Analysis of responses to our consultation on Functional Skills Qualification reform – English and mathematics

Contents

Executive Summary

Our consultation on Functional Skills qualification reform – English and mathematics took place between 27 September and 22 November 2017. The consultation questions were available to either complete online or to download. A copy is available at www.gov.uk/government/consultations/reforming-functional-skills-qualifications-in-english-and-maths

There were 100 responses to the consultation. Of these responses 98 were in a form that matched or broadly followed the layout of the online consultation. Two responses were written submissions which were not included in the quantitative data analysis, but were considered within the qualitative sections. 60 per cent of the responses were from individuals, mostly from teachers, while 40 per cent were from organisations.[1]

1.   Introduction

The consultation on Functional Skills qualification reform – English and mathematics

This report is a summary of the views expressed by those who responded to our consultation.

Background

The Department for Education has taken the decision to reform Functional Skills qualifications in English and mathematics across all five levels (Levels 1 and 2 and Entry levels 1, 2 and 3). The Department for Education has determined that the reformed qualifications in English and mathematics will have common subject content with a view to specifying expectations and increasing comparability across awarding organisations. The detailed subject content is the responsibility of government and was consulted on separately by the Department for Education.[2] When finalised, we will adopt this into our regulatory framework.

The reformed Functional Skills qualifications will be introduced for first teaching from September 2019.

Our consultation on Functional Skills qualification reform – English and mathematics sought views on our proposed approach to regulating reformed Functional Skills qualifications in English and mathematics across all five levels.

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[1] These percentages include the two written responses which were not in a form that matched or broadly followed the layout of the online consultation.

[2] https://www.gov.uk/government/consultations/maths-and-english-functional-skills-revised-subject-content

2. Who responded?

We received a total of 100 responses to our consultation.[3] There were 98 responses to the consultation questions[4] and two written submissions which did not fit the format of the consultation and were considered separately.[5] We do not include the two written submissions in the detailed breakdown of responses in section 4, as those responses did not answer the consultation questions we set out.

Of those responses which gave their respondent type, 60 were from individuals and 40 were from organisations. All the responses were from individuals or organisations based in England or Wales.

Personal / organisation response	Respondent type	Number
Personal	Teacher	39
Personal	Educational consultant	3
Personal	Centre manager	14
Personal	Other	4
Organisation	School/college/academy chain/private training provider	7
Organisation	Other representative or interest group	17
Organisation	Awarding organisation	11
Organisation	Local authority	5

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[3] Where responses were received in hard copy we entered them into the online platform.
[4] Where responses which followed the format of the consultation were received in hard copy we entered them into the online platform.
[5] These two responses are not included in the quantitative analysis that follows. See section 3 on our approach to analysis.

3. Approach to analysis

The consultation included 34 questions and was published on our website. Respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us.

This was a consultation on the views of those who wished to participate and, while we tried to ensure that as many respondents as possible had the opportunity to reply, it cannot be considered as a representative sample of any specific group.

We present the responses to the consultation questions in the order in which they were asked.

The consultation asked questions which were focused on the design, delivery and award of Functional Skills qualifications, and the detail of how to maintain standards across awarding organisations and over time. Respondents could choose to answer all or just some of the questions.

For some of the questions, respondents could indicate the extent to which they agreed with our proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree), as well as providing free-form narrative comments on our proposals.

Not all respondents expressed a preference using the 5-point scale, with some only providing a comment. Likewise, not all respondents who expressed a preference on the scale provided a comment and, of those who did, not all comments were relevant to the question.

Other questions allowed respondents to say whether they had any comments to make on a proposal, and if they said yes, allowed them to provide free-form narrative comments. For these questions we set out whether respondents replied 'yes' or 'no' and analyse any comments made.

During the analysis phase we reviewed every response to each question, and also the two responses that did not follow the format of the consultation (though these responses are not included in the figures which set out the number of responses received to each question).

4.   Views expressed – consultation response outcomes

In this section we report the views, in broad terms, of respondents to the consultation.

Appendix A lists the organisations who responded to the consultation.

> **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?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	17		
Agree	32	39	10
Neither agree nor disagree	5	3	2
Disagree	30		
Strongly disagree	7	17	20

Of those respondents who agreed, many commented that there should be a minimum time to allow learners sufficient time to respond and evidence their competency; this ensured that assessments were designed to provide a valid assessment of skills and competence.

Many respondents commented that minimum assessment times would improve comparability across awarding organisations.

Some suggested a maximum time should also be set and improving consistency across awarding organisations was seen as a desirable outcome.

Some respondents highlighted concerns with the duration of assessments and whether we should introduce requirements setting minimum, but no maximum overall assessment times. Comments suggested that:

- clear provision should be made to take into account learners' individual needs (including LDD, ESOL or SEN learners, who may need more time that was currently allowed)
- some assessments could have no time limit and that this would assist those who read more slowly or have mathematics anxiety

Of the respondents who disagreed and provided a comment, many suggested that a maximum time should be used to ensure consistency and comparability between awarding organisations. This included all awarding organisations who responded to this question.

Some respondents expressed concerns regarding the implications of not having a minimum and maximum assessment time, stating that different or no maximum times could cause confusion over the difficulty of the paper. It was also thought that maximum times reflected real-world situations.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment it was felt that both a minimum and maximum assessment time was appropriate. One respondent considered the difficulty for centres is there were no maximum time, whilst another felt the times (especially the minimum) needed to reflect the increased difficulty of the qualifications.

> **Question 2 – To what extent do you agree or disagree that we should <u>not</u> set requirements around the number of assessments within individual Functional Skills qualifications?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	8	19	14
Agree	25		
Neither agree nor disagree	20	17	3
Disagree	24	20	15
Strongly disagree	11		

Of those respondents who agreed with the proposal and provided a comment, many felt that it would provide awarding organisations and centres flexibility to meet the needs of learners. Other comments included:

- the current system worked well
- the proposal is more appropriate for Entry level
- that awarding organisations should explain their rationale for the number of assessments in an assessment plan

Concerns were expressed that requirements around the number of assessments could delay the development of online assessments and that there could be issues regarding the comparability between awarding organisations.

