

## Response ID ANON-5W9S-YSS5-C

Submitted to A world-class education system: The Advanced British Standard consultation  
Submitted on 2024-03-20 18:26:40

### Introduction

1 What is your name?

Name:  
Ruth Perry

2 What is your email address?

Email:  
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3 Are you happy to be contacted directly about your response?

Yes

4 Are you responding as an individual or on behalf of an organisation?

Organisation

5 If you are responding as an individual, how would you describe yourself?

Researcher, academic or education expert

6 If you are responding on behalf of an organisation, which of the following best describes who/which part of the sector your organisation represents?

Specialist Colleges

If other, please state below:

7 What is the name of your organisation?

Insert name :  
Natspec

8 What is your role within the organisation?

Insert role:  
Senior Policy Manager

9 Would you like us to keep your name and/or organisation confidential?

No

No

10 Would you like us to keep your responses confidential? If yes, please explain why you consider it to be confidential.

No

Reason for confidentiality:

### Chapter 1

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.

Somewhat support

Please limit your response to 1500 characters or less:

The ABS must be inclusive by design, rather than attempts made to factor in learners with SEND as an afterthought. We have some concerns about the over-reliance in the short to medium term on T levels which are as yet unproven, particularly in relation to supporting progress and attainment for young people with SEND, and about the focus on reducing numbers of qualifications without first ensuring learners with SEND will not be disadvantaged. We

broadly welcome the increased teaching time so long as there is a corresponding increase in funding for the support that will be needed for learners with SEND. Many specialist colleges already exceed minimum GLH by a broad margin. They shouldn't be automatically expected to increase GLH, as some learners with SEND lack the stamina to cope with any further taught hours. Some learners with SEND will have had taken a limited number of GCSEs to enable them to focus primarily on core subjects; they may find increased breadth (as well as depth) in post-16 study a difficult leap. Most learners in specialist colleges already study English and maths (either accredited or, where exempt from the condition of funding, unaccredited). They currently benefit from flexibilities that ensure that English and maths learning is relevant to them. We would not like to see more young people being driven towards GCSE re-sits or for providers to be required to deliver English and maths through stand-alone, full class teaching rather than embedding.

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:

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:

A greater focus on the whole programme or learning experience would be welcome, rather than an over-reliance on the qualifications to shoulder all of these aims. Post-16 education should be focused on developing the citizens of the future with the skills and attitudes to contribute to society both socially and economically. It should also be able to offer a rich learning experience to all of the diverse range of learners who access it.

## Chapter 2 - Section 1

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.

Neither support nor oppose

Please limit your response to 1500 characters or less:

Creating two separate ABS types may undermine the desire to achieve parity of esteem between occupational and academic routes post-16. There must be sufficient EEP time - and flexibility in terms of what exactly is covered and in what proportion - to make it meaningful for individual learners. Some learners with SEND, e.g. those with a visual impairment (VI) including those on the proposed occupational route, will need space in their programme to work on independence or other personal and social development skills if they are going to make a successful progression onto HE or into 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.

Neither support nor oppose

Please limit your response to 1500 characters or less:

Many learners enrolling onto level 2 programmes post-16 are not clear about their progression plans (whether employment/apprenticeship or ABS at level 3) so it may not be helpful to have two distinct programmes unless transfer between the two is very simple. The length of time required for learners with SEND to progress to either destination may vary from the proposed one year or two years. Flexibility must be built in.

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:

Providers should have the flexibility to determine how best to spend the remaining GLH beyond those associated with the component qualifications, rather than being required to deliver fixed proportions of maths, English or other curriculum elements.

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:

For learners with SEND, flexibility will be key to allow providers to focus on those elements which are most likely to address current barriers to learning and build skills, knowledge and behaviours that will support sustained progression to level 3. It will be useful for the level 2 and level 3 qualifications to share an approach and structure to help provide a progression ladder (rather as BTECs do now) across levels.

