



# AELP Mini Commission

## Functional Skills Qualifications (FSQS)

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Final Report - December 2024



**AELP Mini Commission**  
**Functional Skills Qualifications (FSQS)**  
**Final Report**

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## Mini Commission Conclusions

One of the most persistent issues facing apprentices, employers and apprenticeship providers is Functional Skills Qualifications as an exit requirement. It is almost universally viewed as a barrier to opportunity within apprenticeships, and as a major source of frustration for providers and learners. However, the data to support some of these conclusions has been largely absent. AELP's first mini commission on Functional Skills Qualifications aims to address this gap and help deliver positive change.

We surveyed 168 providers, supplemented by half a dozen in-depth follow up interviews, collected additional data through FOI requests and other public sources, convened round tables to explore the issue and incorporated data from Aptem, one of the largest apprenticeship management systems in the county, covering a total of 160,000 learners to reach our conclusions.

If one thing should be taken away from the mini commission it is this: **Functional Skills Qualifications should be removed as an exit requirement from apprenticeships.**

Unique in our education system, Functional Skills Qualifications are currently an exit requirement for apprenticeships – no other qualification requires the learner to achieve English, maths or indeed any other qualification in order for them to get the qualification they are doing. You can achieve a T level, A level, degree and even a PhD and no one will check your English or maths as part of that achievement. Only people who have already achieved a GCSE level 4 (or higher) in English and maths or FSQ (at the appropriate level to their apprenticeship) are exempt, assuming they can produce the documents to show this.

What AELP's mini commission found was startling. Apprenticeships are supposed to be vehicles for social mobility, yet **only one in four apprenticeship vacancies are open to learners without GCSE English and maths**. This is a result of providers and employers wanting to avoid the stressful and often irrelevant Functional Skills Qualifications that come with learners without English and maths. Given the dire impact on operations, morale and learner mental health caused by Functional Skills Qualifications as an exit requirement it is not surprising that both employers and providers have responded by seeking to avoid it wherever possible.

This means the current policy of keeping FSQ and an exit requirement actually reduces the number of learners receiving English and maths teaching, an outcome the government can hardly think is desirable.

We know from every conversation we have on this subject that that providers do not want to reduce the amount of English & maths they are teaching – quite the opposite: they believe in and want to continue delivering English and maths. What they are against, in overwhelming numbers, is Functional Skills Qualifications *as an exit requirement*, because it **holds back** learning of English and maths and chokes off occupational progress and achievement for learners and employers, just at the moment when they should be taking off.

Our commission also explored the mental health impact on FSQ on apprentices and their teachers. This is an often unexplored aspect of FSQ, but is incredibly important and clearly damaging to the lives of some of the people who need the support of the skills system the most. Learning should



empower a learner, inspiring them to further learning. Unfortunately FSQ policy as it stands creates frustration, stress and disappointment, and turns learners away from engaging in further training. This has to change.

Keeping FSQ as an exit requirement is also impacting value for money for the government. The mini commission found that around 7% of apprentices are essentially being made to fail as a result of FSQ despite in many cases being functionally competent in their apprenticeship. This represents a significant number of learners blocked from reaching their potential, and a significant number of employers frustrated by the system.

At a time when nearly a million young people are not in employment, education or training and one in three young people leave school with neither GCSE English or maths, it is astonishing that apprenticeships are being closed off. Well-intentioned but poorly thought through rules designed to encourage further learning of English and maths are in fact having the opposite impact. Those in most need of support are being blocked from the apprenticeship route because of these exit requirements. We believe it is now time for the government to remove the need for Functional Skills Qualifications as an exit requirement to complete an apprenticeship.

This is supported by employers: at a recent round table run by Multiverse, one of the largest providers of apprenticeships in the country, with a dozen multi-national employers, **every single one** wanted Functional Skills Qualifications as an exit requirement to be removed. This is backed up by one-to-one conversations we have every week with employers, large and small.

There is a way to decrease the misery caused by Functional Skills Qualifications as an exit requirement while increasing the amount of English and maths support going to the people who need it the most.

AELP's proposals emerging from the Mini Commission are a powerful set of policies that would:

- Increase the number of people getting vital numeracy and literacy skills to succeed in their careers and life, through their apprenticeship.
- Re-open the door to more people without English and maths at Level 2 to participate in life changing apprenticeships.
- Introduce people to a positive experience of learning English and maths to kick start a lifelong learning process.
- Channel finite resources to where they are needed, from where they are currently adding less value.
- Remove the administrative anomaly whereby apprenticeships carry a different requirement from other gold standard programmes, e.g. A Levels and T Levels.

Most crucially of all, removing FSQ as an exit requirement for apprenticeships will open apprenticeships up at scale to people who need English and maths support. It will increase the number of people getting the English and maths support they so desperately need but in a way that removes the fear and anxiety from the process, not only benefiting the maths and English learning and but also benefiting progress in the apprenticeship. We would expect achievement rates to be boosted by at least 5% and for the reputation of apprenticeship programmes as an attractive option for both employers and learners to be transformed.



The Government should act now.

