

**UAL Awarding Body  
statement:  
DfE Review of post-16  
qualifications at level  
3 and below in  
England**

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**Please note that our centres in Northern Ireland, Wales and Scotland are wholly unaffected by any of these developments**

<b>Contents</b>	<b>2</b>
<b>Who we are</b>	<b>3</b>
Funding and the situation right now	3
Our position on reform	5
<b>1. Retain Applied General type qualifications because of an outstanding track record of progression</b>	<b>6</b>
Progression as a measure of success	6
Progression from Levels 1 and 2	7
Progression from Level 3	7
T levels	8
<b>2. Retain Applied General type qualifications owing to their contribution to SEND and social mobility</b>	<b>9</b>
Equality of access, SEND and social mobility	9
<b>3. Achieve confidence in qualifications and standards through enhanced quality assurance, not by dictating content, structure and assessment methods</b>	<b>10</b>
External assessment and external moderation	10
Grade inflation	11
Risk of regulatory conflict	12
<b>4. Recognise the particular needs and successes of UK creative education and industries</b>	<b>13</b>
Creative industries and employers	13
<b>5. Reduce the risk of detrimental effects that would be caused by a dramatic increase in external assessments in these types of qualifications.</b>	<b>15</b>
Risk and the timetable for reform	15
<b>Contact us</b>	<b>15</b>

## Who we are

UAL Awarding Body believes in transformative education. We design and award creative qualifications that empower and inspire educators to help students reach their potential.

UAL Awarding Body is regulated by Ofqual, Qualifications Wales and CCEA and currently offers qualifications in art and design, fashion, creative media, music and performing and production arts. We are also the UK's leading provider of the Diploma in Art & Design – Foundation Studies (FAD). Our qualifications have high retention and achievement rates because they are flexible, responsive and relevant to industry needs, and facilitate student progression.

University of the Arts London (UAL) is Europe's largest specialist art and design university, comprising six renowned Colleges: Camberwell College of Arts, Central Saint Martins, Chelsea College of Arts, London College of Communication, London College of Fashion and Wimbledon College of Arts. UAL Awarding Body was set up by UAL in 2007 specifically to improve the quality of applicants to HE in this sector.

## Funding and the situation right now

We are pleased to confirm that funding for all but two of UAL Awarding Body's Level 3 qualifications, across all our subjects, is now secured until at least 2023.

We welcome the stability this brings for colleges while the Department for Education (DfE) conducts its *Review of post-16 qualifications*. DfE intends to publish its full long-term funding plans in Spring 2020.

As a precursor to this work, the DfE has announced it will remove funding for some "pre-existing" qualifications from August 2020. This is where an individual awarding organisation has several versions of qualifications that are deemed too similar.

DfE is currently considering whether the following UAL Awarding Body Level 3 Art and Design qualifications fall under this category:

- Level 3 Diploma and Extended Diploma in Art & Design (QANs 600/2827/0 and 600/2826/9). These qualifications are externally moderated and do not contain external assessment.
- Level 3 Applied General Diploma and Extended Diploma in Art and Design (QANs 603/1457/6 and 603/1459/X). These qualifications contain external assessment and are on DfE Performance Tables.

**UAL Awarding Body statement:  
DfE Review of post-16 qualifications at level 3 and below in England**

We have submitted a strongly evidenced submission that these are distinct qualifications and now await the DfE's response, due this summer.

Our Level 3 Applied General Diploma and Extended Diploma in Art and Design were developed specifically to meet the DfE's performance table requirements and as such have different structures, content and assessment models to the established Level 3 Diploma and Extended Diploma in Art & Design.

One possible outcome is that funding will be removed from the externally moderated Level 3 Art and Design qualifications. If this happens, UAL Awarding Body will support centres fully in migrating to the new externally assessed Level 3 Art and Design qualifications, which meet DfE Performance Tables requirements.

All our other qualifications have funding confirmed to at least 2023. All UAL Awarding Body qualifications are on the RQF, as the QCF has now been phased out.

The final findings of this multi-stage consultation process are due in Spring 2020, when we expect further guidance from DfE on the types of qualifications and assessment models it will encourage beyond 2023.

This document summarises our response to the consultation and why we believe that UAL Awarding Body will continue to deliver excellent outcomes for students well beyond 2023.

## Our position on reform

UAL Awarding Body is pleased to be fully engaged with the DfE reform agenda. We are keen to help DfE ensure there is a robust, respected and reliable qualifications landscape for the next generation of post-16 learners.

We are a specialist Awarding Organisation with a deep knowledge of the creative education and industry sectors. Our position is explicitly linked to the needs of creative education and ultimately creative industries and employers.

