

## ASSOCIATION OF TEACHERS AND LECTURERS

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***Consultation on the Draft Regulatory Criteria for Functional Skills***  
***Response from the Association of Teachers and Lecturers***  
***Date: 31 August 2009***

ATL, as a leading education union, recognises the link between education policy and our members' conditions of employment. Our evidence-based policy making enables us to campaign and negotiate from a position of strength. We champion good practice and achieve better working lives for our members.

We help our members, as their careers develop, through first-rate research, advice, information and legal support. Our 160,000 members – teachers, lecturers, headteachers and support staff – are empowered to get active locally and nationally. We are affiliated to the TUC, and work with government and employers by lobbying and through social partnership.

### **ATL policy**

ATL believes that teachers as professionals must be recognised for their knowledge, expertise and judgement, at the level of the individual pupil and in articulating the role of education in increasing social justice. Within national parameters, development of the education system should take place at a local level: the curriculum should be developed in partnership with local stakeholders; assessment should be carried out through local professional networks. Schools and colleges are increasingly encouraged to work collaboratively to offer excellent teaching and learning, and to support pupils' well-being, across a local area. Accountability mechanisms should be developed so that there is a proper balance of accountability to national government and the local community, which supports collaboration rather than competition.

### **ATL response**

If functional skills qualifications are intended to ensure that every young person in the country leaves full-time education with a basis for future success then ATL welcomes them wholeheartedly. ATL strongly believes that education makes a difference to lives. It is therefore important that functional skills qualifications are of the highest quality and are capable of achieving this ambition.

ATL's members in schools and Further Education colleges have expressed mixed feelings about how prepared they are to prepare pupils for functional skills qualifications. Though the criteria seem relatively uncontroversial, we believe that they lack detail and require further thought at this stage as well as significant work from the awarding organisation as they move from criteria to specifications. This response

highlights such areas of the criteria and offers some solutions to improve the qualifications that will emerge.

It is hard to ignore, however, that at the heart of the issue around implementing functional skills qualifications is the question of where it fits into existing teaching and assessment and exactly how it is best placed to further the basic education of young people today. ATL firmly believes that qualifications criteria cannot be developed successfully without recognising the wider context, and that confusion around the significance of functional skills qualifications must be resolved if implementation is to be smooth.

### ***The big picture: making functional skills fit***

Looked at optimistically, functional skills qualifications offer lower ability learners who struggle with existing qualifications the chance to acquire stand alone qualifications at entry level. Or as one ATL member, teaching in an 11-16 school, puts it:

“... this enables our weakest and most vulnerable students to leave with basic qualifications that will be recognised not only by colleges etc but by employers [and upon which] students can build in the future.”

Whilst serving this valuable end, it is essential that functional skills qualifications do not suffer from being seen simply as a qualification for low-achievers. It is difficult for a qualification to become valued if it is battling for status from its introduction, and it is unfair for those students undertaking the assessment. The *Your child, your schools, our future* white paper's Pupil Guarantee pledges to offer every learner at 14-19 the opportunity to gain functional skills. This will be meaningless if young people, employers and/or educational institutions do not value the standalone qualifications.

Part of the problem here lies in the lack of clarity over how Functional Skills qualifications fit in with existing teaching and the assessment system. It is clear from ATL's membership that there is significant confusion and speculation around the interaction between Key Stage 3, GCSE, and functional skills teaching and the consequences of recent policy across these areas. ATL questions intentional duplication of learning such as that which diploma students who are also taking GCSEs, or already have an A\*-C grade at GCSE, will undertake due to standalone functional skills qualifications being a compulsory part of their Diploma. This is despite GCSEs being considered to develop the required functionality. The discrepancy of compulsion between GCSEs and Diplomas is at best inconsistent and at worst could lead to three tiers of qualifications with functional skills at the bottom. There is also scepticism about the potential success of functional skills qualifications and, despite the member's comment above, there is some work to be done to overcome the view that they are a 'bolt-on', doomed to fail. Frequent changes during the piloting of the qualifications have not helped raise confidence.