**Ben Rowland, Chief Executive Officer, Association of Employment and Learning Providers**

**Recommendations:**

AELP proposes the following recommendations following extensive data and feedback collection and analysis through this mini commission:

- Remove FSQs as an exit requirement for apprenticeships, bringing them in line with T Levels and A Levels. This would ensure that more learners are able to start, and complete, an apprenticeship. Providers and employers would be less likely to impose entry restrictions leading to increased participation, achievement and progression, particularly for those with the lowest levels of achievement for those who may be disadvantaged.
- Apprenticeship Standard trailblazer groups should consider English and maths requirements for apprenticeships on a standard by standard approach, rather than a one-size fits all approach, allowing more contextualisation. This would ensure that delivery and assessment are more aligned to job roles and skills being tested are meaningful and appropriate to the learner.
- Require and fund providers to deliver English and maths support to all learners who are not able to demonstrate the required level, including an assessment at the start and end of the apprenticeship to demonstrate progress (but NOT as an exit requirement for the apprenticeship).
- Allow and fund learners to take Functional Skills Qualifications if they and their employer wants them to.
- Use the Learner Record System (LRS) as a proxy for lost certificates. The LRS covers anyone under the age of 29 and could be used effectively to reduce the amount learners are having to pay for duplicate certification to prove exemptions. This would be a cost/saving benefit to learners.
- Where apprentices have attained, or are studying towards a higher level apprenticeship, such as a degree, and/or where Initial Assessment indicates Level 2, the learner should be exempt from FSQs. This would be a cost/saving benefit to government as funding is then directed to where it is needed.
- Allow a broader range of exemptions, including a wider range of overseas qualifications. This would be a cost/saving benefit to government to direct the funding where it is needed.
- Consider policy related to specialist English and maths providers being constrained by the apprenticeship subcontracting and APAR rules. This would ensure that all providers have the option to build more partnerships with specialist providers, particularly for smaller providers, and address issues with specialist staff recruitment.



## **Provider Survey - Background**

AELP issued a survey to the sector (July – August 2024) including AELP members, non-members and local provider networks, to gather provider data and evidence of the impact of FSQ policy on apprenticeship provision. 168 respondents completed some, or all, of the survey questions.

The survey requested both qualitative and quantitative data on the following key themes/areas:

1. Regions where apprenticeship provision is delivered;
2. A breakdown of sectors covered by apprenticeship provision;
3. Data questions to ascertain the current picture of apprentices currently live on programme, and how FSQs impact on apprentices who are currently 'in learning' (those Past Planned End Date (PPED) as a result of FSQs and those who have withdrawn as a result of FSQs) during 2023/24 academic year
4. Employer/provider behaviour around artificial restrictions for apprentices with lower level skills;
5. The mental health impact of FSQ on both apprentices and delivery staff;
6. Different approaches to Functional Skills delivery over the last 12 months to improve retention/achievement rates;
7. Whether providers think that Functional Skills Qualifications should be removed as an **exit requirement** to achievement of apprenticeships.

## **Provider data analysis (see annex for a summary of all data)**

### **Theme 1 – Regions:**

In terms of geographics, respondents' indicated an equal spread of provision in all regions with many offering provision nationally.

### **Theme 2 – Sectors:**

The three most popular sectors for apprenticeship provision were Business and Administration, Education and Childcare with Care Services.

### **Theme 3 – Learner Data:**

100/168 respondents clearly answered these data questions which indicated that 12% of learners are PPED, of those 27% are due to non-completion of FSQs and 4% of apprentices ended up withdrawing due to FSQ non-completion.

In order to test the reliability of the data in this section, contact was made post survey with six respondents to ask additional questions regarding FSQ exemptions:

*In relation to the learner number questions, please would it be possible to indicate the number of learners, from your totals given below who:*

- a) Needed to complete one FSQ
- b) needed to complete both FSQs
- c) Were exempt from FSQs?



How many apprenticeship learners do you have on programme at the time of completing this survey?	How many of your apprentices, currently on programme, are Past Planned End Date (PPED)?	How many of your apprentices, currently on programme, are Past Planned End Date (PPED) as a result of not being able to complete their Functional Skills Qualifications (FSQs)?	How many of your apprentices ended up withdrawing (did not complete their full apprenticeship) as a result of not being able to complete their FSQs between August 2023 and July 24?	Needed to complete one FSQ	Needed to complete both FSQs	Were exempt from FSQs	(Diff due to time lag in requesting data)
793	50	8	18	199	88	594	(88)
556	38	17	12	67	12	72	(151)
126	13	8	9	20	45	61	0
3000	400	150	130	360	990	1650	0
96	13	8	9	20	45	61	(30)
<b>4571</b>	<b>514</b>	<b>191</b>	<b>178</b>	<b>666</b>	<b>1180</b>	<b>2438</b>	<b>(269)</b>

*(Numbers above may not tally with total amounts due to time lag of information request. Providers also supplied the information in different formats.)*

**Taking the above into account, 53% of learners were exempt from FSQs however this is data from a small number of providers with varying sizes of provision. This still shows that across only five providers, 2133 learners were affected by FSQ policy and 4% withdrew as a result of not being able to complete their FSQs between August 2023 and July 2024.**

To further explore the impact of exemptions, AELP submitted a Freedom of Information (FOI) request to the Department of Education to ascertain, for apprenticeship starts in 2022/23 a) how many apprentices were exempt from functional skills qualifications, b) had one functional skill learning aim and c) had two functional skills learning aim.