As DfE seeks to reform and improve the system we propose that established best practices, including many specific to the creative sector, are maintained and strengthened as part of the system. Our key messages are that the DfE should:

- 1 Retain Applied General type qualifications alongside A-levels, T levels and Apprenticeships because of an outstanding track record of progression from Level 2 to Level 3 and from Level 3 to Higher Education
- 2 Recognise the positive impact Applied General type qualifications have on students with SEND; the positive contribution they make to the social mobility agenda; and the degree to which they address the needs of learners from disadvantaged backgrounds
- 3 Achieve confidence in qualifications and standards through enhanced quality assurance and regulation via Ofqual, not by dictating content, structure and assessment methods
- 4 Recognise the particular needs and successes of UK creative education and industries
- 5 Reduce the risk of detrimental effects that would be caused by a dramatic increase in external assessments in these types of qualifications.

# 1. Retain Applied General type qualifications because of an outstanding track record of progression

## Progression as a measure of success

The stated purpose of the majority of UAL Awarding Body qualifications is progression to the next level of study. We believe that because this is the stated aim of these qualifications this should be the key metric on which they are judged. This information can be readily gathered, especially at Level 3 for progression to HE via the UCAS system. It is a demonstrable and evidence-based measure.

Where a qualification has a stated purpose of ensuring that learners are prepared to commence a specific job role on completion, it seems reasonable to use employment as an evidence-based measure. We note, however, that many industries (including the creative sector) tend to employ graduates owing to the deeper and broader skillset and adaptability brought by additional years of study in a specialist area.

We recommend strongly against the review of post-16 qualifications extending the definition of “high-quality” to include data on individual earnings criteria. Firstly, the DfE consultation itself points out that it is not possible to guarantee that earning outcomes are being achieved in the same sector which was studied. Secondly, this is not a standard by which other highly regarded qualifications are judged. The different earnings potentials of those taking A Levels in Arts subjects versus those completing A Levels in Sciences is not linked to “quality” or assumptions around Purpose, nor should they be in the Applied General or Applied General “type” sector.

## Progression from Levels 1 and 2

Progression from one level of study to the next intended level of study is one of the primary purposes of our Level 1 and Level 2 qualifications.

Typical examples would be progression from a Level 1 qualification to a subsequent Level 2 qualification, or progression from a Level 2 qualification to a subsequent Level 3 qualification. This is often an important route within an FE college for students with relatively low GCSE attainment, and is often described as “internal progression” for this reason.

89% of learners on a Level 1 or Level 2 UAL Awarding Body qualification progress to a higher-level qualification, employment or an Apprenticeship (based on 2017/18 data returns\*). More than two thirds of these learners chose to progress specifically to a higher-level UAL Awarding Body qualification, with progression from Level 2 to Level 3 a popular option.

*\*Survey sample size 35% of total registrations 2017/18.*

## Progression from Level 3

UAL Awarding Body has an excellent track record in progressing students to Higher Education.

Our 2017/18 UCAS data shows that 90.1% of applicants that completed a UAL Awarding Body Level 3 qualification were offered a place at an HEI. Breadth of recognition was strong, with 200 HEIs offering places to these learners.

A total of 83.3% of all applicants that completed a UAL Awarding Body Level 3 qualification accepted a place at an HEI. Breadth of uptake was strong, with places accepted at 169 HEIs by these learners.

Best available data\* suggests that by comparison, 56% of A level students progressed to HEIs in a comparable manner.

*\*Source: Bursnall, Naddeo, Speckesser (Jan 2019). *Young People’s Education Choices and Progression to Higher Education*. National Institute of Economic and Social Research.*

A recent report by Ofqual, *Applied General User Research*, assessed the efficacy and standing of qualifications, such as those offered by UAL Awarding Body. This report found that perceptions among HEIs recruiting students to creative subjects were more positive than average, concluding that: “HEI staff delivering courses in creative arts ... were more positive about the preparedness for HE of Applied General students” (pp.ii). Additionally, the report notes that: “[i]n creative arts, ICT and sports related subjects, they can be preferred by HEIs over A-levels” (pp. lii).

## T levels

The clearly stated purpose of Technical qualifications (quoted from *Department for Education, Technical and applied qualifications for 14 to 19 year-olds*) is to “... equip post-16 students with the knowledge and skills they need for skilled employment or for further technical study.” Applied General qualifications are defined as being “... for post-16 students who wish to continue their education through applied learning.”

These factors mean that Technical qualifications such as T Levels and Applied General qualifications fulfil distinctive roles. This is especially true of the creative sector, which comprises, for the most part, graduate-entry industries. UAL Awarding Body supports the development of T Levels and of Level 4/5 technical qualifications in the creative sector where they are fit for purpose, but these are likely to be in specialised areas of industry or crafts.

Furthermore, it should be noted that T Levels currently indicate a dual purpose – progression to skilled employment, but also to higher level of study at HE via UCAS, or higher apprenticeships. This suggests that academic, applied and technical qualifications lie along a continuum, with each approach valid and useful to learners and the economy.

