Level 3 and below qualifications review
ScreenSkills response to consultation

Principles - Purpose and necessity

How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer?
Please give reasons for your answer, including any examples of how this may be achieved.:

ScreenSkills, the industry-led body for the screen industries (film, TV, video games, animation and visual effects) supports the general intention of simplifying the choice of Level 3 (and below) qualifications, and providing a clear set of options for 16 year-olds to be able to develop the skills required by employers in our sector. Clarity of purpose will help this aim, and could avoid all Level 1-3 qualifications trying to be "all things to all people".

To be even clearer, the purpose of qualifications at this level should also carefully consider the entire range of pathways available at this age, and how a particular qualification compares with other options. In particular, with T-Levels and apprenticeships intended primarily to provide a progression route into employment or higher technical courses, Applied General Level 3 qualifications will continue to be the most substantial pathway into Higher Education degree courses in screen subjects like film, TV and animation. This purpose needs to be highlighted more clearly, so that young people choosing a course are fully aware of this route. With the significant government support and promotion for "gold standard" T-Levels, A-Levels and apprenticeships, it is vital that this critical purpose of Applied Generals does not become less attractive in comparison.

Are standalone qualifications in personal, social and employability skills necessary?
Yes

Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways.
Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.:

ScreenSkills' frequent skills surveys of employers in the screen industries regularly highlight the lack of personal and employability skills amongst new entrants to the sector, emphasising the need for better training in employability skills in schools, colleges and universities. We would welcome these being built into larger qualifications - not just Level 3 vocational qualifications, but also A-Levels.

However, it is also important to retain standalone qualifications in this area, for two reasons: first, so that academic and vocational learners alike can use them to gain formal recognition of employability skills alongside their main programme of study; and second, to provide bitesize qualifications for disengaged learners to use as a bridge back into formal education.

Principles – Progression

What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?
Please give your answer below.:

ScreenSkills would like the effectiveness of qualifications to be measured by learners' progression into both continuing education and employment. As Applied General qualifications in creative and media subjects frequently lead on to degree courses, it is important to be able to measure how well Level 3 qualifications themselves lay the foundations for future successful employment (as opposed to subsequent learning achieved on a degree).

ScreenSkills already accredits UK degree courses that provide the most effective preparation for working in the screen industries, and so it would be useful to use evidence to understand the progression patterns from different Level 3 qualifications on to these degree courses recognised as being most relevant to industry.

Finally, ScreenSkills regularly surveys employers in the screen industries regarding skills shortages and difficult-to-recruit job roles. It would also be beneficial to be able to use this evidence to measure progression from different Level 3 qualifications into these crucial occupations for the ongoing success of the industry and economy.

How could we better use data about student outcomes to monitor and assess the success of future qualifications?
Please give your answer below.:

See answer to question 8, above.

Principles – Quality

Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications?
No

Please give reasons for your answer. :

Some of these quality features are an appropriate starting point, however many need to be improved to ensure higher quality new Level 3 qualifications for the screen industries.

In particular, the definition of "appropriate assessment" in the current performance table requirements is unsuitable for qualifications in creative subject areas. The introduction of significant external assessment into Level 3 Applied General qualifications has been unsuccessful, with most FE colleges deliberately moving away from newer creative and media qualifications that have followed these instructions (such as BTECs). This is precisely because this is an ineffective way of measuring the ability and performance of learners in creative subjects, where portfolio-based assessment methods are more flexible and often more suited to this type of learner. External assessment will favour more academic learners, whereas screen employers need young people entering the industry with better hands-on, practical skills.

Recognition of qualifications from industry and universities is important, but awarding organisations need to involve employers in more integrated roles in developing new qualifications - rather than just giving a sometimes superficial endorsement only (the T-Level model here is a useful comparison). As industry often does not have a deep understanding of the breadth of available qualifications, organisations such as ScreenSkills can readily play a crucial role in assessing the appropriate type of involvement and suggesting suitable employers for this role.

Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority?
Yes

Please give reasons for your answer and if yes, please state which features should be a priority.:
ScreenSkills would like quality features to be prioritised that encourage new Level 3 qualifications to be co-developed with the screen industry, through the direct involvement of employers and also national bodies like ourselves. As mentioned in our answer to Q10, this involvement should be more in-depth than is currently the case. The involvement should also be appropriate given the purpose and likely delivery models for a qualification. Industry placements, for example, can be powerful experiences, but can also be very difficult to organise in some regions, and can therefore distort the uptake and impact of a particular qualification.

Assessment is a key quality feature that urgently needs to be treated differently from the current set of performance table requirements (see answer to Q10, above). Size is not an indicator of quality in itself - the guided learning hours need to be appropriate for the purpose of the qualification.

Are there particular quality principles that we should consider for adults?
No

Please give reasons for your answer. :
ScreenSkills does not have a detailed opinion on this question.

Applying our principles – Our broader ambitions

At level 3, what purposes should qualifications other than T Levels or A Levels serve:
a) for 16 to 19 year olds? Please give reasons for your answer. :

Neither T Levels nor A Levels are satisfactory progression routes to the best higher education degrees in screen-based courses - those recognised by employers as providing young people with the right skills to work in the screen industry. Other Level 3 qualifications have a better educational approach and (potentially) assessment methodology to prepare 18 year-olds for these more "vocational" degree courses. It is important that these qualifications have a purpose that reflects this important role.

As mentioned in our previous answer, the purpose of a Level 3 qualification needs to take into account its relative role amidst the full range of available options. Where there are gaps in T Level and A Level provision - for example, in courses for the gaming and animation sectors - the purposes of other, related Level 3 qualifications need to be broader to make up for this lack.

b) for adults? Please give reasons for your answer.:
We feel that the purpose of these qualifications should be flexible enough to reflect the needs of adults retraining at an older age.