The results of the FOI are shown below:



**Apprenticeship starts by function skill qualification**

*This data is for the 2022/23 financial year.*

Functional skill	Starts
Not required to undertake an English and maths qualification alongside their apprenticeship	246,170 (74%)
1 functional skill done alongside apprenticeship (English or maths)	32,440 (10%)
2 functional skills done alongside apprenticeship (English and maths)	56,280 (17%)
<b>Total</b>	<b>334,890</b>

*(DfE Caveats - Starts by financial year are based on start month, April 2022 to March 2023).*

**This shows that a total of 88,720 (26%) apprentices will be affected by FSQ policy in the 2022/23 financial year alone.**

Further to the Freedom of Information (FOI) Request - functional skill data split by level, age, gender and learning difficulties and/or disabilities (LLDD) – figures shown below:

FY 2022/23		0 FSQ		1 FSQ		2 FSQ		Total
Data split	Starts	% of row total	Starts	% of row total	Starts	% of row total		
All starts	246,310	73.5 %	32,470	9.7%	56,320	16.8 %	335,100	
Sex	Female	118,870	69.8 %	18,180	10.7 %	33,160	19.5 %	170,210
	Male	127,440	77.3 %	14,290	8.7%	23,160	14.0 %	164,890
Age - refined	Under 19	60,660	79.0 %	9,980	13.0 %	6,190	8.1%	76,830
	19-24	83,920	84.7 %	8,350	8.4%	6,800	6.9%	99,070
	25+	101,730	63.9 %	14,140	8.9%	43,330	27.2 %	159,200
Age - 25+	25-29	34,930	77.6 %	3,950	8.8%	6,110	13.6 %	44,990
	30-34	22,920	64.4 %	3,220	9.1%	9,430	26.5 %	35,570

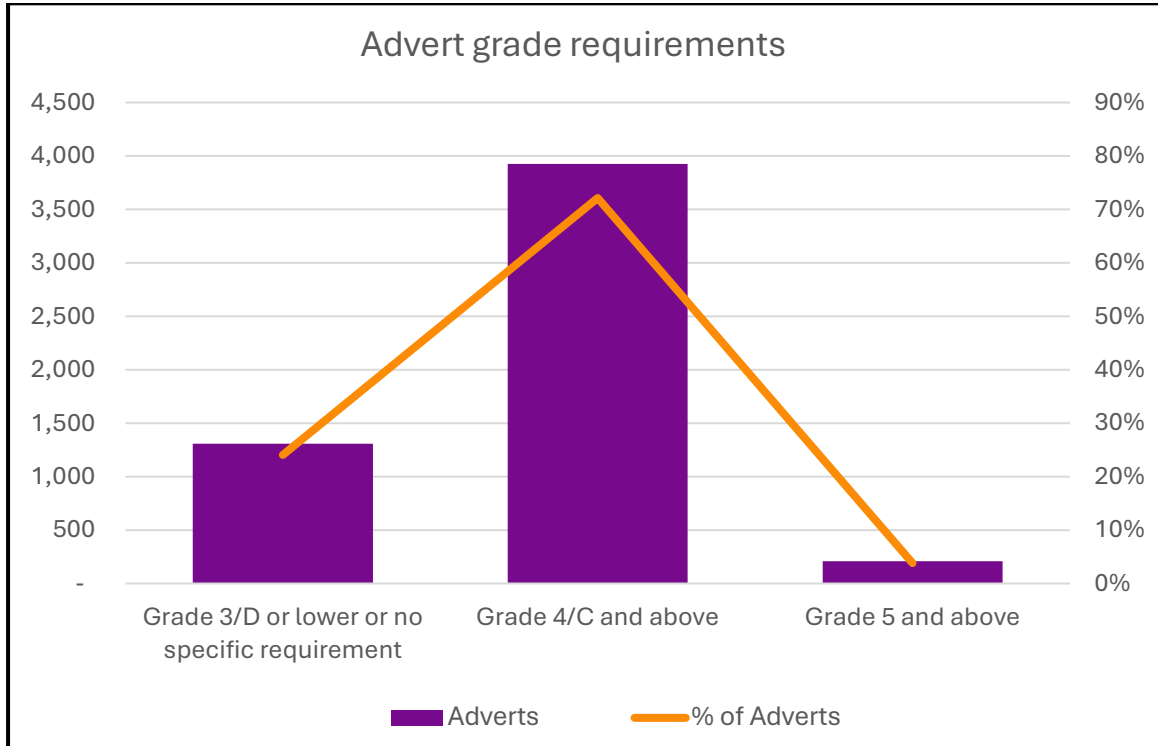




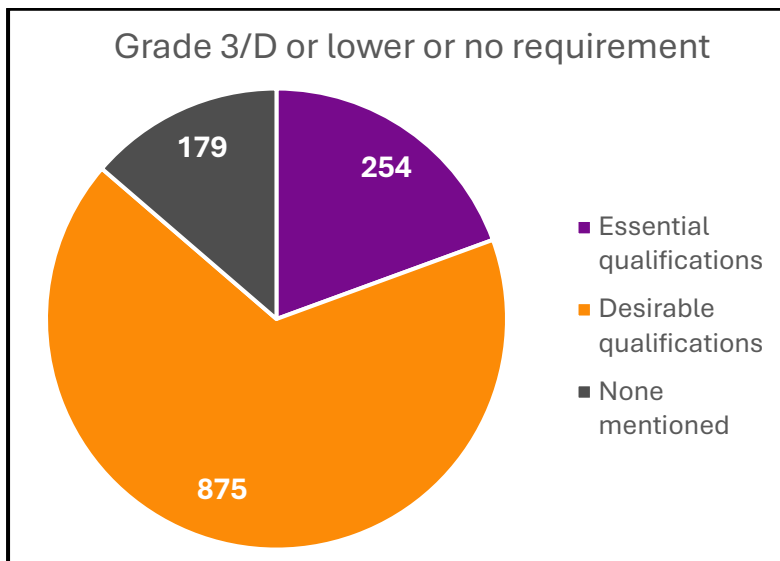
	35-39	16,530	59.1 %	2,550	9.1%	8,880	31.8 %	27,960
	40-44	11,890	57.1 %	1,850	8.9%	7,070	34.0 %	20,810
	45-49	7,800	55.0 %	1,250	8.8%	5,130	36.2 %	14,180
	50-54	4,930	50.8 %	830	8.5%	3,950	40.7 %	9,710
	55-59	2,160	47.1 %	390	8.5%	2,040	44.4 %	4,590
	60+	570	41.0 %	100	7.2%	720	51.8 %	1,390
Apprenticeship Level	2	45,240	57.7 %	12,470	15.9 %	20,740	26.4 %	78,450
	3	106,030	72.9 %	15,270	10.5 %	24,120	16.6 %	145,420
	4	29,280	79.3 %	2,180	5.9%	5,450	14.8 %	36,910
	5	20,820	74.8 %	1,800	6.5%	5,200	18.7 %	27,820
	6	24,770	97.6 %	330	1.3%	280	1.1%	25,380
	7	20,170	95.5 %	420	2.0%	530	2.5%	21,120
LLDD	Diff/ Disab/ Oth	32,730	67.6 %	6,450	13.3 %	9,230	19.1 %	48,410
	No Info	8,750	78.9 %	740	6.7%	1,600	14.4 %	11,090
	None	204,830	74.3 %	25,280	9.2%	45,490	16.5 %	275,600

