

# Reforming functional skills qualifications in English and maths

## Introduction

Would you like us to treat your response as confidential? If you answer 'yes', we will not include your details in any list of people or organisations that responded to the consultation.

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## Consultation questions

Q1. 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?

Disagree

**Please give reasons for your answer**

We disagree with this position. In order to ensure public confidence in the qualifications, there will need to be a degree of comparability between the offers of different providers. In our view, this is best achieved with tight frameworks for the awarding organisations to work within, ensuring, for example, that the sampling of the content domain is broadly comparable from all providers.

Q2. To what extent do you agree or disagree that we should not set requirements around the number of assessments within individual functional skills qualifications?

Agree

**Please give reasons for your answer**

If minimum and maximum assessment times are set, we agree that there is no need to stringently define the number of assessments needed within individual Functional Skills Qualifications. Awarding organisations are well placed to evaluate the appropriate number of assessments (and associated marks) needed to create valid assessments that satisfactorily differentiate between students of all abilities. The freedom to develop assessments that fit with the qualification structure will make the marketplace richer. If no maximum assessment time is set, we would re-iterate our concern around comparability of offers, and the risk of how the content domain is sampled, which could make comparisons more challenging.

Q3. To what extent do you agree or disagree that at the Entry levels we should allow, but not require, centres to set and mark the assessments?

Agree

**Please give reasons for your answer**

AQA does not intend to develop Entry level qualifications in Functional Skills. However, our previous experience of offering these qualifications, and our knowledge of challenges faced by the teachers delivering these qualifications, means that we agree with the proposal to allow (but not require) centres to set and mark assessments that are suitable for their learners, providing the rules as set out in paragraph 2.15 of the consultation document are implemented. We also agree that the absence of a requirement for centres to set and mark assessments allows for flexibility in specific situations such as malpractice.

Q4. To what extent do you agree or disagree that at Levels 1 and 2 we should require all mathematics assessments, and the reading and writing assessments in English, to be set and marked by the awarding organisation?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that all Level 1 and 2 assessments, except Speaking, listening and communicating, should be set and marked by the awarding organisation in order to maintain an appropriately robust level of validity and reliability for these qualifications. It is imperative for qualifications that contribute to accountability measures to have public confidence. The arguments made in support of a move away from NEA in GCSEs and A-levels should be considered here.

Q5. To what extent do you agree or disagree that at Levels 1 and 2 for the speaking, listening and communicating assessments in English we should allow, but not require, centres to set and mark the assessments?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that centres should be allowed to set and mark the Level 1 and 2 assessments for Speaking, listening and communicating. There would be considerable and undesirable cost and logistical implications for awarding organisations were it to be required that the assessments for Speaking, listening and communicating must be set and marked by the awarding organisations. However, there have been issues of grade inflation in the Speaking and Listening components of legacy GCSEs, for the qualification to be reliable, methods of moderation and standardisation would need to be rigorous to mitigate against a similar effect on the reformed FSQ.

Q6. To what extent do you agree or disagree that we should not place any restrictions around availability of assessments in reformed functional skills qualifications?

Disagree

**Please give reasons for your answer**

We disagree with this position for Level 1/2 mathematics and the reading and writing elements of Level 1/2 English. Looking at the points made in 2.23, we are concerned that the overarching reliability of assessments may be compromised and are not satisfied that the issues relating to comparability, predictability and confidentiality have been satisfactorily addressed in a way that ensures public confidence. In relation to 2.24, we would point out that limiting the awarding windows – which we support on the grounds of valid awarding (see our response to Q9) - already imposes restrictions, so the value of on-demand testing when the results cannot be instantaneous is an important consideration.

Q7. To what extent do you agree or disagree that we should continue to have a pass/fail grading model for reformed functional skills qualifications?

Agree

**Please give reasons for your answer**

We support the proposed grading model and support its stated ethos of demonstrating a level of competency.

Q8. To what extent do you agree or disagree that, at Levels 1 and 2, awarding decisions made before assessments have been taken by all learners involved must either: use pre-set pass marks based on rigorous pre-testing of the assessments in setting pass marks, draw on evidence from the actual performance of a sufficiently representative sample of the anticipated cohort

Disagree

**Please give reasons for your answer**

We have concerns about pre-testing for this qualification. The nature of questions means that the contexts used could be memorable to those involved in the pre-testing, meaning that the security of the assessment could be compromised, and the validity of the test questioned, undermining the perceived value of these qualifications by end users. Additionally, any pre-testing is likely to incur significant cost, which would have to be reflected in entry fees, potentially creating a barrier for students. In line with other high-stakes qualifications, we favour an approach where awarding decisions are made using a blend of quantitative and qualitative insights on the cohort, meaning we would seek to set different boundaries based on the demand of the assessment, for each series.

Q9. To what extent do you agree or disagree that, at Levels 1 and 2, for awarding decisions made after assessments have been taken by all learners involved, we should restrict the number of awarding sessions an awarding organisation can hold to no more than 4 each year?

