

# Advanced British Standard

## AQA's response to the Department for Education's consultation

**Adam Steedman Thake**

**Policy and Evidence Manager**

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### **Executive Summary**

All of us working in education have a duty to ensure that all young people leave education with the knowledge and skills to thrive outside the school and college gates and feel confident taking the next steps in their lives, wherever they may lead. We welcome the opportunity to contribute to this consultation and to this important topic of debate.

Our full consultation response is below. Minor grammatical and stylistic changes have been made to the below response as compared to that submitted to the DfE, this is in order to present our analysis in a more easy-to-read manner and does not represent substantive changes.

### **Chapter 1**

This chapter sets out the case for change for reforming 16-19 education in England by introducing the Advanced British Standard. It invites views on how to shape the aims of this reform and the purposes of the ABS to deliver the outcomes we want for students and the economy.

11. We propose several overarching aims and principles that should underpin the introduction and design of the Advanced British Standard. To what extent do you support these proposed aims and principles? If you have further views on this, please share below.

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

We welcome some of the underlying aims of the ABS particularly the desires to: increase the status of vocational and technical qualifications; look more carefully at maths and English; and emulate a more baccalaureate approach with increased breadth.

We agree that increased breadth is a positive aim as a broad education develops a mixture of core skills and knowledge which ensure success outside the school or college gates. As currently envisaged, however, it is not clear that 3 Majors plus Maths and English will deliver breadth and members of our Student Advisory Group were unclear on this aspect of the proposal.

“By 16 I had a firm idea of what subjects I wanted to choose. Why would I need to continue studying English?” - SAG member

Reducing the differences between occupational and academic are welcomed. Bringing academic and technical study together into a clearer framework could simplify student choices. However, other approaches may have more value, like improved advertising and information on post-16 pathways.

Qualifications are inter-linked with curriculum and accountability. All three need to be examined together, or risk creating unintended consequences.

Finally, there is a danger of ‘throwing the baby out with the bathwater’ with current internationally respected A-levels. In addition, we foresee that should A levels be dispensed with in the state sector, independent schools could simply continue to take them, creating further division in our education system.

12. What do you think is the most important thing that the Advanced British Standard could achieve?

Please limit your response to 1500 characters or less

The high level focus on maths and English to 18 – with the aim of improving numeracy and literacy skills – is welcome. The ABS could close the gap for disadvantaged students and students with SEND by supporting more sustained education throughout the 16-19 phase. Even more benefits could be realised by focusing at 14-16 phase, or even 11-16. The GCSE resit policy has struggled to achieve its goal and effectively consigns these young people to repeatedly study for a qualification they have only a small chance of achieving. This can lead to many young people becoming disengaged and developing negative attitudes towards education, particularly in maths.

Reducing the perception of inequality in post-16 options between technical and academic qualifications is a good aim, but ‘perceptions’ are hard to change. We should introduce a greater focus on building parity of qualification standards – which we can achieve through a focus on equal rigour and value. ‘Parity of esteem’ is not achievable through qualification reform alone, and we should focus on achieving qualifications of ‘equivalent value,’ which is. Qualifications can be designed to have the same level of rigorous stretching content, meaning that even if they cover different amounts of the same subject, they represent the to the same level of complexity.

13. If you have further views on the aims, principles and purposes of the Advanced British Standard, or anything else covered in Chapter 1, please share below.

Please limit your response to 1500 characters or less

The aims of the ABS are laudable. It is important to enable both breadth and depth of study, but there is a risk that the ABS as currently envisaged may struggle to deliver this. Additional hours are welcome, although c.200 hours of guided learning hours would only equate to little-more than one AS-level course, or equivalent. With limited additional GLH, content risks being light-touch, or superficial to ensure it is covered. Reducing content within a Major so that it is 90% of an A-level could undermine one of the core strengths of our current system. There is a clear balance to be struck, and it is currently not clear how that would be done.

Further, it is not clear what will happen to existing T-levels, AAQs and A-levels and whether they will remain, be redeveloped, or replaced. Students currently selecting options will need reassuring their choices will have currency. There is the danger of introducing more confusion and undermining confidence in existing courses if the changes to existing products are substantial.

One way to ensure breadth while maintaining high standards is through the Extended Project Qualification. The EPQ enables students to develop their own independent study and project

skills, in an area which interests them. It would fit well under either the EEF portion, or as a standalone Minor option. Any ABS should be built with the EPQ as a cornerstone.

## **Chapter 2 - Section 1**

This chapter makes proposals and invites views on how to design the structure and content of the Advanced British Standard. Section 1 focuses on the Advanced British Standard programmes that students will study and what these will look like.

14. We propose two main programmes at Level 3: Advanced British Standard and Advanced British Standard (occupational). Each will contain a range of separate components to support students. To what extent do you support the proposed design for the Level 3 Advanced British Standard programmes? If you have further views on this, please share below.

Fully support, Somewhat support, **Neither support nor oppose**, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

In awarding terms, aggregating a standardised 'advanced British standard' and its occupational variant award presents issues. Two different students could study radically different subjects, in different disciplines, and both be awarded the same ABS. Employers and FE and HE providers may struggle to distinguish between obvious vocational qualifications and academic ones and there would be a lack of clarity around what a candidate knows and can do.

There are also questions around when the decision of majors and minors are made; it could be that students end up taking four or five AS-levels (minors), then selecting three to continue as full A-levels (majors), as happened under the previous AS/A-level system.

The ABS may struggle to deliver greater breadth, even with additional hours. The increase of 195 GLH presents problems above and beyond the resourcing requirements on teacher workloads. For reference, a full A-level has 360 GLH and an AS-level 180 GLH. An academic student, who desires to go to university, could end up taking three 'majors' that would amount to A-levels with additional English and Maths 'minors' that combined add up to the equivalent of an AS-level. This raises the question of whether this represents increased breadth after all. One way ensure breadth while maintaining rigour is to have Project Qualifications as a minor, or as part of EEP. PQs help students learn important skills to support them in further study and work.

15. We propose two main programmes at Level 2: transition and occupational. Each will contain a range of separate components to support students. To what extent do you support the proposed design for the Level 2 programmes? If you have further views on this, please share below.

Fully support, Somewhat support, **Neither support nor oppose**, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

We should avoid recreating the current issue of repeated GCSE English and maths resits. There is a strong case for changing the policy direction to ensure that Level 2 provides students with sufficient grounding in core skills and ensures they are literate and numerate to function effectively in society. Our new GCSE Maths readiness tool could provide a model for measuring whether a student is ready to progress to the next stage. A similar tool could be designed to

ascertain whether a candidate has a firm grasp of core concepts and knowledge required to progress onto a fuller ABS course of study. We would welcome discussing this in more detail.