## 2. Retain Applied General type qualifications owing to their contribution to SEND and social mobility

### Equality of access, SEND and social mobility

We believe there are potential negative impacts on those with SEND and those from lower income backgrounds who have benefited from Free School Meals if the reform programme is not handled with due regard to their needs.

UAL Awarding Body, along with several other AOs, serves large cohorts of Level 3 learners with a disproportionately large ratio of learners who have SEND characteristics and/or qualified for Free School Meals. These are as defined in Social Mobility Commission statistics as distinct from A Level and other forms of Key Stage 5 attainment. In 2017 the Commission identified that Applied General and Applied General Type Level 3 qualifications had a much higher proportion of these kinds of learners than AS and A Level:

- 5% of A/AS Level students 2016 to 2017 had SEND characteristics.
- During the same period 17% of “Other Level 3” students had SEND characteristics.
- 7% A/AS Level students 2016 to 2017 had previously been eligible for Free School Meals.
- During the same period 14% of “Other Level 3” students had previously been eligible for Free School Meals.

Despite this, UAL Awarding Body and the centres it works with are delivering exceptional progression rates to University for students completing Level 3 Extended Diploma qualifications. Best data available suggests that our headline rate of 83.3% of students progressing to HE exceeds a headline national progression rate of 56% for A Level (see section 1 for details and sources). This is a phenomenal success, representing tangible high-quality outcomes for SEND students and those from lower income backgrounds.

These statistics point to the fact that some Level 3 provision, including some not on Performance Tables, is delivering high-quality outcomes for learners and good value to the system.

To remove funding from such Level 3 qualifications therefore reduces opportunity and discriminates against successful outcomes for SEND students.

### **3. Achieve confidence in qualifications and standards through enhanced quality assurance, not by dictating content, structure and assessment methods**

#### External assessment and external moderation

Our qualifications, for the most part, do not include external assessment. We have produced a successful model of external assessment with our Level 3 Applied General Diploma and Extended Diploma in Art and Design, which has met Performance Table criteria, but we believe that external moderation is a preferable option with several benefits, including:

- More validity for creative subjects
- Prepares students for subsequent working practices in creative Higher Education and creative industries.

The current Department for Education reform agenda risks conflating technical details about qualification structures and assessment methods with “high quality”. There seems to be little evidence that the introduction of external assessment in creative subjects will drive improvement to standards.

There is a risk that poorly implemented external assessment can make creative qualifications less relevant as it moves learners’ away from the research, project-based and team-working methodologies they will need to deploy in a later career in the creative industries.

DfE Performance Table criteria currently require that 40% of a given Applied General qualification is externally assessed. This requires prescription of a task, set by the awarding organisation, performed under controlled conditions, and assessed by the awarding organisation. This may work well for the development and assessment of certain skills and knowledge, but in creative subjects it is a poor fit for the aptitudes required by the sector.

This problem is exacerbated if awarding organisations prioritise their own administrative convenience and cost-control by designing piecemeal and highly prescribed assessments. This is why UAL Awarding Body’s Level 3 Applied General Diploma and Extended Diploma in Art and Design (QANs 603/1457/6 and 603/1459/X) contain a large, meaningful, synoptic approach to external assessment, comprising the whole of the Diploma year.

Even so, the ability to self-define a field of research and enquiry, or to co-design one, echoes precisely the working practices learners will encounter subsequently at HE and crucially in creative industry. Similarly, the completion of work often involves cross-team working on multiple and iterative projects. Performance in a controlled assessment is a weak substitute for this synoptic and industry emulating experience. Instead creative subjects are best served by pushing students to develop their own brief-defining, problem-solving and realisation skills in major projects. These major projects themselves are then best assessed via External Moderation as a mechanism which can handle large bodies of work without causing unmanageable demands on centres, learners and AOs.

If a political judgement is made that external assessment must become a mandatory component of all qualifications, UAL Awarding Body advocates that a similar assessment approach to A level creative arts qualifications be allowed. This approach involves a non-exam assessment, set by an awarding organisation, marked by the centre and Externally Moderated by the awarding organisation during a visit. This compromise allows the retention of some aspects of best practice in creative education (through the production of a portfolio of work), whilst balancing the requirement for a specific assessment type to be used.

## Grade inflation

There is significant evidence from UAL Awarding Body's track record that implemented well, with robust controls, External Moderation does not lead to grade inflation or relaxation of criteria. Rather the criteria and standards set by awarding organisations become embedded in the delivery of the qualification by teaching staff and the national standard is maintained by training and vigilance on the part of the awarding organisation.

According to Ofqual's recent report *An exploration of grade inflation in 'older style' level 3 BTEC Nationals*, UAL Awarding Body saw the award of top grades ("Distinctions") change from 21.7% of learners in 2012/13 to 22.3% in 2015/16. This is a minimal effect of 0.6% consistent with natural variations.