ATL believes that further discussion is needed about when in a young person's education functional skills are best developed. Whilst the functional skills criteria for maths state explicitly that specifications must be consistent with national curriculum levels and adult numeracy

standards, this is not the case for English or ICT. And functional skills are not referred to in the national curriculum level descriptions for Maths, ICT or English. Taking maths as the example, the functional skills criteria indicate that functional skill development between Entry 3 and Level 1 should be consistent with NC level 4. This poses a major contradiction between the expectation that NC level 4 represents expectations for most 11 year-olds (at the end of year 6) whilst functional skills qualifications starting at Entry 1 – that is, below Entry 3 – are to be open to students in year 9 and above. We believe this inconsistency needs looking at urgently. This gap could further add to concerns about the status of the qualification and what can be inferred about the students taking it. But equally importantly, our education and examination system should match the high aspirations that the workforce has for young people, and that young people are developing for themselves. One member in FE highlighted the low standards in English and maths of incoming students and suggested the development of functional skills should be completed before entering further education, not least to increase success in their 'working life' task-based qualifications. Aiming to teach and assess skills considerably under the level that students should be at, does not help them achieve all they are capable of and progress at the pace they may.

The removal of national curriculum assessment at the end of Key Stage 3 leaves a gap which functional skills qualifications may fill. ATL argues, however, that it would be filling the wrong gap. Instead, functional skills should be developed continually in schools. High-stakes Key Stage 2 national curriculum testing should be withdrawn and functional skills qualifications could be taken on a 'when ready' basis through key stages 2 and 3. Teaching would focus on developing an individual's skills rather than preparing them for a test on a set date.

A further issue that will impact upon functional skills qualifications in the classroom is their use as an accountability measure when the details and format of the school report card become clearer. It seems the Government's intention – following Ofqual's intervention insisting that functional skills qualifications should not be an enforced hurdle to a top GCSE grade – is to use the report card as a lever to make sure that schools offer functional skills qualifications to GCSE students. We strongly believe that, particularly in schools in which all students are taking GCSEs, this will have a detrimental impact on the education of already over-tested students. The consequences of using examination results in school accountability include increased pressure on school staff, and young people learning to take tests rather than developing the skills they need.

Without reconsideration of the wider context and issues raised above, no matter how good the criteria and subsequent specifications are, the teaching of functional skills qualifications will be undermined.

### ***Contextualisation of Assessment***

ATL believes that the absence of detail on the contextualisation of assessment makes it difficult to judge at this stage whether the criteria will lead to sound qualifications. Members have identified the need for an explanation of the type of questions and the way the assessment can take place. The criteria could therefore be more explicit in stipulating what

guidance awarding bodies are expected to provide on contextualising assessments. This may include (but not be limited to) specifying that it must include advice on identifying relevant contexts, question-setting and task design, and making the assessment fair for all students. The provision of examples of contextualised assessment would be extremely useful for teachers and lecturers.

ATL emphasises the importance of considering the development of contextualised assessment through an equalities lens. It is essential that guidance provided by awarding bodies takes into account that the qualifications will be taken by a diverse group of people, and offers advice to ensure that contextualised assessment does not inadvertently penalise those with specific needs or experience. A variety of different contexts will be needed – what one person may be able to relate to their day-to-day life, another may only experience infrequently or never at all. Recognition that people with disabilities, of different gender, sexuality, religion, race, and age live different lives must be central to the development of contextualised assessment, which must not favour or disadvantage any group of students.

We are in favour of the local design of assessment. However, we argue that in order for teachers to develop high quality assessment, the awarding bodies should be expected to initiate a system that exists beyond the provision of early-stage guidance and is able to provide peer-based feedback to ensure the high quality of the task-based, contextualised assessment that teachers and lecturers have produced.

