

Reforming functional skills qualifications in English and mathematics

How to respond to this consultation

The closing date for responses is **22 November 2017 at 5pm**.

You can answer as many of the consultation questions as you like. You do not have to answer all of the questions, unless you wish to do so.

Please respond to this consultation in one of three ways:

- complete the online response (click 'Respond online' on the [consultation homepage](#)).
- complete this response form and email your response to consultations@ofqual.gov.uk. Please include the consultation title (Reforming functional skills qualifications in English and mathematics) in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to: Reforming functional skills consultation, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB, making clear who you are and in what capacity you are responding.
- **We can only consider your response if you fill in the 'About you' section at the end of the document.**

How we will use your response

- Your response will be used to help us shape our policies and regulatory activity.
- After the consultation ends, we will publish a summary of responses received.
- We will not include your personal details in any published list of respondents, although we may quote from your response anonymously.

Sharing your response

We may share your anonymised response with the Department for Education if it relates to the subject content for reformed functional skills qualifications.

If you are happy for Ofqual to attribute your response to you, in the responses shared with the Department for Education, please confirm this below:

[] When sharing responses with the Department for Education, I am happy for Ofqual to attribute my response to me.

If you respond on behalf of an organisation, we will list your organisation's name and may publish your response in full unless you tell us not to. If you want any part of your response to stay confidential, you should explain why you believe the information you have given is confidential. If you check the box below, we will not include your details in any list of people or organisations that responded to the consultation.

I want part of my organisation's response to remain confidential.

Please explain which sections of your response you want kept confidential, and why:

Members of the public are entitled to ask for information we hold under information access law (such as the Freedom of Information Act 2000). We may have to disclose information covered by these laws. On these rare occasions, we will usually anonymise responses, or ask for consent from those who have responded, but we cannot guarantee confidentiality.

Contacting you

Ofqual may sometimes follow-up responses received. If you are happy to be contacted about your response, please complete your details below.

Telephone number: 07912 999 108

Email: suepope@atm.org.uk

Please note that the expertise drawn on for this response overlaps with that from the Institute of Mathematics and its Applications (IMA).

Consultation questions

Question 1: To what extent do you agree or disagree that we should introduce requirements setting minimum, but no maximum overall assessment times for reformed functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Given the number of candidates and awarding organisations, it is very important to have strict guidelines around these qualifications to avoid a rush to what is perceived as the 'easiest'. Having strict guidelines on duration would assist with comparability.

Question 2: To what extent do you agree or disagree that we should **not** set requirements around the number of assessments within individual functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Given the number of candidates and awarding organisations, it is very important to have strict guidelines around these qualifications to avoid a rush to what is perceived as the 'easiest'. For mathematics, there is danger that holistic problem solving (i.e. including moving from plausible adult contexts and interpreting the outcomes of mathematical activity in that context) will be undermined if there are several elements. Having strict guidelines on the number of assessments will help with comparability.

Question 3: To what extent do you agree or disagree that at the Entry levels we should allow, but not require, centres to set and mark the assessments?

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

Please explain your reasons

It is important that the current arrangements for Functional Skills at Entry level remain, as that is the best way to ensure that candidates are able to show what they can do. Tutor preparation for the role of Functional Skills assessor could be improved to improve comparability across the qualifications. For example, there could be online training materials that includes exemplars available to all tutors whatever specification they are following. All providers should ensure there are rigorous processes in place to maintain quality across centre adaptations and internal marking.

Question 4: To what extent do you agree or disagree that at Levels 1 and 2 we should require all mathematics assessments, and the reading and writing assessments in English, to be set and marked by the awarding organisation?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This is important to maintain comparability and will help to maintain standards, particularly within apprenticeships, where Functional Skills are part of the framework and funding is dependent on their successful completion.

