



Department
for Education

Functional Skills English and mathematics subject content

Government consultation response

February 2018

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Introduction

On 12 September 2017 the Department for Education published a consultation on the proposed reformed subject content for English and mathematics Functional Skills. The proposed subject content aims to improve the relevance of these qualifications, thereby increasing their recognition, credibility and value in the labour market. The consultation sought views on the following questions:

- whether the proposed subject content covers the appropriate knowledge and understanding for Functional Skills in these subjects;
- whether at Entry Levels, the content covers the key elements of literacy and numeracy needed to support students to progress to higher levels of study in English and mathematics;
- whether at Levels 1 and 2, the content covers the key elements of literacy and numeracy needed for employment;
- whether at Levels 1 and 2, the proposed qualifications secure sound progression for the purposes of progression into further study;
- whether the proposed subject content provides assurance that essential knowledge taught in earlier levels is built upon and represented adequately;
- whether any of the proposals have the potential to have a disproportionate impact, positive or negative, on specific groups of students, in particular the 'protected characteristic' groups. (The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity).

The consultation ran for eight weeks until 7 November 2017. It received 333 responses from further and higher education institutions, apprenticeships providers, employers, subject experts, practitioners, providers and Awarding Organisations. All 333 respondents responded to all six questions posed.

Of the responses we received for the consultation:

- 83 were submitted on behalf of further education institutions;
- 49 were submitted on behalf of apprenticeships providers;
- 35 were submitted by practitioners;
- 31 were submitted by subject experts;
- 29 were submitted by those in other categories (councils, charities, forums and membership organisations);
- 29 were submitted by those in adult community learning;
- 28 were submitted on behalf of providers;

- 15 were submitted on behalf of employer/business sectors;
- 13 were submitted on behalf of Awarding Organisations;
- 9 were submitted on behalf of higher education establishments;
- 5 were submitted on behalf of those in prison education;
- 5 were submitted by organisations representing teachers; and
- 2 were submitted by students.

The Office of Qualifications and Examinations Regulation (Ofqual) consulted separately on Functional Skills technical assessment arrangements.

Overview of reform

English and mathematics Functional Skills are qualifications that offer an accessible and practical route for students who want to develop and improve their skills in these subjects. They are studied primarily by students who are over the age of 16 and in a range of settings, including in further education colleges, adult and community settings, the workplace and prisons. Introduced in 2010, the Government is reforming these qualifications to ensure they equip students with the skills and knowledge that prepares them for work and life, and to improve their recognition and credibility with employers. Working with Ofqual, the Government will also ensure that the changes can be properly regulated and that the current regulations are tightened to strengthen comparability between Awarding Organisations.

As part of the reform process, we worked with sector stakeholders and subject experts to review and revise the content of these qualifications. The revised subject content – on which this consultation response is focused – sets out the learning aims, requirements and standards expected at each Functional Skills qualification level. We will also fund additional continuing professional development to enable teachers to adapt to the new content prior to introduction.

These improvements represent the most significant changes to Functional Skills qualifications since their introduction in 2010. They support the delivery of our Industrial Strategy ambitions to build a world-class technical education system and ensure that everyone can improve their skills throughout their lives, increasing their earning power and opportunities for better jobs.

Summary of responses received and the Government's response

The sections below set out the views of those responding to the consultation on the revised English and mathematics Functional Skills subject content. It also outlines the decisions that have been taken to finalise the content in these subjects.

The written responses and the views expressed by subject experts and other respondents during the consultation period and throughout the development process have been important in shaping and strengthening the content. The Department has also worked closely with Ofqual to ensure that the subject content can be regulated, taking into account the views of Awarding Organisations.

We received a number of specific suggested amendments and clarifications to the subject content. Each suggestion has been considered when producing the final subject content documents for English and mathematics.

The main issues which attracted comment included: the use of aids to support spelling, grammar and calculations; the distinction between subject content levels, particularly between Entry Level 3 and Level 1; the number of guided learning hours; and the inclusion of spelling lists based on a structured teaching of phonics approach for the reading and writing English subject content at Entry Levels. These concerns have been addressed in detail further within this response.

This analysis does not include issues mentioned by respondents which were outside the scope of the Functional Skills subject content consultation – for example, issues raised regarding teaching styles and standards.

