



**FEDERATION OF  
AWARDING BODIES**

# Teacher Assessed Grades approach for Functional Skills completion – 2021

A paper by the Federation of  
Awarding Bodies Functional Skills Group

Contextual information about this document is  
available [here](#)

awarding.org.uk

---

## Background and overview of the paper

The Ofqual/DfE consultation outcome on 'Alternative arrangements for the award of VTQs and other general qualifications in 2021' sets out:

*"...Functional Skills, have 'on-demand' shorter assessments. Where these can be delivered in line with public health measures, including remotely, the Department's policy position is that they should be permitted to continue to proceed. This is to ensure that students and other learners can continue to progress fairly and acknowledges that providers have been implementing protective measures and adapting assessments such as moving to remote assessment."*

*"These qualifications are often taken on demand, with more frequent external examination and assessment opportunities throughout the year, and we do not see a strong rationale for preventing these assessments from continuing where they can be delivered in line with public health guidelines. A number of awarding organisations have recently invested in remote assessment solutions for FSQs. Therefore, the Department proposes that remote assessments should be taken by FSQ learners where these assessments can continue and learners are able to access them. For students and other learners who are unable to access FSQ assessments, an alternative method of awarding these qualifications may be needed to ensure these learners can progress."*

Functional Skills will therefore offer a Teacher Assessed Grade (TAG) option, as a last resort, where a centre can demonstrate it is not possible to live test individual learners, who are assessment ready, for safety reasons.

This paper sets out what this TAG approach will be for all Functional Skills subjects (both Legacy and Reformed) from Entry 1 to Level 2. This is a FAB document, agreed across all Functional Skills awarding organisations. Therefore, how each awarding organisation operates may differ and each will produce their own guidance based on this document. It is important for centres to have clarity that the overarching principles will be the same. The principles follow DfE policy.

Principles of any TAG arrangement for Functional Skills:

- Live testing will continue as this is the preferred method of assessment for Functional Skills. This testing could take place face-to-face or using adaptations such as being delivered remotely.
  - Centres must investigate all live testing and adaptation options before approaching their awarding organisation with an application for a Functional Skills TAG. Centres will need to evidence how all options have been explored and exhausted for each learner.
  - As live testing should be the primary method of awarding, and TAGs should only be requested when centres can clearly demonstrate learners are assessment ready, unable to access an assessment safely, and as a 'last resort', centres should not request to submit TAGs for whole cohorts.
  - Implementation of any TAG arrangement will start once Ofqual's regulatory framework comes into effect and will remain in place until 31 August 2021 as per VCRF requirements. Only learners that the centre expected to be entered for assessment between 1 August 2020 and 31 August 2021 and deemed to be eligible, with suitable evidence to support a pass grade against the assessment, should be put forward.
  - Learner eligibility will be determined by criteria clearly defined by the awarding organisations, in line with policy positions from the DfE, which centres must follow.
-

- 
- Centres must retain suitable evidence, of both a learner's eligibility and what has been used to support any TAG judgements, as this may be requested for review by awarding organisations.

## Implementation

Any TAG approach will need to replicate, as far as possible, the needs of centres and learners who require results. Most awarding organisations operate an on-demand testing model while a smaller number offer these tests in short windows. Awarding organisations will operate an approach which enables centres to explore all possible live testing options including adaptations, select learners for a Teacher Assessed Grade (TAG), gather appropriate evidence, complete internal standardisation and for awarding organisations to complete quality assurance activities and issue results in a timely manner.

Awarding organisations operate TAGs at an assessment level rather than against the qualification.

Each awarding organisation will implement this TAG arrangement in a way that works for them and their customers, ensuring that all activities can be completed within the timeframe including:

- Centre attempts to live test
- Centre identifies learners unable to access a live test safely
- Centre applies to their awarding organisation to use TAGs for eligible learners
- Centre implements TAG approach in line with AO guidance
- Centre completes internal quality assurance processes
- Centre submits TAGs to AO
- Awarding organisation completes external quality assurance processes
- Awarding organisation issues results.

