

RSS RESPONSE TO DEPARTMENT FOR EDUCATION CONSULTATION ON 16 TO 19 LEVEL 1 ENGLISH AND MATHS QUALIFICATIONS

02 June 2026

This response has been submitted via an online form. Please find a copy of the questions we responded to below. Full details about the consultation can be found [here](#).

Q. Who among the 16-19 students under Condition of Funding with a grade 2 or below prior attainment do you think would benefit most from this qualification?

This is the Royal Statistical Society's (RSS) response to the Department for Education consultation on 16-19 Level 1 English and Maths qualifications. The RSS is a membership organisation for statisticians and data scientists, and we advocate for the importance of statistics and data. Representing over 10,000 members, we champion the role of data and statistics in society. Our response relates specifically to the proposed Level 1 qualification in Maths.

We believe that the proposed qualification has potential to benefit students whose progression pathways into further study, apprenticeships or employment are limited by failing to achieve grade 4 or above. Attainment in GCSE Maths is particularly important for setting students up for success. Research suggests that a one-grade improvement in GCSE Maths is estimated to be associated with an increase of £14,579 in lifetime earnings, greater marginal earnings return than any other subject.¹ The proposed qualification could serve as an important stepping stone to help students achieve a good GCSE maths grade.

We also think that those students who might be interested in data-based careers could benefit from this qualification. In addition to preparing people for GCSE maths, it could also prepare students for the level 2 certificate in data analysis or the level 2 data analyst apprenticeship. A modular level 1 qualification could help people to recognise skills in interpreting data – which is a distinct skill from other mathematical skills – which could form the basis for developing skills in data-informed numeracy.

Q. What opportunities do the proposed qualifications present for 16-19 students?

The proposed qualification addresses a real and persistent problem; repeated GCSE resits for students with grade 2 or below rarely lead to success and are demoralising for learners and teachers. Although Functional Skills Level 1 offers an alternative pathway, its design does not readily support

¹ Department for Education: Louise Hodge, Allan Little & Matthew Weldon (2021). *GCSE attainment and lifetime earnings*.

https://assets.publishing.service.gov.uk/media/60c36f0cd3bf7f4bd11a2326/GCSE_Attainment_and_Lifetime_Earnings_PDF3A.pdf p. 34.



progression to GCSE. A distinct Level 1 qualification could allow teaching at a more realistic pace, rebuild learner confidence and strengthen the foundational skills required for onward progression.

Q. Considering the diverse prior attainment and progress levels within this cohort, what challenges do you anticipate for those students who we envisage would typically complete the qualification within one year before moving to GCSE?

Students in this cohort are likely to face several challenges. It may be difficult for students to maintain motivation, particularly for those with prior experiences of low attainment or repeated failure. Effectively tracking progress across such a diverse group may also be complex, with learners progressing at different rates and requiring tailored support. In addition, fostering peer support could be challenging where confidence and ability levels vary significantly, potentially limiting opportunities for collaborative learning and mutual reinforcement.

Q. Do you think these qualifications should adopt a modular structure, or would a linear structure better support achievement and progression? What risks and opportunities do you see with these options, and why?

We believe that a modular structure is likely to better support engagement and progression, as it breaks learning into smaller, more manageable units with regular opportunities for feedback and consolidation. This can help students build understanding incrementally and gain confidence, while also enabling more effective tracking of progress. Recognising achievement throughout the course, rather than relying on a single high-stakes assessment, could also improve learner engagement. Modular learning further provides opportunities for non-exam assessments. We believe that there is a high exam burden at GCSE-level, which could be reduced through projects or coursework that better reflect the practical nature of subjects such as statistics.²

However, there are risks: too many modules could place excessive demands on time and reduce teaching and learning opportunities. A limited modular approach (for example, two modules with a clear progression in difficulty) would help balance these benefits with the need to minimise assessment burden.

Q. What challenges do you anticipate there would be in delivering modular qualifications for the identified cohort of students? If such challenges arise, what strategies or mitigations would you recommend to address them?

Challenges in delivering modular qualifications are likely to include maintaining student attendance and engagement across multiple assessment points, as well as the additional workload for teachers in preparing and administering assessments. There may also be logistical pressures, particularly in larger colleges, where securing space for frequent assessments can be difficult. To mitigate these

² Royal Statistical Society (2024). *RSS Submission to DfE Curriculum and Assessment Review Call for Evidence*. <https://rss.org.uk/RSS/media/File-library/Policy/2024/RSS-response-to-DfE-Curriculum-and-Assessment-Review-call-for-evidence.pdf>



challenges, we believe that a limited number of modules should be used to minimise assessment burden, alongside flexible approaches such as opportunities for students to revisit or improve performance within later assessments.

Q. Are there particular groups of students who might be particularly advantaged or disadvantaged by either a modular or linear approach?

A modular structure is likely to benefit students who experience anxiety around high-stakes exams, as assessment is spread over time and focused on smaller units of learning. However, modular approaches tend to rely on consistent attendance and engagement across multiple assessments. This may disadvantage students from less stable home environments that are more likely to experience absences and interruption to consistent study.³

Q. Should the subject content be organized to reflect a similar structure to the future GCSE subject content requirements (as set out in the content & assessment objectives [here](#)), with the addition of additional foundational content as necessary? If not, is there an alternative way of organizing content that would be more suitable?

