

A world-class education system: The Advanced British Standard consultation

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) is a trade union and professional association representing 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation. Our response is based on the views of our members, obtained through discussions at ASCL Council, with relevant advisory groups, including our sixth-form advisory group and our FE committee, and prompted and unprompted emails and messages.

B. Key points

3. ASCL welcomes the interest and focus on the 16-19 age range, a sector which for too long has suffered from severe underfunding and a widening disadvantage gap. ASCL has represented members' views on post-16 issues to the government on numerous occasions, and we are therefore pleased to have the opportunity to contribute to this consultation.
4. We believe, however, that the approach being consulted on here is fundamentally flawed. It is wrong to use the proposal of a new qualification as a starting point for 16-19 reform. The starting point should be a consultation on the underlying principles of what we want our students to study at the age of 16-19. When these principles are agreed, in consultation with the sector, then the next stage is to look at qualification and assessment structures – of which a qualification like the Advanced British Standard (ABS) may or may not be appropriate. By not undertaking this approach first, and instead trying to make a clunky qualification 'wrapper' serve several purposes, the government is putting the cart before the horse. The sector is being consulted on an output (i.e. a qualification) before we have agreed the relevant inputs (what skills, knowledge and areas that we want our young people to learn and know).
5. The ABS could have represented a pivotal moment in re-imagining the purpose of our 16-19 curriculum. This could have been the opportunity to agree with the profession, and other stakeholders, what most needs to be addressed in the 16-19 space. Unfortunately, this opportunity has been missed. Instead, this consultation pre-determines the areas to be discussed and specifically excludes others (such as GCSE reform).
6. Our members tell us, with overwhelming unanimity, that the recruitment and retention of sufficient appropriately qualified staff must be the starting point for reform. If this

fundamental building block is not in place, then all other proposals stand little chance of being successfully implemented and will not attract the support of the sector.

7. This challenge is even greater with regard to teachers in FE colleges, where much of the ABS would be delivered. Data from the Association of Colleges shows that the average college has 30 unfilled teaching vacancies. The DfE’s own data shows that, over the past decade, the rate of FE teachers leaving the profession has been significantly higher than for primary and secondary school teachers. This situation has been getting worse, with over half of FE teachers who entered the profession in 2014/15 leaving the sector within five years.¹

C. Answers to specific questions

Question 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?

8. Somewhat support.
 - **Bring academic and technical study into a clearer, high-quality menu from which young people can choose**
9. This principle already exists in the 16-19 landscape in the form of over 60,000 students who mix and match A levels with AGQs. This is a “clear and high-quality menu”, and we have not seen any evidence as to why this needs to be fundamentally changed. The ability to include the technical qualification (TQ) from a T Level could be added to this mix with relatively minimal disruption. This would increase choice, rather than the present defunding of AGQ proposals which dramatically reduces choice. It is ASCL’s strong view that the present defunding process should stop whilst the government considers the evidence from the ABS consultation, so that students can continue to access the current “high-quality menu” for the next decade.
 - **Increase the amount of time young people spend with a teacher in 16-19 education**
10. We agree with this principle, but it remains an impossibility without solving the resource side first, particularly the shortage of teachers. There is not enough scope for teachers to spend more time teaching than they already do. Workload is the biggest driver of teachers leaving the profession. The only way to increase provision is to bring in more qualified maths teachers. However, as the government has systematically missed its existing targets for maths teachers over many years, it is hard to see how we will be able to meet this additional resource requirement. The table below indicates the scale of this problem:

Maths recruitment to ITT target				
2019/20	2020/21	2021/22	2022/23	2023/24
65%	84%	90%	88%	63%

11. More physical space to teach in is also required, as is more funding to resource this aspiration. We should also remember that students did have considerably more time 10-15 years ago, when students studied four subjects in Year 12 and teaching time tended to be five hours per subject. It was only the decoupling of AS levels, along with severe funding cuts, that drove our system to become an “international outlier” in terms of teaching hours.
 - **Encourage young people to gain knowledge and skills across a broader range of subjects while maintaining sufficient depth of understanding**

¹ See [Workforce data indicates little prospect of staff shortages improving any time soon - NFER](#) for more detail.