## Learner eligibility and TAG evidence

Live testing, either remotely or in person, remains available throughout the period and must always be the primary option. Adaptations to delivering live tests have been made so centres **must** explore and exhaust all these options before considering a TAG for any learner. There is a clear expectation from DfE that TAGs will be an exception process rather than the 'norm' for Functional Skills qualifications. Therefore, eligibility for a learner to be **considered** for a TAG has to be clearly established, by the centre, **before** any teacher judgement based on supporting evidence is considered.

A learner who has completed their course of study could be considered for a TAG application provided the centre can demonstrate:

- the learner's end date is in the past
- the learner would have been eligible for a TAG **at the time they intended to take a live test**
- the centre has supporting evidence to demonstrate the learner was assessment ready
- the centre can demonstrate it is **not safe** to invite the learner back to take a test **and** has explored all possible adaptations to test.

Evidence of all these points **must** be retained within the centre as the awarding organisation may need sight of this before being able to approve a TAG.

---

---

## **Establishing learner eligibility**

Centres must demonstrate that normal assessment arrangements are not safe and that the learner cannot:

- access an assessment face-to-face
- access an assessment utilising adaptations such as remote invigilation or assessment
- delay the assessment.

A key part of the eligibility judgement must be a consideration of when each learner requires the result and, working back from the end date when the result is required, whether there is likely to be a clear opportunity for the learner to access a live test safely in any way before that date. Centres will need to clearly justify why each learner is eligible for a TAG, providing clear evidence of the options they have explored to access live testing for each learner.

Where centres can demonstrate that they have explored all possible options for each individual learner to take a live test, including all possible adaptations that have been put in place, then centres may proceed with an application to the awarding organisation to submit TAGs for each individual learner.

## **Applying for TAGs**

To apply to use a TAG, a learner must be assessment ready, which can be evidenced, and centres must have evidence to demonstrate why that learner is unable to access a live test for safety reasons.

In order to submit a TAG, each learner must have a body of evidence which can be used to inform a TAG judgment.

Provided centres can evidence:

- the efforts made to live test
- the learner's readiness to take an assessment
- the body of evidence that is used to support a TAG judgement

then a TAG application can be submitted for consideration.

The awarding organisation will review the centre's application and advise them of the outcome. An application can still be rejected at this stage if the awarding organisation is not satisfied that the evidence supports the application.

## **Evidence to support the process**

The following criteria should support eligibility judgements. Centres will need to have clear records in place which may be reviewed as part of the quality assurance process, to provide reassurance that the learners selected are eligible and any outcomes are robust and a true reflection of the learner's achievement.

---

Requirements for TAG application	Evidence to support TAG application
Reason why learner is <b>eligible</b> including: <ul style="list-style-type: none"> <li>• why learner cannot take a live test</li> <li>• why a learner needs a result now</li> <li>• that the learner is assessment ready.</li> </ul>	Rationale from the centre with: <ul style="list-style-type: none"> <li>• clear evidence to demonstrate efforts to live test (both face-to-face and remotely)</li> <li>• need for a result by a set date to support progression</li> <li>• readiness for assessment between 1 August 2020 and 31 August 2021.</li> </ul>
Supporting evidence for the <b>TAG</b> : Centre <b>must</b> have a body of evidence that a teacher can use to form the basis of their TAG judgement	<b>Recommended evidence</b> includes, but is not limited to: <ul style="list-style-type: none"> <li>• completed sample/past paper taken as a mock test including the conditions the mock was taken under</li> <li>• formative assessment results.</li> </ul> This <b>could</b> be further supported by other evidence which may include, but is not limited to: <ul style="list-style-type: none"> <li>• any other learner work towards the qualification (i.e. work they have independently undertaken in class or at home)</li> <li>• learner work demonstrating the skills assessed by FS qualifications that has been completed in support of another qualification learning aim.</li> </ul>
Supporting the <b>TAG</b> : Using the evidence, the teacher can confirm that they believe the learner would have <b>passed/achieved</b> the assessment	Evidence described above plus commentary from the teacher using agreed pass descriptors to demonstrate how the evidence aligns.

While the use of a past/sample paper is not mandated, we **highly recommend** the use of this material as a key part of any supporting evidence as these tests have been produced by the awarding organisation and are therefore seen as a standardised source of evidence.

