

Reforming functional skills qualifications in English and maths

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 maths) 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:

Email: Charlie.stripp@mei.org.uk

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

This seems a sensible approach to ensure that the content is adequately assessed but without being too restrictive.

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

The consultation document states that underpinning knowledge will be assessed and that, for mathematics, this includes working without access to a calculator. That would imply at least two assessments – one with and one without a calculator. It is not clear what all the underpinning knowledge consists of – it is only referred to in passing in the content document so it is not possible to say whether the number of assessments should be specified any more than to say that there should be at least two. However, the practicalities of delivery of the assessments for the wide variety of centres should also be taken into account.

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

This seems to balance the risks with the needs of the learners and centres in an appropriate way.

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

We think it sensible to keep the current arrangements for mathematics, as proposed. We have no view about the English assessments.

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

English is not part of our expertise.

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

A high level of flexibility in terms of availability makes comparability more of a challenge but this level of flexibility is important for the wide variety of candidates for these qualifications.

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

This seems to fit the purpose of the qualifications

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

This is a desirable approach to ensure comparability of standards between qualifications from different awarding bodies but will bring challenges in terms of financing pre-testing and determining whether the sample is sufficiently representative.

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

In terms of awarding, it is important to ensure that the cohort is large enough. It might still be possible for there to be more than four assessment opportunities if the approaches referred to in question 8 were followed.

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

We agree that it is important to ensure that the standards are set correctly in the first year of awards. However, it is difficult to either agree or disagree with a non-specific proposal

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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

This is essential in view of the currency of these qualifications and the high number of awarding bodies likely to be involved in offering them.

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

This is outside our area of expertise.

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

This is essential to ensure that the integrity of the qualifications is maintained.

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 is essential to ensure that the qualifications are respected.

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

This is in line with the approach taken at GCSE and seems desirable if the qualifications are to be of the same standard. However, it is not sufficient to ensure comparability of standards between qualifications from different award bodies. In particular, it is surprising that the consultation document does not outline any measures to address the problem that meeting the rules for accreditation may not ensure comparability of standards of the assessments. Ofqual has experience of comparability studies at both GCSE and A level and the experience of GCSE

Mathematics shows that assessments which meet all the rules thought of before accreditation do not necessarily end up at the same level of difficulty.

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

There should be a minimum period of time where the legacy qualifications are available to enable learners currently on the course to have sufficient time to complete it. It is not clear whether 12 months would be long enough for all learners to complete their courses.

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 very much depends on what the final content is; whether there is some kind of “not in context” assessment and how wide the content ranges are. The intention should be that the full range of content needs to be taught and so it should all be assessed over time. Narrow ranges for content areas should be avoided as this will make it harder to assess candidates’ functionality – an extended problem solving scenario may well make use of only a subset of the total content.

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

See response for question 17; it very much depends on what the final content is and how it is to be assessed.

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 approach for GCSE (9-1) was to set a weighting range for non-calculator assessment; this is quite wide. The approach to non-calculator assessment in Functional Skills should not be more restrictive than the approach at GCSE so strict weightings would not be appropriate. It may be appropriate to have different weightings at different levels but consideration also needs to be given to the practicality of delivery of functional skills assessments in the wide variety of centres in which they are taken. It is likely that a non-calculator assessment would have a small weighting in comparison to the overall functional skills qualification.

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

It is not possible to agree with this approach since “underpinning skills” are not defined anywhere. The content document from the DfE speaks about “underpinning knowledge” but that is not defined either. If “underpinning skills” means “ability to work without a calculator” then the sensible approach would be to assess problem solving in an applied context with a calculator and problem solving in an applied context without a calculator.

It may be appropriate to include some questions which assess mathematical fluency out of context at entry level; at levels 1 and 2 the underpinning skills will be assessed as students work in realistic contexts.

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

See response to question 20. All assessment of working in context and of problem solving includes some assessment of underpinning skills. Care must be taken not to design rules which encourage poor assessment of problem solving in order to meet the rules at a minimal standard.

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 is outside our area of expertise.

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 is outside our area of expertise.

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 is outside our area of expertise.

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 is outside our area of expertise.

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 is outside our area of expertise.

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 is outside our area of expertise.

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:

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?

no

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

no

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

The 2015 review of Functional Skills qualifications

<https://www.gov.uk/government/publications/improving-functional-skills-qualifications> resulted in awarding bodies being required to improve their qualifications. The post results review outlined in paragraph 3.19 is likely to require some changes; with the

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.

possibility of four assessment opportunities a year this may require rewriting of papers already written or in production.

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

We are not able to identify any.

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

We are not able to identify any.

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

We are not able to identify any.

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 *: Charlie Stripp

Organisation (if applicable): MEI

Position (if applicable): Chief Executive

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. 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

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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: _____