12. We agree that more knowledge and skills across a broader range of subjects is probably an improvement on our present system. However, this is a topic that should be consulted on with the sector on its own merits. Some of our members believe that the present three subjects followed by a three-year degree works very well for many young people. Most members, however, would probably favour a return to the four-subject model referenced above. All members would welcome a professional dialogue on how a properly resourced, broader 16-19 phase might work, including what should be included, such as employability skills, enrichment activities and preparation for work, alongside academic or vocational subjects.
13. It also seems clear that, under these proposals, a majority of students would continue to take three majors, with some additional English and maths. This does not, despite claims to the contrary, appear to represent a significant broadening of their curriculum.
14. Many of our members agree that studying a broader range of subjects might represent a better experience for students. However, the drive to study more maths and English could have negative consequences here, as subjects such as arts, craft, technology and sports could be pushed out as a consequence.
- **Ensure all young people study maths and English up to age 18, as part of a strong core underpinning all study programmes**
15. This is an area that also requires further meaningful dialogue with the profession – including, but not limited to, the issue of the lack of qualified teachers for more maths and English lessons. There is certainly no overwhelming desire among ASCL members to see maths and English taught to all up to 18. Many believe that maths and English skills are already developed through studying other subjects at A level and through AGQs. It is highly unlikely that students will prioritise additional maths or English classes over their ‘main’ subjects. We are very concerned that this will lead to students ‘voting with their feet’ by not attending lessons, adding to the current attendance issues we are experiencing across the country.
16. There is also no clarity in the consultation over the level or type of maths and English, i.e. whether this is academic learning, functional skills, competency-type content, etc. Furthermore, there is no clarity on how the extra maths and English would be assessed, and whether these results would count towards UCAS points or be valued by employers or other destinations.
17. The spectre of the current deeply unsuccessful resit policy also casts its shadow over this issue, i.e. the now embedded view that having to do more maths or English is a ‘punishment’ for a student’s failure to reach the magical Grade 4 GCSE. Until this policy is reformed, any subsequent reforms are likely to fail.
18. As the government is aware, ASCL would like to see a ‘passport-style’ approach to ensuring all young people leave school or college with the necessary competency in literacy and numeracy. This would, in our view, be a much more effective way of achieving what we assume is the government’s major aim with these proposals. Please note that we think the terms ‘literacy and numeracy’, rather than English and maths, are more helpful in describing this aim. See our answer to Question 30 below for more detail on our proposed ‘passport’ approach.

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

19. See paragraph 5 above.

Question 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.

20. No further views.

Question 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?

21. Fully oppose.

22. We do not believe that proposing two new qualifications at Level 3 in the Advanced British Standard and Advanced British Standard (occupational), each with many different options available within them, offers any more clarity than the present landscape, which already offers academic, vocational and technical routes. Indeed, specifying one ABS as “occupational” merely reinforces the academic versus vocational divide, which is one of the four principles that the ABS is apparently designed to overcome. This would, in our view, be an extremely retrograde step.

23. It is also unclear whether all components of the ABS are to be assessed and count towards an overarching ABS qualification grade, or whether each would be separately assessed and graded. This is crucial to what students choose and providers decide to timetable. See our responses to Questions 36 – 41 for further thoughts on this issue.

24. ASCL members are very much in favor of more funded EEP activities. The decline in hours devoted to these activities has been one of the biggest casualties of the severe underfunding of schools and colleges over the last 13 years. It has contributed to the widening gap between students from less advantaged backgrounds attending higher tariff universities, compared to students from more advantaged backgrounds.

Question 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?

25. Fully oppose.

26. We agree that there should be a clear offer below Level 3. However, that does not mean that Level 2 should be restricted to two routes. Level 2 for some sectors, such as hairdressing or construction, is the main entry level into the profession. However, for young people, who do not necessarily know what they want to do after Level 2, being restricted to either a transition route or an occupational route is unhelpful. In addition, employers do not necessarily recruit solely from those who have chosen an occupational route. They want employees with a range of social and communication skills. Therefore, it is not helpful to limit Level 2 in the way the proposal sets out. We would prefer to see programmes which cover academic, transitional and vocational skills for young people.

27. If both programmes offered the same progression opportunities, but with a different focus, then offering these two approaches might be helpful to students and providers. However, we welcome taking cognizance of the “evidence of good practice in designing Level 2 programmes on the need for some flexibility”. Flexibility in allowing providers to combine qualifications and EEP activities is paramount. Providers must be trusted to put on what is wanted and needed locally, and not be hamstrung by accountability or funding rules as to what combinations of content are allowed (an example of punitive rules being the new regulations stipulating a minimum number of four hours for maths and three for English).

Question 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.