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

Don't know

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

Somewhat oppose

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:

Proposals for Entry & Level 1 are unclear, other than that they are excluded from the ABS. We agree that mirroring the approach for levels 2 & 3 wouldn't work, as purposes and destinations differ across levels and more flexibility and personalisation are needed at lower levels. But some common features and structures, and relationships between quals at levels 1 and 2 would help build a progression framework. Providers must be able to determine whether they use qualifications, non-accredited learning or both, especially at Entry level for learners with SEND. English and maths could be required, provided there is flexibility about the approach that providers can take in terms of content, use of accreditation, number of hours and delivery methods. The new requirements relating to the condition of funding should not be carried forward; they are inconsistent with effective SEND pedagogy. Providers need flexibility to focus on those parts of a programme that will best address barriers to learning, build on strengths, and support progression to next steps, including exploration of options as many learners at these levels are not aware of possible subjects or future career options. Any requirements should be carefully modelled before introduction, to check that they do not impede effective approaches already in use. Natspec would be happy to discuss with DfE effective use of extra hours at Entry and level 1 and how to include learners with at these levels in the ABS framework.

## Chapter 2 - Section 2

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:

The FE sector has faced a prolonged series of qualification reforms, particularly in relation to vocational/technical qualifications. We would be reluctant to see all existing qualifications jettisoned before strong evidence is established that a new set of qualifications is needed. We would not like to see an approach that repeats the error of removing public funding from some BTECs before establishing T levels as a successful route to HE for learners with SEND.

While we welcome a system in which occupational and academic options are treated as of equal value, should new qualifications be introduced, it will be important not to impose the same system of assessment on all majors. Over-reliance on long-form written responses and exam conditions, which may suit some academic majors, will prove unnecessary hurdles to achievement for many learners with SEND on an occupational route who would otherwise be capable of higher education or employment.

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?

Not Answered

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

Not Answered

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:

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.

Somewhat support

Please limit your response to 1500 characters or less:

We welcome the increase in teaching time but there must be some flexibility about how it is used, especially for learners with SEND. A standard expectation of full-class, discrete sessions is unlikely to be the most appropriate approach to broadening the curriculum/improving the learning experience for many learners with SEND. We would be happy to work with the DfE to explore what flexibilities might be needed.

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:

Different occupational areas may need slightly different amounts of taught time, so it may be better to set a range, rather than a fixed amount, of acceptable GLH. It will be important to acknowledge that some learners, especially those with SEND, may need more teaching time than the GLH assigned, and they must not be disadvantaged in funding terms because of their slower pace of learning. If the current funding and commissioning system persists, with local authorities taking the lead in commissioning high needs funded places, then DfE must ensure that LAs are prepared to commission full courses of the size and duration that the young person will require to achieve the ABS.

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:

We would prefer government to issue guidance about the broad range of areas that might be covered by EEP, rather than set any mandatory requirements, beyond the suggested principles. This will allow providers to determine which elements of EEP are most important for their learners. It is essential, however, that EEP is seen as a key element of the new ABS and not merely a bolt-on. If the ABS is to help develop the citizens of the future, then time spent on this activity is essential.

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:

Access to Work funding should be made available for in-work support for disabled learners on industry placements, in line with supported internships and apprenticeships. Without this, the additional costs will be prohibitive for providers and may discourage employers if, for example, learners with SEND are not supported by job coaches. Any government-led work to encourage employer engagement in the ABS must coordinate with work to increase placements for apprentices, supported interns, and learners on other Entry/level 1 preparation for employment programmes. Practically, employer engagement is best organised at local/regional level with all provider types involved in achieving a fair and fit-for-purpose allocation of placements across all learners and all programmes requiring work placements. Central government could support this local/regional approach financially and through national campaigns.

## Chapter 2 - Section 3

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?

Somewhat support

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.

Somewhat support

Please limit your response to 1500 characters or less:

Learners should have an English and maths curriculum meaningful to them and relevant to their planned next step. The opportunity should be taken to develop an alternative to GCSE re-sits that allows for a more practical application of English and maths that is more motivating for learners than re-visiting a previous experience of failure.

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?