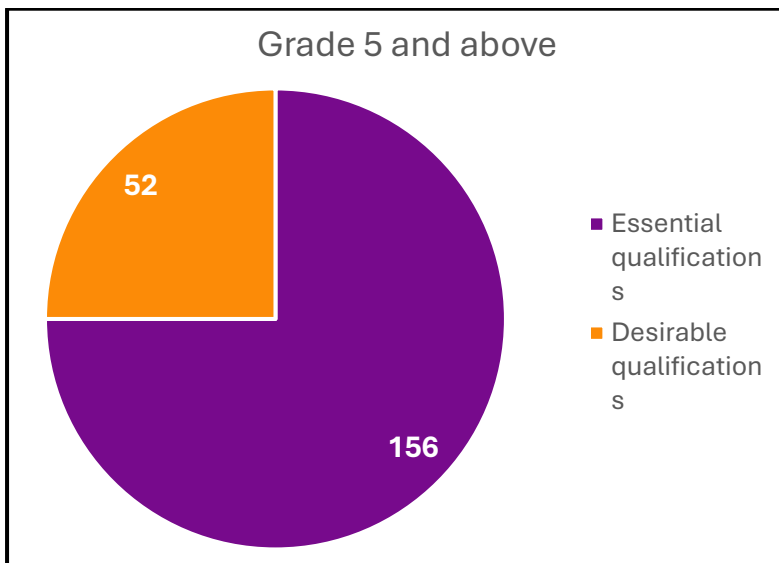
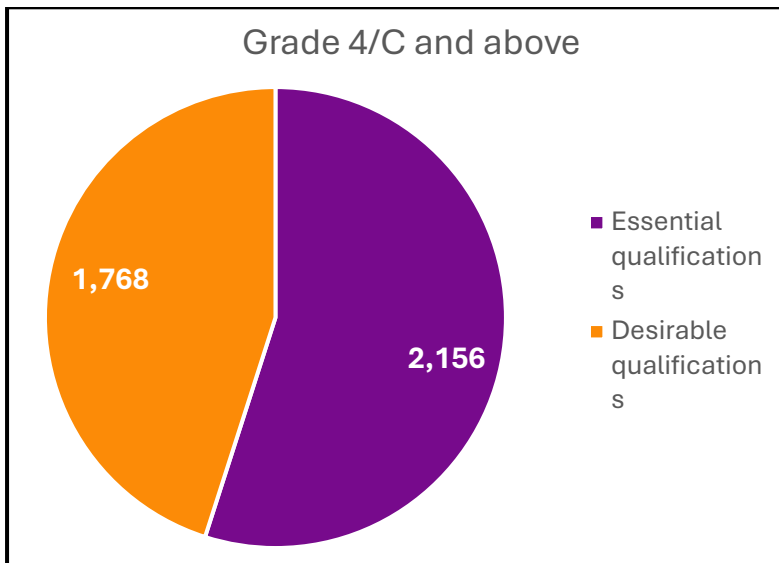
### Apprenticeship Vacancies

To ascertain the level of restrictions on entry criteria for even starting an apprenticeship, we looked at 5,440 currently live apprenticeship vacancies (all apprenticeship levels) and found that (as of 25 September 2024) **72% of adverts require learners to have a minimum of grade 4/C and above, with a further 4% requiring Grade 5 and above.** Only the **remaining 24%** of adverts either have no specific maths and English requirement or they accept grade 3/D and below. We also drilled down further to consider those advertising prior qualifications as 'essential' or 'desirable' and found that **55% of the Grade 4/C qualification requirements are advertised as 'essential'**. This compares to just **19% for adverts where the grade requirement is lower or not required.**



**(Source: [findapprenticeship.service.go.uk](http://findapprenticeship.service.go.uk))**





#### **Theme 4 – Entry Restrictions**

**53% of providers have imposed restrictions on entry criteria** citing various methods of selection including minimum level requirements, initial assessment and other assessment results, with some only advertising apprenticeship places for learners that had already achieved FSQs, requirements for online study prior to enrolment and extending the programme length. **43% of providers are also working with employers who have stipulated maths and English eligibility criteria** when recruiting to apprenticeship vacancies. This is also clearly evident in the employer voice section of this report which particularly affects recruitment to the care sector, where it was quoted that *“A lot of Universities also only offer apprenticeship places to those who have already achieved FSQs”*. This is concerning as it indicates that a high number of apprentices are being excluded from even starting



an apprenticeship thus limiting achievement and/or progression, particularly for those with lower prior levels of achievement and disadvantaged learners.