Conditions for completion of the mock test will not be mandated but the test used and the mark scheme applied must be an awarding organisation produced sample, practice or past paper made available by us for this purpose. Awarding organisations will provide clear guidance on the pass threshold to enable accurate assessment that will reflect the standards within the live assessments.

While conditions for collating evidence are not mandated, centres will need to consider the conditions through which this evidence is gathered, and should implement measures to ensure

---

they are confident that the evidence is authentic to the learner, the evidence is reliable and comparable to those going through live testing.

Centres must therefore record the conditions under which the evidence has been produced, and where evidence has been gathered without control, they should include other supporting evidence to corroborate this to provide reassurances of the learner's overall ability to achieve the qualification and progress.

### **Centre declaration**

Each centre must submit to their awarding organisation a declaration from their Head of Centre that confirms:

- They have explored all possible avenues to live test either in-person or remotely and with all available adaptations for the learners being put forward for TAGs
- They are only entering TAGs for learners who are eligible and have the valid reason of safety concerns as to why they cannot access live assessment
- They have supporting evidence available for each learner that underpins a judgement and supports the award of a TAG
- They will adhere to the process defined by the awarding organisation in relation to TAG arrangements
- The approach the centre has taken to making judgements e.g. the evidence that has been used to base their judgements on
- They have internally quality assured all decisions made in relation to TAGs and the approach they took to this
- They have compared the volume of achievement for their submissions against previous years.

The centre will have completed a robust internal quality assurance (IQA) process in line with its awarding organisation practices, demonstrating that all judgements have been standardised before TAGs are submitted.

The centre must retain the supporting evidence for both eligibility and TAG decisions within the centre as awarding organisations may request sight of this as part of external quality assurance processes to verify the outcomes for all learners.

Awarding organisations will require a Head of Centre declaration prior to the release of any results awarded through the TAG process. This may be in the form of one overarching declaration for all TAG submission windows until August 2021, or a separate declaration for each submission a centre makes. Any false declaration will be investigated by the awarding organisation and appropriate actions will be taken.

Centres must retain the supporting evidence for both eligibility and TAGs within the centre for use as part of any quality assurance process the awarding organisation may put in place to verify the outcomes for all learners.

### **Internal quality assurance**

Each awarding organisation will set out its approach to internal quality assurance and publish this to centres. Awarding organisations already have in place clearly defined internal quality assurance processes for Functional Skills elements which are internally assessed and externally verified. Centres should follow their awarding organisation's guidance, keeping clear records of all internal processes used to arrive at the TAG outcomes for each learner. This will enable

---

---

centres to demonstrate each TAG has been quality assured, reducing the risk of malpractice or unconscious bias.

An outline of the expected IQA process is as follows:

For each TAG, centres must follow an internal quality assurance process before the TAG is submitted which meets the requirements below:

a. Internal sign-off

Each TAG will be determined by a teacher. This judgement should then be internally quality assured by another staff member. This would ideally be the Head of Department, or someone who usually conducts the role of Internal Quality Assurer for Functional Skills. Where a staff member might have a personal interest in a learner (for example, as a relative), Heads of Centre should make sure that additional controls are put in place, as appropriate.

b. Head of Centre sign-off

The Head of Centre will be required to confirm that the TAGs are a true representation of learner performance. If the Head of Centre is unavailable to do this, it may be delegated to a deputy. In reviewing these TAGs, the Head of Centre should consider how the volume of learners achieving compares with previous years (i.e. 2020, 2019 and 2018).

The Head of Centre will be required to submit a declaration confirming this when the TAGs are submitted. The declaration should include details of the evidence that was used, and a justification if the achievement rate is significantly different from previous cohorts.

Awarding organisations will not expect centres to use the TAG process for learners not yet reaching a pass threshold as TAGs can be submitted at multiple opportunities throughout the TAG period, once learners become eligible. That eligibility must be kept under review, with learners only being put forward for consideration as centres establish evidence that would support a pass TAG if the learner remains eligible as they are still unable to take a live test safely.