### ***Task-based Assessment***

We are clear that task-based assessment must move away from the problem of rote learning for examination that concentrates the efforts of teachers and pupils in the wrong place. There is concern amongst members that the criteria do not do enough to ensure this will be the case. In particular there is a lack of confidence that the functional skills qualifications will stretch students. Allowing pupils to achieve a level beneath that at which the assessment is pitched, but not a level above, sends out an unusual message about ambition and achievement. It potentially hampers the development of skills rather than encouraging them.

Task-based assessment that is open-ended rather than at a single level can be marked according to how effectively the student has used techniques they have learnt or skills they have developed. In removing an upper limit, it would allow students to speed up their progress, learn more than the basics, and use initiative to go beyond the box-ticking trap that much learning for assessment has fallen into. This is not inconsistent with assessing for functional skills qualifications on a 'when ready' basis. Teachers will use their professional judgment to decide when a pupil has reached a given level and can also identify which students have developed additional skills that will allow them to be challenged and hopefully to progress more rapidly – assessing at a single level makes this more difficult.

ATL's members are concerned with the lack of detail in the criteria that deal with task-based assessment. It would be beneficial for guidance to be clearer on the actual assessment tasks. Consideration should also be given to students with special educational needs and there should be

clarity of their entitlement to support such as the readers, scribes or extra time they receive for GCSEs.

### ***Workload and costs***

ATL's members have expressed concern as to the impact functional skills qualifications will have on workload. Consideration should be given to the timing of the three exam periods with respect to the existing heavily-loaded external examination timetable and the pressures teachers and lecturers face in preparing for (modular) exams. If functional skills qualifications are to involve an element of internal marking, who will allocate this time and who will pay for it? Furthermore, what other tasks might a classroom assessor give up in order to carry out assessment and marking of functional skills qualifications? The success of the qualifications is in large part dependent on the success of teaching. Teachers must not be overburdened with paperwork, to the detriment of high quality teaching. In the current economic and public spending climate, it is unlikely that school budgets will increase at the levels they have in recent years. ATL is concerned that the cost to schools of increased assessment will require sacrifices to be made elsewhere that will impact upon young people's education.

### ***Subject-specific comments***

Subject specialists in ATL's membership commented on the criteria for Maths and ICT functional skills qualifications. Our members believe that the assessment weightings for maths are sound and consistent with what is already taught. There is some concern from ICT teachers that the subject-specific criteria lack the future-proofing that is necessary in such a fast-changing subject area and does not allow for stretching capable students. Questioning whether functionality can be taught using the system designed and whether the qualifications are at the right level for students, one ATL member who teaches ICT suggests that:

“... students need to progress at their own speed and for this to happen there needs to be more flexibility. The criteria set the boundary too low and ultimately rather than allowing more functionality it will give less.”

### ***Conclusion***

ATL believes that teaching functional skills can help students develop skills for life, to participate successfully in the workplace and in society. These skills can be key to the transferability of learning and experience. Functional skills qualifications must be of sufficiently high quality, and must be capable of developing and stretching students, to achieve this. We think that more detailed criteria – that make greater demands on what is expected from awarding organisations to support teachers – will be best placed to ensure this is the case. At the same time, consideration should be made to the impact of functional skills qualifications on staff workload, and whether this is directed in the right place.

All pupils should develop functional skills throughout their schooling and functional skills qualifications should build on those skills developed in the national curriculum. Teaching should be aspirational and a strong qualification allows this to come across. We have concerns about the status of the qualification, when it should be taken, and by whom. We

believe that over-testing and teaching to the test are already a problem within our education system and that functional skills qualifications threaten to exacerbate that. Instead, ATL proposes that functional skills qualifications are assessed in a different way, on a 'when ready' basis, and with contextualised assessment that takes full account of the diversity of students. Functional skills should have an honest focus on developing students and must not be another mechanism to hold schools to account.