The proposed qualification should provide a strong foundation for progress to GCSE, and the content should therefore reflect GCSE requirements. Significant questions remain, however, about the content of the proposed Level 1 qualification. Much of the current description overlaps with existing Level 1 Functional Skills, in that it is graded, focused on core skills, Level 1 and positioned for progression to further study or employment. Without clear differentiation in purpose, status, or progression value, we believe there is a risk of duplicating an existing pathway rather than simplifying the system. While we recognise that a separate consultation on subject content is forthcoming, we emphasise that greater clarity on the intended role and added value of the qualification is needed before determining how content should be organised.

Q. What should these qualifications include to help teachers teach effectively and support good learning, e.g. a specific approach to structure? Please tell us why you think your suggested approach would work well.

The qualification should include clear explanatory notes and worked examples to support effective teaching and learning. These can help organise key mathematical concepts, support consistency in teaching approaches and familiarise students with the language they will encounter at GCSE. Worked examples, in particular, are valuable in reinforcing understanding and modelling problem-solving processes.

We believe, however, that success will depend on wider system factors. School accountability is a significant factor; as long as performance measures prioritise GCSE grade 4+ outcomes, schools

³ Children's Commissioner (2025). *The impact of housing instability on children's GCSE grades*.
<https://www.childrenscommissioner.gov.uk/resource/the-affect-of-housing-instability-on-childrens-gcse-grades/>



have limited incentive to enter students for a Level 1 qualification which does not contribute to headline measures. This is likely to result in low uptake in schools and concentration in further education settings, reinforcing perceptions of it being a second-tier pathway.

Q. The Review recommended that the qualifications should be graded to the equivalent of ‘a strong GCSE grade 3’. Do you agree that the qualifications should recognize a level of attainment that is equivalent to the level of attainment that students with a grade 3 in GCSE have?

We agree that grading these qualifications to the equivalent of a strong GCSE grade 3 is appropriate. As the aim is to support progression from grades 1-2, this provides a logical and meaningful step forward for learners. The positioning of this qualification as a bridge to GCSE is welcome; we believe that alignment with GCSE content and a defined ‘ready to progress’ threshold will help to maintain learner ambition and support confidence and successful progression.

Q. Do you think that achievement below the level broadly comparable to that typical of students achieving a grade 3 at GCSE should also be recognised in the grades awarded for these qualifications?

We believe it is important that achievement comparable to GCSE grade 3 is recognised to ensure that students and teachers can recognise and value the progress made. Recognising incremental progress can play a key role in building confidence and motivation, particularly for learners who may otherwise feel that efforts are not reflected in outcomes.

Q. What are the key design considerations to ensure these qualifications have value for students who pass the level 1 qualification but may not then progress on to gain a GCSE grade 4?

To ensure these qualifications have value for students who do not go on to achieve a GCSE grade 4, the content should focus on knowledge and skills that are directly applicable to everyday life and employment. This includes areas such as number, ratio and proportion, measures, and statistics, with an emphasis on interpreting data, graphs and real-world information. While the qualification will inevitably draw on core GCSE content, there is an opportunity to prioritise those elements with practical and vocational relevance, such as statistics. We believe that the qualification should include a statistics module which aims to develop statistical literacy, helping learners to develop key skills such as the ability to understand uncertainty and error.

While the Level 1 qualification is positioned as a stepping stone to GCSE, it could also prepare students for the Level 2 Certificate in Data Analysis or a Level 2 Data Analyst apprenticeship. We believe it is important to highlight these progression pathways for students inclined towards vocational studies. A modular Level 1 qualification could recognise skills in interpreting data, enabling students to demonstrate numeracy for a Level 2 data qualification.

In terms of assessment design, we support the inclusion of non-exam assessments which better reflect practical applications of maths. For example, coursework or project work involving analysis of



real-world datasets could help to build confidence with concepts while supporting students' understanding of the practical relevance of maths skills.

Q. Are there other key steps we could take to ensure that the qualifications are recognised and valued by employers, parents and other external audiences as a separate qualification to the GCSE? What might they be?

Raising awareness will be key to ensuring these qualifications are recognised and valued by parents and employers. The government's approach to T-Levels has proven effective in building recognition and credibility, despite the relatively modest uptake so far. A similar approach could be adopted here, with a clear focus on communicating the purpose and value of the qualification. This should emphasise that it will equip students with strong core knowledge and practical skills, building a solid foundation for further study.

The RSS did not provide answers to the following questions:

Q. Do you think that as well as the overall qualification result being reported a student's attainment in any individual modules or components should also be reported on? What do you think are the benefits and risks of this approach?

Q. Could any of the proposals have an impact – positive or negative – on people with any of the following protected characteristics?

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Q. What action could help reduce any negative impacts you identified in the previous question?

Q. Are there any other equality-related impacts you think we should consider?