Some responses were relevant to Ofqual's autumn 2017 consultation on Functional Skills English and mathematics regulatory requirements and assessment arrangements. These issues will be addressed by Ofqual in its consultation response and are therefore not reported here.

In addition to considering specific technical responses to the consultation, we have also assessed the impact of the reforms on people with protected characteristics. Responses to the question on the impact of our reforms on people with protected characteristics informed the finalisation of the subject content. This analysis is included in our equality impact assessment, published alongside this consultation response.

Question analysis

Knowledge and understanding for Functional Skills

Does the proposed subject content cover the appropriate knowledge and understanding for Functional Skills in these subjects?

	Total	Percent
Yes	215	65%
No	67	20%
Not Sure	51	15%

Government response

Almost two-thirds of the respondents thought that the proposed subject content covered the appropriate knowledge and understanding for Functional Skills in these subjects. They agreed that the subject content has the breadth and scope required to give students the skills they need and that the subject content and expectations are appropriate.

Three respondents expressed the need for robust plans to ensure that Functional Skills teachers are trained and supported to adjust to the new standards and qualifications. Where required, we will work with the sector to develop and adapt continuous professional development resources to support teachers to deliver the new standards and qualifications. It will also be important that Awarding Organisations offering the reformed Functional Skills qualifications put in place appropriate support for their centres to help them deliver and assess the reformed qualifications.

A few respondents raised concerns about the time and funding required to teach the reformed qualifications to enable students to make progress. The Department will work with Awarding Organisations to assess how many guided learning hours the reformed qualification will require within existing rules.

Some Awarding Organisations were concerned that producing assessment material and resources from the subject content will be difficult, and that more clarification on certain areas of the subject content is needed. In response to this we have made amendments to the subject content with the aim of providing a clear framework for teachers, education providers and Awarding Organisations to comparably teach and assess the new Functional Skills qualifications. However, the subject content aims to set out what must be taught. It does not attempt to indicate how those expectations must be assessed. This is covered, as appropriate, in Ofqual's general and subject specific regulations.

Supporting progression to higher levels of study

At Entry Levels: Does the content cover the key elements of literacy and numeracy needed to support students to progress to higher levels of study in English and mathematics?

	Total	Percent
Yes	188	56%
No	70	21%
Not Sure	75	23%

Government response

Over half of the respondents felt that the subject content at Entry Levels covers the key elements of literacy and numeracy needed to support students to progress to higher levels of study in English and mathematics. Many of these respondents also commented that the subject content gives a well-balanced, sound and secure foundation to build on, to further a student's knowledge and support progression.

The addition of the word lists for spelling and reading was largely welcomed as a solution to the longstanding issue of standardisation and expectations across levels.

Twenty-seven respondents expressed concerns that phonics should only be included within the subject content as one of several teaching strategies. However, a further six respondents cited it as a positive step forward. The revised subject content sets out the lists of words that students at Entry Levels should be able to read and spell. These words are linked to the understanding of the letter/s-sound correspondences. Securing this knowledge is an important step to helping people learn to read. The details of the letter/s-sound correspondences for the Entry Levels have been included in the subject content to ensure that students can decode unfamiliar words.

Five respondents expressed concern about the volume and word selection of the phonetic word lists. To address these concerns we have considered comments on the phonetic word lists and worked with subject experts to revise and reduce the word lists.

Three respondents felt that a large amount of continuing professional development would be needed to help teachers to deliver phonics successfully. To support this we will work with the sector to develop and adapt resources to support the successful teaching of phonics to support these qualifications.

Four respondents were concerned that the teaching of phonics may affect students' desire to participate in the qualification. Specifically, they felt that adult students could

find phonics patronising and remind them of school. We will work with the sector to ensure that adults who need support learning how to read and write are taught in a way that is appropriate to their needs, supported by appropriate materials.

Twenty-seven respondents, the majority from further education institutions, were concerned that some of the subject content seems challenging for the level proposed, particularly at Entry Levels. Others were concerned that some of the progression between levels is too great and that the subject content does not provide sufficient knowledge or understanding for the student to progress to the next level. Others argued that the greater challenge narrowed the gap between levels.

Each of the levels are aligned with national curriculum key stages as follows: Entry Level 1 – Key Stage 1; Entry Level 2 and 3 – Key Stage 2; Level 1 – GCSE grade 3 to 1; Level 2 – GCSE grade 4. Following the Education and Training Foundation’s initial Functional Skills reform consultation, responses to an earlier version of the subject content were analysed and considered when producing the proposed subject content. The latest version of the subject content has attempted to even out the distinction between levels, without compromising the alignment to the national curriculum key stages.