28. We agree that Level 2 students should receive the same amount of teaching hours as Level 3 students – provided, of course, that these are fully funded. Again, trusting providers by allowing flexibility to combine qualifications and EEP activities is paramount. Providers know what is wanted locally and what the progression opportunities are afterwards. They are best placed to structure programmes that meet students' needs, including building maths and English skills through a functional approach to content and pedagogy.
29. Giving providers the opportunity to provide teaching which includes a suite of different learning opportunities and experiences to suit the needs of their students, employers and communities is far better than expecting all Level 2 students to study the same subjects nationwide.

Question 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.

30. We agree that these subjects should *not* be structured or sized as majors and minors. Evidence from the early T Level transition programmes, where only around 14% of students progressed on to T Levels, shows that pre-determining the structure of Level 2 and below programmes does not work. Again, it is about offering flexibility to providers to build the right programme for the needs of their learners.

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

31. Don't know.
32. We do not consider "branding" to be the most important factor in curriculum reform. Students and other stakeholders, including employers, soon see through any cosmetic attempts to 'talk up' qualifications or programmes by giving them a particular brand. In broad terms, it would be confusing to use the term 'advanced' for Level 2 programmes, as it is well established that 'advanced' refers to Level 3.
33. Also, when discussing branding, it's difficult to resist pointing out that the ABS at both levels is neither 'British' nor a 'standard' (it is a wraparound qualification wrapper).

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

34. Somewhat support.
35. The proposal not to include Level 1 and Entry Level students within an ABS is sensible, as clearly this is not advanced level content. We absolutely agree that these students should receive the same amount of fully funded hours as Level 2 and Level 3 students.
36. However, the assumption should not be that Level 1 and Entry Level students are excluded from further study or work at Levels 2 and 3. Schools and colleges teach many young people who are taking Level 1 programmes, including those for which English is not their first language, and these young people need more time to progress to higher level study.

Question 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.

37. Currently, Entry and Level 1 students all study maths and English as part of their

programme. These are usually taught as functional skills, as well as through integrated vocational subject content. Again, as mentioned previously, providers are best placed to know the individual needs of their students, as well as what is wanted locally and what the progression opportunities are afterwards. Trusting providers by allowing flexibility for them to combine qualifications and EEP activities is therefore paramount.

Question 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 views on this, please share below.

38. As mentioned in our responses to Questions 11 to 13 above, focusing on a qualification framework, rather than on what it is we want our young people to actually learn and do, is a flawed approach. A levels are an internationally well-respected brand, and there does not seem to be any evidence as to how removing them from our Level 3 landscape will improve outcomes for young people or the UK as a whole. To a slightly lesser extent, the same is true for BTEC qualifications and other AGQs.
39. It is too early to decide on whether to subsume T Levels into the ABS until we have seen evidence of the progression destinations of the first few T Level cohorts five years after finishing their T Level. We don't yet know how many will end up going on to university, into degree apprenticeships or other technical qualifications or employment. And deciding to supersede AAQs, when they haven't even started yet, seems even more premature. Leaders, teachers, students and parents are – understandably – extremely confused as to why the government is introducing these qualifications at all if the plan is to discontinue them so quickly.

Question 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?

40. Somewhat oppose.
41. In broad terms it is difficult to disagree with the criteria used for including subjects in the ABS, as they are sensible and apply to our existing qualification landscape. However, there is one fundamental area where we disagree. This is that “where currently there may be a subject both offered as an A level and an AAQ, under these reforms there will (in the majority of cases) be just one subject available”. The present Level 3 vocational landscape is being dismantled to defund AGQs and introduce AAQs because of the desire to get rid of “content overlap”. It therefore seems remarkable that the proposal above is to also then get rid of AAQs because they overlap with an A level. AAQs apparently will have already gone through that reform process with IfATE and Ofqual, and yet the proposal is to further rationalise. This flies in the face of student choice, and of the underlying principle about breadth and offering more vocational parity and choice.
42. What this consultation fails to recognise (as it is not mentioned at all) is that some students prefer to study in an applied way, through coursework and more practical approaches to assessment. For them, studying applied subjects such as AGQs (and potentially, to a lesser extent, AAQs) represents the best way to thrive and progress. Studying for an AGQ in business as opposed to an A level in business is a totally different experience. Present government Level 3 reforms, as well as this proposed reform, ignore this fact – to the great detriment of thousands of young people. This is, in our view, deplorable.

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

43. Somewhat oppose.

44. We are not sure that the principles above align with the fundamental principle that we believe to be essential at Level 2, i.e. that local providers have flexibility in deciding what is best for their learners, and are not hamstrung by inappropriate accountability and funding rules. We need to remember that, for many young people, learning at Level 2 is about keeping their options open. The importance of flexibility in subjects and content to meet learner and local needs cannot be overestimated.