## **Risk of regulatory conflict**

Another risk of using qualification content, structure and external assessment rules is the introduction of a dual-track regulatory regime: one from the DfE and another from Ofqual. As happened with Performance Table criteria this could lead to conflicts and confusion, not just for Awarding Organisations, but also in understanding and confidence from employers, HEIs and the wider public.

UAL Awarding Body has urged DfE to reconsider this approach. A stronger emphasis on the quality, validity and comparability criteria currently enshrined in the Statutory powers of qualifications regulator Ofqual would provide a more consistent approach.

## 4. Recognise the particular needs and successes of UK creative education and industries

### Creative industries and employers

The creative industries in the UK are booming – worth £92b GVA in 2017 and predicted to out-perform the rest of the economy and create another 600,000 jobs by 2023, should the correct conditions be in place. These figures are quoted from the Government’s own Creative Industries Sector Deal, which also identifies the pipeline of creative talent from schools and colleges as crucial to realising this opportunity for the UK economy.

This success has been hard-won over decades of exceptional creative education and innovation in the UK’s schools, FE sector, Art Schools and Universities. Creative education in the UK is delivering a world-leading, skills and people led industry for our economy and social well-being.

It is not, therefore, appropriate to equate successful employment outcomes with earning data gathered for individuals on a relatively short-to-medium term basis. There are several reasons for this:

- 1 Careers in different sectors follow different trajectories and rates of increase in earnings. This makes any specific short-term period taken as a measure of success (e.g. five years from completion) relatively arbitrary.
- 2 The assumption of cause and effect between a qualification taken at Level 3 and subsequent earnings is weakened by other environmental factors, which can attend certain qualification types – e.g. social and economic disadvantage.
- 3 Individual earnings as a metric ignores wider cultural, social and economic value created by individuals, including the contribution made by small businesses and start-ups to innovation.
- 4 As identified in Sir Peter Bazalgette’s *Independent Review of the Creative Industries*: “the sector comprises higher-than-average numbers of self-employed, micros and SMEs. 90% of creative businesses have no more than five employees, 80% no more than two, 60% just one. The comparative figures for the UK economy are, respectively, ten, five and two” (pp. 13). These self-employed creatives are not robustly reflected in earnings data, nor are their proactive life choices.

**UAL Awarding Body statement:**

**DfE Review of post-16 qualifications at level 3 and below in England**

- 5 Talent from the creative sector is also integral to the wider success of other industries and economic activity. Marketing, branding, and product design for example are integral to major companies which are net contributors to the economy, but can only be supported by an appropriate flow of talent into the economy. Measuring solely the individual earnings of learners post-qualification misses the point that a wider net benefit is delivered to tax receipts by the contribution creative skills make to the economy. This is before wider consideration of social benefits.
- 6 DfE's own impact assessment, section 52, identifies that "Data we hold about progression to employment tell us less about student outcomes. We can tell whether students leave education to go into employment and whether that employment is sustained, but we cannot tell whether that employment was directly relevant to the qualifications taken. We can also identify students' later earnings but not occupation."

UAL Awarding Body qualifications are designed to address the particular skills needs of the successful creative economy. They require students to develop a self-defined area of research and realise multiple experimental solutions to problems, culminating in a large synoptic project. These projects require collaboration across the student cohort to realise work, exhibitions and performances. The project-based nature of the work also strongly emulates the future demands students will encounter at Higher Education and in employment in the creative industries, where defining a brief with a client and realising it across a team of specialists is a typical way of working. Examples include in games design, broadcast production, performing arts, 3D design, software design and graphic design.

## **5. Reduce the risk of detrimental effects that would be caused by a dramatic increase in external assessments in these types of qualifications**

### Risk and the timetable for reform

There is a significant risk that the current proposed funding decisions from DfE will cause detrimental effects to the system and learners.

There is a short-to-medium term risk of system and regulatory failure owing to a dramatic and quick increase in the number of external assessments to be delivered by centres and awarding organisations by 2021.

There is also a long-term risk that less-valid assessments will dominate in certain subjects, leading to poor learning and outcomes for learners who will be less prepared for progression to HE or employment. This issue applies especially in the creative sector if manageability of assessments in a time and cash-pressured sector is given too much weight, over depth and breadth of learning.

UAL Awarding Body believe that these additional risks will be offset by retaining Applied General type qualifications in the system, without compulsory external assessment. We see no risk to standards in doing so for the reasons outlined above.

## **Contact us**

We will be releasing communications and updates on these issues as and when any new or relevant information becomes available.

If you have any questions or would like to discuss these developments in more detail please contact us at [comms.awarding@arts.ac.uk](mailto:comms.awarding@arts.ac.uk)