We believe that GCSE resits currently do not substantially increase the rates of students achieving Level 2 and are demotivating for those stuck in the resit cycle. We believe that the ABS at Level 2 would follow a similar approach and principle, when a new approach is warranted. Any redesign of the Level 2 programme should reexamine the GCSE resit policy, and the principles underpinning it.

A transition programme for progress to the fuller ABS could represent a significant narrowing of the curriculum for students on it, even for only one year. If students do not pass their one-year transition programme, they may end up continuing the programme for more years or would drop off the transition programme onto the occupational programme.

16. If you have views or evidence on how additional teaching hours at Level 2 could best be used to benefit students, please share below.

Please limit your response to 1500 characters or less

In addition to teaching applied numeracy and literacy skills to benefit students, a focus on digital fluency and on oracy will broaden their competencies. For example, oracy has been shown to have a positive impact on attainment. Recruitment of teaching staff is a clear challenge to overcome and resources are already strained particularly when it comes to qualified maths teachers, with many maths teachers already working over their contracted hours.

Some areas which could prove beneficial are:

- Tutorial hours with pastoral support
- English and Maths stepping up programme for preparation to study at Level 3.
- EEP programmes of study tailored to the learner's ambitions around occupational competence (where ABS occupational is chosen)
- Resilience, emotional intelligence and 'learning to work' programmes to support all ABS students, occupational or otherwise, to develop skills for life and work.

17. If you have views or evidence on how a transition year could best be structured to support progression to Level 3, please share below. This could include reflections on the existing T Level foundation year.

Please limit your response to 1500 characters or less

18. In branding terms, how do you think the Level 2 programmes should be considered in relation to the Level 3 Advanced British Standard?

Both Level 2 and Level 3 programmes should be framed as the Advanced British Standard, with no level-based badge provided to students

Both Level 2 and Level 3 programmes should be framed as the Advanced British Standard, but it should be clear whether a student reached Level 2 or Level 3

**Level 2 programmes should have a different name and framing, separate from the Level 3 Advanced British Standard**

Don't know

It will be very difficult to award an ABS at both Level 3 and Level 2, even with differentiation, without causing significant confusion for the wider education sector and employers. This is why we have GCSEs, FSQs, A-levels and T-levels, among other qualifications, as they all have their own distinct branding. Within baccalaureate systems also, there is a difference between different routes – the French general baccalaureate is different from the technical or professional baccalaureate, the German *Abitur* is different and separate from vocational or technical routes, with different names and branding.

One of the key issues with the current system is the branding of non-academic qualifications. While GCSEs and A-levels are well-understood for those who follow an academic route, other routes are less well-understood. Ofqual found that entries to FSQs are declining, and that general awareness of them is lower than for GCSEs. Public First found awareness of fictional ‘H-levels’ was almost identical with T-levels. To succeed, the ABS will need to ensure the Level 2 pipeline creates strong progression routes onto the ABS and ABS occupational.

Level 2 programmes will need to provide the same breadth that students will experience on the ABS. Current 14-16 education programmes have seen declines in creative and practical subjects taught; these declines will need reversing, so that students will be prepared to study a broad range of subjects at ABS level.

19. To what extent do you support the proposal for Level 1 and Entry Level students?

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

One of the key things that this cohort of students will need is a strong grounding in numeracy, literacy and digital fluency, to help them lead fulfilling and rewarding lives. We believe that a core standard of numeracy, literacy and digital fluency will be best developed and assessed through on-demand, digital assessments. The additional teaching hours could also be used to break down lessons over multiple sessions.

If we anticipate these students will progress to a full ABS course of study, the Level 1 and Entry level will need to have the same breadth that students will experience on the ABS. This consistency of study will mean students of all levels will receive a broad curriculum, providing them with a wealth of experiences which allow them to develop skills and knowledge that will help them in their next steps and in the workplace.

On-demand assessment would allow all young people to do the kind of numeracy, literacy and digital fluency required for an apprenticeship, further or higher education course, or employment. The assessment would show what a young person can do (eg statistics, proportions, reading extended texts etc), focused on ensuring they meet an accepted benchmark. By being on-demand, a learner who did not pass could focus on the areas they needed to develop and – when they felt confident – could take it again without having to wait a year or six months.

20. If you have views or evidence on how students at Level 1 and Entry Level would most benefit from additional teaching hours, please share below.

Please limit your response to 1500 characters or less

Level 1 courses do form a significant part of the post-16/FE offer and those studying GCSE and certifying at grades 1-3 are essentially performing at Level 1 and need to be provided for under

any reform. Integrated Level 1 provision in ABS for English and maths could help move away from the demotivating GCSE re-sit cycles and would be an effective use of additional teaching hours.

Using additional teaching hours to progress students from Level 1 to Level 2 courses through modules or a foundation year that directly prepares them for those at the higher level can ensure a more cohesive system at post-16. While a core focus on maths, English and digital skills could be beneficial, the use of a broader credit-based system at lower levels may also help students personalise their education journey, increasing accessibility and inclusivity and preparing them for broad post-16 study.

## **Chapter 2 - Section 2**

This chapter makes proposals and invites views on how to design the structure and content of the Advanced British Standard. Section 2 focuses on the design of the component parts of the Advanced British Standard: majors; minors; employability, enrichment and pastoral (EEP) activities ; and industry placements.

21. Once rolled out, we anticipate that the Advanced British Standard qualification framework will supersede the varied Level 3 qualification landscape for 16–19 year-olds (including A levels and T Levels etc.). If you have further views on this, please share below.

Please limit your response to 1500 characters or less

Combining a subject offered at A-level and AAQ into one course available at different levels would potentially undermine strengths in our existing system. Ofqual surveys before the pandemic consistently showed high levels of confidence in A-levels, and confidence has increased post-pandemic also. Public First polling also found 88% of UK employers understood exactly what an A-level was – higher than a bachelor's degree.

The risk inherent within the ABS is that replacing established terminology could lead to confusion, as seen with the introduction of T-levels and 1-9 GCSE grades. While the varied and at-times complicated 16-19 landscape can be confusing, this is primarily an information, awareness and branding problem.

Internationally A-levels are well-respected and are sat in thousands of schools in 160 countries. Over 1,400 universities in 125 different countries recognise A-Level qualifications, including 600 universities in the US (including all the Ivy League universities) and in many other major student destinations. They also represent a major export market for UK based awarding organisations.

Members of our Student Advisory Group also worried that our academic system works to help students specialise for university and that this could be undermined by the ABS.

“The ABS is taking out A-levels from a streamlined system that works and replacing with something that doesn't fit. If we're doing less depth how will that help with university specialisms?” - SAG member

22. To what extent do you support the proposal for how subjects will be selected to be included in the Level 3 Advanced British Standard programmes?