A small number of respondents also commented that the content is similar to that of GCSEs, making it less ‘functional’, which may discourage students who need a graduated approach to support them with their underpinning knowledge. The reformed subject content will provide the knowledge and underpinning skills that students will need to build upon at each level. The contextualisation of the subject content will be provided by the education institutions in teaching the qualifications and the Awarding Organisations in designing and assessing them.

Eighteen respondents were concerned that education providers may require extra guided learning hours to assist students who need more time to progress. They were also concerned that the inclusion of phonics at Entry Levels will mean that students will need to spend more time learning sounds and spellings. We will work with Awarding Organisations to assess how many guided learning hours the reformed qualification will require within existing rules.

For 16-19 year olds, providers have access to ‘disadvantage funding’ in order to make reasonable adjustments for individuals. This funding is allocated by formula within the providers basic funding programme and is there to help meet the additional needs of students including those with a disability or special educational needs.

For students aged 19 and above, through the Adult Education Budget, the Department for Education provides Learning Support funding to providers to help them meet the additional needs of adult students and meet the costs of reasonable adjustments as set out in the Equality Act 2010. Learning Support can cover a range of needs including an assessment for dyslexia, funding to pay for specialist equipment or helpers; and

arranging signers or note takers. Learning Support is also available to providers delivering apprenticeships or training funded by the Adult Education Budget.

There are three elements to this funding:

- **Fixed monthly rate** - providers claim a fixed monthly rate for each student to fund support e.g. equipment, an interpreter, support worker.
- **Excess** - if support needs exceed the fixed monthly rate providers can claim excess costs.
- **Exceptional Learning Support** - if support costs exceed £19,000, providers can apply for Exceptional Learning Support, with appropriate supporting evidence.

Some students with profound learning difficulties and/or disabilities may have an Education, Health and Care Plan (EHCP) which includes high needs funding up to 25 years of age. This is funded outside of the Adult Education Budget.

Literacy and numeracy needed for employment

At Levels 1 and 2: Does the content cover the key elements of literacy and numeracy needed for employment?

	Total	Percent
Yes	200	60%
No	64	19%
Not Sure	69	21%

Government response

The majority of respondents thought that the content covers the key elements of literacy and numeracy needed for employment. A large number of respondents felt that mathematical problem solving, decision-making and statistical knowledge are good, important skills to acquire. There was recognition that the more robust demands of the qualification were likely to meet employers' demand for staff with better-developed communication skills.

A specific comment showed concern that although the focus on employer needs in reforming the Functional Skills qualifications is welcome, there is no evidence of how the new proposals might match the whole spectrum of UK employer workplace requirements. The Department, working closely with the Education and Training Foundation and in consultation with Ofqual, produced the latest version of the Functional Skills subject content. During the course of the reform programme we have worked with a wide range of employers of different sizes, types and sectors to understand mathematics and English skills required from Functional Skills qualifications. We used this feedback to inform the subject content and include specific skills that employers have stated they require from individuals in the workplace.

Four respondents commented that the Level 1 and 2 subject content is directly applicable to students and provides a good basis for the use of numeracy and literacy in real life situations. They also commented that the narrower breadth of content compared to a GCSE and the functional nature of the assessment in contextualised scenarios makes the Functional Skills courses appealing to students.

One respondent highlighted the fact that every sector of industry has different requirements and that the subject content is too generic and therefore does not meet all of these requirements. They requested that the subject content should be more specific to vocational areas to allow the content to be functional and contextualised. However, the subject content is not designed to be occupationally-specific, but rather to set out the broader skills required at each skill level. Teaching approaches should be adapted to suit

the specific occupational context, if required. We will also work with panels of professionals as part of the T level development process to set out occupation-specific mathematics and English requirements, where appropriate.

A small number of respondents stated that they did not think that a non-calculator assessment was required. This is because tools such as calculators and spreadsheets are readily available in the workplace as long as students know how to use them. Some respondents felt that students should be encouraged to use both calculators and spelling and grammar checking tools, since they would usually have access to these tools and removing them would be unrealistic.