**Providers:**

*“We now only allow those working at one level below on IA. This has resulted in potentially competent and capable learners not developing new skills and knowledge in job role and disproportionately excluding people from disadvantaged backgrounds”*

*“Originally we accepted learners with lower GCSE grades (2s/E) but because of the number of learners that were withdrawing because they could not pass FS we have now restricted our entry criteria to grade 3/D and the learner must only require one FS (maths or English) and not both FS”*

*“Our processes state unless the applicants have GCSE's or FSQ at required level they have to take a diagnosis. Only exceptional cases agreed by Director are allowed on to the programme”*

**Employers:**

*“Yes, certain employers particularly within early years settings have bespoke eligibility criteria in relation to prior attainment”*

*“About 50% of our employers now either want a minimum standard of Initial Assessment (IA) (see above) or won't put learners on programme unless they have prior attainment”*

*“Many employers set their own eligibility criteria and will not take on any apprentices who do not already have FSQs at level 2.*

**Theme 5 – Mental Health Implications**

Responses indicate that **52% of provider staff have had their mental health affected by the delivery of FSQs** with common themes suggested as increased stress (35%), lack of confidence (21%), overworked (17%), frustrated (10%), demotivated (6%). Apprentice absence, resignations and recruitment impacts (10%). However, it's not only provider staff who have seen their mental health affected by the delivery of FSQs – **41% of apprentices have had their mental health affected by FSQs** with the reasons cited as – increased stress (58%), leaving apprenticeship and/or loss of job (19%), frustrated (8%), demotivated and absent (7%), demoralised and lack of confidence (7%) and 3% not even starting the apprenticeship due to seeing FSQs as a barrier. Again this is reflected in the employer and learner voice section of this report with more examples of the unnecessary anxiety and stress that FSQs place on apprentices who do not necessarily need FSQs to perform in their apprenticeship and job roles.

**Delivery staff:**

*“Many potential Vocational Tutors do not accept the post due to having to deliver FSQs and lack confidence in their own maths/English skills”*

*“De-motivating, immensely draining to remain positive and energised to encourage learners who have failed multiple times”*

**Apprentices:**





*increases their confidence, and undoes some of the previous learning stresses they encountered at school or college. Even the most hard to reach student really gets some practical knowledge to build on, and use in future endeavours” (original survey response)*

From speaking to this provider they explained that although English is less of a concern, as the learners have to write assignments so they can pick up on grammar, punctuation and spelling throughout the course of their apprenticeship, it's the maths where they tend to struggle but, with some students presenting with Additional Learning Support (ALS) needs. The tutor will spend as much time with them as needed to get them to a level of understanding of what they are being asked to do. Once they understand they become more confident and are happy to proceed with the exams.

However, when asked about the mental health of the learners in the survey this provider did indicate that learners often have *“anxiety, low confidence, and stressed when first starting sessions with me. Some cry when faced with a topic they struggle with. This is combatted with the provider time and teaching styles”*.

#### **Provider response 2**

*“There is a lot of pressure around FSQs and this is often a hold up for their apprenticeship; I have a mother of three, who is now pregnant again who is crying over the exam. She has been in hospital and is still worried about the exam. This is not a good position for her or her family” (original survey response)*

This provider sees the value of FSQs as an exit requirement so doesn't want to see this removed, however they highlighted that they work with a number of learners of different age ranges and for some, particularly in different stages of their lives, it does add additional pressure therefore there should be some additional support available over the course of their apprenticeship i.e. mental health as they felt it is 'morally wrong' to know that the learner is struggling but have to take time to study maths, for example.

#### **Provider response 3**

*“New rules will have massive positive implications allowing us to set the appropriate level of English and maths” (original survey response)*

This provider explained that their comment was in reference to the recently introduced rules around Additional Learner Needs (ALN) and providers (an appropriate SEN specialist) being able to determine the appropriate level as this has helped those learners who would have previously missed out due to undiagnosed conditions to be able progress. Also, they worried, if the learner didn't achieve FSQs during their apprenticeship, about how and when would they pick this up and would it have a detrimental effect on them long term i.e. future employer requirements. However, they also mentioned that they are very much on side with aligning apprenticeships to T Levels and gave an example of Early Years – *“a learner can progress from a T Level without passing FSQs but not an apprenticeship which seems unfair”*. Finally they stressed the need for End Point Assessment Organisations (EPAOs) to be on board with the changes around learners not requiring a statement or Education Health Care Plan (EHCP) as they didn't feel this was fully understood by the EPAOs.

#### **Provider response 4**



Another provider, who indicated 'don't know' to this question commented on their survey response:

*"I do not believe they [FSQs] should be removed fully but the flexibilities introduced this year in the apprenticeship funding rules should be further reformed to allow learners with learning disabilities to be recommended for a drop in level. For example, a learner who fails three exam attempts, has an IA score that is more than 1.5 levels below the exit requirement and shows no quantified improvement despite suitable teaching and support should be allowed to then sit at the next lowest level as an exit requirement. Or exit levels should be set at L1, with an expectation to attempt progression to level 2 but not be a mandatory exit requirement. Or functional skills should be embedded into the standard to include assessed topics such a presentation skills, math's relevant to the role e.g. healthcare workers calculating BMI, weight, height or medicine doses etc. These could be centre devised or trailblazer devised.*

#### **Provider response 5**

*"Numeracy is an essential skill in life and removing it from L3 Apprenticeships would be a detrimental step for the country as a whole and for individuals. It should be viewed as a renegade step. Teaching of numeracy to younger age groups should be reviewed and greater support placed there to ensure more people are reaching the end of compulsory education with a L2 qualification, not lowering the importance of numeracy by removing it as a requirement" (original survey response)*

This provider spoke very passionately about current levels of numeracy in the United Kingdom (against other countries) and the knock effect this has on productivity as they felt that removing the requirement for FSQ as an exit requirement, particularly maths, is 'setting people up to fail' in the workplace. However they then highlighted that this should not be the sole responsibility of tertiary education to bring learners up to Level 2, and we should also be looking at the issue of what is happening in secondary education that is failing a lot of learners. Also that instead of removing them as an exit requirement, we should be looking at FSQs in terms of the content of assessment to ensure they are 'worded in a way that people understand them'. This builds on from AELP's previous Spelling it Out, Making it Count, research, in partnership with Edge and Gatsby Foundation, where we found that *"a primary concern voiced by training providers is the lack of contextual ties to vocational and real-world settings in FSQs"*.