Of the respondents who disagreed with the proposal and provided a comment, the majority thought the number should be set to provide consistency, quality assurance and comparability between awarding organisations. Of these, two thought that assessments should be varied according to individual learners' needs and one thought the lack of consistency could possibly be addressed by guidance on assessment strategies.

Some respondents commented on the number and nature of assessments that should be set, including:

- there should be a minimum number of core assessments in areas such as Reading, Writing, and Speaking, listening and communicating in English
- there should not be any more assessments than under current arrangements
- that methods should be standardised across awarding organisations
- Ofqual should decide on a linear or module approach to ensure comparability (with a preference for a linear approach)
- that formative assessment should be included as part of the summative process
- learners should not be able to take an assessment an unlimited number of times

Some respondents found this question hard to answer while the content and requirements had not been finalised, as these could determine the number of assessments needed.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment it was noted that consistency between awarding organisations would be desirable, but that if providers had the option between different assessment measures they could select the most appropriate measure for their learners.

The respondent who did not provide a response on the 5-point scale stated that we should consult with awarding organisations as to the right number of assessments.

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 assessments?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	40	45	26

Agree	31		
Neither agree nor disagree	8	6	2
Disagree	6	6	5
Strongly disagree	5		

Of those respondents who agreed with the proposal, and provided a comment many considered that the current system works and that it shouldn't be changed. It was felt that the proposal provided flexibility for centres, while reducing stress for learners by providing a familiar context and setting for the assessment.

When considering the impact of the proposal on awarding organisations, it was felt that the proposal gave them the ability to take control where they found discrepancies in a centre's assessment procedures and that they should be encouraged to work with centres to improve their assessment processes. In order to ensure the credibility of assessments, it was thought that awarding organisations should give clear guidance to centres.

Of the respondents who disagreed with the proposal, and provided a comment, some raised a concern over a lack of consistency, comparability and quality assurance between centres. Others thought that centres should be able to mark assessments subject to quality assurance by the awarding organisation.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	57	52	33
Agree	28		
Neither agree nor disagree	1	1	0
Disagree	5	4	1
Strongly disagree	0		

Of those respondents who agreed with the proposal, and provided a comment many agreed that the proposal provides quality assurance, consistency and comparability with respect to awarding organisations, centres and the marking of assessments. The current system was considered to be working well and should not be changed; this would mirror the approach to other Level 1 and 2 qualifications. The need for

quick turnaround on marking and for copies of the marked scripts to be available for centres was noted by some.

The respondents who disagreed with the proposal, and provided a comment, felt that some teacher assessment should be allowed (either to allow for the development of project based assessments or at Level 1 only). A lack of feedback for learners was noted, as was a concern about reduced flexibility.

Question 5 − To what extent do you agree or disagree that at Levels 1 and 2 for the Speaking, listening and communicating assessment(s) in English we should allow, but not require, centres to set and mark the assessments?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	41	38	25
Agree	22		
Neither agree nor disagree	14	11	3
Disagree	8	5	5
Strongly disagree	2		

Of those respondents who agreed with the proposal and provided a comment, many thought that the current system worked well and the proposal provided flexibility for the assessment to be in a context which is relevant to the student; being able to use a supplied or adjusted topic provided a wider range of scenarios for learners. Awarding organisations were requested to provide clear guidance and monitoring of centres to ensure the integrity of assessments, while some felt it would not be effective for awarding organisations to mark and set assessments, as that this would place undue strain on them.

Of the respondents who disagreed with the proposal and provided a comment, some thought that externally setting assessments would provide greater comparability. One considered that centres should be required to set assessments but with external moderation at least once for each level to maintain standards between centres.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment:

- one thought that centres should mark but not set assessments
- one was concerned that if a representative from an awarding organisation was present at the assessment this would be intimidating for learners

- one thought that the Speaking, listening and communicating standards are open to interpretation and would be better assessed externally
- one noted that the rigorous standards for Level 2 could be more consistently maintained by external assessment

Question 6 − To what extent do you agree or disagree that we should <u>not</u> place any restrictions around availability of assessments in reformed Functional Skills qualifications?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	62	51	26
Agree	15		
Neither agree nor disagree	6	4	2
Disagree	5	0	7
Strongly disagree	2		

Of those respondents who agreed with the proposal, and provided a comment, many noted the need for flexibility in assessments to meet the needs of learners, employers and centres. Seven of these responses noted this was particularly important for learners with work commitments, and four that this allows for assessment when the learner and assessor consider it appropriate. Four raised concerns that restrictions could hinder the completion of short courses and apprenticeships.

Of the respondents who disagreed with the proposal, and provided a comment, issues of comparability and security were raised. It was felt that there should be regulations around scheduling and that while the flexibility of the qualification was important, there should be regulations about the length of assessment sessions. These should not be protracted and should not span different weeks.

The respondent who did not provide a response on the 5-point scale (an organisation) considered that there appeared to be a move towards restricted assessment and awarding windows but that flexibility is required by learners.

One of the respondents who provided a written response outside of the question structure thought that adult learners require flexibility and thought that restrictions should not be placed on assessments.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	46	40	30
Agree	25		
Neither agree nor disagree	4	2	2
Disagree	13	14	0
Strongly disagree	1		

Of those respondents who agreed with the proposal, and provided a comment, many thought that the proposal supported the clear distinction between levels and avoided confusing stakeholders. Respondents considered pass or fail was appropriate to the competency-based nature of Functional Skills qualifications and avoided an undue focus on grades. Some thought that awarding organisations should allow learners and centres to view the marks received by learners and to provide feedback on their results.

Of the respondents who disagreed with the proposal, and provided a comment, some thought that there should be a graded approach to motivate learners and indicate the strength of their results. It was also thought that awarding organisations should be required to publish marks and provide feedback to learners to assist with resits and progression.

Of the respondents who neither agreed nor disagreed with the proposal, and provided a comment, one thought that there should be pass or fail grading but for each individual skill as an individual award.

