

# Consultation on Implementing Functional Skills Reform

## How to respond to this consultation

The closing date for responses is **Friday 11 May at 17:00**.

Please respond to this consultation in one of three ways:

- [complete the online response](#) (click 'Respond online') on our consultation homepage
- complete this response form and either:
  - email your response to [consultations@ofqual.gov.uk](mailto:consultations@ofqual.gov.uk) – please include *Implementing Functional Skills Reform* in the subject line of the email and make clear who you are and in what capacity you are responding
  - post your response to: *Implementing Functional Skills Reform*, 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

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

If you are responding on behalf of an organisation and you are happy for Ofqual to attribute your response in our publications to your organisation, please provide the name of your organisation below.

**Organisation name:** MEI

## **Sharing your response**

We may share your anonymised response with the Department for Education.

The information you provide in response to our consultations, including personal information, may need to be disclosed in accordance with the Freedom of Information Act 2000 and the Data Protection Act 1998.

## **Confidentiality and contacting you**

To maintain your confidentiality, you are not required to provide your name or any information that will identify you. However, Ofqual may sometimes follow-up responses received. If you are happy to be contacted with regard to your response please complete the details below.

**Name:** Charlie Stripp

**Position (if applicable):** Chief Executive

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**Email:** [Charlie.stripp@mei.org.uk](mailto:Charlie.stripp@mei.org.uk)

## Consultation questions

**Q1: To what extent do you agree or disagree with our proposed approach to setting rules for assessment strategy documents?**

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

**Please provide any comments:**

This approach seems to be broadly in line with the requirements for other national qualifications.

**Q2: To what extent do you agree or disagree with our proposed rules around the technical evaluation process?**

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

**Please provide any comments:**

**Q3: To what extent do you agree or disagree with our proposed approach to interpreting the subject content requirements for new FSQs in English?**

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

**Please provide any comments:**

**Q4: To what extent do you agree or disagree with our proposed approach to interpreting the subject content requirements for new FSQs in mathematics?**

- Strongly agree  
 Agree  
 Neither agree nor disagree  
 Disagree  
 Strongly disagree

**Please provide any comments:**

The interpretation of the subject content requirements includes the guidance on problem solving. There are three parts to this guidance.

1. *That questions assessing mathematical problem solving should not add to the complexity of the qualification. We agree with this.*
2. *That questions and tasks assessing problem solving are likely to have attributes A and C on page 23 of the draft conditions and guidance and may, or may not, have the other attributes. We agree that this is suitable for Functional Skills qualifications.*
3. *Problem solving questions and tasks should comply with the expectations in Table 1 on page 24 of the draft conditions and guidance. We strongly disagree with this. Some of the expectations of Table 1 contradict both the purpose of Functional Skills qualifications and the following paragraph which precedes Table 1.*

*“We expect problem solving questions and tasks to involve the type of cognitive operations and processes typically encountered in everyday life. The context within which a question or task is set should be relevant and not superfluous to the question or task.”*

At Level 2, Table 1 indicates the expectation that learners will address problems “some of which draw upon a combination of all three areas from the subject content and require students to make connections between those content areas”.

The three areas in the subject content are as follows.

- number and the number system;
- common measures, shape and space;  
and
- information and data.

MEI has considerable experience in curriculum and qualification design, including designing realistic contextual tasks. In spite of this, we are unable to

think of realistic tasks suitable for Level 2 which bring together Level 2 content from all three content areas, require the student to make connections between all three content areas and involve the type of cognitive processes involved in everyday life.

At Entry Level, a Table 1 requirement is that learners address problems “each of which draws upon knowledge and/or skills from **one** of the three areas from the subject content”. However, many problems focussed on measures, shape and space will also naturally require an understanding of number. We think it will be difficult to set tasks in the content areas of shape and data which do not also require counting, writing numbers or other number skills. Even the most basic kinds of real life problems, appropriate to Entry Level, can involve knowledge from more than one of the three areas in the subject content.

The requirements of the “address individual problems” column of Table 1 will not encourage suitable assessment of Functional Skills Mathematics and should be removed.

**Q5: To what extent do you agree with our proposed minimum and maximum overall assessment time requirements in English?**

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

**Please provide any comments:**

**Q6: To what extent do you agree with our proposed minimum and maximum overall assessment time requirements in mathematics?**

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

**Please provide any comments:**

**Q7: To what extent do you agree or disagree with our proposed approach to setting rules around the contextualisation of the reading and writing assessments at the entry levels?**

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

**Please provide any comments:**

**Q8: To what extent do you agree or disagree with our proposal to set a rule on awarding organisations to provide guidance to centres around any setting, adaptation, delivery or marking of assessments that they undertake?**

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

**Please provide any comments:**

**Q9: To what extent do you agree or disagree with our proposal to put in place guidance on assessment availability?**

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

**Please provide any comments:**

**Q10: To what extent do you agree or disagree with our proposal to mandate a common approach to issuing results, so that all learners who do not meet the required standard receive a result of 'Fail'?**

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

**Please provide any comments:**

We agree that the grading system should be pass/fail and that those learners who do not pass should receive a result of 'Fail' so, initially, we agreed with this proposal.

However, there does not seem to be anywhere else in the consultation where the requirement (b)(ii) (found on p13) for FSM5.2(b) is addressed. The requirement that candidates who have not taken all the necessary assessments automatically fail is unfair. Consider a Mathematics qualification which has two assessments one worth 25% without a calculator and one worth 75% with a calculator. The pass mark is a total over both the assessments. A candidate who gets enough marks in the calculator assessment could pass even if he/she scored zero in the non-calculator assessment as long as he/she was present for both assessments but another candidate with an identical mark in the calculator assessment who had not attended for the non-calculator assessment would fail. Candidates with equal marks should get the same grade – turning up for an assessment should not make the difference between passing and failing.