#### **Provider 6**

*"How do you facilitate apprenticeship progression if FSQ are removed?" (original survey response)*

This provider (FE College) talked about their retention and achievement rates on FSQs as they see a very high number of learners achieving. They offer their apprentices separate FSQ workshops and one to one sessions with a FSQ specialist (not always viable in smaller providers). Of 345 learners enrolled onto either Level 1 or Level 2 FSQs they have a 63.5% retention rate. They only found one learner where FSQs had been mentioned as a reason for withdrawal but that learner moved onto a different apprenticeship and achieved FSQs at level 1. Their pass rate for learners who don't withdraw is 100% and 66% of learners achieve FSQs at the first attempt. This is across all levels and ages; of those 345 learners, 102 are aged 16-18, 54 are 19-24 and 189 are 24+. So it's clear that their model is working and they prefer exam based tests rather than portfolio, however they did mention that there is sometimes an issue where delivery is contextualised to the apprenticeship but that exam questions often throw some learners as they are then not contextualised or refer to a completely different sector i.e. a hair dressing learner faced with a painting and decorating



apprenticeship. They mentioned that contextualisation of exam questions is more important to ensure the right product and right policy for the apprentice/learner.

#### **Provider 7**

*“However, we believe there should be a wider range of alternative qualifications and increased flexibility for those who need it. The current content for F/S maths where application is tested is proving very challenging for apprentices”*

This provider spoke about the challenges, particularly with L2 maths, and ability for learners to apply the skills they have learned when some of the questions, which feature towards the end of exam papers, are too wordy and complicated it ‘puts people off wanting to attempt them’. Although they spend a lot of time teaching exam techniques it is very time consuming and learners feel that ‘too much time is being spent on working on what they’re being asked to do’ which ultimately affects their pass rates.

**Other survey responses** where respondents indicated ‘no’ to removing as an exit requirement but also offered further comments:

*“No but I do think that:*

- 1. Functional Skills exams should be functional and more focussed on Essential Skills*
- 2. The level of Eng/maths for the role should be decided upon relevant to the standard and job role and this is the level of qualification/skill that is required. i.e. what is the appropriate level of Eng/Maths required for Early Years work?”*

*“As OFQUAL determined a guided learning requirement of 55 hours for L2 under the reformed standards, it is hard to accommodate that number of hours into a pre-determined apprenticeship programme (especially if the apprentice is not yet working at Level 2). I would want it to be possible to either lengthen the apprenticeship programme to allow sufficient support to take place for the FS aims to be achieved and/or claim funding for FS delivery prior to the apprenticeship 'main programme' starting”*

*“The qualification should be fit for purpose. It was fine before it was reformed”.*

Finally, another provider gave a different viewpoint after answering ‘don’t know’:

*“As educationalist we feel it is necessary to ensure a good level of English and maths is achieved. Not everyone can enter an apprenticeship and it is important to aspire to get an apprenticeship. We don’t want to be an open to all qualification as this will diminish the stature of apprenticeship and a level of English and maths is need to complete apprenticeship programmes. We have a good success in apprenticeships but it costs us a lot of money. If more FS funds were available this would be a big help and more would achieve. Some thoughts: Why are they leaving school with low ability-Should FS be an option in schools? Level 3 Standards removed the entry level apprenticeship which has led to higher levels of maths and English. This is a barrier to entry. Lower/entry level apprenticeship should be available. FS maths should be broken into 3 tests like English to help achieve in bite size tests. I would be concerned about having an option to not achieve FS as this would reduce motivation from apprentices and employers to achieve and diminish apprenticeship status”*





## Employer voice

As well as obtaining vital data and evidence from providers, we also spoke to a number of NHS Trusts to gain the viewpoints of employers on the same key themes. With the care sector indicated as the third biggest sector for survey respondents, NHS England kindly invited AELP to provide an update on this work at their National Skills for Life Network meeting in August. Circa 100 delegates were on the call and their feedback highlighted the impact of FSQs further. This is summarised below.

Most NHS trusts have imposed entry criteria stipulating prior achievement of FSQs, or initial assessment results showing only the need for some form of skills refresh, to get learners to the required level in the timescales available with one quoting that they have become “*a less inclusive employer*” as a result of these restrictions. A lot of Universities also impose entry criteria and learners are not accepted onto an apprenticeship without prior attainment of FSQ maths and English.

*“We support learners on a Foundation Degree Nursing Associate apprenticeship. We have had to put in a requirement of FSQ before they start as we currently have five learners nearing the end of their apprenticeship who have been unable to complete their FS and therefore cannot qualify. This is causing a lot of stress and anxiety for them”.*

Where learners have been required to complete FSQs as part of their apprenticeship, Trusts have seen good apprentices unable to qualify as a result of them being unable to achieve the exams – maths in particular. Quite alarming was the feedback that “*learners are having to resit five or six times*” which can prove very overwhelming for the learner, adding to mental health issues and anxiety, as the following quotes outline.

