

**Federation of Awarding Bodies – response to the Department for Education consultation on the English and Maths Functional Skills revised subject content**

**October 2017**

**Overview of the Federation of Awarding Bodies**

The Federation of Awarding Bodies is the trade association for vocational and technical awarding organisations (AOs) with over 125 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies.

Our members operate across a wide range of vocational/technical sectors and provide a range of qualifications to support learners to qualify and progress in their chosen sector. Our membership includes the majority of the awarding organisations that award the current functional skills qualifications (FSQs) and we have a dedicated forum where our members meet to discuss matters related to the functional skills reform programme; the FAB Functional Skills Group. We therefore have an interest in this consultation on the revised subject content for English and Math Functional Skills and in the Ofqual Functional Skills consultation which we will also be responding to.

This consultation response is provided on behalf of the Federation’s membership following consultation with the members of the FAB Functional Skills Group. However, AOs are a diverse community and our members may wish to make their own individual submissions containing their own perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

**Note on the format of the Federation’s draft response**

This consultation has been issued by the Department for Education with an on-line mechanism for responses (unless there are exceptional circumstances). As the Federation wishes to consult with members of the FAB Functional Skills Group on the draft response we have formulated this response form for the purpose of consultation with members only.

Feedback from members will be used to amend the draft response and the final text will be submitted to the Department via the on-line system by the deadline of 07 November 2017.

**Further information** -Further information and clarification can be obtained from Ailin O’Cathain, Head of Policy, [ailin.ocathain@awarding.org.uk](mailto:ailin.ocathain@awarding.org.uk), telephone: 02037863171

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

The Federation wishes to feedback a number of over-arching issues with the subject content documents with the intention of supporting the strengthening the final content:

**A- Clarity of purpose of the subject content documents-** The intended purpose, status and function of the subject content documents would benefit from some clarification. DfE colleagues have stated that the content documents are intended as a broad-based curriculum to inform the development of the revised Functional Skills Qualifications (FSQs). However, the expectation was that the documents would provide the standards for assessment upon which the design, delivery, and award of the new qualifications would be based across all Functional Skills awarding organisations. As this does not now appear to be the intention of the documents it should be stated for the sake of clarity and shared understanding.

**B- Standards for assessment –** It will be important to define clear standards for assessment to ensure there is a shared understanding of how the subject content needs to be measured in order to provide valid and reliable performance evidence, and to support accurate and consistent assessment judgements and assessment outcomes against a national standard.

The subject content documents, as they are currently presented, would require each assessment organisation (AO) to interpret the subject content statements without any agreed or shared understanding of functionality, problem-solving, or the necessary assessment model and methodology for providing accurate, consistent, valid or reliable evidence of functional skills proficiency at the levels specified. There needs to be an articulation of a specification for an assessment model that defines the performance standards or levels of attainment upon which to design, develop and deliver consistent and comparable assessments across multiple assessment providers.

**C- Overall level of demand –** The overall the level of demand within each level of the FSQs has increased. This has resulted in the requirements not being calibrated to nationally defined and regulated level expectations, and not being consistent with 'equivalent' qualifications and programmes. The standards articulated are often well above any nationally defined performance expectations. Simply raising the demand beyond established level expectations will not support students to progress to higher levels.

For example, at Level 2 in Maths there are 21 subject content statements (many with composite requirements) and at least 69 separate performance requirements. By contrast, the current Level 2 Functional Skills in Maths present only 7 overarching performance standards, which are underpinned by 12 indicative coverage and range statements. Raising the overall level of demand may mean that learners require more teaching and support to develop the required skills and prepare them for assessment. This highlights the challenges presented by the proposed 45 guided learning hours (see below).

- D- Progression through the levels** – In some of the statements level differentiation is unclear as are the required standards of performance which is problematic when seeking to reduce standard variability and comparability issues for the new qualifications.
- E- Guided learning hours** - The new subject content introduces new requirements, for example, the need to learn a prescribed list of spellings. However, the expectation is that these requirements should be achieved within 45 learning hours. It is not clear what research has been conducted with centres to provide an evidence base that the required delivery can be achieved within this time whilst providing learners with a fair chance of developing their skills and achieving the FSQs. This is particularly concerning at level 2 where a GCSE in English or Maths is 120 guided learning hours.
- F- Overall purpose statement** - The purpose statement for Entry level does align with the recent policy statement about LLD learners in apprenticeships being required to reach E3 in FSQ. The purpose of Entry level needs to reflect progression to the workplace.