14 How should we determine "overlap" in relation to:
a) overlaps with T Levels? Please give reasons for your answer.:

The purpose is critical in considering overlap between T Levels and other qualifications. T Levels are not designed to support progression on to higher education degrees in creative subjects for the screen industry, so other qualifications (such as Applied Generals) that serve this critical purpose must continue to be approved for funding.

In addition, the work placement for T Levels is likely to be very difficult to organise in some UK regions where there are relatively few local screen employers, often only SMEs. It is important therefore to allow overlap with T Level subjects, where other qualifications might well be the only deliverable option to ensure regional diversity across the UK. This is a very important issue for the screen sector.

b) overlaps with A Levels? Please give reasons for your answer.:

Apparent overlaps with A Levels need to be treated very carefully, and to consider how different qualification structures and assessment methodologies suit respective industries. A Levels in Media Studies and Film Studies are academic qualifications with 70% or more external assessment, and so are often less effective development for young people to enter the screen industries - or in the first place for them to progress on to "vocational" degree courses.

How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?
Please give your answer below. :

ScreenSkills would like to see a continued expansion of careers guidance and support, so more 16 year-olds have a good quality range of progression options, and know which Level 3 courses are the best choice for them following their GCSEs.

There needs to be better and more widespread connections between schools and FE colleges to encourage and support young people in moving provider if there is a more suitable course available. Enabling better engagement with the world of work pre-16 can also help young learners progress directly to the right Level 3 course.

How could post-16 qualification reform and broader study best support more people to achieve at level 3?
Please give your answer below.:

High quality delivery and teaching of qualifications at Level 3 is critical to ensure greater levels of achievement. ScreenSkills is working directly with FE colleges to support and recognise courses that have close links and engagement with screen industry employers.

It is also important to support the reforms of Functional Skills qualifications so Level 3 learners can choose these applied literacy and numeracy courses rather than GCSE retakes where they are more appropriate.

If level 2 qualifications are intended to lead directly to employment, what quality principles should apply?
Please give reasons for your answer including any examples of good practice.:

There are few young people qualified to Level 2 only that are employed in the screen industries, apart from in customer service, administration and some craft roles. Therefore the majority of Level 2 qualifications in creative subjects need to act as a bridge to higher level qualifications at Level 3 and above, with quality principles that reflect this purpose.

What are the key roles that qualifications at level 1 and below need to play?
Please give your answer below.:

As above, there are very few young people working in the screen industries qualified to Level 1 only. This means that the key role for Level 1 (and below) qualifications in the creative subjects is to act as a bridge to ongoing courses at Level 2 and above.

This is particularly important given that these lower-level qualifications have a critical social role in re-engaging young people who have not succeeded with a traditional academic education, providing recognition of shorter learning courses that can help build back towards more substantial learning programmes.

Are there additional principles we should apply to level 1 and below?
No

Please give your reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.:
ScreenSkills does not have an opinion on this point.

Securing early progress - Pre-existing qualifications

Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation?
Yes

Please give reasons and any supporting evidence for your answer.:
ScreenSkills feels this is generally a sensible way to reduce the abundance of available qualifications, and the overlap between different versions of qualifications.

However, it is important to be sure that there are no differences between pre-existing and redeveloped qualifications in terms of structure, content or funding requirements, which risk some types of learner, some regions or some sub-sectors being disproportionately affected by this withdrawal of funding.

Securing early progress - Qualifications with no enrolments

Do you agree with the proposed criteria for identifying qualifications with no enrolments?
No

Please give reasons for your answer.:
Again, this generally seems a sensible way to reduce number of available qualifications.

However, it is important to also bear in mind that qualifications are sometimes developed in good faith to follow approval criteria or performance table requirements, but do not generate demand and uptake amongst learners due to other, unexpected funding issues or structural requirements. If there is a clear and demonstrable demand for a qualification, but its success has been hampered by other regulatory constraints, there needs to be an opportunity to appeal against its funding being withdrawn. This is especially the case when employers have been heavily involved in the development of qualifications on a voluntary basis, and withdrawing funding risks disengaging the support of industry behind a new qualification.

Are there specific reasons that a qualification with no enrolments should remain approved for funding?
Yes

Please give reasons for your answer.:
Please see answer to Q21 above.

Securing early progress - Qualifications with low enrolments

Do you agree we should consider removing approval for funding from qualifications with low enrolments?
No

Please give reasons for your answer.:
Please see answer to Q21 above.
In addition, there will always be some qualifications focused on a niche part of the screen sector, where registrations correspondingly only need to be low. If this is clear in the purpose and design of the qualification from the outset, and it is still performing well compared with these goals, then funding should not be removed.

Are there specific reasons that a qualification with low enrolments should remain approved for funding?
Yes

Please give reasons for your answer.:
Please see answer to Q21/Q23 above.

Shaping the next stages of the review - General and equalities impact assessments

Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND, or others with a protected characteristic under the Equality Act 2010?
Please give reasons for your answer.:

As discussed earlier in this response, the work placement element of a qualification for the screen industries can be difficult to deliver in some UK regions, given the lack of employers across all parts of the country. The quality features for new qualifications at Level 3 and below need to take this into account, to avoid a "postcode lottery" where creative and media production qualifications become unavailable in some UK regions. Students from disadvantaged backgrounds might well find a long work placement (such as in T Levels, and especially in London) unaffordable.

Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation?
No

Please give details of any additional impacts below.:
We do not have any further impacts to suggest.