Question 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.

45. The inclusion of “allowable” subjects causes our members real concern. There has been a lack of transparency with the “subject experts” and their criteria used in assessing content overlap in the present Level 3 defunding reforms. Understandably, this has led to a lack of trust in how these decisions may be made under the ABS proposed reforms. At the heart of qualification reform should be consensus on what we want our young people to learn. Awarding bodies (with employer input where appropriate) should then be invited to design qualifications that meet those criteria. The government is taking an overly centralised and prescriptive role in only allowing certain subjects to be included, according to what may feel to many to be current political whim. This is a dangerous approach which suggests a distrust in the ability of the teaching profession, young people and parents and carers in making decisions about what is best for young people.

Question 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.

46. Don't know.

47. We absolutely agree that more time spent with a qualified teacher would be beneficial. However, this time must be resourced properly. Qualified teachers must be available, providers must be funded appropriately to employ them, and there must be appropriate buildings available in which to teach students. Arbitrarily mandating an increased number of teaching hours, without properly resourcing this, will render this policy unworkable before it ever gets off the ground, and will have dire unintended consequences.

48. The balance of teaching time to self-directed study amongst our members' present schools and colleges is extremely wide-ranging. The main reasons for this variability are the availability of teachers and the level of funding, rather than any fundamental differences in opinion among leaders or teachers. This underlines our point that any reform will only be successful if it is sufficiently resourced.

Question 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 GLH delivered currently.

49. We cannot meaningfully answer this question when we disagree with the underlying principles behind the proposal. As stated earlier it is far more important to get right what we want our young people to learn and know first. Deciding on hours at this stage is putting the cart before the horse.

Question 27: If you have views or evidence on how time for employability, enrichment and pastoral 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.

50. We believe that EEP hours are an extremely valuable part of the student experience. The principles outlined above are broad enough to cover the areas that our members feel are

important. Indeed, the present study programme guidelines are equally sufficient in terms of allowing providers to make appropriate decisions about putting on EEP activities. However, this can only be successful if they are appropriately funded. EEP funding should be in addition to core programme funding, which is woefully inadequate to deliver meaningful student experiences. This is one of the areas where students from disadvantaged backgrounds need more support on average than those from more advantaged backgrounds, who are often able to access some of these experiences outside of their school or college.

51. Flexibility must be given to providers to decide what activities are the most appropriate, and they must be sufficiently funded. Whether this funding could or should be ringfenced should also be part of a separate consultation with the sector.

Question 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.

52. It is disappointing that this consultation is not sharing “what we have learned through offering industry placements”, which is referenced above. This would be helpful in making future decisions, such as on whether 315 hours is the appropriate length for a placement and whether some of the other flexibilities are working (sharing placements between two employers, allowing students’ part-time job hours to count, etc.).
53. Our members tell us that the greatest help they could receive in being able to find employers would be a local directory of willing employers by occupational route. The present system is patchy, inconsistent, time-consuming and often falls to an overworked member of staff who has had no training in employer engagement strategies. The role of sourcing industry placements, work experience and other work-related activities and careers-related work needs to be professionalised and properly funded.
54. The issue over whether all students on the occupational programme take an industry placement, depending on whether their programme is designed for occupational entry competence or progression onto further study, seems rather confusing. Students may not know whether they want to go on to further study or into employment at the age of 15 or 16, so any programme should allow for the widest possible choice of destinations. There is also the underpinning problem in this proposal that exists presently with T Levels. If a provider does not have local willing employers in certain occupational routes, then they cannot offer a T Level. This is simply unfair on students and is limiting student choice and opportunity.

Question 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?

55. Somewhat support.
56. The principles as set out are difficult to disagree with, but they are meaningless without a broader discussion of what it is that we want our young people to know and learn. The arguments for this reform seem centered on the fact that England is an “international outlier”. That may indeed be so, but what is the evidence to say this is a problem for England? Where is the evidence of the problems or issues that are caused as a consequence? What are we trying to achieve here – apart from just adding more hours so that we more closely match other countries?
57. Also, as mentioned earlier, this is an extremely difficult policy to engage with whilst the profession has no confidence that there will be enough teachers to teach the present maths and English hours, never mind after the effective doubling or trebling of the number of taught maths and English hours which this reform would require. When there is a

meaningful strategy in place to address the current teacher recruitment and retention crisis, particularly in maths, then there should be a separate consultation on what additional hours we may want for maths and English, and why we want them.