One of the respondents who provided a written response outside of the question structure gave tentative support to the pass or fail grading model, provided the reformed qualifications were designed for this from the start. The response noted that there needs to be reassurances that the results are comparable from one awarding organisation to another and there are clear views of where the pass marks lie.

Question 8 − To what extent do you agree or disagree that, at Levels 1 and 2, awarding decisions made <u>before</u> assessments have been taken by all learners involved must either: use pre-set pass marks based on rigorous pre-testing of the assessments; or in setting pass marks, draw on evidence from the actual performance of a sufficiently representative sample of the anticipated cohort?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	32	45	27
Agree	40		
Neither agree nor disagree	11	2	5
Disagree	6	9	2
Strongly disagree	1		

Of those respondents who agreed with the proposal, and provided a comment it was thought that the proposal would improve the validity, comparability and consistency of awards especially across years; it was also thought that having set pass marks allows learners and centres to understand what is expected of the learner and to better prepare.

Some thought Ofqual should set clear guidelines on what constitutes 'rigorous pre-testing' and a 'sufficiently representative sample' to ensure robust pass marks and issues relating to the difficulties in financing pre-testing and determining if a sample is sufficiently representative were raised.

Of the respondents who disagreed with the proposal, and provided a comment, most highlighted difficulties with pre-testing and obtaining a representative sample for smaller awarding organisations and so the proposals were only beneficial for large awarding organisations. It was suggested that pass marks could be set based on a small sample which could be reviewed as more learners take the assessment. Of the respondents who neither agreed nor disagreed with the proposal and provided a comment, it was felt the approach should be consistent across all awarding organisations, to ensure the process is transparent. Another respondent thought that both methods were acceptable if they did not limit flexibility or the number of assessment windows in one year.

Question 9 – To what extent do you agree or disagree that, at Levels 1 and 2, for awarding decisions made <u>after</u> 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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	7	9	4
Agree	6		

Neither agree nor disagree	21	16	5
Disagree	25	34	5
Strongly disagree	31		

Of those respondents who agreed with the proposal and provided a comment, it was thought that four sittings per year provided sufficient time for retraining between resits, and that the proposal would ensure learners and teachers were aware of the dates of the awarding windows, making matters easier.

Of the respondents who disagreed with the proposal, and provided a comment, many considered that adult learners needed flexibility and that the proposal was too restrictive. Half of these responses thought that the proposal created particular problems for rolling programmes such as apprenticeships and learners in custody. The majority of awarding organisation respondents disagreed with the proposal, expressing the view that it was too restrictive.

Of the respondents who neither agreed nor disagreed with the proposal, and provided a comment, one agreed with the intention of our proposal to ensure awarding is robust, but was unsure whether it would be effective. In order to ensure that awarding of each test version is based on a statistically robust sample of results, it would seem necessary to consider either restricting the number of test versions based on the awarding organisations overall entry, or giving guidance on the minimum number of results which must be used for awarding. The response considered the latter to be the most effective approach. The response noted that if regulation is in place to ensure that all awarding organisations apply appropriate rigour and use sufficient evidence in making awarding decisions then this additional measure should not be necessary.

Of the two responses which provided a comment without providing a response on the 5-point scale:

- one thought that there should be more than four awarding sessions or that there may be better methods to ensure rigorous monitoring by awarding organisations.
- one considered the proposal to be a move towards restrictive assessment and awarding windows which was not appropriate in the post-16 sector where more flexibility is needed. Adult learners on rolling courses need to be able to sit assessments at a convenient time and apprentices have time restrictions that are not consistent with set assessment opportunities.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	15	30	26
Agree	41		
Neither agree nor disagree	24	21	3
Disagree	5	4	4
Strongly disagree	3		

Of those respondents who agreed with the proposal, and provided a comment, it was noted that this would allow for any modifications to be made following introduction of the reformed Functional Skills qualifications and that Ofqual should be willing to closely monitor awarding organisations. It was also thought that this approach would provide for consistency in future assessments and allow for a smoother transition.

Of the respondents who disagreed with the proposal and provided a comment, one did not think that a different approach to regulation would be required if awarding is robust from the outset and requested further details of any proposed regulations.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment it was thought that the approach would depend on the content of the regulations and their impact on learners, with one of these noting that it is important that standards are set correctly in the first year of awards. Another noted that scrutiny of awarding strategies as part of the up-front evaluation process should be sufficient to reassure Ofqual that the proposal is not required.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	18	29	28
Agree	39		
Neither agree nor disagree	24	19	5
Disagree	4	3	2
Strongly disagree	1		

Of those respondents who agreed with the proposal, and provided a comment, many considered that the proposal would ensure the comparability and credibility of assessments. Four thought the proposal would be beneficial to awarding organisations as a source of feedback and evidence of compliance with Condition H3.1(c), but that pre-standardisation would be necessary by ensuring there was a shared understanding of the Pass criteria.

Of the respondents who disagreed with the proposal and provided a comment, one did not see the need if correct procedures were in place.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment, some thought that the proposal may not be necessary if rigorous quality assurance procedures are put in place throughout. Another respondent thought the proposal should be used for the first year of awarding.

> **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, and is tailored to the fact that these assessments are likely to be centre-set and marked?**

Responses from those who responded to this question were as follows:

	Total	**Individuals**	**Organisations**
Strongly agree	18	45	23
Agree	50		
Neither agree nor disagree	13	7	6
Disagree	4	2	4
Strongly disagree	2		

Of those respondents who agreed with the proposal and provided a comment, many thought that the proposal would improve comparability, consistency and validity between assessment results. Some thought that there should be a consistent approach to moderation across awarding organisations which is proportionate to the nature of Entry level qualifications. Concerns that the proposal might restrict flexibility were also raised.

Of the respondents who disagreed with the proposal and provided a comment, some thought that the proposal was unnecessary, or struggled to see how the proposal would work in practice.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment, it was noted that it is important that actions taken to ensure public confidence are not unduly burdensome and do not interfere with providing positive learning and assessment experiences. It was thought that improvement of Entry levels should focus on the quality of teaching and learning rather than assessment methods and their quality assurance.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly Agree	30	48	24
Agree	42		
Neither Agree nor Disagree	8	2	7
Disagree	7	6	2
Strongly Disagree	2		

Of those respondents who agreed with the proposal and provided a comment, many considered that the proposal would ensure the quality, comparability and consistency of the qualifications across organisations. Furthermore, it was noted that there should be consistency in the way that awarding organisations monitor centres.