Question 5: To what extent do you agree or disagree that at levels 1 and 2 for the speaking, listening and communicating assessments in English we should allow, but not require, centres to set and mark the assessments?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 6: To what extent do you agree or disagree that we should **not** place any restrictions around availability of assessments in reformed functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

One of the current features of Functional Skills assessments that is important to many providers is the availability of assessment. This is important where funding is linked to learner outcomes, and for providers who are not linked with academic provision in schools and colleges. For example, candidates in the Armed Forces or the secure estate need assessment when ready.

Question 7: To what extent do you agree or disagree that we should continue to have a pass/fail grading model for reformed functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

As they are competency based qualifications, it would not make sense to introduce grading for reformed Functional Skills qualifications. It would be valuable for providers to know the pass marks and candidates' scores for assessments that are not marked by tutors, as they do know this information for candidates assessed at tutor mediated Entry levels.

Question 8: To what extent do you agree or disagree that, at Levels 1 and 2, awarding decisions made **before** assessments have been taken by all learners involved must either:

- use pre-set pass marks based on rigorous pre-testing of the assessments
- in setting pass marks, draw on evidence from the actual performance of a sufficiently representative sample of the anticipated cohort

- Strongly agree
- Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Whilst these arrangements might be desirable for comparability they could seriously undermine the ability of smaller Awarding Organisations to continue being able to offer Functional Skills qualifications. Unless there is an intention to reduce the number of Awarding Organisations involved, it is important that the procedure for awarding decisions is proportionate and manageable.

There is no evidence to suggest that the current arrangements are not working.

Question 9: To what extent do you agree or disagree that, at Levels 1 and 2, for awarding decisions made **after** assessments have been taken by all learners involved, we should restrict the number of awarding sessions an awarding organisation can hold to no more than four each year?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Allowing only four sessions per year represents a restriction that would cause problems in terms of flexibility for many providers and employers. This is important where funding is linked to learner outcomes, and for providers who are not linked with academic provision in schools and colleges. For example, candidates in the Armed Forces or the secure estate need assessment when ready.

Question 10: To what extent do you agree or disagree that we should regulate differently for the first year of awards for reformed functional skills qualifications to ensure initial standards are set appropriately?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This does seem a reasonable approach. There should be a requirement that standards are maintained through the transition, as happened for GCSE. Learners' futures should not be jeopardised through this change. All the evidence suggests that Functional Skills qualifications are not broken – changes should not undermine what currently works.

Question 11: To what extent do you agree or disagree that, for Levels 1 and 2, we should require an enhanced level of scrutiny of qualification outcomes post-awarding?

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

Please explain your reasons

The approach outlined seems reasonable. The currency and validity of the qualifications must be maintained. Robust and transparent scrutiny to assure comparability of outcomes is an essential part of this process.

Question 12: To what extent do you agree or disagree that we should set a process for reviewing qualification outcomes for the Entry levels, and for speaking, listening and communicating at Levels 1 and 2, that

- has the same purpose to that proposed for levels 1 and 2
- is tailored to the fact that these assessments are likely to be set and marked by the centre

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

Please explain your reasons

For Entry levels there should be proportionate accountability. Currently, moderation and quality assurance procedures vary across Awarding Organisations. Clearer expectations could improve this. Greater transparency around the moderation processes would benefit the comparability and status of the qualifications.

Question 13: To what extent do you agree or disagree that we should set requirements and/or guidance around awarding organisations' centre-monitoring procedures in relation to functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Currently, moderation and quality assurance procedures vary across Awarding Organisations. Clearer expectations could improve this. Tutor preparation for the role of Functional Skills assessor could be improved to improve comparability across the qualifications. For example, there could be online training materials available to all tutors whatever specification they are following.

Question 14: To what extent do you agree or disagree that we should set requirements on awarding organisations to produce guidance for centres on the conduct and assessment of speaking, listening and communicating?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 15: To what extent do you agree or disagree that we should set a requirement for awarding organisations to produce a document covering their approach to assessing reformed functional skills qualifications?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Whilst this is important, assessment strategies are commercially sensitive and not in the public domain. Given the number of Awarding Organisations offering Functional Skills, there needs to be tight rules to ensure comparability.