*“We have had someone sit their maths exam five times. Obviously this has had an impact on the work place and their mental health. They had no issues with the main content of the apprenticeship and they passed with flying colours”*

*“We had someone have to drop out of their apprenticeship having failed their maths exam around 6 or more times. They had passed the rest of the apprenticeship requirement. Therefore they have done all the work and have come away with nothing”*

*“If they haven’t managed to pass in 8/9 years at school how are they supposed to get through it in a matter of months doing 3 hours as a week!”*

Some Trusts provide upfront, additional courses and support, and are seeing a high number of staff with dyslexia and/or dyscalculia but there is limited additional funding to support this, therefore they are funding this themselves, as well as pastoral support – one delegate quoted that “*the amount of pastoral support required due to stress and fear of exams*”.

*“We have had to incorporate this into enrolment days, before and after exams. We do our best to support them but it takes them [the learner] back to school so they still get nervous and anxious. We have used assessment tools to give guidance on dyslexia and dyscalculia but don’t have funding for any deeper assessments. Also, we have lots of people where English is not their first language but there are costs to this support too”*

Exemptions came up a lot during the discussion, both for employees who may have passed English and maths qualifications a long time ago and simply cannot find their certificates so are having to resit. Also, with regards to exemptions for overseas workers, many foreign qualifications not



recognised as an exemption, even though staff are working in high level positions such as consultants and IT specialists. Also, where learners have previously achieved higher level qualifications, such as a Degree, Masters etc. should they then have to further prove a level of literacy / numeracy competency by completing FSQs as part of their apprenticeship?

*“Family members have studied in India and other countries, but their qualifications are not accepted in UK, they shouldn’t have to do it again! Those now working in England as Doctors and IT professionals etc, have that experience and ability so that should be taken into account to allow resources to be put into other areas of their work. Funding should go where it’s needed not to tick a box’.*

*“I have just had a guy wanting to start a MSc. He already has a Masters and a PhD in another area and as he couldn't find his GCSE maths and English qualification he has had to go through the Functional Skills Level 2 route. That is a waste of his time and the Trusts’ time”.*

Many potential employees in this sector are ‘put off’ apprenticeships due to the need to sit FSQ exams as they feel the exam approach is very much ‘back to school’.

*“There are lots of people interested in progressing onto apprenticeships but as soon as they see this [FSQs] is a requirement they don’t start the journey’ and ‘other potential employees opt to take the self-funded route via UCAS in order to achieve their qualifications and progress their careers rather than stay with the Trust”.*

Some Trusts questioned the relevance of FSQs and whilst they acknowledged that English is important for communication and writing skills, not all jobs require a level 2 in maths to be able to carry out their job role and progress their career further. Trusts were in agreement that maths and English should be included to ensure an appropriate level to enable them to complete their apprenticeship but this should be relevant to their job role.

Allowing learners time to complete their FSQs was also mentioned which correlates with AELPs calls for FSQs to be included in Off-The-Job-Training (OTJT) time

*“It is important to allow members of staff the time and support they need to gain the FSQ quals, either before or during their apprenticeship, as staff have felt the pressure on top of their apprenticeship they’re not being allocated the time to do this properly’.*

Another delegate quoted that

*“Employers need to ringfence the time for staff to do this [FSQs] properly – line manager pressure to be on the job and negotiating to take that person out of their job role, it’s unfair for that member of staff who might benefit from having the time to concentrate on their FSQs”*

The style of FSQ questions was also discussed.

*“Lots of people find [the questions] difficult and are not related to real life so some people struggle to see this especially with maths skills they do know. In these cases GCSE might be an alternative option for them’.*

Digital methods of exam testing was also mentioned



*"I'm considering reverting back to paper exams as I find remote invigilation and exams can be a huge cause of anxiety for our 'older' staff, especially those not confident with IT so it's a double stressor for them".*

Although Ofsted was not specifically mentioned during the discussion or as part of our provider report, one delegate highlighted the following in the chat:

*"There is a need to brief OFSTED on what the expectations and outcomes are; both our visits have been challenging around Functional Skills. One inspector could not understand why we weren't teaching [the learners] level 3 maths and English if they had level 2 and wouldn't take no for an answer, another made comment in our report on maths success when the issue is the content and changes in the qualification not the sub-contractor quality or the learner. Their focus is very much on developing even when the certificate is in place to retain or regain skills as well as develop beyond what is needed for the role or apprenticeship"*

### **Learner voice**

One delegate from the above meeting was willing to give their learner perspective of having to complete FSQs as part of their first apprenticeship:

*"I am a learner now and have been previously. I had to do my functional skills as my CSEs / GSEs were out of date. Now I am studying again and if I had needed to do them again I wouldn't have signed up. Studying first time was fine, until I went to take the exams and had a panic attack. It has scarred me for life! Even having to do the BKSB assessment this time I felt so anxious it was crazy. I was exempt but still had to do the assessments. I know I failed maths, but I didn't care and didn't give it my best shot, just wanted it over and done with"*

When exploring this in more detail with the learner, they explained that they undertook a Level 3 apprenticeship in 2009 to upskill. Due to their previous qualifications being 'out of date', when they sat the FSQ exams, it caused them extreme anxiety resulting in a panic attack. They subsequently went on to complete a Level 4 Business Admin apprenticeship in 2012, and is currently doing a Level 3 HR apprenticeship however, regardless of having achieved her FSQs in 2009, they had to undertake initial assessments and this caused them more anxiety and they questioned the need to do this if they already had FSQ exemptions. It also appears that there is no standardisation across providers for initial assessment testing – some require this to be invigilated but others do not.



### **Provider case study – Dental Nursing**

A provider who participated in an AELP information session, prior to issuing the survey, provided a case study which highlights the impact of FSQ policy.