Fully support, Somewhat support, Neither support nor oppose, **Somewhat oppose**, Fully oppose, Don't know

There is currently a broad suite of different qualifications offered which offer different learning journeys in the 16-19 phase. For example, A-level Maths and Level 3 Mathematical Studies (Core Maths) are both Level 3 courses, offering students the opportunity to develop their mathematical knowledge and expertise, but offer different syllabuses. Combining these two courses into one 'Maths course', available at 'major' or 'minor' level could in theory work but could lead to much greater confusion about what the student knows and can do. To further include the AAQs into one overarching 'maths' course would simplify in one regard but could create further confusion about what a candidate knows and can do.

We think that combining all maths courses into one could present substantial problems. Currently, we have various groups of students at different attainment levels – some doing A-level Maths, those who have not achieved Grade 4, etc. Different students will benefit from different levels of mathematical study and content. Aspiring pure mathematicians, applied engineers, social scientists and office managers may each benefit from different levels of and emphases on mechanics, statistics or life numeracy. This would lean towards having several maths courses which could be chosen for either ABS pathway, rather than either a maths major or maths minor. The same is true for English.

23. To what extent do you support the proposal for how subjects will be selected to be included in the Level 2 programmes?

Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, **Don't know**

Progression is a key cornerstone of the education system, as it enables students to know what they know and can do and to understand what their next steps could look like. Level 2 programmes will need to provide the same breadth that students will experience on the ABS. Current 14-16 education programmes have seen declines in creative and practical subjects taught; these declines will need reversing, so that students will be prepared to study a broad range of subjects at ABS level.

As we say elsewhere in our response, we are concerned that the Level 2 ABS creates two potential problems. First, that it follows a similar logic to the current resit programme, i.e. that repeating content is beneficial to students in order to support them making progress. Being pushed into resits can lead to many young people becoming disengaged from studying and developing negative attitudes towards education, particularly in maths as they repeatedly study content they may struggle to grasp. We think a new approach should be taken for the ABS.

Secondly, it would create problems for HE, FE and employers as with two levels of ABS there would be confusion around knowing with certainty what a candidate knows and can do.

24. If you have further views on how subjects will be included in these reforms at either Level 2 or Level 3, please share below.

Please limit your response to 1500 characters or less

Level 2 programmes will need to provide the same breadth that students will experience on the ABS. Current 14-16 education programmes have seen declines in creative and practical subjects taught; these declines will need reversing, so that students will be prepared to study a broad range of subjects at ABS level.

The ABS is a reform of qualifications, but teachers we have spoken to have stressed that successful reforms look at curriculum, qualifications and the accountability framework together, to avoid creating unintended consequences and reduce risks.

The ABS is a reform of qualifications, but teachers we have spoken to have stressed that any successful reform requires looking at curriculum, qualifications and the accountability framework together, at same time to avoid creating unintended consequences and will reduce risks.

The guidance does cite that evidence will be from various sources (progression data, economy skills needs etc.) but there is not enough information within the consultation to reliably confirm how subjects will be selected in the new Level 3 ABS programmes. Further clarity is required for the process, and the impact in relation to AO burden, for qualifications that have recently been through technical evaluation with the DfE and Ofqual.

25. To what extent do you support the proposal for increased teaching time relative to self-directed study? We particularly welcome any evidence of how this is balanced currently.

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

The increase in Guided Learning Hours is a positive intention, which we support. However, the average increase from 1280 GLH to 1475 GLH represents only sufficient time to cover slightly-more-than 1 AS-level (GLH 180 hours) across two years. Whilst this will provide a notable increase, it may not be sufficient to provide adequate stretch to cover skills gaps.

While bringing the English system up to more parity with other jurisdictions seems reasonable, our distinct approach does have positive benefits elsewhere in the system. Our focused and in-depth Level 3 academic qualifications are prized by HE providers both in the UK and internationally, as high-quality preparation for Higher Education. Solely focusing on the 16-19 phase of education ignores the previous years of education which needs to be designed to enable smooth transition to the post-16 phase. There are also questions around how additional GLH will be provided, given current teacher and lecturer shortages.

Young people on our Student Advisory Group raised concerns about the impact additional hours could have on stress and mental health. Others questioned whether additional hours would be detrimental to their next steps, as when they leave school or college there are substantially fewer contact hours - providing more could lead to young people being less well prepared.

“Teaching hours isn't a very good idea. I already struggle with the number of hours I have to do - that will impact on mental health.” - SAG Member

26. If you have views on the appropriate size of subjects, including whether we should standardise associated hours, please share them below. We particularly welcome any evidence of guided learning hours delivered currently.

Please limit your response to 1500 characters or less

Reducing content within a Major so that it is 90% of an A-level would undermine one of the core strengths of our current system. A-levels are rigorous academic courses which provide high quality preparation for HE. Young people on our Student Advisory Group told us they like the



depth of study at A-levels – watering down the content would mean keen and enthusiastic students would receive less instruction in their chosen field. Ofqual surveys found that over 80% of people trust A-levels (83%) and think they are good preparation for further study (83%). AQA research found that it is easier for a student to get into university with vocational qualifications if they also have at least one A-level.

For the ABS academic route, the move to 5 subjects would increase breadth, but it would be at the expense of choice. This could be unpopular with young people who have told us that they value making their own choices about their studies, rather than be forced to do subjects they are not passionate about.

A small AAQ can feature between 150-420 GLHs, a full A-level involves 360 GLHs, Core Maths has 180 GLHs. Standardisation of content and GLH across a diverse range of subjects is fraught with problems and will potentially not allow for the diversity in provision that will allow students to access a broad array of subjects which are most appropriate for them. We believe there is no perfect size of subject, given that different students benefit from courses of different configurations.

27. If you have views or evidence on how time for employability, enrichment and pastoral (EEP) can best be used, please share below. We particularly welcome views and evidence about how to support students with additional challenges, e.g. lower prior attainment or the most disadvantaged.

Please limit your response to 1500 characters or less

One way to provide strong EEP would be through Project Qualifications, available at Foundation, Higher and Extended level. Research has shown that PQs help students develop their own independent study skills and metacognition while focusing on a topic or subject that is of particular interest to themselves. Research has also shown that PQs have a variety of positive impacts on wider attainment and post-school study; this means that they are valued by Higher Education providers. Our research found that students with EPQs are more likely to get a high-grade degree and that at every level of deprivation, those with EPQs outperformed the equivalent non-EPQ cohort.

While the Extended PQ may be too demanding for lower prior attaining students, the Foundation and Higher PQs offer the same benefits at a level more appropriate for these students. As they are focused on areas of interest to the student, they can be more engaging for learners than traditional subjects, helping low-engagement students participate in further study.

PQs also diversify modes of assessment, encourage young people to pursue their passions, equip them with skills employers prize and measure their competencies in a different way.

PQs could form part of a rigorous and stretching EEP, or could be their own standalone Minor. However they are configured, PQs should form a cornerstone of the ABS and be available to all learners.

28. If you have views on how we can encourage employers to offer industry placements and what further support education providers will require, please share below.