### **English subject content**

Building on the over-arching points above, in relation to the subject content for **English**:

At present the subject content document is a broad specification of knowledge and understanding to underpin teaching and development. As stated above, we had anticipated that the document would be a content specification of knowledge and understanding for the development of comparable, competence-based qualifications and assessments to develop and recognise English communication skills for employability and everyday life. However, the English subject content does not fulfil the requirements as a document for qualification development because:

- Knowledge and understanding are not articulated as assessable outcomes and include statements that are not assessable.

- Knowledge and understanding are not expressed 'functionally' - in terms of the way they are used in the workplace and everyday life.
- A large number of statements are specified in ways which leave them open to subjective interpretation meaning the scope of individual requirements and therefore the requirements of each overall level are not clear. This does not support development of assessments with strong comparability.
- There is unclear differentiation and progression between levels meaning it is unclear what is to be taught and assessed at the specified level which is in addition to the requirements of the level/s below. A large proportion of statements are duplicated or significantly overlap at more than one level. There are several inconsistencies which add to the lack of coherence around level requirements.
- The requirements for spelling at Entry level, include extensive lists of words and guidance on further associated words which must be spelt correctly to meet the requirements of the level. These do not seem workable as one part of a qualification with 45glh without heavily and unreasonably skewing teaching, learning towards spelling. The Federation recognises the importance of accurate spelling, the contribution it makes to effective communication and the desire of employers to have assurance that this skill is present within members of their workforce. We therefore support the policy intention to reflect this in Functional Skills English qualifications. However, the approach to spelling which is specified within the content document does not seem to be suitable for functional skills learners or for this size and type of qualification. We have concerns that the approach will not prove effective in delivering the policy intention or meeting the needs of employers or learners.
- There is an absence of assessment objectives which are required to ensure consistency and comparability in assessment across the awarding organisations. These should be developed and agreed by AOs, overseen perhaps by Ofqual as part of subsequent development.

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

**English subject content**

**A- Spelling**

There seems to be a misconception that spelling is not currently part of the FSQ assessments. Currently, marks are deducted for spelling mistakes so it is already an important feature that is reflected in assessment. The proposed requirement for spelling at Entry level to include extensive lists of prescribed words presents a number of potential issues, including:

- **Sufficiency and consistency of sampling-** In a competence-based qualification, with a Pass /Fail outcome the candidate needs to demonstrate that they have met **all requirements** to achieve the qualification. They should therefore successfully achieve 100% of the spelling requirements which may well be difficult for even the most capable learner under the pressure of assessment. In reality, it would not be manageable or reasonable to assess all of these in each assessment so sampling would be required. The size of the sample will need to be determined to ensure it is consistent across all AOs and that it is reliable in relation to the total number of prescribed words. Given the extent of the prescribed spelling list it is not clear how this can be achieved without disproportionately skewing the assessment of English towards spelling and away from other areas that might be of equal or greater importance.
- **Diagnostic assessment** - Learners for functional skills will come from a variety of backgrounds and will have different level of ability with spelling. A thorough diagnostic assessment of each learner will therefore be required to identify the ability of each individual learner and prepare them for summative assessment. This would be extremely time consuming for centres and teachers and will take time from other teacher-led activities.
- **Guided learning time-** delivery time will need to be dedicated to teaching the spelling of the prescribed list of words and formative assessment of spelling will need to be conducted throughout the learning process. The amount of time this could take is a concern in terms of how far it could skew the teaching time towards a focus on spelling course. Further consideration is required of how this content can be adequately covered in a qualification that has 45 guided learning hours attached to it and an expectation, as stated by the Minister, that this will not be increased. Spelling is but one requirement of the writing component of the English FSQ and writing in totality is just one third of the overall qualification. We are concerned about how much of the 45 guided learning hours it will require to teach spelling and whether this is the best use of time in relation to achieving the overall purpose of functional skills.
- **Teaching to the test** – the provision of a prescribed word list may well lead to ‘teaching to the test’ with a focus being on memorising the list and not on understanding the underpinning principles of spelling that may well help learners to spell a wider range of word accurately in work and everyday life. With this approach, Functional Skills tests risk becoming spelling tests, rather than tests of functional proficiency when constructing language and applying it in authentic situations. There is also a risk that learners’ use of language becomes highly repetitive and formulaic, according to these limited and apparently arbitrary lists.
- **Summative assessment** -it does not seem workable to attempt to reliably assess the prescribed spelling requirements through the type of writing covered by the Scope of Study for the level (i.e.