Strongly Agree

**Please give reasons for your answer**

We strongly agree with limiting the number of awards to defined series. In line with the points made in our response to Q8, we feel that a traditional approach to awarding, using evidence of student performance and based on a significant number of students, is the best method of setting and maintaining the right standards. This represents a good compromise between the provision of regular awards to facilitate flexibility and requirement to ensure comparable standards.

Q10. 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?

Disagree

**Please give reasons for your answer**

Our view is that the driver here should be maintained standards demonstrably by Ofqual across the functional skills suite. If we are effectively defining a new standard, then the grading approach should change to reflect this (as in GCSEs), if we are awarding to the same standard on a new qualifications (as in A-levels), then the grading approach we currently use can remain. Our interpretation of the consultation is that the latter is preferred, and so the approach in the first year should not differ markedly from that adopted in subsequent years. It is essential, however, that a common approach to grading functional skills is rigorously applied across all awarding organisations.

Q11. 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?

Agree

**Please give reasons for your answer**

We welcome post-awarding scrutiny to help ensure comparable standards are applied across the awarding organisations and believe this is best facilitated by common approaches to setting and awarding. This will enhance confidence both real and perceived in the qualification.

Q12. To what extent do you agree or disagree that we should set a process for reviewing qualification outcomes for the Entry levels, and for speaking, listening and communicating at Levels 1 and 2, that has: the same purpose to that proposed for Levels 1 and 2 is tailored to the fact that these assessments are likely to be centre-set and marked

Strongly Agree

**Please give reasons for your answer**

We strongly agree that there should be a set process for reviewing qualification outcomes for the Entry levels and Speaking, listening and communicating, with a focus on centre monitoring arrangements.

Q13. 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?

Agree

**Please give reasons for your answer**

We agree that set requirements and guidance around awarding organisations' centre-monitoring procedures would be helpful to mitigate the effect of the lack of upfront controls in centre-set and marked assessment.

Q14. 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?

Agree

**Please give reasons for your answer**

We agree that there should be set requirements for awarding organisations to produce centre guidance on the conduct and assessment of Speaking, listening and communicating. This will help to ensure a greater degree of comparability of student experience and standards across centres. However, we would welcome further information as to the extent and detail expected in such guidance.

Q15. 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?

Agree

**Please give reasons for your answer**

We support this approach. We have already had productive discussions with Ofqual on our experience of recent GCSE and A-level reform, and the role the Assessment Strategy played in the accreditation process. We hope that this will help inform the way in which future submissions are treated.

Q16. 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?

Disagree

**Please give reasons for your answer**

We disagree with this position. A minimum of 9 months would mean AQA offering multiple re-sit opportunities. Our concern would be that the entry for each of these could be very small, meaning it would be difficult to make sound awarding decisions. Instead, we would prefer a single re-sit opportunity for all students alongside a sufficient period between accreditation and assessment so that students and teachers can be well prepared for revised qualifications.

Q17. 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?

Agree

**Please give reasons for your answer**

In principle, we welcome the inclusion of weighting ranges to content areas. We would, however, wish to point out that any ranges should have a degree of tolerance that can be applied to individual assessments. This is based on our experience of writing mathematics qualifications at a number of levels. In our experience, when a range is too tightly defined it can compromise the effectiveness of the question writing process, whereby questions are written to meet the criteria, rather than test the students in the best way possible. In ensuring appropriate coverage of content, it is, of course, essential to balance breadth of coverage with assessing depth of understanding. If too much emphasis is placed on the former, risk is placed on the latter.

Q18. 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?

Agree

**Please give reasons for your answer**

We would contend that Level 1 should have a higher weighting on number skills, but have no strong preference on exact weightings in this area. We would also point out that our understanding of the way in which this course is delivered is that learners for Level 1 and Level 2 are often co-taught. Any significant variation in approach may create problems for teachers.

Q19. To what extent do you agree or disagree that we should set weightings for calculator-based and non-calculator-based assessment within reformed functional skills qualifications in mathematics?

Disagree

**Please give reasons for your answer**

Weightings for non-calculator assessment should be set though this could be at 0%. Any set weightings should not compromise the validity of assessments or dilute the purpose of these qualifications. For example, if non-calculator assessment was felt to constitute 10% of the assessment, it may not be possible to create a valid paper for such a small percentage of the marks. Further, if applying mathematical skills in realistic situations is to remain a central element of what it means to be functional, this is compromised by a need to set questions that can be reasonably tackled without a calculator. We would not wish to be in a position where we are setting contrived questions or offering overly predictable assessments in order to meet a high requirement for non-calculator assessment.

Q20. 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?

Agree

**Please give reasons for your answer**

We would welcome set ranges for these skills, as it will help ensure comparability between the awarding organisations. With reference to our response to Question 19, we would contend that the best place for some non-calculator assessment would be in assessing underpinning skills.

Q21. To what extent do you agree or disagree that we should set greater emphasis on the assessment of underpinning skills in an applied context and problem solving in an applied context than on underpinning skills in reformed functional skills qualifications in mathematics?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that application of skills in context and realistic problem solving should carry significantly greater emphasis than simple testing of skills.