Of the respondents who disagreed with the proposal and provided a comment, some did not see the need for the proposal as the requirements are already laid out in the General Conditions of Recognition.

Of the respondents who neither agreed nor disagreed with the proposal and provided a comment, it was thought that the current system is adequate, with one noting that faster response times from awarding organisations and dedicated exam help lines would be helpful.

One of the written responses outside the question structure noted that the reliability and quality of the reformed qualifications would be aided by an increase in the expectations and quality assurance of assessment processes by providers. It was thought that inspection and monitoring by awarding organisations should be more rigorous.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	44	52	27
Agree	35		
Neither agree nor disagree	2	1	1
Disagree	5	2	4
Strongly disagree	1		

Of those respondents who agreed with the proposal, and provided a comment, many considered that current guidance was lacking and inconsistent between awarding organisations and that there should be regulations to ensure consistency. Respondents thought the proposal would ensure quality, consistency and comparability of results across organisations, and that where guidance was already provided this currently worked well.

The respondents who disagreed with the proposal, and provided a comment considered that this was already provided for by the General Conditions of Recognition and so did not see the need for additional requirements.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	46	50	32
Agree	36		
Neither agree nor disagree	3	2	1
Disagree	1	1	0
Strongly disagree	0		

Of those respondents who agreed with the proposal, and provided a comment, many thought that a formal assessment strategy would make assessment clear and transparent to awarding organisation staff and consultants, centre staff and learners, with some noting that information was currently lacking from some awarding organisations' websites and documentation. Some thought that it would assist with

learner and centre decision-making when selecting an awarding organisation. Others felt that the proposal would ensure consistency between awarding organisations, with some suggesting that a template or clear guidance could be useful to support this.

The respondent (an individual) who disagreed with the proposal thought that it would not be needed if Ofqual's guidelines are sufficiently robust.

> **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?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	26	40	19
Agree	33		
Neither agree nor disagree	10	7	3
Disagree	14	34	5
Strongly disagree	6		

Of those respondents who agreed with the proposal and provided a comment, many thought that the proposal provided an opportunity for learners to complete the qualifications they had started, and that this proposal would allow for an easy transition and ensure standardisation. However, some suggested that 18 months might be more suitable, and a potential problem for work-based and apprentice learners on an 18-month apprenticeship was highlighted.

Of the respondents who disagreed with the proposal, and provided a comment, there was disagreement as to whether the time period should be shorter or longer. Some raised concerns that the volume of learners sitting the reformed qualifications would be low until the legacy qualifications are withdrawn and suggested that the timescale should be shortened. One acknowledged that the funding arrangements could limit this problem. The majority of awarding organisations who responded to this question disagreed with our proposal on the basis that it would create additional regulatory burden to run the two qualifications in parallel.

The respondent who provided a comment without providing a response on the 5-point scale thought that the proposed timescale seemed generous.

One written response outside the question structure thought that the timescale should be a minimum of 12 months.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	21	31	24
Agree	34		
Neither agree nor disagree	22	12	10
Disagree	12	12	2
Strongly disagree	3		

Of those respondents who agreed with the proposal, and provided a comment, many thought that the proposal would improve comparability across awarding organisations, reliability across different assessments and aid consistency in assessment and marking. Some respondents welcomed the inclusion of weighting ranges to content areas but thought that any ranges should have a degree of tolerance that can be applied to individual assessments to avoid compromising the question writing process.

One respondent suggested that underpinning skills should be assessed without a calculator and problem solving with a calculator. The weighting of the three stages of problem solving should allow for proportionate assessment of comprehension and communication as well as mathematical operations.

Of those respondents who disagreed with the proposal, and provided a comment, some felt that different pathways would require different weightings, dependent of the specific skills needed within a particular industry. Another felt that weightings are unnecessary, providing that assessments cover all the required content.

Of those respondents who neither agreed nor disagreed and provided a comment, many felt they would need to know more details surrounding the proposed weightings before making a decision. Some respondents were unsure about the proposal, as they were not mathematics specialists.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	11	25	16
Agree	30		
Neither agree nor disagree	30	14	5
Disagree	14	17	13
Strongly disagree	5		

Of those respondents who agreed with the proposal and provided a comment, many thought that the Entry levels should have a high weighting for skills and the number area whereas the weighting at Level 2 should focus on application and problem solving. One explained that weighting levels should possibly differ as number skills are needed at Entry level rather than problem solving.

Of those respondents who disagreed with the proposal and provided a comment, it was felt that the proposal depends on how it is determined which skills are more important and worth more in weighting. One suggested that having consistency in terms of weightings would make the transitions between levels clearer, adding to the credence of the qualification as well as developing understanding of the requirements.

Of those respondents who neither agreed nor disagreed with the proposal and provided a comment, many thought it difficult to comment due to not knowing what the content or weighting ranges will be.

The respondent who provided a comment but did not provide a response on the 5-point scale was unsure what the intended benefit of the proposal was.

> **Question 19 – To what extent do you agree or disagree that we should set weightings for calculator- and non-calculator based assessment within reformed Functional Skills qualifications?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	17	31	14
Agree	28		
Neither agree nor disagree	22	11	11

Disagree	13	17	9
Strongly disagree	10		

Of the respondents who agreed with the proposal and provided a comment, it was suggested that greater weighting should be put on calculator papers (especially at Entry levels) as non-calculator papers will test fewer function-based skills. Some respondents noted that the proposal would ensure the comparability of assessments between the different awarding organisations.

The majority of awarding organisation respondents agreed or strongly agreed with this proposal.

Of those respondents who disagreed with the proposal and provided a comment, many thought that restricting the use of calculators did not reflect the functional nature of the qualification.