Question 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?

58. Somewhat oppose.
59. The components mentioned above are to a large extent predicated on two principles. The first is to “consolidate, develop and build on the mathematics and English knowledge gained at Key Stage 4”. We do not believe this is the appropriate starting point for this discussion.
60. Instead, whilst we welcome the focus on literacy and numeracy, we believe a more appropriate starting point for discussing post-16 maths and English is to first review Key Stage 4. ASCL advocates the introduction of a new literacy and numeracy qualification, or ‘passport’. We envisage this as acting as a new, high-quality, well-understood standard, enabling all school leavers to demonstrate their competence in literacy and numeracy. It would also function as a universal qualification taken by all students, typically before they leave school, and be perceived as high value for everyone, regardless of future study. Some learners may gain the qualification later in life or in the 16-19 phase. It should be criterion-referenced, so that there is public understanding of what it demonstrates an individual knows and can do. This should reflect consensus on what it means to be a literate and numerate adult and be grounded in real-world application, to ensure it reflects the need for the literacy and numeracy which most people will come across in their day-to-day lives and employment.
61. We do, however, still see a role for GCSE English language, literature and maths, which we envisage a large number of pupils continuing to take. These, as with other GCSEs, would demonstrate mastery in the discipline – rather than also trying to act as a proxy for literacy and numeracy. We believe that, unless pupils are literate and numerate, they will struggle to access other aspects of a broad and balanced curriculum in the 16-19 phase, whether this is part of an ABS or indeed any other programme.
62. Literacy and numeracy teaching is most effective when it is systematic and takes place within the context of a broad and balanced curriculum. This means ensuring that teachers have access to high-quality training and CPD. It also means that perverse incentives to focus solely on English and maths must be avoided, as there is extensive evidence that literacy and numeracy skills are enhanced by pupils’ experience of a broader range of subjects and activities.
63. To achieve these aims, schools and colleges must be properly funded to offer a broad range of subjects at every key stage, and be supported to undertake and make time for high-quality professional learning. This must allow access to a range of well-evidenced curriculum resources, and enable teachers to focus on high-quality curriculum design, delivery and teaching. This means freeing teachers as much as possible from other expectations placed on them, through ensuring that children and young people are able to access wider support services, including mental health support, in a timely manner.
64. The second underlying principle in this section of the consultation document is that repeating GCSE maths and English is the correct starting point, and that “if [students] did not manage to achieve their Level 2 in key stage 4, [they should be given] further opportunities to do so”. ASCL disagrees with this. Schools and colleges must be supported to focus on high-quality teaching by removing the perverse and unnecessary incentives inherent in the current approach to school and college accountability. The fact that, in

normal exam years, roughly a third of candidates do not achieve a 'pass' (in the government's own language) in these crucial subjects says less about the quality of teaching and learning, and more about the content of these GCSEs, and whether they really tell us whether young people are literate or numerate. This is why ASCL recommends that the government considers the creation of a new, high-quality universal qualification which would allow all students to demonstrate functional literacy and numeracy, as part of its mission to level up across the country.

Question 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?

65. Don't know.
66. We believe that the starting point for discussing a "range of English and maths majors/minors" should be to ask what we are trying to achieve, and what evidence we have about the countries we are trying to copy. This is glaringly absent from this consultation paper. For example, the paper states that "In maths, this will build on Core Maths qualifications – which are valued by the sector and underpin progression to HE and occupational study with a quantitative element". However, no evidence is included as to who actually values core maths. Is it the students, universities, employers, providers?
67. There is also an underlying assumption that even students who have achieved a high pass at GCSE should continue to study maths and English, as at least a minor. Again, however, there is no evidence provided as to how this would build their skills, broaden their opportunities or improve their life chances. If students are already very numerate and literate and want to study other options post-16 (especially where the vast majority of these options will include numeracy and literacy skills development anyway), it is unclear to us why should we deny them this choice.

Question 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?

68. We are not convinced that all students should be studying maths and English at Level 3. This needs to remain an individual choice for each provider in consultation with the student over what suits their own needs, preferences and progression plans.

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

69. We do not agree with the assertion that "introducing a dedicated Core Maths Premium" would represent "a significant contribution to Core Maths workforce costs". Core Maths is only taken by around 12,000 students each year. Adapting the 16-19 funding methodology to give an extra £900 per student is therefore a mere drop in the ocean of maths workforce costs. We do not believe it will in any way solve the retention and recruitment crisis in maths teachers.
70. We are also in principle against using hypothecated pots of funding to target particular policy drives such as this, and believe any extra funding should be added to the 16-19 core base rate instead.