through setting assessments that require learners to write, 'short simple texts such as messages and notes'). It is not possible to set assessment tasks which will reliably prompt the use and spelling of the specific words that are prescribed.

- **Progression through the levels-** It is not clear how the words specified for spelling at Entry level relate to the requirements at levels 1 and 2. The introduction to the document states that the requirements of a given level subsume the levels below. It needs to be clearly stated whether the word lists included for Entry levels are also expected to be requirements for learners and assessments at levels 1 and 2.
- **Appropriateness of words-** it is not clear why the words listed have been selected and it is debatable whether all of them are level appropriate.
- **Impact on achieving the purpose of the FSQ-** The reliance on the prescribed lists presents a risk to the expectation that students should learn to spell, and to use, an increasingly broad range of vocabulary, and where uncertain, use appropriate reference materials and other strategies to check the accuracy of their work.

The Federation would therefore like to see a revision of the Subject Content statements about spelling at Entry 1-3 and a clear move away from the use of prescribed spelling lists to an approach that better reflects learner development and progression. The word lists that are currently included in the Appendix could be retained as guidance for teaching and assessment rather than as prescribed assessment requirements. To ensure that spelling is included in assessment there could be a requirement for written work that is provided for assessments is checked for accurate spelling punctuation and grammar at all levels. This would ensure that the requirement is not limited to the prescribed lists and would require learners to be able to spell the words that are used in their work, study and daily life.

In addition to our concerns about the approach to spelling at Entry levels, we also have a number of detailed illustrative examples of where the subject content requires clarification:

FSQ English Level	Example of content that requires clarification
Entry 1	<p><b>Speaking, Listening and Communicating</b></p> <p>Clarification of what is meant by 'using appropriate terms and registers' would be useful to clearly define the standard. As it is, it is open to a high degree of interpretation.</p>

	<p><b>Reading</b></p> <p>‘Read simple sentences containing one clause’- It is not clear what the performance expectation is here and whether learners need to read and understand the sentence, or just read the collection of words correctly.</p> <p>It is not clear what is meant by the ‘key functional feature’ of short, simple texts.</p> <p><b>Writing</b></p> <p>‘Punctuate simple sentences with a capital letter and a full stop’. Is the intention to suggest that the requirement is that only one capital letter should be included in the sentence? What if the sentence requires the use of other capital letters?</p>
Entry 2	<p><b>Speaking, Listening and Communicating</b></p> <p>Ordinarily, E2 standards would be defined by ‘simple’ information, ‘simple’ topics and ‘simple’ expressions of opinions and feelings. Replacing some of these with ‘straightforward’ information and topics appears designed to raise the standard. Straightforward has ordinarily been used to help define expectations at Level 1, and in parts at E3, in the legacy qualifications.</p> <p>‘Make appropriate contributions to simple group discussions with others about a straightforward topic" It is not clear what is intended by the term "appropriate" in this context at this level? Does it define a standard of contribution or the type and delivery of the contribution (e.g. polite and conscious of turn-taking, for example)?</p> <p><b>Reading</b></p> <p>‘Identify key functional features and understand organisational markers in short, straightforward texts’. It is not clear what ‘key functional features’ are and what the ‘organisational markers’ are.</p> <p>‘Use illustrations, images and captions to locate information’. Does this require the illustration to represent the information in the text, and so provide an alternative method of comprehending what is happening?</p>