Please limit your response to 1500 characters or less

Work placements have been difficult to secure for T-levels and remain a challenge for providers. One of the fundamental issues is that employers and businesses focus on delivering their services and products, rather than teaching 16–19-year-olds about their industry. There need to be

appropriate and attractive incentives for them to be involved and to offer 315 hours' worth of placements (this equates to 45 7-hour workdays).

Further support for education providers could be fostered by recognising and valuing strong relationships with a wide variety of industry placement providers to give schools confidence to choose from these options. The providers can include both well-known high-quality providers and those who are working in a more local context supporting the needs of individual schools. A good example of this is the International Baccalaureate Career-related Programme where several providers (e.g. Microsoft Corporation, etc.) signed a formal Co-operation Agreement with the IB and are acknowledged as Career-related studies Strategic Providers. Providing a range of professional development for schools to support teachers and students through ABS. The professional development could include, for example, a wide range of practical workshops, linked with industrial employment online and face-to-face.

### **Chapter 2 - Section 3**

This chapter makes proposals and invites views on how to design the structure and content of the Advanced British Standard. Section 3 focuses on how best to support students to develop maths and English knowledge and skills to thrive in life and work.

29. We propose that we develop the English and maths offer within these reforms around certain principles. To what extent do you support these principles?

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

The overarching principles will support the design of a system that will ensure a clear set of diverse English and maths options. Additional 150-175 GLH for both Maths and English has the potential to deliver huge benefits and increase uptake of these core subjects substantially.

We particularly welcome the inclusion of 'financial literacy and numeracy' in the consultation, as being confident in budgeting, managing debt, saving and investing should be instilled in young people. Indeed, it is one aspect of numeracy which all citizens need in later life. We also agree that young people should be exposed to the greatest writing, to broaden their horizons and careful thought will be needed to ensure that modern Britain is represented in these texts.

Members of our Student Advisory Group felt that Maths and English would be very beneficial if the content was presented in a real-life way. Students told us that currently some pupils get forced to do a route because they did not achieve high grades in maths and English so the proposals could help this cohort of students. However, some of the STEM-focused students were frustrated by the idea that they would be forced to study English further, when they wanted to study STEM subjects and work in a related field; they did not see the necessity of improving their existing skills and knowledge in English.

30. To what extent do you support using the proposed knowledge and skills identified for maths and English to inform these components of the Advanced British Standard? If you have further views on this, please share below.

Fully support, Somewhat support, **Neither support nor oppose**, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

The overarching principles support the design of a system that will ensure a clear set of diverse English and maths options; this wide variety of courses is a strength of our system. We particularly welcome the inclusion of ‘financial literacy and numeracy’ in the consultation, as being confident in budgeting, managing debt, saving and investing should be instilled in young people. Members of our Student Advisory Group felt that Maths and English would be very beneficial if the content was presented in a real-life way. Students told us that some pupils get forced to do a route because they did not achieve high grades in maths and English so the proposals could help this cohort.

At present, English and maths subject content at Level 3 and below is vast and differentiated across Functional Skills, GCSE, A-levels, Core Maths and others. This variety is a strength of the system, as students have a range of different routes open to them. The student population is a diverse group with a range of different needs – any proposals to help the cohort improve their knowledge and skills must enshrine a similarly diverse suite of courses, to ensure that all students have sufficiently stretching courses open to them.

Confusion or misunderstandings around the different courses on offer can more to do with a lack of information, rather than a fundamental flaw in the system. Complexity is best overcome with information and understanding and is in essence a marketing and branding issue.

31. We propose that there will be a range of English and maths majors and minors at Levels 3. To what extent do you support this proposal?

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

We support the range of different courses available. To deliver courses which truly upskill young people in English and Maths, there must be a sufficient variety of options. We advise against a one-size-fits-all solution, instead a broad suite of courses aimed at ensuring all learners have the chance to develop their skills.

To take the Certificate Level 3 Mathematical Studies, ‘core maths’, as an example: this is a stretching course, aimed at students who have a good standard of mathematical knowledge and confidence, but are not taking A-level Maths. It is inappropriate for lower-achieving students who will struggle to access content and with 180 GLH may represent too much content for all learners. As such, a broad range of courses should be provided.

Further definition on “theoretical” and “applied” minors would be beneficial to understand their application. English teachers we have spoken to fear that a theoretical English course would be a watered-down AS-level English Literature and that English teachers may struggle to deliver an Applied English Minor as the content is very domain specific and would be best taught by specialist teachers (e.g. Applied Business English taught by Business teachers).

As we know from TQUK colleagues who deliver vocational qualifications, a small AAQ can feature between 150-420 GLHs. Wrapping all these together under one minor banner presents problems for standardisation across courses and could end up increasing confusion.

32. How can we best support students who have secured lower Level 2 passes in English and maths at 16 (e.g. grade 4 or 5) to progress onto Level 3 study in these subjects?

Please limit your response to 1500 characters or less

To encourage Level 2 learners to study Level 3 English and maths, diagnostic tools/assessments would support identifying Level 3 study suitability. AQA has developed 'GCSE Maths Readiness tests' to help identify any gaps in conceptual understanding for Year 9/Year 10 students beginning their GCSE Maths study. These provide a model that could be developed for Level 3, to help identify strengths and weaknesses in mathematical understanding. We would welcome speaking further about these tools.

We are also working to develop assessments of fundamental core competencies in numeracy and literacy, to provide an accurate and robust measure of the fundamental knowledge and skills for success. These will provide students with a record of their competence, which could be used to help them progress to higher levels of study.

Bridging courses/minors/stepping up programmes in year 1 of study would also support students to make the progress necessary to access the fuller Level 3 curriculum. A similar approach is already currently available for Level 1/2 Technical Awards at Key Stage 4, which are designed to support learners where Level 2 is too much stretch, but allows them to still achieve at Level 1. Using this principle as a model, students at Level 2/3 could also be supported to progress to more stretching content efficiently.

33. If you have views on how English and maths can be delivered for students taking the occupational programme, please share below.

Please limit your response to 1500 characters or less

We support the range of different courses available. To deliver courses which truly upskill young people in English and Maths, there must be a sufficient variety of options. A broad suite of courses aimed at ensuring all learners have the chance to develop their skills is preferable to a one size fits all approach.

We are developing assessments of literacy and numeracy, which could measure when students are confident in the fundamentals. Our maths diagnostic tests can also check students' understanding of core concepts, identifying courses of study which would benefit them.

Currently, English and Maths are embedded into T Levels for those who have not achieved a level 4 GCSE. If embedded hours count towards the 150-175 GLH, given this is at Level 2 and not Level 3, it could be that a learner taking the ABS occupational route with a T Level option has an easier progression route than their counterparts taking non-T Level ABS Occupational or the ABS.