However, in contrast, a similar number of respondents felt that having a non-calculator assessment and not being able to use spelling or grammar check would support students in retaining information. They also felt it would place less reliance on such tools, allowing students to gain the underpinning knowledge needed to use calculators or dictionaries more effectively. A few respondents also felt that allowing the use of these tools to check calculations and spelling and grammar, would undermine the validity of the qualification.

During the course of the development of Functional Skills subject content, employers emphasised that they place significant emphasis on the need for people to be able to carry out basic mental arithmetic, check their own calculations and use correct spelling, punctuation and grammar¹. This is why we have included sections to enable the assessment of these skills in the revised subject content.

¹ [Making Maths and English Work for All Report](#)

Securing progression into further study

At Levels 1 and 2: Will the proposed qualifications secure sound progression for the purposes of progression into further study?

	Total	Percent
Yes	179	54%
No	63	19%
Not Sure	91	27%

Government response

Over half the respondents thought that the proposed qualifications secure sound progression for the purposes of progression into further study and that the specification provides a good range of underpinning skills. Many felt that Functional Skills work well for those who need a qualification to progress to a non-technical degree or employment.

There was a wide view that the new Functional Skills qualifications require good positioning and marketing in order for further education providers and employers to understand and accept the qualifications as a route to further study. We agree that the reformed qualifications need to be positioned and marketed to promote greater awareness of their purpose and relevance and will work to increase their recognition among employers and education providers.

Some Awarding Organisations expressed a concern that the reformed Level 2 Functional Skills qualification will be harder to obtain than a grade 4 (previously a grade C) at GCSE. Functional Skills qualifications are designed differently to GCSEs. They are not graded but assessed on a pass or fail basis, with a pass demonstrating core knowledge in each of the areas tested. Depending on an individual's skills and background this may better suit certain types of students. Ofqual is responsible for ensuring consistency in regulation between Level 2 qualifications.

We heard concerns voiced from four providers that there is a significant gap between the same levels within different Awarding Organisations. We have communicated these concerns to Ofqual who is responsible for regulating the qualifications.

There was one respondent who thought that Functional Skills should be more closely coordinated with existing and proposed qualifications. Functional Skills qualifications are already integrated as study options within 16-19 education, traineeships, apprenticeships and wider adult education. We are in the process of developing the requirements for forthcoming T levels with employer led T level panels creating outline content for these new programmes.

Assurance that knowledge is built on and represented

Does the proposed subject content provide assurance that essential knowledge taught in earlier levels is built upon and represented adequately?

	Total	Percent
Yes	193	58%
No	72	22%
Not Sure	86	20%

Government response

The majority of respondents felt that the proposed subject content provides assurance that essential knowledge taught in earlier levels is built upon and represented adequately.

Five respondents expressed concerns that the spelling lists were too difficult and too long for students undertaking a Functional Skills qualification for the first time. They were particularly concerned for those individuals who have not received sufficient schooling. Additionally, some felt that adult students who struggle with spelling may be put off by the level of difficulty in this requirement and this may also lead to lessons of learning by rote. Conversely, other respondents welcomed the inclusion of word lists as they ensured consistency and aided comparability for students between teaching institutions and Awarding Organisations.

The Department has worked with subject experts to revise and reduce the word lists included within the subject content. Inclusion of the lists in the Functional Skills subject content brings comparability between the Awarding Organisations to ensure consistency.

Some respondents commented that Functional Skills teachers need to have the skills and competence to deliver the subject content to a high level, and provide functional scenarios to allow students to learn and apply their skills. As part of the Functional Skills qualification reform, the Department is working closely with the sector to develop a well-planned, robust training programme for teachers and education providers prior to the first teaching of the qualifications in September 2019. This training programme aims to give teaching staff the support, confidence and tools they require to enable them to deliver the new qualifications.

Conclusion and next steps

We are grateful to all those who responded to the consultation and to those individuals who have worked with Awarding Organisations and the Department to finalise subject content for these qualifications. We believe that the changes made in response to the consultation appropriately address the issues raised, and that the content we have published will provide people with the high quality qualifications they deserve.

Following the publication of the revised subject content we will continue to work with the sector to prepare for the introduction of the reformed English and mathematics Functional Skills qualifications in 2019. In addition, Ofqual will begin the consultation process on the conditions of and guidance for Functional Skills English and mathematics qualifications.



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Reference: DFE-00019-2018



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