Not Answered

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:

English and maths qualifications across levels should share a common structure/framework so that they can act as a progression ladder to enable learners to achieve at as high a level as possible.

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:

Opportunities for contextualised or embedded delivery will help make English and maths meaningful for learners on all programmes but especially those on an occupational route. We would advise against overly prescriptive requirements in relation to delivery and ask that government allows teachers and curriculum managers to exercise their professional judgement in deciding which approaches will work best for their learners and in their settings. Otherwise, there is a risk that some learners with SEND may be unnecessarily disadvantaged by the mandatory use of inappropriate pedagogy.

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:

We would strongly recommend that government takes this opportunity to rethink the use of GCSEs post-16 and the role/content of Functional Skills which, over a series of reforms, have become less and less distinct from GCSEs. Rather than take the existing GCSEs and Functional Skills as the starting

point, it might be more appropriate to develop some more fit-for-purpose alternatives within the ABS framework.

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:

### Chapter 3

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.

Somewhat oppose

Please limit your response to 1500 characters or less:

We do not agree with the presumption that rigorous assessment means assessment that is primarily by written examination or exclusively summative. Many learners with SEND are unfairly disadvantaged by written exams, which do not allow them to fully demonstrate their knowledge and skills. The pressures of external exams and everything resting on on-the-day performance is contributing to increased anxiety amongst young people and causing some who already have SEMH needs to absent themselves from education. Government should be exploring alternative methods that are equally rigorous – and perhaps have more validity in terms of mirroring the application of knowledge and skills that learners will be expected to demonstrate in HE or at work. We would also strongly support modular assessment that allows learners to build towards a final qualification. This is particularly useful in motivating learners, giving them experiences of achievement along their post-16 journey.

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.

Somewhat support

Please limit your response to 1500 characters or less:

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?

Not Answered

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

Please limit your response to 1500 characters or less:

There should not be too many hurdles or non-negotiables required for the achievement of a 'full ABS award'. It will also be important that achievement of some of the components is not seen as a failure; rather, the full ABS should be seen as an extra 'gold standard' award on top of the component parts achieved. Learners should also be able to 'top up' their achievements at a later point. This would be particularly helpful to learners who have to take an unexpected break in their education (e.g. for health reasons) or who come very close to full achievement and wish to re-take a component in the future.

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

Don't know

Please limit your response to 1500 characters or less:

It would be preferable for some degree of compensation to be built into an overall ABS award, so that a learner is not overly disadvantaged by one area of weakness, but this would need to be balanced against having a simple grading structure which may be difficult to achieve if a scoring system is used.

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:

We would like to see all students who have completed some or all of the elements of an ABS receiving a transcript that follows the same basic template, regardless of whether or not the full award has been achieved, with an extra element (e.g. in the form of an additional certificate) for those who have met the minimum requirements. This will guard against learners with partial achievement perceiving themselves, or being perceived, as having 'failed'.

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:

Assigning individual grades/marks for majors and minors will be useful in recognising learners' spiky profiles. It should also be possible for learners who do not complete/pass all elements to receive certification that captures what they have achieved. This will be particularly important for learners with SEND whose health (mental or physical) or other factor may prevent them from completing all aspects of the ABS. There should be an additional principle that learners should not reach the end of a programme and have nothing to show their achievements, just because they have not 'jumped all the hurdles'.

## Chapter 4

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:

We would like to see a choice of subjects and qualifications retained along with a means to recognise achievement of individual qualifications within the ABS wrapper. Qualifications across levels should interlock and be available in different sizes (as with the current BTEC framework) to support progression, enable personalisation and recognise spiky profiles. Existing flexibility within the system for learners with SEND and the providers working with them should be retained (and increased) so that the ABS is fully inclusive. Government should guard against adding in new requirements in relation to pedagogy or hours that will reduce providers' ability to be responsive to learner need.