English teachers we have spoken to worry a theoretical English course would be watered-down AS-English Literature and that Applied English Minors would be best taught by specialists e.g. Applied Business English taught by Business teachers not English teachers.

As we know from TQUK colleagues who deliver vocational qualifications, a small AAQ can feature 150-420 GLHs. Wrapping all these together under one minor banner presents problems for standardisation and could end up increasing confusion.

34. If you have views on how existing Level 2 qualifications (GCSEs and Functional Skills qualifications) could provide the basis for two-year Level 2 study for English and maths within the Advanced British Standard, please share below.

Please limit your response to 1500 characters or less

GCSEs provide students with accurate measures of what they know and can do with an academic focus. GCSEs are well-known academic qualifications and should form a benchmark for any new Level 2 academic study programme as they provide good preparation for further academic study at Level 3 in STEM subjects.

However, for young people who do not achieve a Level 2 in English and Maths the system does not work as well. Being pushed into resits can lead to many young people becoming disengaged from studying and developing negative attitudes towards education, particularly in maths as they repeatedly study content they may struggle to grasp. We recommend a new approach should be taken for the ABS.

Also, the ABS should be future-focused and take digital exams as an accepted paradigm. Digital, when-ready assessment would provide the necessary flexibility for learners to progress at the right pace for them. This approach would work well for students who have just missed the current benchmark Grade 4 in GCSE at Key stage 4, enabling them to fill in gaps in their knowledge and skills and then pass the required standard quickly.

35. If you have further views on what students will study as part of the Advanced British Standard, or anything else covered in Chapter 2, please share below.

Please limit your response to 1500 characters or less

We believe that all students should leave education confident in their numeracy, literacy, and digital fluency. To be a success, the ABS must ensure all people are equipped with these skills. AQA are working towards new assessments of these fundamental core competencies, to provide accurate benchmarks for all learners. We will be working on defining what skills and knowledge someone must have to be 'digitally fluent' and will present recommendations for how best to increase digital fluency with a particular emphasis on disadvantaged students and closing the digital divide. We welcome further discussions with you as we continue making progress.

As English and maths qualifications (non-FSQ and non-GCSE) are being reformed during current Level 3 and below reform they are being mapped to the proposed newly developed literacy and numeracy standards. These should be used to complement curriculum delivery within the recommended 150-175 GLH, alongside FSQ/GCSE. There are many examples in current practice, where this approach has supported students who struggle to access GCSE/FSQ qualifications.

Also, Project Qualifications should form a cornerstone of any ABS programme. These could either be under the EEP portion, or as a standalone Minor in their own right. PQs allow for self-directed learning on a topic which they are interested in and help them develop key wider skills.

### **Chapter 3**

This chapter seeks initial views on the assessment, grading and awarding principles that should inform further development of the Advanced British Standard. There will be subsequent technical questions that we are continuing to work through with Ofqual. Ofqual will then consult on detailed assessment arrangements in due course.

36. We have proposed assessment principles to underpin the Advanced British Standard. To what extent do you support these assessment principles? If you have further views on this, please share below.

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

We broadly welcome the principles, particularly around reducing the assessment burden on students. Exams provide a tried and tested method for measuring large cohorts of students in a rigorous, reliable manner, with limited opportunities for malpractice. Over the pandemic, TAGs created huge workload for teachers, with less reliability than exams. As EDSK's 'Examining Exams' found, traditional exams are an impartial way to assess students' knowledge and understanding, with lower probability of malpractice.

However, exams offer only one way of assessing students, and a broader ABS should build on the benefits of a variety of assessment methods. Project Qualifications represent high-quality, robust courses of study which are not exam-based; we propose that PQs should form a cornerstone of the ABS.

We believe digital exams are the next evolution and can have substantial benefits for students, schools and colleges, and the environment. Digital exams are more flexible, meaning they can be taken when the student is ready and should underpin reducing the burden of exams.

The key concern is around how aggregating grades for a combined ABS would work. Different students would sit different subjects, set by different exam boards, and still be granted the same overall classification. If a student wishes to query their mark, there are questions around who conducts a review. A new body would need to be created, or an existing body given new remit to preside over aggregation of results.

37. We have proposed principles to underpin the new grading system. To what extent do you support these grading principles? If you have further views on this, please share below.

Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

Please limit your response to 1500 characters or less

We support the grading principles laid out as they are largely identical to the principles underpinning the current system. One of the key things which must be preserved is the currency of existing qualifications, particularly GCSEs and A-levels. These are well-respected qualifications both internationally and in HE institutions in the UK, and provide rigorous certification of academic competencies.

One issue with mean student performance remaining comparable over time is that it can effectively mean some students struggle to achieve the minimum standard, as we currently see with students resitting their GCSE Maths and English. This policy has created the current issues we see with the GCSE resit cohort, who are often demotivated by repeatedly struggling to gain a 'pass.' We propose a new assessment, aimed at demonstrating core competencies in numeracy, literacy and digital fluency, taken when the learner is ready between 14-19, de-coupled from high-stakes exams. This would be an on-demand, when-ready assessment focused on core knowledge and concepts needed by all young people. In this way, a new assessment can provide an accurate measure of a student's fundamental capabilities, in a lower-stakes way.

We welcome the opportunity to work further with Ofqual to resolve the various technical questions that need to be addressed. The key concern is around how aggregating grades would work across a diverse suite of courses.

38. To what extent do you support the proposal that students will receive individual grades/marks for each major and minor (or equivalents) studied within the Advanced British Standard?

**Fully support**, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know

Individual grades in individual subjects provides the required level of specificity for students to help them plan their next steps. It will provide HE, FE and employers with a good understanding of what applicants know and can do, allowing them to make accurate decisions.

Without individual grades in each subject (major, minor etc), it will be impossible to know which student is most suitable for further study or employment and would fundamentally undermine the currency of ABS courses. To work an example, if two students achieve the same overall ABS (say at a 'merit') and both apply to study Engineering at a university, it will be impossible to know which student will have the best chance of success on the course, other than at a very general level. Providing specific grades in individual subjects is the best way to provide the specificity necessary for young people to take their next steps with confidence.

39. Do you agree that students should receive some type of overall Advanced British Standard award? If yes, what value could an 'ABS award' add on top of individual component grades, particularly for higher education providers and/or employers?

**Yes**, No, Don't know

Please limit your response to 1500 characters or less

An overall ABS award would provide a broad measure of an individual student's capabilities. This could work similarly to the International Baccalaureate Diploma Programme, where an overall diploma is awarded if a combined total of grades is reached across multiple qualifications, with floor standards.

Stakeholders have varied needs, so giving students individual grades in subjects alongside an overarching general wrapper can provide the level of specificity required alongside a broad high-level view on what a student can do could cover many bases. It is vital that individual marks are provided, whatever decision about the overall ABS award is taken as the risk of only offering an overall ABS award is that it will only meet the needs of a subset of students, employers, and education providers.