*“In response to the request for further information regarding both recent and historic issues that we have experienced in relation to Functional Skills maths at level 2 which learners are required to achieve as part of their apprenticeship. Dental nurse learners must achieve their apprenticeship which has a Diploma included to be able to apply to the General Dental Council for a licence to practice which is a mandatory requirement for continued employment.*

*If they are unable to succeed in the math component, they are unable to progress to gateway and potentially they would lose their employment unless their employer were able to offer a non-clinical role.*

*We have supported 2 recent learners throughout their apprenticeship with math alongside their dental nurse standard, one lady aged 34 and another aged 55.*

*The second learner also sought additional support from a private tutor in attempt to gain and retain understanding and skill to achieve math, however, neither were successful having attempted the level 2 exam on several occasions, each time feeling defeated and questioning their ability with the added worry for their continued employment.*

*Historically, we have experienced learners give up with their apprenticeship because of the math component and choose a commercial course to enable them to continue in their chosen profession”.*

### **External Evidence:**

During our mini commission survey period, we were approached by Aptem who provided data from 160k learners who were in-learning on an apprenticeship (2023/24 academic year). The results of this analysis are as follows:

- Of these 160k learners 27% were undertaking one or more functional skills qualifications alongside their apprenticeship.
- 35.6% of learners undertaking functional skills were past planned end date vs. 26.6% of learners who did not do an FS qualification but were still past planned end date.
- 61.5% of learners who did a functional skill qualification alongside an apprenticeship withdrew from the apprenticeship vs. 35.4% of learners who withdrew from an apprenticeship without the functional skill requirement.
- Nearly 50% of learners at Level 2 need to undertake at least one functional skills qualification.

Further analysis was carried out by provider type, broken down by learner starts; those with 0-500 learner starts per annum vs. 501-2000 vs. 2000+. This analysis found that:

- Larger providers have considerably more learners needing to achieve functional skills.
- Of those that complete their apprenticeship, the providers seem to manage the FS qualification alongside the apprenticeship well and don't go past planned end date, but they have an extremely high withdrawal rate; the learner either copes with doing both the apprenticeship and FS qualification within the time frame or they leave.



Comparing this to smaller to medium size providers (up to 2000 learners):

- There is a 12-16% difference in learners going past planned end date with and without the functional skills additional requirement, so it's definitely costly to those providers if their learners require functional skills.

The learner withdrawal rate across all providers of all sizes is 20-25% higher if that learner is required to undertake a functional skills qualification.

Unsurprisingly the lower levels have much higher functional skills learners. There are very few degree level learners required to do functional skills.

Around 50% of Level 2 learners have an FS qualification requirement, this decreases to around 1/3 at level 3 and 20% by level 4.

### **Provider research**

We also spoke to a large provider (AELP member) who had carried out their own research. This information is confidential and commercially sensitive therefore has not been referenced in this report, however they did provide a different perspective regarding policy development, suggesting that *'a set of pre-requisite entry criteria should be put in place for each standard, on for example, safety, economic or occupational competency grounds. This would help alleviate issues created by a one-size fits all approach to functional skills qualifications across apprenticeships as a whole'*. Also, that current content does not address essential life skills to prepare apprentices for dealing with financial implications of moving into employment such as budgeting.

### **Get Further - note for AELP mini commission on subcontracting barriers to delivering English and maths within apprenticeships**

Contacts: Annabel Richardson, Head of Functional Skills & Alice Eardley, Chief Programmes Officer,

*"Adults missing English and maths qualifications is a large-scale issue and one of the biggest challenges faced by apprenticeship providers and employers, leading to lower uptake than desired and higher non-completion rates. One way of addressing this challenge would be to clear the way for the development of increased capacity for delivering English and maths within the sector. There are currently barriers within the system that make it difficult for providers to access English and maths support from outside their organisation.*

*Apprenticeship training providers are generally occupational specialists and not necessarily experts in delivering English and maths support. It can be challenging to recruit English and maths specialists to deliver the kind of flexible support specifically required for apprentices (or those aspiring to apprenticeships), especially when the number of learners needing English and maths is likely to vary between cohorts. This is a particular challenge for smaller providers who may not have the resources to recruit dedicated specialist staff to support a small number of learners. Delivery of apprenticeship English and maths provision would therefore be more effective and impactful if apprenticeship providers had more flexibility to subcontract to maths and English delivery specialists. It would allow the main provider to have more staff hours focused on the delivery of the apprenticeship standard,*



*with the knowledge that the appropriate maths and English qualifications were being delivered by subject specialists.*




*Currently, specialist English and maths providers are constrained by the apprenticeship subcontracting rules, despite not being the ones delivering apprenticeship training. This results in them being unable to provide delivery above a £500k cap per annum on delivery (and £100k cap in the first year), limiting their potential scale and impact across the sector. Subcontracted specialist providers of the occupational standards are often organisations that aren't solely training providers but are, for example, employers, so the cap is less of a challenge for them. Organisations that deliver English and maths are usually specialists in these areas and unable to operate at the small scale imposed by the cap. Furthermore, the guidance for acceptance onto APAR is complex and currently aimed at providers delivering apprenticeship standards, with many of the due diligence checks not relevant for solely maths and English providers.*

*The Department's focus is on removing barriers to opportunity. However, the existing subcontracting rules and cap severely limit the potential to scale specialist English and maths support to reach more learners. Organisations that solely deliver English and maths provision should be excluded from the apprenticeship subcontracting rules in order to reduce pressure on providers by removing the need to identify and upskill staff to deliver maths and English qualifications. Ultimately, adapting the subcontracting rules to allow for English and maths providers will support more learners to complete gateway qualifications and unlock opportunities in their careers and education”.*



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