Q22. To what extent do you agree or disagree that we should set a requirement that learners must pass each of the three content areas (reading, writing, and speaking, listening and communicating) in order to achieve an overall pass in functional skills qualifications in English?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that there should be a requirement that learners must pass each of the three content areas in order to achieve an overall pass in FSQs in English. We agree that in order to pass the reformed FSQs in English learners should demonstrate competency in all three content areas.

Q23. To what extent do you agree or disagree that we should set a weighting for spelling, punctuation and grammar that will apply to the writing assessments for functional skills qualifications in English?

Strongly Agree

**Please give reasons for your answer**

We strongly agree there should be a set weighting range for the SPaG requirements in order to ensure a comparable approach across different awarding organisations.

Q24. To what extent do you agree or disagree that for those sections of online writing assessments where spelling, punctuation and grammar will be assessed for functional skills qualifications in English, we should set a requirement that disallows spelling, punctuation and grammar checks?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that spelling, punctuation and grammar checks should be disallowed for those sections of online Writing assessments where SPaG will be assessed. We agree that the use of such checks would undermine the assessment of underpinning skills.

Q25. 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?

Level-based approach

**Please give reasons for your answer**

We think a level based approach that is drawn up from set criteria, as per Question 26, would provide the most reliable assessment outcomes for the Speaking, listening and communicating.

Q26. To what extent do you agree or disagree that we should set mandatory common assessment criteria for speaking, listening and communicating at each level for functional skills qualifications in English?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that there should be mandatory common assessment criteria for Speaking, listening and communicating at each level in order to facilitate a comparable and fair level based approach, as per Question 25. We would also be grateful for early clarify clarification of what physical evidence would be required to support the assessments made by the teachers. This is relevant against the comment in 5.10, which talks about requiring awarding organisations to strengthen their arrangements around centres controls and monitoring of centre set and marked assessments.

Q27. To what extent do you agree or disagree that we should set rules around the assessment of reading and spelling of words contained in the appendix of the subject content?

Strongly Agree

**Please give reasons for your answer**

We strongly agree that there should be rules around the assessment of reading and spelling of words as contained in the appendix of the subject content. Set rules will ensure that this element of the subject content is appropriately and consistently assessed by all awarding bodies. However, further support is needed in determining an assessment approach which assesses the reading and spelling of set word lists in a meaningful way. The assessment approach would need to take into consideration the possibility of the word lists being rote learned.

Q28. We have set out the ways in which our proposals could impact (positively or negatively) on learners who share a protected characteristic. The term 'protected characteristics' is defined in the Equality Act 2010. Here, it means sex, disability, racial group, age, religion or belief, pregnancy or maternity, sexual orientation and gender reassignment. Are there any potential impacts that we have not identified?

No

**Comments:**

If the proposals are implemented as suggested we do not see any further potential impact on learners who share a protected characteristic other than those identified.

Q29. Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on learners who share a protected characteristic?

No

**Comments:**

See answer to question 28.

Q30. Do you have any other comments on the impacts of our proposals on learners who share a protected characteristic?

No

**Comments:**

We have no further comment on this topic.

Q31. Are there any regulatory impacts that we have not identified arising from our proposals?

Yes

**Comments:**

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

Q32. Are there any additional steps we could take to minimise the regulatory impact of our proposals?

Yes

**Comments:**

In our view, a degree of regulation is welcomed in this field in order to ensure comparability of standards between awarding organisations.

Q33. Are there any costs or benefits associated with our proposals which we have not identified?

Yes

**Comments:**

As per our response to question 16, if the legacy FSQs and the new FSQs are to be run concurrently, there will be significant cost involved for the awarding organisations alongside potential confusion for centres around entries and re-sits, which in itself could be a burden.

Q34. Is there any additional information we should consider when evaluating the costs and benefits of our proposals?

Yes

**Comments:**

Functional skills must be robust, highly valued qualifications that can be seen as comparable in challenge if not size, but distinct from GCSEs. We believe that best way to achieve this is to ensure that setting and awarding processes are comparable to those used in GCSEs, and public confidence in functional skills is enhanced through rigorous regulation.

## Feedback

We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation?

|                   | 1 | 2 | 3 | 4 | 5 |                   |
|-------------------|---|---|---|---|---|-------------------|
| Very hard to read |   |   |   | X |   | Very easy to read |



## Your details

|                |
|----------------|
| Name           |
| James Kennelly |

|                   |
|-------------------|
| Organisation name |
| AQA               |

|                                   |
|-----------------------------------|
| Position or job title             |
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|  |
|--|
| Is this the official response from your organisation or your own, personal response? |
| This is the official response from my organisation                                   |

|   |
|---|
| Which nation or country are you based in? |
| England                                   |

|   |
|---|
| How did you find out about this consultation? |
| Ofqual's website                              |

## Your details (official response)

|  |
|--|
| Which of these options best describes your organisation? |
| Awarding body or exam board                              |