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:

Delivery of the full ABS will be difficult for specialist FE colleges, but it may open up more opportunities for joint programmes across specialist and general FE settings, with staff working creatively across settings to support learners with SEND to achieve. These types of partnerships will need to be underpinned by simpler funding, sub-contracting and reporting/recording arrangements and a willingness on the part of LAs to commission jointly delivered provision. Additional teaching hours will require additional learning support for learners with SEND. As there is already a shortage of learning support assistants and English and maths teachers, and colleges are struggling to recruit, government may need to consider incentivising people to remain in or take up support and English and maths teaching roles, including through increasing funding for colleges and within the high needs budget so that they can pay more salaries comparable to those for the same or similar roles in schools.

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:

A national support programme to develop provider understanding of the ABS will be needed – in terms of planning, delivery, timetabling, assessing etc. If providers are going to be expected to implement reasonable adjustments for learners with SEND (as suggested in the interim equality impact assessment), they may need training in this area.

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:

Please limit your response to 1500 characters or less:

Please limit your response to 1500 characters or less:

Please limit your response to 1500 characters or less:

Please limit your response to 1500 characters or less:

Please limit your response to 1500 characters or less:

Please limit your response to 1500 characters or less:

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

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:

KS4 learners may need a broader curriculum if they are going to make informed choices about their ABS options, particularly in relation to vocational options. The introduction of a new framework post-16 gives government the opportunity to review whether there is still a need for the same amount of external assessment (in exam form) imposed on 16 year olds at the moment. This could be slimmed down considerably, allowing more time for teaching and learning and reducing the pressures that are having a profoundly negative impact on the mental health of young people. A focus on reforming English and maths education would also be helpful, first to identify why so many 16 year olds are failing to reach level 2 by the end of KS4 and then to

determine what different approaches would lead to more young people developing a higher level of functional literacy and numeracy by age 16.

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:

Broad awareness-raising at national level for young people, teachers in schools and colleges, and for parents and carers will need to be accompanied by local IAG which will help explain what is available within travel-to-learn areas.

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:

We would advise that the ABS is inclusive by design, rather than relying on additional support to make it accessible to learners with SEND. Features to support accessibility include: flexible rules of combination for qualifications; lack of prescription in relation to pedagogy, GLH for different components, and course duration; assessment approaches that aren't too dependent on written examinations taken under controlled conditions and on specified days; a limited number of 'hoops to be jumped through'; the potential for partial achievement to be recognised and celebrated, as well as returned to and built upon to achieve the full award. If too much time is given to qualifications, learners with SEND will not have sufficient space in their programmes to include other important knowledge and skill development, e.g. independence, employability or learning skills, developing confidence/self-esteem or addressing anxiety or other barriers. This may make the ABS unsuitable for some learners with SEND and, as a result, prevent them from achieving in the same way as their non-disabled peers. Any increase in hours or expectations in terms of English and maths will require additional learning support; learners with SEND on work placements may need job coach support and the employers may need advice and guidance from job coaches on working effectively with disabled learners. Disabled learners on an ABS should be eligible for Access to Work funding while on industry placement.

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:

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:

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:

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:

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:

The interim impact assessment appears to place almost all responsibility on providers for mitigating the potential negative impacts of the ABS on disabled learners: e.g., "We expect the impact of hours on learners with disabilities to be mitigated by providers' individual policies on supporting learners with health needs, and reasonable adjustments will need to be considered by each setting where a learner has the protected characteristic of disability." Consideration should be given to how other stakeholders could reduce any potential negative impact of the introduction of the ABS, e.g. government through inclusive design of the framework, Ofqual through setting requirements on awarding organisations that do not discriminate against disabled learners, and awarding organisations through inclusive design of accessible assessment approaches and tools.

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:

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:

We would have preferred to answer 'none of the above' to question 18 on branding. It makes little sense to use the word 'Advanced' of both levels 2 and 3, when the term has an established association with level 3. 'Intermediate' could be used of level 2 in line with accepted usage and if Entry level and level 1 are to be included in some way into the framework, then the terms 'Foundation' and 'Entry-level' could be used. The overall term 'ABS' is somewhat questionable, given there are multiple levels – not just Advanced, it won't be introduced across Britain, and is more of a framework than a standard. We would recommend a fundamental re-think of the titling and branding.