Of those respondents who neither agreed nor disagreed with the proposal and provided a comment, the value of the proposal was questioned as most calculations are performed using a calculator in real world situations.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	18	33	16
Agree	31		
Neither agree nor disagree	21	11	10
Disagree	11	10	10
Strongly disagree	9		

Of those respondents who agreed with the proposal, and provided a comment, it was thought that the proposal would ensure standardisation and comparability of assessments, and across awarding organisations. Some suggested that the weighting should be adjusted so that problem solving skills are focussed on more than underpinning skills. Some respondents noted a concern that the reformed qualifications could be too similar to GCSE, and that the context of assessments already meant that underpinning skills are being tested.

Of those respondents who disagreed with the proposal, and provided a comment, concern was expressed that setting weightings in the three areas would make the development of robust and reliable assessments too complex and would have a knock on effect on marking and results increasing the turnaround times. It was also explained that, as all areas have to be achieved, all areas should have the same weighting and all learners should have a good understanding of all underpinning skills.

Of those respondents who neither agreed nor disagreed with the proposal and provided a comment, further information was sought to understand how weightings would be set.

> **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?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	25	28	27
Agree	30		
Neither agree nor disagree	21	13	8
Disagree	10	12	2
Strongly disagree	4		

Of those respondents who agreed with the proposal, and provided a comment, it was thought that the proposal reflects the functional aspect of the qualification and how the skills are used in the real world. It was noted that assessment in context can help learners understand why the specific skills are appropriate and important and where they might be useful in 'real life'. Some noted that consideration should be given to ensuring that no learners were disadvantaged by the use of contexts.

Of those respondents who disagreed with the proposal, and provided a comment, one respondent explained that, while advantageous to have learners demonstrate their skills in an applied context, it is important for learners to be able to demonstrate an ability to transfer their skills across different contexts. Concern was expressed that the reforms are too deep and far reaching, making them to similar to GCSE qualifications.

Of those respondents who neither agreed nor disagreed, and provided a comment, one did not find the three categories helpful or necessary as underpinning skills should allow awarding organisations to make judgements about the extent to which context should be included, without the need for a separate weighted category; this respondent suggested that two categories would be more helpful. The respondent also suggested that the underpinning skills section should account for no more than one third of the overall assessment.

The respondent who provided a comment, but did not provide a response on the 5-point scale, thought that the reformed qualifications are moving away from applied knowledge and are placing an increasing emphasis on theory. They raised concerns that the reformed qualifications are becoming too similar to GCSE and it was suggested that the simpler introductory qualifications similar to the National Reference Tests should be introduced.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	45	42	30
Agree	27		
Neither agree nor disagree	6	3	3
Disagree	4	7	1
Strongly disagree	4		

Of those respondents who agreed with the proposal, and provided a comment, many agreed that all areas are of equal importance, so passing each of the three content areas to pass overall is necessary. Some respondents commented that this works well currently.

Two respondents suggested that it may be reasonable for a learner to sit and achieve higher levels of some of the components, e.g. Level 2 Speaking, listening and communicating, and a lower level of others in order to pass at Level 1. Learners should be able to carry forward passes at a higher level and not need to retake.

Of those respondents who disagreed with the proposal, and provided a comment, it was thought that it should be possible to award the three components separately. Of

these, one respondent explained that many adults do not have a consistent profile and are more likely to do well in the Reading and Speaking, listening and communicating assessments, but are often a level below in Writing while still being employable. It was also stated that unit achievement can be motivating and allows learners and teachers to focus on learners' particular needs.

> **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?**

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	30	42	23
Agree	35		
Neither agree nor disagree	12	5	7
Disagree	4	4	4
Strongly disagree	4		

Of those respondents who agreed with the proposal, and provided a comment, many agreed that it was a necessary skill that needs to be developed and tested, as it is important learners understand correct grammar and punctuation. They are key elements of the English qualification for individuals to be 'functionally' literate. Some commented that setting a weighting would ensure the comparability of assessments across awarding organisations; SPaG weightings were seen to be a continuation of current practice at Levels 1 and 2, with one respondent commenting that the current weighting of 40-45 per cent remains appropriate.

Of those respondents who disagreed with the proposal, and provided a comment, one believed that the proposal would disadvantage learners with dyslexia and highly educated students who are second language speakers, who excel in fluency and coherence, but not accuracy.

Of those respondents who neither agreed nor disagreed with the proposal, and provided a comment, some stated that although accurate SPaG is undoubtedly important, modern working conditions mean that learners are more than likely to be able to use spelling and grammar checks when writing in the workplace.

> **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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	14	27	17
Agree	16		
Neither agree nor disagree	10	5	5
Disagree	22	18	12
Strongly disagree	22		

Of those respondents who agreed with the proposal and provided a comment, some respondents commented that it was 'nonsensical' to have SPaG checks available during assessment; if SPaG is being examined, spellchecks need to be disabled otherwise there could be no parity between assessments taken on screen and on paper.

Of those respondents who disagreed with the proposal, and provided a comment, most thought that Functional Skills should be preparing learners for the skills they need; to assess them without SPaG checkers would not reflect the real world, removing an element of functionality. It was suggested that emphasis should be on teaching learners to understand grammar and recognise the different meanings of words, how to proofread and checking/correcting spelling and grammar accurately using the relevant tools. Furthermore, some respondents expressed concern that the removal of spellcheckers would further disadvantage dyslexic students and those with learning difficulties and/or disabilities causing them unnecessary anxiety and adding extra pressure.

Of those respondents who neither agreed nor disagreed with the proposal, and provided a comment, it was stated that although accurate SPaG is undoubtedly important, modern working conditions mean that students are likely to be using spelling and grammar checks when writing in the work place. One stated that there is a distinction between the ability to use suitable resources to find information and to check the quality of work, and IT-enabled functions which actually prompt candidates about potential errors in order to measure genuine skill. It would be reasonable and defensible to restrict the latter given the potential inconsistency with paper-based assessments.

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.