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

71. See our response to Question 30.

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

72. No further views.

Question 36: We have proposed assessment principles to underpin the Advanced British Standard. To what extent do you support these assessment principles?

73. Somewhat oppose.

74. Again, as with so many aspects of this consultation, the questions around the detail of assessment put the cart before the horse. We need to focus on what we want students to be able to demonstrate and then to discuss the best methods of doing that. Arbitrarily discussing assessment principles when the content is unknown and not agreed appears pointless.

75. However, we do not agree with the focus being on predominantly summative assessment and primarily by exam. This works well for more traditional subjects such as A levels, but much less well in more practical subjects. We should learn from the fact that these principles have already been applied to the new T Levels, and many students and providers have been surprised by the fact that T Levels are so exam-based, when their expectation was that they would be highly practical. Students studying more technical and vocational subjects must be allowed to be assessed in practical ways, not by traditional rote-learning approaches to summative end exams. Not doing so may distort results, and lead to perverse outcomes such as only one male student achieving a distinction* last summer out of all T Level students in the country.

76. This focus on traditional methods of assessment represents a missed opportunity to rethink how we should best assess students. The starting point, in our view, should not be that “assessment will primarily be by exam unless the content cannot validly be assessed by exam”, but rather “assessment should be by the method most appropriate to the subject being assessed, and the needs of the students taking it”.

Question 37: We have proposed principles to underpin the new grading system. To what extent do you support these grading principles?

77. Don't know.

78. The principles mentioned seem reasonable, but we repeat the caveat in our response to Question 26.

Question 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?

79. Fully support.

80. We would reject any proposal whereby students did not receive individual grades/marks for each component. Perhaps the more appropriate question is to ask to what extent these should be shared with the candidate and centre, and the way in which these individual components would be aggregated. There is also the key question of the role of universities and employers. Would they make offers based on aggregated marks or on individual components? This would obviously determine to a great extent the behaviour of students and centres in prioritising their studies.

Question 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?

81. No.

82. In addition to our response to the previous question, it is our strong view that a pass / fail model would be dreadful for low attaining students, and recreate the problems we see with cliff-edge judgements at Key Stage 4. What would be the intention for 18-year-olds who don't get enough marks to achieve the award? Would they be doomed to continual resits for ever? Frustratingly, these very obvious concerns are inevitable when a new qualification like the ABS is introduced in this way, and it is unclear whether it is a standard, a collection of subjects, or an award.

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

83. No minimum attainment conditions.

84. It is impossible to meaningfully answer on minimum levels of attainment when we do not know the final content or structure of the ABS, or indeed the aforementioned behaviour of post-18 providers.

85. However, what must *not* happen is that punitive accountability or funding rules are imposed on centres that do not achieve any minimum levels.

Question 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.

86. As per our responses to Questions 39 and 40, it is impossible to mark a preference for what are entirely nebulous concepts at this stage.

Question 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.

87. No further views.

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

88. We fundamentally disagree with way in which Level 3 reforms are currently being implemented, and particularly with the defunding of AGQs. As we have repeatedly argued, there are real strengths in our three current pathways of academic (A level), vocational (AGQ) and – subject to evidence over the next few years – technical (T Level). These routes must all be preserved, whether or not they end up under an overarching wrapper such as the ABS.

Question 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?

89. We do not believe that the ABS proposals offer any solutions to the present recruitment and retention crisis. We cannot see any opportunities here unless the reform comes with significant additional funding. Even with more funding, however, there still will not be enough teachers without a major strategic focus on recruitment and retention.

90. There is a further problem in that a large swathe of ABS teaching would be done in FE colleges, where pay and conditions of service are generally much poorer. There are therefore two workforce challenges here – to increase the number of qualified maths teachers overall, and then to make it as attractive to work in FE as in schools. There are in

effect two different marketplaces competing with each other for the same resource. In FE, the DfE does not have any significant terms and conditions levers to pull to make it more attractive.

91. An additional challenge would be if majors and minors could not be taught concurrently (which is our understanding). In that case schools and colleges may need twice the number of subject teachers to offer both a major and a minor in each centre. This would be completely unworkable.