Question 16: To what extent do you agree or disagree that once reformed functional skills qualifications are available, we should require awarding organisations to make current functional skills qualifications available for a minimum of 9 months, and a maximum of 12 months which would include all resits?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

To protect learner interests, the transition period needs to be a full 12 months, particularly given the need to recognise the current flexibility of assessment arrangements. Candidates who have begun to study for a qualification should not be pressured into undertaking the assessment before they are fully prepared. This is especially important where Entry level candidates are concerned.

Question 17: To what extent do you agree or disagree that we should assign weighting ranges to the content areas for reformed functional skills qualifications in mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

It is important that all Functional Skills assessments are designed to assess the full range of content. However, if the requirements are too strict this can lead to contrived assessment so ranges might be more appropriate.

Question 18: To what extent do you agree or disagree that any weighting ranges set for content areas should differ between the levels in reformed functional skills qualifications in mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

Please explain your reasons

This needs very careful consideration in order to understand the implications for the validity of the assessments.

Question 19: To what extent do you agree or disagree that we should set weightings for calculator-based and non-calculator-based assessment within reformed functional skills qualifications in mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

The Minister's letter referenced does not require the use of non-calculator papers nor does there appear to be any other justification presented. It is wholly inappropriate in a qualification concerned with being 'functional' to include a non-calculator element. Particularly in C21, when people are more likely to have a calculator on the phone or via a spreadsheet on their computer. Functionality requires being able to use technology intelligently – is my answer reasonable? Mental methods and estimation skills are crucial to being able to function mathematically.

Including a non-calculator element of the assessment could reduce the demand of Functional Skills qualifications and undermine their purpose as tutors 'train' students in 'underpinning skills' rather than focussing on selecting and using mathematics to solve increasingly complex problems in familiar then unfamiliar plausible adult contexts. There would be considerable practical challenges implementing a non-calculator element of an exam at Levels 1 and 2.

Question 20: To what extent do you agree or disagree that we should set weightings for the assessment of underpinning skills, underpinning skills in an applied context and problem solving in an applied context in reformed functional skills qualifications in mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

The notion of 'underpinning skills, underpinning skills in an applied context and problem solving in an applied context' appears to be an attempt to map to the GCSE Mathematics assessment objectives. Functional Skills qualifications are not intended to be a GCSE-lite. Assessing problem solving in context automatically includes the assessment of 'underpinning skills' as learners need to be able to select appropriate mathematics and use it accurately (currently analysing).

Including assessment of 'underpinning skills' per se could reduce the demand of Functional Skills qualifications and undermine their purpose as tutors 'train' students in 'underpinning skills' rather than focussing on selecting and using mathematics to solve increasingly complex problems, in familiar then unfamiliar plausible adult contexts.

There is also a danger that schemes of work will place undue emphasis on the development of decontextualized skills (e.g. fractions, percentages, decimals) rather than developing these skills through problem solving. This would have a negative impact on learners' attitudes and learning, as used to happen with Key Skills.

Learners with particular needs e.g. dyslexia, dyscalculia, autism, may be able to use their mathematics consistently and accurately to solve problems, but may be unable to demonstrate technical competence with standard procedures. It is important that students are not disadvantaged by the reforms.