<p>Entry 3</p>	<p><b>Speaking, Listening and Communicating</b></p> <p>The E3 SLC standards no longer include ‘techniques to clarify and confirm understanding’? Is this an intentional change?</p> <p><b>Reading</b></p> <p>‘Identify different purposes and key functional features of straightforward text’</p> <p>At E2, the requirement is to ‘identify key functional features and understand organisational markers’. At Entry 3 there seems to be a lower performance expectation which does not contribute towards logical progression through the levels.</p> <p>‘Recognise that language in texts can be adapted to suit purpose and audience’</p> <p>Is it appropriate to have candidates ‘recognise’ for the first time that language in texts can be adapted to suit purpose and audience? At E2, learners are required to write in "words and phrases that are appropriate to purpose and audience". To do so at E2, they must understand on some level that ‘language can be adapted to suit purpose and audience’. If the intention is to have progressive levels subsume one another hierarchically then this does not appear to support this progression.</p> <p>‘Understand organisational features and use them to locate relevant information (e.g. contents, index, menus, tabs and links)’.</p> <p>It is not clear what the distinction is between ‘organisational features’ at E3 and ‘organisational markers’ at E2.</p> <p>‘Read and understand words and phrases commonly used on forms’.</p> <p>What are the words or phrases commonly used on forms? Might these include, for example: "statutory", "next of kin", "obligations", "legislation", "liability", or "policy"? How will this be determined, and how will it be interpreted consistently?</p> <p><b>Writing</b></p> <p>Is the differentiation in standards between E2 and E3 clear in relation to the expected use of punctuation? The E2 requirement includes a range of punctuation and while it suggests only the use of "basic" punctuation, the examples listed are the same as E3, except for commas.</p>

	<p>'Use mostly correct grammar'- how should this be interpreted by different organisations for consistent assessment purposes?</p>
--	--

FSQ <b>Maths</b> Level	Example of content that requires clarification
Entry 1	<p>'Recognise the hours in a day; days of the week; months, number of weeks, and seasons in a year'</p> <p>Presumably this standard requires candidates to recognise the <b>number</b> of days in the week, not recognise the days of the week e.g. Monday, Tuesday.</p>
Entry 2 Maths	<p>'Multiply whole numbers in the range 0x0 to 12x12'</p> <p>This is demanding at the level.</p> <p>'Divide two-digit whole numbers by single-digit whole numbers and express remainders'</p> <p>This is challenging at the level. Is this performance expectation supported by the use of calculators?</p> <p>'Recognise simple fractions (halves, quarters and tenths) of whole numbers and shapes'</p> <p>What is the standard that is required? Do learners need to be able to understand the representation of these figures as fractions? This was previously an E3 requirement and is challenging at this level.</p> <p>'Recognise decimals to one decimal place'</p> <p>It is not clear what the candidate must be able to do with, or in response to, a figure presented to one decimal place.</p> <p>'Use and compare metric measures of length including millimetres, centimetres and metres and common imperial units such as miles'</p> <p>This seems above the level expectations. It would be challenging for E2 students.</p>
Entry 3 Maths	<p>'Recognise and continue with fractions and decimals and place in sequence'</p> <p>It is not clear what this means, specifically, "recognise and continue with fractions..."</p> <p>'Use a suitable measuring instrument for a given task'</p> <p>This is open to considerable interpretation.</p>

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

The Federation has provided below a number of illustrative examples of where the subject content at levels 1 and 2 requires clarification:

FSQ English Level	Example of content that requires clarification
Level 1	<p><b>Writing</b></p> <p>It is not clear how the requirement to use correct grammar will be 'levelled' in a way that allows for accurate and consistent interpretation. How should this requirement be interpreted at Level 1?</p> <p>'Spell words used most often in work, study and daily life, including specialist words'. The standard of performance is not clear. It is not clear what specialist words should be tested when learners can come from a range of backgrounds. This will largely be dependent upon their area of work or study.</p>
Level 2	<p><b>Reading</b></p> <p>'Identify the different situations when the main points are sufficient and when it is important to have specific details'. This will be very difficult to assess in reading in a manner that is valid and reliable as currently articulated.</p> <p>'Understand organisational features and systems and use them to locate relevant information in a range of straightforward and complex sources' – it is not clear what "systems" are being referred to here. The standards include references to "functional markers", "functional features", "organisational features" and now "systems", but not all of these terms are listed and explained in the glossary.</p> <p>'Analyse texts, recognising their use of vocabulary and identifying levels of complexity, formality and bias'- It is not clear what the intention or purpose of identifying levels of complexity might be, or whether this performance is appropriate to this level.</p>