The key concern around an overall ABS award is around how aggregating grades would work given the way the exam system is currently structured.

40. What minimum attainment conditions, if any, should a student need to achieve to receive a Level 3 Advanced British Standard award?

Pass all subjects at Level 3, except for English and maths (Level 2 pass accepted)

Pass all subjects at Level 3, including English and maths;

Pass a set proportion of subjects (e.g. 3 majors and 1 minor or 2 majors and 2 minors)

Meet a minimum aggregate Advanced British Standard score

No minimum attainment conditions

### **Don't know**

Another condition not listed above (please specify below)

Please limit your response to 1500 characters or less

For a Level 3 ABS to have currency, it must recognise students operating at Level 3. If students only achieved some of their subjects at Level 3 and were awarded a Level 3 ABS, there would be uncertainty about what level a student was operating at. Individual marks/grades must be reported for each minor and major so stakeholders can set minimum thresholds that are appropriate for their needs.

Aggregation brings a raft of problems, particularly as it would require an appeal system for challenging an overarching ABS grade. Different students would sit different subjects, set by different exam boards, and still be granted the same aggregated 'mark' or classification. A student could do English Major with Pearson, Maths Minor with AQA, Science Major with OCR, which then leads to an unknown entity who would award the overall ABS; this would work with a pass/fail system, rather than a graded ABS. For a graded ABS, a new body would need to be set up sitting above exam boards to aggregate. This would introduce a large amount of complexity and time for students who wished to appeal their aggregated score into a system with little slack.

To answer more specifically around Maths and English requirements, we would need to know more detail about what those requirements could look like.

41. Which of the Advanced British Standard award options outlined do you prefer and think would add most value? Please include any evidence if available.

Please limit your response to 1500 characters or less

In terms of the overarching ABS framework, a student should have to pass ABS qualifications at Level 3 to achieve an overall ABS award. A certificate would prove someone had met the standard, providing a strong indicator of their overall performance across a range of subjects. An award stating that they had met the benchmark of the minimum standards would add most value in this regard.

There are concerns around how aggregating grades would work, which is why we oppose aggregated scores. A minimum aggregated standard would be complicated across the exam boards, as students sitting different courses with different AOs could achieve the same overall award. There are currently robust procedures in place for students who wish to query their mark in, say, A-level Chemistry, because this can have such a huge impact on students' next steps. There would need to be similarly robust procedures in place for the ABS, to ensure that students are able to use their ABS as proof of what they know and can do. This would require a new body to oversee aggregation and appeals and introduce an added stage for students applying for further or higher education who wished to appeal their aggregated score.

In the International Baccalaureate Diploma Programme, an overall diploma is awarded if a combined total of grades is reached across multiple courses, with floor standards. This model would present practical issues given multiple exam boards and aggregation issues.

42. If you have further views on how students will be assessed and graded under these reforms, or anything else covered in Chapter 3, please share below.



Please limit your response to 1500 characters or less

The key concern noted is around how aggregating grades would work, which is why we propose no aggregation across different ABS modules. While we do not support aggregation due to the complexities, one way of implementing aggregation would be to base it on a similar model to UCAS tariff points. UCAS tariff points remain a useful metric as they provide a standardised metric across both academic and vocational courses of study, and provide HE/FE providers with strong measures of what students know and can do. The ABS could use UCAS tariff points as a model to ensure consistency and fairness across different subjects and between vocational and academic study. This previously worked with AS-levels which were counted as 40% of an A-level for UCAS tariff points; this could be extended to different courses of study across different ABS routes. The previous AS-level being worth 40% of an A-level for UCAS tariff purposes could serve as a useful model for the value that should be assigned to Majors and Minors. While this is one way to do aggregation, the increased complexity and requirement for a new ALB make aggregation an unattractive proposition.

We welcome the opportunity to work further to resolve the various technical questions that need to be addressed.

#### **Chapter 4**

This chapter seeks views on the implications of the Advanced British Standard for 16-19 education providers and workforce to ensure we can put the right support in place for the sector and maximise the breadth of offer available to students.

43. What strengths in the current approach to 16-19 education should we aim to preserve under the Advanced British Standard?

Please limit your response to 1500 characters or less

The existing strong brand of A-levels should be preserved; these qualifications have been around for a long time and have established currency with education providers and employers – and many of the teachers we have spoken to echo these points. Ofqual surveys before the disruption of the pandemic consistently showed high levels of confidence in A-levels. Public First polling also found 88% of UK employers understood exactly what an A-level was – higher than a bachelor's degree.

The freedom to specialise at age 16 should also be preserved, as this serves as motivation and is a pivotal moment in student progression. Members of our Student Advisory Group liked being able to specialise at 16 as they had a firm idea of what they wanted to continue studying and not being forced to do subjects that they did not. This specialisation from age 16 provides students with a deep understanding of their subjects, meaning that they are well prepared particularly for university study. Any proposals for the ABS must ensure that the freedom of choice for young people is preserved.

The ABS must also consider recent approvals of qualifications as part of current Level 3 and below reform. Recognising the need for stability will prevent administrative fatigue to awarding organisations, employers and providers, and support with the potential confusion with current approval processes in the wider context of ABS reform.

44. What opportunities and challenges do you see for the recruitment, retention and deployment of staff as a result of implementing the Advanced British Standard?

Please limit your response to 1500 characters or less

The opportunities and challenges remain unclear until further information is available; however, timing of the ABS in relation to current Level 3 and below reform could produce significant challenges in relation to staff developing and delivering ABS qualifications. Additionally, there may be a challenge in teacher training programmes to ensure teachers are effectively trained and available to support with the increased teaching hours.

There will be workload and wellbeing implications as the ABS is a significant change for teachers and FE lecturers. The NFER found that fifteen out of 18 secondary subjects are struggling to meet recruitment targets; this will impact schools and colleagues as they will face difficulties offering increased GLH and breadth of subjects.

45. What staff training do you think may be required to implement the Advanced British Standard successfully?

Please limit your response to 1500 characters or less

There will need to be a concerted focus on teacher training to ensure that the workforce are supported to deliver a successful ABS. Staff training will need to be focused on supporting the growing mental health needs of students, which can have a significant impact on absence rates. There will also need to be training on how best to support students with SEND or students with lower prior attainment as they may take a broader suite of subjects than they would have previously.

Teaching at secondary level is often highly specialised, with teachers being qualified to their specific discipline and often not receiving training in other disciplines. To deliver a broader ABS, teachers will need cross-disciplinary training, to ensure they can effectively build links with other subjects. This could also help with shortages in particular subjects, as non-specialists could fill in some provision.

In relation to Assessment Objectives, we do not believe that there will be a significant impact on staff training, but there will be some training required to ensure that centres and providers are clear on the terminology and routes available.