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Marked-based approach	33	30	3
Level-based approach	47	20	27

Of the respondents who favoured a level-based approach, and provided a comment, some considered that the current approach works well. All but one awarding organisation respondents favoured a level-based approach. Respondents commented that a level-based approach was more accurate to administer and award, being the best way to assess a learner in a range of skills and providing greater consistency and standardisation. Five respondents explained the mark-based approach could be too complicated, limiting and unnecessary for most assessors, and could allow for non-achievement of some competencies. Candidates would either demonstrate the competence at a level or not; using pass marks is artificial.

Some respondents mentioned that units such as Speaking, listening and communication require a tutor to make a decision as to whether a learner has met the criteria or not and using marks would produce less reliable assessment outcomes. One further commented that marking would involve extra standardisation and associated costs and would introduce unnecessary compensation between criteria.

It should be noted that there was some confusion regarding this proposal, and some respondents thought 'level' referred to the level of the qualification (i.e. Entry levels 1, 2 and 3, and Levels 1 and 2).

Of those respondents who favoured a mark-based approach, and provided a comment, some commented that this approach would ensure a rigorous application of marking criteria leading to less subjective bias from assessors and widespread validity. It was explained that it is easier to administer, record and check a mark based approach, both internally and externally. It is also easier for candidates to understand their marks as well as what areas they need to improve on. One further pointed out that most further education assessors are accustomed to using marks and therefore they understand the process.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	37	45	27
Agree	35		
Neither agree nor disagree	5	2	3
Disagree	3	3	1
Strongly disagree	1		

Of those respondents who agreed with the proposal, and provided a comment, many respondents commented that this is necessary for comparability and consistency, particularly in assessments across all awarding organisations as all learners should be assessed at the same level across the country. Of these, one mentioned that it would allow for clarity within centres and for candidates.

Of those respondents who neither agreed nor disagreed with the proposal, and provided a comment, one was concerned that these reforms are taking the qualification too close to GCSE, commenting that the reforms are too deep and far reaching.

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?

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Strongly agree	16	22	18
Agree	24		
Neither agree nor disagree	26	17	9
Disagree	7	9	5
Strongly disagree	7		

Of those respondents who agreed with the proposal and provided a comment, some believed this would give greater clarification on the expectations of the learner and helps assessors and learners prepare for assessment. One noted that there should be parity for learners across awarding organisations due to the risk that these words could be applied in different ways which may disadvantage some learners.

It was thought that the inclusion of word lists meant that it is essential for Ofqual to set rules or expectations as to how these relate to assessment of the reformed qualifications to avoid undermining public confidence. The responses raised concerns that the inclusion of word lists is not linked to applied functional skills and could cause issues of validity and reliability in assessments.

Although two respondents did not particularly agree that reading and spelling should be tested as such, they did agree that rules should be set around the assessment, if implemented, to ensure consistency. Ofqual should work with awarding organisations to agree how the assessment of lists should be approached.

Of those respondents who disagreed with the proposal, and provided a comment, several respondents questioned having lists of words at all; how the lists would be assessed and the benefits it would provide were also questioned.

Of those who neither agreed nor disagreed with the proposal, and provided a comment, it was suggested that standalone spelling tests would not be desirable, with one respondent suggesting that testing particular words and phrases within an assessment would be acceptable.

One respondent commented that the introduction of 'spelling tests' could be seen as demeaning, despite assessments of word lists being valid and desirable. They suggested that for onscreen tests, a test where a candidate listens and responds to instructions would be viable.

The respondent who did provide a comment but did not provide a response on the 5-point scale thought that a separate, formal spelling test should be avoided as this would not provide a good indication of overall spelling ability which could be more appropriately assessed within the writing element of the qualification. The response also noted that SPaG currently has a higher weighting in the legacy qualification than for GCSE English Language.

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

Responses from those who responded to this question were as follows:

	Total	**Individuals**	**Organisations**

Yes	31	13	18
No	56	40	16

Of those who responded 'yes' and provided a comment, impacts on learners who share a protected characteristic included:

- learners with special educational needs and disabilities, as well as second language speakers, will be impacted by not using dictionaries or spellcheck software. Six respondents mentioned the impact on dyslexic students specifically

- tests for problem solving and understanding could negatively impact those whose first language is not English

- requiring all three components to be passed to obtain a pass in English discriminates against people with learning difficulties who may struggle with Speaking, listening and communicating

- issues with deaf learners participating in Speaking, listening and communicating sessions were identified, especially how deaf learners will access these qualifications without the need for reasonable adjustments. The respondent welcomed the fact that sign language is still permitted within the Speaking, listening and communicating elements of the assessment but believed suggested applying the same rule as the Apprenticeship Framework where anyone achieving a qualification in British Sign Language (BSL) does not need to complete functional skills

- learners whose normal form of communication is BSL should fall into the same category as learners on ESOL programmes as BSL is a recognised language in its own right and is sufficiently different from standard written and spoken English to disadvantage learners for whom English is not their first language. The respondent also felt that Functional Skills qualifications were not appropriate for ESOL learners

- the use of phonics may negatively impact those who have hearing or sight issues, cognitive impairment and those who have not previously had access. For adult learners, emphasis on phonics could be considered demeaning. One respondent commented that there is little evidence to support the effectiveness of the use of phonics in the teaching of adult learners

- those with learning difficulties such as slow processing, dyscalculia or those with limited working memory may be negatively impacted by non-calculator assessments finding them too difficult even though they could have arrived at the correct answers with a calculator

- the introduction of a calculator mathematics paper may unintentionally cause a barrier for candidates who have difficulties in using, holding or operating

calculators. The respondent also mentioned that the use of calculators may impact some candidates due to a lack of prior knowledge of how to use it

- one stated that if there was a variation in weighting ranges at different levels in the mathematics qualification, this could discriminate against candidates with disabilities. For example, if the weighting in relation to shape and space is larger at certain levels, this would disadvantage candidates with visual impairments at those levels

- one raised that limiting results to four times a year will adversely affect learners in custody

- having to pass all three components of the English qualification could have negative impacts on pregnant learners who may be unable to complete the final section resulting in them failing the qualification as a whole

- the effect of multiple, longer duration assessments on learners with protected characteristics

- applied contexts must not present inappropriate barriers to achievement, biases, or equality, access and inclusion issues

- one respondent thought that Ofqual had made little reference to the visually impaired, and another stated that all possible aspects of mental health difficulties could be expanded in the analysis

Of those who answered 'no' and provided a comment, one commented that it's difficult to foresee all impacts until the new awards are tested with real learners.