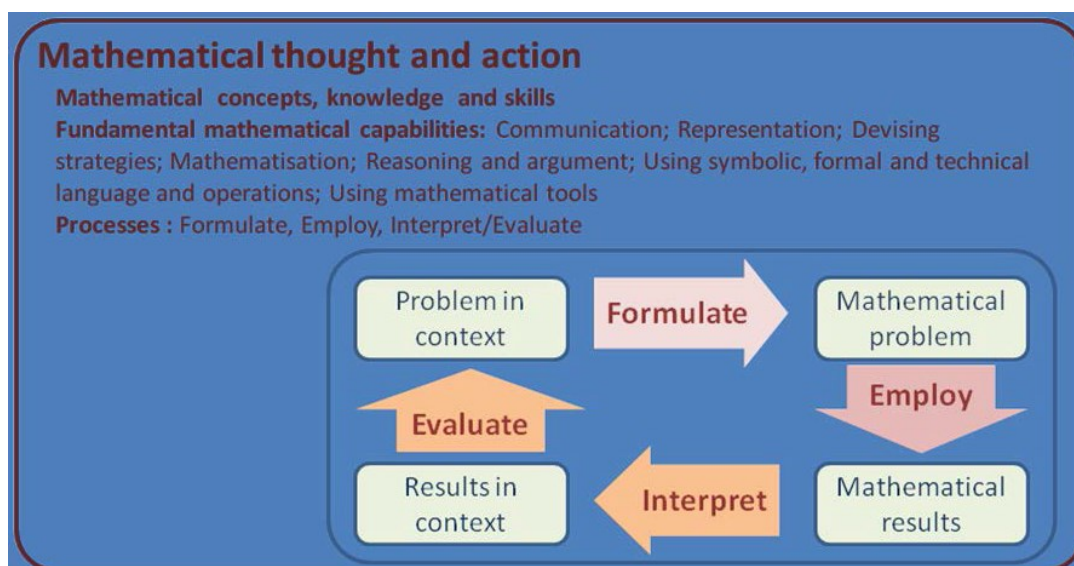
Question 21: To what extent do you agree or disagree that we should set greater emphasis on the assessment of underpinning skills in an applied context and problem solving in an applied context than on underpinning skills in reformed functional skills qualifications in mathematics?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

Assessing problem solving in context automatically includes the assessment of 'underpinning skills in an applied context' as learners need to be able to select appropriate mathematics and use it accurately (currently analysing) within the given context. Moving between the context and mathematics is an important part of mathematics problem solving.

The current Functional Skills qualifications were informed by the OECD's PISA mathematisation process. PISA assesses mathematical literacy defined as "an individual's capacity to formulate, employ, and interpret mathematics in a variety of contexts. It includes reasoning mathematically and using mathematical concepts, procedures, facts and tools to describe, explain and predict phenomena. It assists individuals to recognise the role that mathematics plays in the world and to make the well-founded judgments and decisions needed by constructive, engaged and reflective citizens." The [2015 framework](#) includes:



Question 22: To what extent do you agree or disagree that we should set a requirement that learners must pass each of the three content areas (reading, writing, and speaking, listening and communicating) in order to achieve an overall pass in functional skills qualifications in English?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 23: To what extent do you agree or disagree that we should set a weighting for spelling, punctuation and grammar that will apply to the writing assessments for functional skills qualifications in English?

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 24: To what extent do you agree or disagree that for those sections of online writing assessments where spelling, punctuation and grammar will be assessed for functional skills qualifications in English, we should set a requirement that disallows spelling, punctuation and grammar checks?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 25: Do you think that we should set a mark-based or a level-based approach to the assessment of Speaking, listening and communicating for functional skills qualifications in English? Please give reasons for your answer.

- Mark-based approach
- Level-based approach

Please explain your reasons

This response is focussing on mathematics only.

Question 26: To what extent do you agree or disagree that we should set mandatory common assessment criteria for speaking, listening and communicating at each level for functional skills qualifications in English?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 27: To what extent do you agree or disagree that we should set rules around the assessment of reading and spelling of words contained in the appendix of the subject content?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons

This response is focussing on mathematics only.

Question 28: We have set out the ways in which our proposals could impact (positively or negatively) on learners who share a protected characteristic.¹ Are there any potential impacts that we have not identified?