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

92. The teaching profession has always been able to respond to changes in curriculum and subject content. Adapting to the structure of the ABS would be relatively straightforward provided there is adequate funding for CPD. However, as with T Levels at present, it is increasingly difficult to recruit appropriately trained technical teachers when the teacher salary levels are so far behind what the equivalent industry salary might be.
93. The significant gap between FE and school staff also looms large, and the ABS proposals offer nothing to address this. Indeed, with the need for necessary ongoing CPD, we would reiterate the fact that the DfE is not able to influence the practice for FE teachers as much as they would for maths teachers in schools.

Question 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:

94. **Buildings/estates:** There will need to be an increase in the estate size in order to accommodate more teaching hours. Most schools and colleges are already at maximum capacity, and many school and college buildings are in poor condition.
95. **Technology:** Investment in appropriate learning technologies for both staff and students is always needed on an ongoing basis, especially if online assessment is increased. In addition, the use of AI must be considered, both in terms of assessment design and coursework use by students.
96. **Provider landscape:** We do not comment on the different provider structures as our members come from all types of provider.
97. **Accountability arrangements:** It is impossible to comment on potential accountability arrangements until the structure and minimum attainment levels are agreed. However, ASCL is always in favour of proportionate accountability that is agreed with, not done to, the sector.
98. **Admissions:** In general terms ASCL is in favour of providers having flexibility over their own admissions criteria within broad parameters, as is the case at present, and not having minimum entry criteria imposed centrally.
99. **Transportation:** As T Level experience is showing us, transport issues can act as a barrier to students being able to access certain qualifications which need long placements with an employer who may be a long way from students' homes. Any new qualification design should aim to eradicate this unfair barrier.

Question 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.

100. No further views.

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

101. We are disappointed with the two following assertions: “GCSEs and the emphasis on an academic core of the EBacc subjects will remain an integral part of secondary education following the introduction of the ABS” and “Externally assessed examinations at the end of pre-16 education will remain, as we believe that this is the best and fairest way to ensure children learn and retain knowledge”. We believe that there should be a consultation with the sector about both of these areas. The phrase “Alongside this academic core, we will consider how best to align vocational and technical qualifications at 14-16, such as Technical Awards, with the ABS” seems to almost be an afterthought; we would argue that this needs urgent attention.

102. It should also be remembered that the Ebacc is a DfE performance measure; it is not an award (indeed the notion of an Ebacc certificate was shelved a decade ago). A majority of GCSE students do *not* enter the full complement of Ebacc subjects, for a variety of reasons, so we challenge the assertion that is the core of most students’ experience at Key Stage 4.

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

103. We welcome the focus on more support for students with their career choices. However, this is an area where the removal of direct funding from schools and colleges for careers work, over ten years ago, has caused problems from which the sector has not yet recovered (despite a plethora of initiatives such as the formation of the CEC, enterprise advisers, Gatsby benchmarks, careers strategies, LSIPs etc.). The careers education landscape is fragmented and variable, and will remain so until providers receive dedicated, earmarked funding for their CEIAG activities. The present PAL initiatives are generally seen as a stick to force compliance, when the sector would welcome more carrots.

Question 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.

104. The ABS as proposed would require students to study more subjects and have additional teaching hours. It is unclear what these proposals would mean for the many 16–19-year-old students who currently study qualifications at a lower level than A levels. Two in five students do not achieve the equivalent of two A levels by the age of 19. It is vital that they are not forgotten during the design and implementation of these reforms. There is a risk that a new knowledge-rich post-16 qualification could exclude students with SEND if the government fails to reform the SEND system, including providing funding to ensure that schools are at least able to provide support and reasonable accommodation for students with additional learning needs.

105. Current problems of poor funding and under-resourcing mean reasonable adjustments for education and learning activities for young people with SEND remain inconsistent. Some students cannot access the support and reasonable adjustments that they need during exams, especially those without EHCPs. The current proposals fail to take account of the academic challenges many children with identified SEND face.

106. In the 2023 analysis of [SEND](#) data, 37.1% of pupils identified with SEND in Year 11 achieved Level 2 (equivalent to 5+ A*- C/9-4 at GCSE) including English and maths GCSEs by age 19 in 2021/22, compared to 79.3% of pupils with no identified SEN. The same report shows that 22.5% of SEND pupils with SEN support and 7.0% of those with an EHCP in 2021/22 achieved Grade 5 or above in English and maths GCSEs, compared to

55.8% of pupils with no identified SEND. This data highlights the need for innovative pathways for this growing proportion of young people, whose academic success will not be supported or enhanced by simply adding to an already inaccessible qualification pathway.