46. We are interested in the changes that may need to be made to deliver the Advanced British Standard for all students, regardless of where they live. What changes do you think may be required in the following areas:

a. Buildings/estates?

Please limit your response to 1500 characters or less

Facilities to support newly approved subjects as part of mainstream education – not every centre will have all facilities to support the ABS broad and balanced curriculum offer and therefore this could result in a narrowed subject curriculum in certain areas.

Members of our Student Advisory Group raised concerns that their schools do not have sufficient classrooms to facilitate more lessons and breadth. School and college leaders also raised similar concerns around estates and facilities. Increases across the school estate will be required to ensure high quality GLH in a wider array of subjects.

b. Technology?

Please limit your response to 1500 characters or less

The future of education is increasingly digital. To prepare students for their future study and employment, we need to ensure they learn sufficient digital skills and fluency. Greater technology in schools, properly embedded in high quality learning experiences will require a substantial improvement in the IT capabilities of many schools. Not every school will require increased technology, but many will. Using technology in high stakes examinations is also a matter of when, not if, and the school estate will need preparing with the required devices and sufficient space to sit digital exams.

We should consider the way tech allows us to think differently about the core elements of the ABS. For example, if pupils are able to access interactive course materials on screen, this might relax the need for a subject specific teacher or lecturer. In essence, technology will likely mean there is more of a grey area between teacher directed and student directed learning hours. There also could helpfully be consideration of how can we use technology to provide a wrap-around digital record of achievements that includes grades and extracurricular activities, to provide a rounded picture of what students know and can do, giving employers a strong indication of candidates' suitability.

Certain subjects may require specific technology such as engineering to allow for CAD and modelling; therefore, consideration is required to ensure providers can offer a broad and balanced curriculum.

c. Provider landscape?

Please limit your response to 1500 characters or less

As there is a continued distinction between those providers that offer A-level and those that offer T-level and other VTQs; there needs to be consideration about how that would impact on the parity being sought by ABS and the availability of the different types of ABS. It is unclear what changes would support this.

d. Accountability arrangements?

Please limit your response to 1500 characters or less

The ABS suite of courses are a prescribed combination of subjects, meaning that to achieve the ABS you must fit the formula. In this way, they reduce some of the need for formal accountability measures, in the sense that the EBacc and other measures are designed to incentivise the take up of certain subjects.

Education sector representatives we have spoken to emphasise the need for the accountability measures at Level 2 to be aligned with those at Level 3. Alignment is crucial for a joined-up system. If we push younger students away from creative and technical education at KS4, they will struggle to adapt to an ABS based on these subjects.

Accountability measures across Level 2 and 3 could focus on the breadth of subjects on offer and for their partnership work with technical colleges in their local areas. The breadth should be across multiple disciplines, including STEM (both vocational and academic), the arts and sports. This would mean that all students have access to high quality courses in any area they want, and prepare them for the breadth they would experience at ABS.

e. Admissions?

Please limit your response to 1500 characters or less

HE admissions have relied on A-level grades for decades, and have established, robust procedures in place to ensure they award places to students who will thrive on their courses. HE providers we have spoken to worry that the ABS will not have the currency they require to make informed decisions and fear the damage that could be done to the A-level brand – something that currently works very well.

The strongest concern HE representatives expressed to us was that an ABS Major would be ‘watered down’ A-levels. There were fears that an ABS Major with 90% of the content of an A-level would equate to 90% of the rigour, representing a substantial downgrading in the preparation for advanced study at HE. Replacing A-levels with Majors content could create problems for educating the most gifted students – removing 10% of content could mean removing 10% of stretch for the most enthusiastic students.

#### f. Transportation?

Please limit your response to 1500 characters or less

Consideration for transportation for work placements may be required and how this could be subsidised in the same way this is for T-levels.

47. If you have further views on how the Advanced British Standard could impact 16-19 providers, or anything else covered in Chapter 4, please share below.

Please limit your response to 1500 characters or less

## **Chapter 5**

This chapter seeks views on the implications of Advanced British Standard reforms for students and wider groups, and how we can maximise benefits and mitigate any risks.

48. What changes to pre-16 education do you think will be needed to create effective pathways into the Advanced British Standard?

Please limit your response to 1500 characters or less

In the 14-16 phase of education, there has been a noticeable decrease in breadth for many students; this will mean that many students may not be prepared for increased breadth the ABS is attempting to deliver. School leaders we have spoken to have had to make difficult decisions around offering wider courses in their schools – particularly in the arts and MFL. To ensure effective breadth at Level 3, we need to have a strong pipeline of study throughout ages 11-16, so that students have been exposed to a broad range of subjects throughout their secondary education. This narrowing at earlier stages is reflected in the decreasing GCSE entries for Music, Drama, Performing Arts, and German. French GCSE entrances have been broadly stable since 2019, while the overall number of GCSEs entered across all subjects for has increased by c.500,000.

The ABS occupational would also struggle to operate effectively if it follows a restricted 14-16 phase. A broadening of the pre-16 education would potentially reap rewards for the ABS, by embedding breadth from an earlier stage.

Consideration around Technical Awards at KS4 will be required to ensure consistency for those learners progressing to Level 2 and 3 ABS programmes in the form of grading, assessment and entry requirements. Subject areas will also need to be aligned to ensure clear routes.

49. If you have views on how students can be supported to make informed choices for their Advanced British Standard programme or apprenticeship – linking to their prior attainment, abilities, interests and future ambitions – please share below.

Please limit your response to 1500 characters or less

Targeted and timely careers advice can have a huge impact on students' trajectories and should be made available to all students. The IfATE occupational maps support students to see progression routes through to final job destinations, and adding the ABS will support with informed decisions. We would welcome the same being created for the routes to Higher Education in the form of academic route maps that go onto occupations/careers.

Members of our Student Advisory Group felt that the existing structures of GCSEs and FSQs provided a strong idea of what students want to do aged 16-19, and where their interests, talents and passions lie. They felt that a lot of their educational journeys were shaped by thinking about what they wanted to do post-16, allowing them to specialise aged 16-18, and then specialise further for university. This should be preserved.

Research (Cavaglia et al. 2021) shows that subject stereotyping based on gender, ethnicity and socio-economic status strongly influences subject choice; this can narrow young people's life chances, limit their potential, and exacerbate inequalities. Subject choices at Key Stage 4 and post 16 are heavily shaped by the institutions students attend. Consequently, lower-achieving students are more likely to be guided to study less-academic subjects, meaning they have lower odds of taking facilitating A-levels to help them gain entry to highly selective universities. High quality information, advice and guidance can address this.

50. If you have views or evidence on the additional support that may be needed to enable students with SEND to access the Advanced British Standard, please share below.

Please limit your response to 1500 characters or less

Firstly, it is important to note that there shouldn't be an automatic assumption that children with SEND require a different curriculum to their peers without SEND. Their needs will primarily be met through high quality teaching and learning. For this reason, it is encouraging to see a greater focus on SEND in the updated CCF and ECF. However, there will be some whose needs are such that they may have difficulties accessing part of the curriculum.

