyn Wyburd, Chair of UCML, (University of Cambridge)
- Professor Stephen Parker, Chair of ALCAB panel for Modern and Classical Languages (University of Manchester)
- Professor Katrin Kohl, Member of ALCAB panel, representing German (University of Oxford)
- Bernardette Holmes, MFL Subject Content Criteria Writer for GCSE and AS/A Level languages
- Professor Adrian Armstrong, President, Association of University Professors and Heads of French (AUPHF), (Queen Mary University of London)
- Professor Sarah Colvin, President, Association for German Studies in Great Britain and Ireland, (University of Cambridge)
- Professor Mairéad Hanrahan, President, Society for French Studies, (University College London)
- Professor Claire Honess, Chair, Society for Italian Studies, (University of Leeds)
- Professor Isabel Torres, President, Association of Hispanists of Great Britain and Ireland (AHGBI), (Queen's University, Belfast)