FSQ Maths Level	Example of content that requires clarification
Level 2 Maths	<p>'Evaluate expressions and make substitutions in given formulae in words and symbols'- It would be helpful to understand what the standard will be for given formulae at Level 2.</p> <p>'Identify and know the equivalence between fractions, decimals and percentages' - This is challenging at the level. Is 'to know the equivalence' to understand how to convert from one to the other?</p> <p>'Calculate amounts of money, compound interest, percentage increases, decreases and discounts including tax and simple budgeting'- These are very demanding performance expectations using percentages.</p> <p>'Understand and calculate using ratios, direct proportion and inverse proportion' - This is a challenging standard and should be exemplified further. Ratios are an area which candidates at Level 2 find very demanding.</p> <p>'Calculate actual dimensions from scale drawings and create a scale diagram given actual measurements'- many candidates find scale very challenging.</p> <p>'Draw 3-D shapes to include plans and elevations' -what is the performance expectation and precise standard of performance at the Pass level here?</p>

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

There are a number of examples of where the progression through the FSQ levels is not clear:

- 'Implicit meaning' has been moved from English level 2 to level 1. However, level 1 requires the use of straightforward documents that are put in a direct way. It is not therefore clear how implied meaning can be assessed.
- English Entry 2, criteria 19 requires a form to be filled in but this is a very specific type of assessment activity that will become highly predictable for learners. Also, the E2 requirement appears to be at a higher level than the E3 requirement in criteria 14 which only requires learners to read and understand the words and phrases commonly used on forms.

- E3 English requires learners to ‘Follow and understand the main points of discussions’ and ‘Make relevant contributions to group discussions about straightforward topics’. Level 1 English requires learners to ‘Follow and understand discussions and make contributions relevant to the situation and the subject’. There is no clear distinction in the performance requirements articulated in these two different level standards.
- E3 English requires learners to ‘Write text of an appropriate level of detail and of appropriate length (including where this is specified)’ and level 1 requires them to ‘Write text of an appropriate level of detail and of appropriate length (including where this is specified) to meet the needs of purpose and audience’. It is not clear what the distinction would be between the levels. If it is appropriate at E3, it presumably meets the needs of purpose and audience.
- It is not clear what the practical, or intended difference, between the spelling standard at Level 1 and Level 2 is, or how it should be interpreted and manifest itself in teaching, performance measurement and assessment. Level 1 requires learners to ‘Spell words used most often in work, study and daily life, including specialist words’ and level 2 requires them to ‘Spell words used in work, study and daily life, including a range of specialist words’.

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

As illustrated above the differentiation between the levels is not always clear. In some of the statements level differentiation is unclear as are the required standards of performance which is problematic when seeking to reduce standard variability and comparability issues for the new qualifications.

**6. In accordance with the Equality Act 2010, Ministers must have “due regard”, when making decisions, to the need to eliminate unlawful discrimination; advance equality of opportunity; and foster good relations, in relation to protected characteristics. The Department for Education has been taking this requirement into account in developing draft subject content and assessment objectives.**

The Federation is concerned about two key changes in the reformed FSQs: the requirement for learners to be assessed without the use of a calculator (in part) and the requirement for learners to be assessed (in part) without the use of a dictionary. The Federation is concerned these requirements may present unintended barriers to achievement for learners with special learning needs.

Calculators do not give learners the correct answers unless they have the knowledge required to enter the right commands into the calculator. To do this they need to understand the underpinning mathematical process required to achieve the correct answer. It is still possible, and indeed very easy, to obtain an incorrect answer when using a calculator if you key-in the wrong instructions. If the aim of the FSQ in Maths is to assess learners' ability to engage in higher-order thinking such as solving problems and working with real-world data, the use of calculators can benefit all students including those with learning disabilities who might otherwise be unable to participate in these activities. Access to calculators for those with dyscalculia can help with learning and access to assessments. It is the potential impact on learners with learning difficulties that concerns us the most as the requirement to work/be assessed without access to a calculator could present a significant barrier to achievement.