Creating a cohesive structure that incorporates Entry level to Level 3 qualifications at post-16 and enables clear progression has the potential to help all students, including those with SEND who may require more support. Ensuring Entry level and level 1 qualifications have parity in the guided learning hours offered and national accountability measures can ensure that resources reach these students.

Offering authentic and flexible options at lower levels (that are still covered by the umbrella of the reform) can increase inclusivity. A credit-based system at Entry level and level 1 post-16, that has a clear pathway to level 2 and 3 courses (both academic and vocational) can provide an authentic and accessible offer for students with SEND. Removing the time constraints of linear courses at this level and offering credit/modular based options can help the full range of students

access the ABS more effectively. AQA's [Unit Award Scheme](#) offers an example of how this could be structured.

51. If you have views or evidence on the additional support that may be needed to enable other groups of students to access the Advanced British Standard, please share them below. Examples of these groups include disadvantaged students and students with caring responsibilities.

Please limit your response to 1500 characters or less

Flexibility in course structure/length can help students from a range of backgrounds access a qualification. Part-time study or credit-based/modular options can help students with caring responsibilities or those who have part time employment alongside study stay engaged with their education. Ensuring young carers and others are not penalised for non-attendance or creating appropriate, flexible schedules can facilitate course completion for these students.

Currently, over 120,000 students study ESOL at post-16, however provision is fragmented, and students aged 16-19 years often have to attend 'adult education' courses. Having options to integrate ESOL courses, especially at Entry level and Level 1, into the mainstream post-16 education structure could help 16–19-year-old ESOL students start working towards certification in a broader curriculum of subjects sooner. The current system often requires learners to complete a full-time ESOL qualification before embarking on any other subjects or a vocational course. This can delay their pathway to work or further study.

52. If you have views on how to ensure the Advanced British Standard provides effective pathways into post-18 education or study, please share below.

Please limit your response to 1500 characters or less

It will be important to build on the successful elements of current L3 qualifications in supporting onward student progression, particularly the pathways for students taking AGQs, AAQs, T-levels and legacy A-levels.

Early engagement with HE providers is crucial to ensure they are involved and have buy-in with reforms. This is informed by learning lessons from challenges faced with HE engagement and acceptance of T-levels and AAQ engagement letters of support for recognition.

T-levels can offer less flexibility in terms of UCAS points meaning that students may have fewer opportunities to take other qualifications alongside them. This level of flexibility is necessary for some learners to be able to access the course of study, particularly those from disadvantaged backgrounds, those with additional needs, those who need to work part-time or have caring responsibilities.

Students can have gaps in skills and confidence for independent study, which could be filled through project-based learning. The EPQ can provide opportunities to enhance learning through building learner agency, advancing academic skills, preparing for future success, engaging both students and teachers. Student interviews revealed that many found the EPQ helped bridge the learning gap between A-levels and university. As such, PQs should form a cornerstone of the ABS.

53. If you have views on how to ensure the Advanced British Standard reforms meet the needs of employers, please share below.

Please limit your response to 1500 characters or less

The core skills of literacy and numeracy are valued by employers. The CBI's 2021 'Employer and Skills survey' reported that half of employers regarded numeracy and literacy skills as one of the three most important factors to consider when recruiting school and college leavers.

AQA research found that project-based learning, such as through the EPQ or Duke of Edinburgh award scheme, provide opportunities to incorporate several broader skills, including collaboration, communication, creativity, critical thinking, digital literacy and problem-solving.

Colleagues at TQUK have received feedback from employers about fatigue through the provision of work placements, supporting enrichment activities, and supporting qualifications redevelopments for Level 3 and below reform. Employer fatigue will need to be carefully managed in ABS reform. Employer engagement can involve employers working with schools to influence skill development and educational achievement. However, this type of engagement is dependent on employers volunteering their time, as they are under no obligation from the government to engage in this outreach.

54. If you have views on the impacts of the Advanced British Standard reforms on other groups of students who take post-16 qualifications, please share them below. Examples of these groups could include adults in further and community education providers, students in custodial settings, and students in devolved administrations, Crown Dependencies or overseas.

Please limit your response to 1500 characters or less

It is difficult to comment on the impacts without knowing how the ABS will be funded. However, we would welcome further engagement with devolved nations, and for the DfE with the ESFA to confirm what funding principles would apply. We would also welcome further engagement with DfE/ESFA with the Ministry of Justice on how students in custodial settings may be considered for access to ABS programmes – particularly in relation to placements for occupational routes.

55. If you have views on the impacts (positive or negative) of the Advanced British Standard reforms on any group with a protected characteristic, please share below.

Please limit your response to 1500 characters or less

Some students with disabilities struggle to focus for prolonged periods of time, so the increased teaching hours could make the ABS programmes less accessible to some groups. Increased flexibility of study (part-time) and increased project-based learning could provide appropriate opportunities for these students to study in a way that supports them.

This is a sizeable number of students - 11% (194,800) of the proportion of 16-18 learners by study aim receive SEN support and 5% (78,400) have EHCP – Educational Health Care Plans. While not every student with SEN support or an EHCP will struggle with increased hours, care must be taken to ensure that the ABS reform will support these students, as they are perfectly capable of accessing the courses given sufficient support and flexibility.

56. If you have views on the impacts (positive or negative) of the Advanced British Standard reforms on the environment, please share below.

Please limit your response to 1500 characters or less

There may be an increase in greenhouse gas emissions caused by travel for increased teaching time and for work placements. It is worth considering the "green" rating of the subjects that are

proposed for ABS subjects. If ATE have started to rate their subjects, although greater transparency in relation to these ratings and how they are arrived at would be welcome.

Moving to digital examinations could offset any additional exams required for more subjects being taken. Digital exams reduce the need for paper examinations to be transported to and from the examination centre and save on paper usage. Digital exams represent an increasingly environmentally sustainable method of conducting exams.

57. If you have further views on the wider implications of the Advanced British Standard, or anything else covered in Chapter 5, please share below.

Please limit your response to 1500 characters or less

58. If you have further views on anything else associated with the Advanced British Standard not covered in the questions throughout the consultation, please share below.

Please limit your response to 1500 characters or less

As our TQUK colleagues have emphasised, sufficient time will be required to make ABS reforms a success, so we positively note the intention for these reforms to be done over the long-term. Awarding organisations are redeveloping and reforming qualifications over the next 3-5 years as part of Level 3 and below reforms, which will impact schools and colleges when these reforms come to fruition. Sufficient time should be built in to ensure these reforms are not immediately superseded by the introduction of the new ABS programmes. Further information is needed around what the next steps will be for approved newly reformed L3 and below qualifications in conjunction with the introduction of the ABS.