> **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?**

Responses from those who responded to this question were as follows:

	Total	**Individuals**	**Organisations**
Yes	34	15	19
No	53	38	15

Of those who responded 'yes' to the question and provided a comment, most responses were similar or the same as those to Question 28. The following suggestions for additional steps Ofqual could take were made in addition:

- requiring awarding bodies to give greater guidance around disability, especially where it affects speaking, listening and communicating e.g. learners with speech impediments

- the continuation of the use of bilingual or English dictionaries for spelling.

- discarding the non-calculator assessment

- learners being given more time and allowed to use technology that is available in the work place

- unitisation to help learners progress as far as they possibly can

- deaf candidates should be allowed to do the Speaking, listening and communicating assessment with the assistance of a BSL interpreter.

- maintain the use of pre-release material

- removing references to teaching methods such as the use of phonics from the subject content

- continuing to offer the right to exemption of certain elements of the assessment, if necessary, without impacting overall achievement

- all awarding organisations ensuring that there is an automated reader for mathematics tests so that people who are dyslexic and/or have poor reading skills do not require a reader

- Introducing certification for each section of the qualification, enabling recognition for those who have worked hard to complete the qualification but have been unable to complete all three sections due to factors outside their control

- Recognising that while BSL is permitted for Speaking, listening and communicating, that does not mean the whole qualification is accessible to BSL users. A significant number of BSL users will excel in this area but then struggle with the others, particularly grammar

Of those who responded 'no' and provided a comment, it was suggested the position should be reviewed after being rolled out. Another stated that we should further engage with the Department for Education on the proposed content which has the potential to disadvantage such learners.

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

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Yes	14	6	8
No	69	44	18

Of those who had additional comments it was thought that:

- guidelines are needed clarifying to what extent technology can be used to 'help' disabled candidates and to what extent, and in what circumstances they should have access to amanuenses (scribes).

- the introduction of a non-calculator element and the restriction on the use of dictionaries were concerning, as restrictions on their use may disadvantage learners, particularly those with dyscalculia and dyslexia. The respondent pointed out that the promotion of the use of phonics might not be readily accessible for learners with a hearing impairment.

- contexts in mathematics assessments may have an impact on ESOL students' ability to access functional skills mathematics, especially at Levels 1 and 2.

- learners with particular learning needs may be able to use their mathematics consistently and accurately to solve problems, but may be unable to demonstrate technical competence with standard procedures.

- the transition period should be a minimum of 12 months and a maximum of 18 months so as not to penalise work-based candidates or those taking maternity or paternity leave.

- institutions should be given greater scope and freedom to make their own access arrangements for learners with protected characteristics.

- the focus on phonics in English speaking and listening is problematic, particularly for deaf students whose language development may be different. The respondent suggested that deaf candidates should not have to take a functional skills assessment if they have achieved a recognised BSL qualification, and the same dispensation is applied to all areas when it comes to the requirements of Functions Skills.

- the number of assessments proposed; the lack of flexibility in how candidates can demonstrate functional proficiency, and the reduced manageability of the new assessment model, could significantly impact disabled learners, those who are not in formal or highly structured educational settings, those with motivational or personal issues and those with limited means, support and resources.

- word-based questions in the mathematics assessment could result in questions which are unnecessarily linguistically complex and act as a barrier to comprehension.

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

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Yes	15	6	9
No	61	40	21

Of those who responded 'yes' and provided a comment, it was stated that:

- work-based learners do not have the same flexibility on time as college-based learners

- the culmination of changes will be logistically onerous; the 9 to 12-month window could potentially cause issues for those needing all three elements of Functional Skills

- there is no mention of a designated proportion of fixed or open questions in reading assessments. This is essential to avoid a large amount of meaningless and too easy multiple choice questions and must be addressed so that all awarding organisations are offering a similar assessment

- the regulations around the availability and format of an 'on demand' assessment would need to be carefully considered if the proposed restriction on the number of awarding sessions is implemented

- controlled assessments currently have low, medium or high levels of control and there should be a similar level of control in the new qualifications to ensure comparability across awarding organisations

- this stage of the reforms needs to be progressed promptly to allow awarding organisations time to develop and implement the reforms

- vagueness in the regulatory requirements leads to awarding organisations interpreting the requirements in different ways. Lack of consistency also results in areas where Ofqual has chosen not to set requirements eg not placing a restriction on the total number of assessments or choosing to set a minimum assessment time but not a maximum. If awarding organisations take different approaches it makes it more difficult to complete work on comparability or standardisation across different awarding organisations

- a rule allowing the use of calculators for some parts of the mathematics qualification but not others may cause a regulatory burden

- large numbers of learners type their answers in the paper-based writing assessments as a reasonable adjustment and a considerable additional regulatory burden will result from awarding organisations requiring confirmation, for every such learner, that SPaG checking software was not used

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

Responses from those who responded to this question were as follows:

	Total	**Individuals**	**Organisations**
Yes	24	8	16
No	52	37	15

Of those who responded 'yes' and provided a comment it was thought that the following would minimise the regulatory impact of Ofqual's proposals:

- workshops, which could improve understanding of the reforms, once finalised

- regular updates on progress

- assurance that the system for maintaining standards will be manageable and proportionate

- delaying proposals or working more closely with apprenticeship changes to mitigate any potential problems. A hybrid Functional Skills qualification could be offered that ensures learners aren't disadvantaged if they don't get all elements completed before the deadline

- effective, widespread communication for all stakeholders

- further details on various aspects of the proposals as soon as possible, citing in particular the new specifications, subject content, assessment requirement plans and the upfront evaluation processes

- clarity about core standards, ensuring the most helpful non-exhaustive applied examples are provided

- awarding organisations having sight of the final regulatory requirements at least six months prior to the required submission of the assessment strategy

- making a clear distinction between the Department for Education's subject content documents and the formal assessment requirements for the qualifications, and ensuring that what the respondent saw as the 'inappropriate' approach to reading and spelling throughout the levels is not be directly transcribed into assessment requirements as this would present an entirely inappropriate regulatory impact.