Similarly, access to specialist dictionaries, can be a useful support for those learners with conditions that make accurate spelling a challenge for them, e.g. dyslexia. Removing access to a dictionary may act as an unintended barrier to their achievement of the FSQs.

It is also not clear what the intention is for the future assessments of learners with such needs and whether AOs will be expected to uphold the barriers these requirements will present (and thus potentially bar these learners from achievement). Presumably allowing access to calculators and dictionaries in assessments where they would otherwise not be available would not be viewed as being a 'reasonable adjustment'. The Department needs to be clear about what adjustments will and will not be acceptable across England for these assessments to ensure there is a consistent approach applied to all learners who may apply for reasonable adjustments. In the absence of this clarification AOs will be left to bear the risk of legal action under the Equality Act.

More broadly, there also needs to be consideration of how these requirements will impact on the burden of assessment that is placed on learners. The need to assess with and without a calculator in Maths and with and without a dictionary in English is likely to result in the need for there to be an additional assessment where the prohibited 'tool' is not available in the assessment environment. This additional burden of assessment may act as a barrier to those learners who do not respond well to 'exam' conditions as well as to those with conditions that make assessments more challenging than usual.

The decision to remove access to calculators and dictionaries for part of the assessment is more surprising because of the nature of the FSQs and the expectation that they should 'meet the needs of employers and prepare students to apply their knowledge and skills in their

working and everyday life'. It is difficult to imagine a work environment where access to dictionary and calculator resources would be denied. It is commonplace to work on a computer with automatic spelling a grammar checking facilities and to work on Excel spreadsheets that automatically carry out mathematical functions. In addition, many people now have access to these tools 24/7 via their mobile phones and use them in work and in everyday life. It therefore seems incongruent with the stated aim of the qualifications to deny access to these during assessment.

- 7. Do any of the proposals have potential to have a disproportionate impact, positive or negative, on specific student groups, in particular the 'protected characteristic' groups? (The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity); if they have potential for an adverse impact, how can this be reduced?**

In addition to the comments already provided in relation to assessment without access to calculators and dictionaries and their potential to impact on those with disabilities the Federation is also concerned about the prescribed use of phonics in the teaching of functional skills. We fully understand that the use of phonics has had a positive impact on the reading abilities of school age children. However, the prescription of the use of phonics in the teaching of functional skills is a concern.

Functional skills qualifications will be taught to a wide range of learners. Some may be young adults who have experienced teaching through phonics and have not responded well to it. It is therefore questionable whether 'more of the same' will be an effective approach to take with them. Others may be older adults who have no experience of being taught through the phonics approach. They may or may not respond well to this teaching methodology. There is little evidence of whether the use of phonics in the teaching of adult learners does or indeed, does not work. The DfE's own publication on [Literacy and Numeracy Catch -Up Strategies](#) (October 2017) comments on the 'inconsistent evidence around how effective phonics approaches are'.

It is also not clear how effective the use of phonics is with hearing impaired learners and whether it could create a barrier to achievement for them. Also, there does not seem to be an explicit mention of these learners being able to use their usual way of working in the assessment.

So, whilst we understand the motivation to expand a successful teaching methodology from children we have concerns that it may not be the most effective approach for all learners. We therefore feel that it should be presented to the teaching workforce as an approach that

should be considered as they plan their teaching of the new FSQs but that ultimately teachers should feel free to use their skills and expertise to devise approaches to teaching FSQs which they feel are best suited to the learners they are teaching. In a recent [speech](#) at the Freedom and Autonomy for Schools National Association (FASNA) autumn conference Nick Gibb stated that: 'Now teachers are free to pursue and debate the most effective teaching methods'. We would like to see this freedom extended to the use of phonics to ensure it is an approach that is only applied where the teacher's expertise indicates that it will be appropriate and effective with the group of learners they are working with.

Prescription of the use of phonics may, in some cases, not be effective for some types of learners. So, raising awareness of the benefits of phonics, promoting and encouraging the approach and upskilling the teaching workforce to use phonics wherever they can be effective are all actions that we would support but we do not believe that phonics should be prescribed as the main pedagogical methodology for the teaching of the FSQs.