- Yes
- No

Please provide details:

We are concerned that the literacy demand of Functional Skills qualifications in mathematics is maintained as appropriate i.e. one level below the level of the qualification. It is important that the ability of providers to adapt Entry level assessments for their learners is maintained. Pre-release material is very important in this regard.

Question 29: Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on learners who share a protected characteristic?

Maintain the use of pre-release material, which can assist with familiarity and help to reduce literacy barriers.

Question 30: Do you have any other comments on the impacts of our proposals on learners who share a protected characteristic?

Learners with particular needs e.g. dyslexia, dyscalculia, autism, may be able to use their mathematics consistently and accurately to solve problems, but may be unable

¹ The term 'protected characteristics' is defined in the Equality Act 2010. Here, it means sex, disability, racial group, age, religion or belief, pregnancy or maternity, sexual orientation and gender reassignment.

to demonstrate technical competence with standard procedures. It is important that students are not disadvantaged by the reforms.

Question 31: Are there any regulatory impacts that we have not identified arising from our proposals?

It is important that Functional Skills qualifications maintain their identity as a qualification for life, work and future study and are not made to look like GCSE or other qualifications. It is important that any changes maintain the quality of current Functional Skills qualifications and strengthen comparability and public confidence.

Question 32: Are there any additional steps we could take to minimise the regulatory impact of our proposals?

Ensure that the system for maintaining standards is manageable and proportionate.

Question 33: Are there any costs or benefits associated with our proposals which we have not identified?

Functional Skills are already a valued brand by the 830 000 candidates who take them each year, and the employers and education providers who use them. It is important that the reforms do not damage what currently works but strengthens the provision, bringing greater comparability and even greater awareness of their relevance and currency.

Question 34: Is there any additional information we should consider when evaluating the costs and benefits of our proposals?

Take care not to damage the Functional Skills 'brand'.

About you

To evaluate responses properly, we need to know in what capacity you are responding to the consultation. We will only consider your response if you complete the following section. Questions marked with a * are required.

Name *: Sue Pope

Organisation (if applicable): MMSA (Meeting of Mathematics Subject Associations)ⁱ

Position (if applicable): Hon Sec

Is this a personal response or an official response on behalf of your organisation? *

Personal response (please answer the question 'If you ticked 'Personal response'')

Official response (please answer the question 'If you ticked 'Official response'')

If you ticked 'Personal response', which of the following are you? *

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (please state below)

If you ticked 'Official response', which of the following are you? *

Awarding organisation

Local authority

School or college (please answer the question 'School or college type' below)

Academy chain

Private training provider

University or other higher education institution

Employer

Other representative or interest group (please answer the question 'Type of representative group or interest group' below)

School or college type

Comprehensive or non-selective academy

State selective or selective academy

Independent

Special school

Further education college

Sixth form college

Other (please state below)

Type of representative group or interest group

Group of awarding organisations

Union

Employer or business representative group

Subject association or learned society

Equality organisation or group

School, college or teacher representative group

Other (please state below)

Nation*

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country: _____
- Non-EU country: _____

How did you find out about this consultation?

- Ofqual's newsletter
- Ofqual's social media channels
- Other social media channels
- Ofqual's website
- Internet search
- Other: Education channels

ⁱ The MMSA is a meeting between the “classroom facing” mathematical Subject Associations and is not an institution itself. The MMSA is a Special Interest Group (SIG) of the JMC*.

The MMSA exists to explore and promote issues of common interest. It acts as a single point of contact for external agencies where appropriate. MMSA is the principal vehicle for discussing joint work between the following associations:

The Association of Mathematics Education Teachers (AMET)

The Association of Teachers of Mathematics (ATM)

The Mathematical Association (MA)

The National Association of Mathematics Advisers (NAMA)

The National Association for Numeracy and Mathematics in Colleges (NANAMIC)

* The Joint Mathematical Council of the United Kingdom

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