### **External quality assurance**

The awarding organisation will need to be satisfied that the centre's internal process is robust and leads to fair and accurate outcomes for the learners included in any alternative arrangement. It is vital that centres retain all evidence and clear records as awarding organisations may request access to:

- All or some of the evidence used to confirm learner eligibility
- All or some of the evidence used to support TAG judgements
- Records of the IQA process and the learner evidence reviewed at each stage
- Head of Centre declaration of the outcomes

The awarding organisation may choose to quality assure the process a centre has followed to ensure that the centre is following its own processes adequately. It may choose to extend these checks to review a sample of the evidence used and, in extreme cases where concerns remain, may ask to see all evidence for all learners to provide reassurances of the validity of the outcomes produced by the centre.

Awarding organisations may use all evidence at its disposal, taking a risk-based approach, to decide on the nature of the checks it carries out for each centre which may vary on a case-by-

---

---

case basis. It may, for example, choose to increase any sampling in cases where a significant volume of learners is submitted in any given period.

Awarding organisations should carry out additional checks on data it holds for individual centres to satisfy itself that the volume of learners being submitted is valid. If the awarding organisation has any outstanding concerns regarding an individual centre's submission, it may withhold results until it has satisfied itself of the validity of the centre's submission

## **Issuing results**

Once the awarding organisation has assured itself of the validity of the centre's submission in any given period, where results are normally issued on-demand, the awarding organisation will release the results on a rolling basis in a similar way to live test results. It is for each awarding organisation to determine the best approach and how often results will be released.

## **Malpractice and maladministration**

Where an awarding organisation has any concerns regarding a centre's submission it may choose to take further action over and above the quality assurance activities outlined above. Where serious concerns are identified, an awarding organisation may choose to withhold results for any or all learners included in a centre's submission pending the outcome to any further investigation.

## **Appeals**

TAGs will only need to be submitted to the awarding organisation where centres have evidence to support the award of a Pass grade, where the centre can clearly demonstrate that the learner(s) are unable to access a live test. Where a centre decides a learner is not eligible for a TAG, learners will be able to appeal to their centre if they can demonstrate that they:

- are unable to take a live test either remotely or in-person
- are unable to complete a live test with other existing adaptations
- require a result immediately for progression purposes.

This must be further supported by evidence that would be used to underpin a teacher judgement. So, the learner would need to demonstrate to the centre that they:

- are assessment ready
- have sufficient supporting evidence demonstrating they are capable of passing the assessment.

If, on reviewing the learner's appeal, a centre believes that an error of judgement has been made and a TAG should be requested, the centre can submit a TAG during the eligible period (up to 31 August 2021) provided that they have conducted internal quality assurance to support the application. All evidence of the appeals process must be retained within the centre.

If the outcome of the centre review is that a TAG should not be submitted for the learner, the centre should explain the reason for this to the learner and support them to understand the decision.

---

---

## Alignment with VCRF principles

The VCRF provides guidance to awarding organisations on how to award results to learners up to the end of August 2021. The principles set out the manner in which awarding organisations may adjust their qualifications, either through the provision of TAGs or adaptations to live tests, to ensure learners can achieve a result and not be penalised due to COVID-19. Qualifications have been categorised depending on their characteristics with different approaches defined depending on the category. For Functional Skills, the categorisation (B2), means live testing can continue but an 'alternative approach' allowing TAGs to be awarded, for eligible learners has been permitted.

In order to create a TAG, centres must be able to demonstrate that it is not possible for the learner(s) to access a live Functional Skills test in any format or with any adaptation. Therefore, it is important that any supporting evidence resembles, as closely as possible, the live assessment materials a learner would see if taking a live test. By encouraging the use of past papers, this reduces the risk of TAGs being demonstrably different to a live test result. As conditions for taking tests are relaxed, the additional materials, mapped to the Functional Skills subject content, ensures any additional evidence is also as closely as possible aligned to a live test.

In terms of burden to centres, it is expected that centres will be teaching their learners over a period of up to 45 or 55 guided learning hours (depending on the FSQ). Therefore, centres are expected to have evidence in place to support their judgement on when to enter a learner for a live test i.e. assessment readiness. The TAG application process should not therefore create a significant additional burden as awarding organisations would expect this material to exist anyway. The additional step of applying for a TAG is to enable awarding organisations to review TAG submissions and ensure they are being made appropriately, are based on suitable evidence and are due to learners being unable to sit a live test. Therefore, while there is inevitably some additional burden, it has been kept to a minimum with only the necessary additional processes implemented to ensure comparability between TAGs and live tests as much as possible.

---