**Q11: To what extent do you agree or disagree with our proposed approach to setting rules around the number of assessments and tasks in the reading; writing and speaking, listening and communicating components?**

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

**Please provide any comments:**

**Q12: To what extent do you agree or disagree with our proposed approach to the assessment of the reading expectations?**

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

**Please provide any comments:**

**Q13: To what extent do you agree or disagree with our proposed approach to the assessment of the spelling expectations?**

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

**Please provide any comments:**

**Q14: To what extent do you agree or disagree with our proposed approach to setting guidance around the use of language and stimulus materials that is in line with the reading and spelling expectations set for each entry level?**

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

**Please provide any comments:**

**Q15: To what extent do you agree or disagree with our proposed weighting ranges for spelling, punctuation and grammar at both levels 1 and 2 and at the Entry levels?**

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

**Please provide any comments:**

**Q16: To what extent do you agree or disagree with our proposed common assessment criteria?**

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

**Please provide any comments:**

**Q17: To what extent do you agree or disagree with our proposal to require awarding organisations to produce exemplar materials to support assessor judgements in relation to the speaking, listening and communicating component?**

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

**Please provide any comments:**

**Q18: To what extent do you agree or disagree with our proposal to disapply our General Condition of Recognition H2 (moderation where an assessment is marked by a centre) in respect of the speaking, listening and communicating component?**

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

**Please provide any comments:**

**Q19: To what extent do you agree or disagree with the monitoring arrangements we are proposing to put in place for the speaking, listening and communicating component?**

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

**Please provide any comments:**

**Q20: To what extent do you agree or disagree with our proposal to produce guidance to clarify that the use of sign language is permitted as a reasonable adjustment in new FSQs in English?**

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

**Please provide any comments:**

**Q21: To what extent do you agree or disagree with our proposed approach to the number of assessments in new FSQs in mathematics?**

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

**Please provide any comments:**

We agree that it should be possible to either have a single assessment or two assessments (one with and one without calculator) and that there should be a single pass mark for the qualification. However, we note that the intention expressed in paragraph 5.7 of the consultation document that the non-calculator assessment should not be a hurdle is at odds with the requirement (b)(ii) for condition FSM5.2(b) (see our response to question 10).

**Q22: To what extent do you agree or disagree with our proposed approach to the coverage of subject content in new FSQs in mathematics?**

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

**Please provide any comments:**

Functional Skills is more about being able to use content in realistic situations than it is about knowing the content. We agree that all the content should be taught but some of it will arise more frequently in everyday contexts and it is reasonable that this is reflected in assessments.

**Q23: To what extent do you agree or disagree with our proposed approach to the weightings for calculator- and non-calculator based assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

**Please provide any comments:**

25 % of the assessment without a calculator seems reasonable.

**Q24: To what extent do you agree or disagree with our proposed approach to the weightings for underpinning skills and problem solving?**

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

**Please provide any comments:**

We agree that problem solving and questions focussed on the underpinning mathematical content should appear on both calculator and non-calculator papers. It seems as if the intention is that 75% of the marks should be allocated to questions where the main focus is problem solving – this is a reduction from the current 100%. Questions which assess problem solving will also assess the underlying mathematics – if it is envisaged that marks within individual assessment items will be split between problem solving marks and underpinning marks then 75% for problem solving is too much. However, if the intention is as written, namely that all the marks for an assessment item are allocated to *either* problem solving *or* underpinning then 75% for problem solving may not be enough.

**Q25: To what extent do you agree or disagree with our proposals around the use of evidence to support standard setting?**

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

**Please provide any comments:**

**Q26: To what extent do you agree or disagree with our proposals around maintaining standards in reformed FSQs?**

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

**Please provide any comments:**

**Q27: Do you have any comments on our proposed rules and guidance for new FSQs in English?**

No

**Q28: Do you have any comments on our proposed rules and guidance for new FSQs in mathematics?**

See responses to earlier questions.

**Q29: Are there any regulatory impacts that we have not identified arising from our proposals?**

No response

**Q30: Are there any additional steps we could take to minimise the regulatory impact of our proposals?**

No response

**Q31: Are there any costs or benefits associated with our proposals which we have not identified?**

No response

**Q32: Is there any additional information we should consider when evaluating the costs and benefits of our proposals?**

No response

**Q33: Do you have any comments on any ways in which our proposals will prevent innovation by awarding organisations?**

No response

**Q34: We have set out the ways in which our proposals could impact (positively or negatively) on learners who share a protected characteristic.<sup>1</sup> Are there any potential impacts that we have not identified?**

No response

**Q35: Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on learners who share a protected characteristic?**

No response

**Q36: Do you have any other comments on the impacts of our proposals on learners who share a protected characteristic?**

No response

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<sup>1</sup> 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.

## 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.

**Organisation (if applicable): \***

MEI

**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)

MEI is a charity and a membership organisation. It is an independent curriculum development body for mathematics. It is a major provider of mathematics teaching and learning resources, and of mathematics CPD for secondary school and post-16 mathematics teachers.

MEI developed and manages the DfE-funded Further Mathematics Support Programme and will manage the successor DfE-funded Advanced Mathematics Support Programme. MEI plays a key role in the management of the National Centre for Excellence in Teaching Mathematics. MEI was responsible for developing, and provides resources and CPD for, a suite of GCE Mathematics qualifications and two Core Maths qualifications run by OCR.



**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: update email\_\_\_\_\_