

## Implementation of Functional Skills Reforms

### Joint response of the Association of School and Principals Professional Council

#### **A Introduction**

- 1 The Association of School and College Leaders (ASCL) represents over 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

The Principals Professional Council (PPC) joined forces with ASCL in 2014 and now operates as a Committee within ASCL. PPC represents Principals and senior leaders in Further Education Colleges.

- 2 ASCL/PPC welcomes the Government's approach to ensuring consistency in the way that awarding bodies assess Functional Skills. This is helpful for both English and maths Functional Skills.
- 3 We believe that these reforms will generally help learners understand better what is expected of them, as well as schools and colleges knowing better how to prepare young people for these qualifications.
- 4 ASCL/ PPC broadly agrees with the rules which are proposed to be implemented.
- 5 Individual institutions, including schools and FE colleges led by ASCL/PPC members will be responding to the consultation independently of our response so the comments in this document, submitted from ASCL/PPC, are a broad set of observations on the proposals<sup>88</sup>.
- 6 ASCL/PPC notes that Ofqual are seeking views on whether the rules on functional skills implementation are appropriate.
- 7 Our remarks are organised in sections as follows:  
**A Introduction**  
**B Answers to consultation questions**  
**C Conclusions**

## **B Answers to consultation questions:**

8 Our answers are set out below in response to the 36 questions in the consultation.

- 1 ASCL/PPC agree with the proposed approach to setting rules for assessment strategy documents.
- 2 We approve of the proposed rules around the technical evaluation process.
- 3 The associations agree with the proposed approach to interpreting subject content requirements for the new Functional Skills Qualifications (FSQs) in English.
- 4 We agree with the proposed approach to interpreting the subject content requirements of the new FSQs in mathematics.
- 5 ASCL/PPC agree with the proposed minimum and maximum overall assessment time requirements for English.
- 6 We agree with the proposed minimum and maximum overall assessment time requirements in mathematics.
- 7 The associations support the proposed approach to setting rules around the contextualisation of reading and writing assessments at entry level.
- 8 ASCL/PPC approve of the proposal to set a rule on awarding organisations to provide guidance to centres around any setting, adaptation, delivery or marking of assessments.
- 9 We agree with the proposal to put in place guidance on assessment availability.
- 10 The associations approve of the proposal to mandate a common approach to issuing results but we much prefer the term “not yet met the standard of a pass” instead of the term “fail”.
- 11 We support the proposed approach to setting rules on the number of assessments and tasks in the reading, writing and speaking, listening and communicating components.
- 12 ASCL/PPC agree with the proposed approach to the assessment of reading expectations.
- 13 We are in agreement with the proposed approach to the assessment of spelling expectations.
- 14 We support the proposed approach to setting guidance around the use of language and stimulus materials that is in line with reading and spelling expectations set for each entry level.
- 15 Given that it is difficult to assess the actual impact of the two important changes being made to new FSQs given in paragraph 4.23 at this stage we can neither agree nor disagree with the proposed weighting ranges for spelling, punctuation and grammar at L1, L2 and Entry levels.
- 16 The associations agree with the proposed common assessment criteria.

- 17 We fully support the proposal to require awarding bodies to provide exemplar materials in support of assessors' judgements in speaking, listening and communication components. This will be most helpful to teachers preparing students for assessment.
- 18 ASCL/PPC considers the proposal to dis-apply the General Condition of Recognition in respect of the speaking, listening and communicating component a sensible proposition.
- 19 We are in agreement with the proposals for the monitoring arrangements for speaking, listening and communicating.
- 20 The associations fully support the proposal to produce guidance to clarify the use of sign language as a reasonable adjustment in the new FSQ in English.
- 21 ASCL/PPC agree with the approach to the number of assessments in FSQs in mathematics.
- 22 We agree with the coverage of subject content in the new FSQs in mathematics.
- 23 We neither agree nor disagree with the proposed approach to weightings for calculator and non-calculator based assessments.
- 24 The associations neither agree nor disagree with the proposed approach to weightings for underpinning skills and problem solving.
- 25 We approve of the approach around the use of evidence to support standard setting.
- 26 We support the proposals around maintaining standards in the reformed FSQs.
- 27 We have no comment to make in response to this question.
- 28 We have no comment to make in response to this question.
- 29 We have no comment to make in response to this question.
- 30 Yes. All awarding Bodies should introduce these changes in a measured way and learners and teachers should be given time to assimilate their impact and prepare for the changes.
- 31 We consider that the new FSQs may incur more cost to the Assessment Centre (school/college) in the short and medium term in Awarding Body fees and this should be avoided wherever possible.
- 32 We have no comment to make in response to this question.
- 33 We feel that innovation may be stifled by these changes as the system will be very rules driven, however this is but this may well be necessary to ensure consistency in approach across the FSQs by all Awarding Bodies. This is an area that should be carefully monitored and reviewed.
- 34 See 30 and 33 above.

35 See 30 above.

36 We have no further comments to make.

## **C Conclusion**

9 We feel that the proposed changes will ensure consistency in the approaches of Awarding Bodies to functional skills so that learners will experience the same assessment approaches whichever awarding body their functional skills are assessed by.

10 However we strongly suggest that these changes should be introduced in a measured way so that learners and teachers have time to assimilate the changes.

11 We hope that this is of value to your consultation, ASCL/PPC is willing to be further consulted and to assist in any way that it can.

Kevin Gilmartin Post-16 Policy Specialist - Association of School and College Leaders  
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