107. Evidence from [EPI](#) shows that vulnerable pupils do not fare well under the current compulsory maths and English resit policy. In 2022/23, only a quarter of students passed their English GCSE resit and fewer than one in six passed their maths resit. Disadvantaged students and those with special education needs fare particularly badly, being 30 to 40% less likely to pass on average. Translating this policy to the ABS would perpetuate this cycle of shame.

Question 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 below. Examples of these groups could include disadvantaged students and students with caring responsibilities.

108. We welcome the acknowledgement that there needs to be “substantial additional investment in mental health care”. However, our members are telling us that they are not seeing any evidence to verify the assertion that “345,000 more children and young people will be able to access NHS-funded mental health support”. Increasing mental health challenges, particularly since the Covid lockdowns, is an extremely pressing problem across schools and colleges. Accountability and high stakes examination systems are therefore something to be very wary of and must be considered carefully in the design of any new qualification system.

109. We agree with the assertion that “Increased hours may, however, reduce the ability of students to find and do paid work alongside their studies”. ASCL argues for the post-16 pupil premium as a way of helping to mitigate this situation, especially where more study hours are proposed which would mean a corresponding decrease in time available for part-time work and carer responsibilities.

110. There is a range of students from different backgrounds who will struggle to access the ABS as proposed. This includes many students with SEND, from disadvantaged backgrounds, for whom English is not their first language and who have missed aspects of their education because of illness, whether physical or emotional. Any system or qualification which further marginalises students such as these cannot possibly be considered a new “gold standard”.

Question 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.

111. It is imperative that any new qualifications provide early evidence of progression opportunities, e.g. how they are being perceived by HE in terms of offer-making. Evidence of early progression data must be collected and shared with the sector on an annual basis. The present system of a two-year time-lag for this data does not achieve this. This has been particularly highlighted by the appalling situation of having no destination data for the first two cohorts of T Level students (which was rightly criticised by a House of Commons report², which recommended that “the department must publish data on the education, apprenticeship, and employment destinations for the first cohort of T Level students at the earliest opportunity”). The government response to this was: “The Technical Education Learner Survey (commissioned by DfE) is tracking the destinations of the first 2 T Level cohorts and we will be publishing the findings from the first cohort (1 year after completion) in late 2023 / early 2024”. Unfortunately this has still not happened. Any new plans for the ABS must avoid repeating this unfortunate precedent.

² [The future of post-16 qualifications - Education Committee \(parliament.uk\)](#)

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

112. Evidence from the T Level reforms has shown us that it is predominantly large employers that work with the government, and which therefore are able to discuss their own needs. This can lead to curriculum and content being developed which may ignore the needs of the majority of employers which are SMEs. The T Level in metrology, for example, which is currently under development, will meet the needs of very few SMEs. Any future reform such as the ABS needs to encompass views from across all employer groups of all sizes. Employer needs vary according to location and the government should not assume that one size will fit all.

113. The best way of ensuring that the needs of businesses of all sizes and types are understood and can be met is through Local Skills Improvement Plans (LSIPs). These are developed by employer representative bodies and providers (incorporating the previous local skills strategies developed by LEPS and local businesses) and are up-to-date and reliable indications of employer needs in different regions.

Question 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 below.

114. We undoubtedly will be far from alone in pointing out the inappropriateness of calling a qualification the Advanced *British* Standard, when it is an English qualification. Even so, the government must avoid any potential unintended consequences of introducing new qualifications that are variable across the different jurisdictions, not least because of the potential consequences on destinations (for example the behaviour of HE providers potentially preferring the long-established qualifications such as A levels which would still be available in other countries).

Question 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.

115. No further views beyond those already expressed, particularly for students with SEND and those from disadvantaged backgrounds.

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

116. No specific views.

Question 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.

117. No further views.

Question 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.

118. No further views.

D. Conclusion

119. Post-16 education in England is a phase of education that is generally considered stable and relatively high-performing. What the post-16 sector needs is sufficient resources and

investment in teachers, buildings and level of per-student funding. T Levels have been recently added to this landscape and are going through an evolutionary phase. They need time to bed in prior to any further reforms. Yet the present Level 3 reforms are continuing apace, are destabilising the landscape and causing uncertainty and concern in schools and colleges across the country. The proposal for the ABS adds to this uncertainty.

120. Whilst we do not feel that the post-16 sector needs radical overhaul at present, we are very happy to engage in a broader conversation about long-term priorities in this sector, which should be evidence-based and fully consulted on.

121. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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Association of School and College Leaders
20 March 2024