- ensuring that the language of Ofqual's conditions and guidance are not open different interpretations

- the requirement for 'pre-delivery evaluation' should not place an undue burden on awarding organisations or give any adverse effects on the steps centres need to take to deliver the new qualifications.

- the removal of references to phonics and the use of aids in written documents to be permitted

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

Responses from those who responded to this question were as follows:

	Total	**Individuals**	**Organisations**
Yes	27	9	18
No	47	34	13

Of those who responded 'yes' and provided a comment, costs or benefits included:

- additional requirements, assessment development, increased monitoring, marking and training of awarding bodies and centres

- the increased expense of additional exam papers, particularly the proposed separate calculator and non-calculator mathematics papers. Of these, one respondent also mentioned that reading and spelling lists will also add to assessment costs

- smaller awarding organisations will find it difficult to fully meet the requirements for pre-testing assessments for fixed pass marks

- a loss of income to students and work time for employers. Another believed that the hours each learner will need to be successful will also increase

- CPD for staff

- assessment costs, including developing items, compiling papers, marking, offering resits and so forth

- if legacy and reformed qualifications are to be run concurrently, there will be significant burden and cost involved for awarding organisations as well as potential confusion for centres around entries and resits which could be an additional burden

- developing new assessments, handbooks, and support materials, initial and diagnostic assessments, training for staff and examiners and marketing materials. Costs for centres include redeveloping teaching materials, teacher and assessor training, investment in new support materials and systems

- lack of clarity in the requirements can also add to the costs if leading to resubmissions

- similarities between Functional Skills qualifications and GCSEs may result in the uptake of the reformed qualifications will suffer in favour of GCSEs. This could lead to uptake falling below that required to cover investment in the development of these qualifications

- costs relating to invigilation may increase

- pre-testing any assessments

- materials to allow for adjustments for learners with protected characteristics may be an additional cost.

- administrative costs such as resourcing of support documents and materials

- recruitment of suitable staff, given the greater requirement on the skill levels of teaching staff, which is already a significant challenge in post-16 education

Some respondents did not respond 'yes' or 'no' but did provide comments, which included:

- some costs may be intangible such as loss of learner confidence, reduced learner numbers and reduced pass rates

- centres will only run the qualification for the funding allocated so this could potentially cause unfairness if the award is left too open. Further education faces massive cuts each year and the sector could lose out if guided learning hours are too variable
- it may not be possible to calculate the true costs until the content is finalised and the number of assessments is confirmed

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

Responses from those who responded to this question were as follows:

	Total	Individuals	Organisations
Yes	28	10	18
No	49	35	14

Of those who responded 'yes' and provided a comment, it was thought that:

- it is important that teaching organisations are informed as early as possible about the content of the new qualifications.
- learners may have passed Entry Level 2 and wish to progress to Entry level 3 only to find that the criteria have increased so much that they really need to cover the Entry level 2 content again.
- assessment of functional skills mathematics should be paper based only.
- Ofqual should recognise that different types of learners need flexibility in assessments to meet their needs. This was noted to be a particular issue for apprentices and learners in custody and that some smaller awarding organisations have built up an expertise in offering Functional Skills qualifications to these learners.
- teachers and external assessors are involved in the marking process, so possible costs involved in increasing the standardisation and moderation structure and any extra salary implications should be considered.
- Ofqual should be careful to avoid damaging the reputation of Functional Skills qualifications.
- Ofqual should check our thinking on costs and benefits with a selection of centres.
- the impact on adult learners should be considered if assessments are changed and they are required to attend two separate exam sessions.
- consideration should be given to the potentially negative effects on learners, as well as the effects on vulnerable groups; learners such as apprentices or those on rolling courses need access to 'on demand' assessment, but this may

not be possible if extensive pre-testing or large cohort requirements are imposed.

- the reformed qualification should be robust enough to be considered as an equivalent to a GCSE, due to it being a work based assessment which is standardised across all awarding organisations.

- the changes bring Functional Skills qualifications too close to GCSE, possibly setting skilled people up to fail.

- additional assessments and staff training would result in additional costs, which may lead to a significant increase in fees for the reformed qualifications.

- the introduction of four marking windows will severely impact social mobility and learners' experience with the new qualifications.

- costs for centres need to be considered, including staff training/upskilling, costs of registration, increased assessments, volume of resits and invigilation requirements.

- how often changes are made should be considered, as employers barely understand the present qualifications and many colleges and universities do not accept them to enable access to further or higher education.

- the considerable investment required of awarding organisations in developing new Functional Skills qualifications will be worth it if the new qualifications are an improvement on the existing ones, can be delivered at a reasonable cost, and the candidate volumes are similar to the existing qualifications.

Appendix A: list of organisational consultation respondents

When completing the questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation.

Below we list those organisations that submitted a non-confidential response to the consultation. We have not included a list of those responding as an individual; however all responses were given equal status in the analysis.

AQA
Association of Colleges
Birmingham Adult Education Service
British Army
Citizen Maths
City and Guilds
City College Peterborough
EAL
Federation of Awarding Bodies
Gateway qualifications
HALC
Harrow ACL
Havering College
Highfield qualifications
HOLEX
Humber Local Enterprise Partnership
Institute of Education, Centre for Post-14 Education and work
Institute of Mathematics and its Applications
Joint Council for Qualifications
Learning and Work Institute
MEI (Mathematics in Education and Industry)
MMSA (Meeting of Mathematics Subject Associations), a special interest group of the Joint Mathematical Council of the United Kingdom
National Literacy Trust
National Numeracy
NCFE
NEU, ATL Section
New College Durham
NOCN
North Tyneside Council Employment and Skills Service
North Yorkshire County Council
OCR
Open Awards

Paul Johnstone Consultancy Ltd
Pearson
Runway Training
Signature
The Royal Society
TUC Union Learn
Wessex Training and Assessment Ltd
Weston College

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