

ABS Consultation – UVAC Position

Initial questions focus on individual and organisation background.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know Free text box: 250 words)

Somewhat support.

The aims and principles make sense. Perhaps more could be said about breaking down barriers between 'academic' and 'technical' education and recognising the value of combining 'academic' and 'technical' education. We acknowledge this is emphasised in the consultation narrative.

We also want to know how the value of the overall ABS award (if DfE's preference is confirmed) will be demonstrated and secured. i.e. demonstrating that the value of the ABS is more than the sum of its parts. Is this an aim of the ABS and of a baccalaureate type of qualification/qualification framework?

We are unsure as to how the ABS relates to learners who for whatever reason 'miss the bus' at 16-19 and do not achieve an ABS at 16-19. How are opportunities for second chances built into the ABS system, particularly for disadvantaged learners if the ABS becomes an award/qualification rather than simply a qualifications framework? We need to "narrow the disadvantaged gap at 16-19", but for some individuals this will only be achieved with subsequent action at age 20, 21+ etc.

As ever, detail is key. How will an appropriate balance be achieved between gaining knowledge across a broader range of subjects while maintaining sufficient depth and understanding? HEIs will need to be confident there is sufficient depth and understanding in the ABS to act as a foundation and preparation for HE study.

12. What do you think is the most important thing that the Advanced British Standard could achieve? (250 words)

Delivery of the aims outlined. Additionally, help end the stigma attached to 'technical' education and provide a way of combining 'technical' and 'academic' education in 16-19 provision. We would hope that the introduction of the ABS increased the esteem attached to certain types of learning (e.g. technical education and work-based learning) and demonstrated that both 'academic' and 'technical' learning was appropriate for high achieving individuals. We also believe the ABS will help extend the breadth of study at 16-19, while retaining depth to support higher level study/learning in particular subjects/occupations.

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. (250 words)

We are not quite sure how Government intends to align the ABS with Advanced Apprenticeships (i.e. level 3 Apprenticeships) that may be taken by 16-19-year-olds (as well as older learners) and indeed Intermediate Apprenticeships (level 2). If the ABS is 'the' award/qualification for 16-19 olds how will individuals completing an Advanced Apprenticeship at 16-19 be perceived in relation to those with an ABS award/qualification (if awarded)? The ABS covers 'academic' and 'technical' education, but how does it relate to Apprenticeship, the current 'third' mainstream option for 16-19-year-olds? Will such individuals/Apprentices be disadvantaged by not gaining an ABS award? Further work and engagement with Apprenticeship providers, employers and individual Apprentices is needed to explore this issue.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know. Free text box: 250 words)

Fully support.

Our key issue is how the similarity and difference between the Advanced British Standard and Advanced British Standard (occupational) are explained to key audiences e.g. potential students, employers and HEI etc. The titling seems entirely appropriate and is welcome. We would also want DfE to consider how it distinguishes an Advanced British 'Standard' (occupational) from the occupational 'standards' developed by employers through the IfATE managed Trailblazer process.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know. Free text box: 250 words)

Somewhat support.

A level 2 programme for 16 - 19 year-olds must not, however, be referred to as an Advanced British Standard. A level 2 programme is not advanced learning but instead is intermediate learning. We would support the other proposals outlined.

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. (250 words)

No comment.

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. (250 words)

No comment.

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

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

Under no circumstances should both Level 2 and Level 3 programmes be framed as the Advanced British Standard, with no level-based badge provided to students. Advanced means level 3 e.g. A level and more specifically Advanced Apprenticeships which will remain but will be separate under ABS arrangements. Including a level 2 programme in the ABS offering will undermine actual 'advanced' ABS qualifications and the ABS concept. It will cause substantial confusion for employers.

Level 2 programmes should have a different name and framing, separate from the Level 3 Advanced British Standard. Intermediate which links to Apprenticeship terminology could be considered. If level 2 programmes need to be seen as part of the same family as the Advanced British Standard, surely the branding and title Intermediate British Standard should be used.

Finally, in branding terms the Advanced British Standard is an England focused initiative. How will the 'British' name be explained to employers, individuals and stakeholders in Scotland, Wales and Northern Ireland?

19. To what extent do you support the proposal for Level 1 and Entry Level students? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

Fully support.

The ABS must not cover students studying Level 1 or Entry Level. This is more than "due to the diverse needs of this cohort". By definition level 1 and Entry Level study is not advanced!

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. (250 words)

No comment.

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 views on this, please share below. (250 words)

As our earlier response more consideration needs to be given to Apprenticeships in the 16-19 landscape. Intermediate and Advanced Apprenticeships will be taken by some 16-19-year-olds, those progressing from the ABS and adults.

An Apprenticeship is a learning programme and through end point assessment, external quality assurance and the award of a certificate will be regarded by many as a 'qualification'. Statements such as "will supersede the varied Level 3 qualification landscape to 16 - 19-year-olds" are clumsy.

The commentary on p27 that states that "the ABS will not cover 16-19-year-olds who are undertaking apprenticeships" analysis here is insufficient. The ABS could have massive implications for Apprenticeships for 16-19-year-olds that DfE needs to analyse. Will, for example, 16-19 Apprentices be disadvantaged by not having access to a potential ABS award?

The consultation gives the impression that progression is always upwards. Sometimes an ABS may lead to a level 3 Advanced Apprenticeship. Such progression is positive. Individuals undertaking an Advanced British Standard (occupational) may also progress to an Advanced Apprenticeship part way through their ABS studies.

With current T Levels, students may transfer to an Apprenticeship during their studies.

In the early parts of the consultation readers will be confused as to whether the ABS is a qualification framework encompassing strong, distinct and understood qualifications or alternatively a qualification in its own right. In future DfE needs to be clear as to what the ABS is, a qualification's framework and/or an award/qualification.

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? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

Somewhat oppose.

DfE state "We will aim to ensure there is just one subject, where currently there are different qualifications offering similar versions of the same subject." Different qualifications with different subject coverage and qualification types can provide greater choice and offer different approaches supporting learners who respond better to different learning styles. We would urge DfE not to be too dogmatic.

We do not believe the expertise and experience of Awarding Organisations (AOs) is sufficiently recognised in plans to develop the ABS.

23. To what extent do you support the proposal for how subjects will be selected to be included in the Level 2 programmes? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

No comment.

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. (250 words)

Again, we would hope substantial use was made of the expertise and experience of Awarding Organisations.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know, Free text box: 250 words)

Somewhat support.

We would note that preparing students for the self-directed study that will be needed in HE is important.

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. (250 words)

No comment.

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. (250 words)

No comment.

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. (250 words)

Providers (both FE and HE) will be approaching employers to work with them to deliver a range of programmes, including ABS industry placements and Apprenticeships. Government and others should raise employer awareness and understanding of the objectives and requirements of key programmes. Explaining how the ABS and in particular ABS occupational programme relates to Apprenticeship should be an important objective.

We are unsure how the value attached to an industry placement in an ABS occupation programmes will be demonstrated. With an ABS occupational programme some students undertake an industry programme and some do not. How will an ABS with an industry placement be distinguished to employers?

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? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

No comment.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know. Free text box: 250 words)

No comment.

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? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

No comment.

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? (250 words)

No comment.

33. If you have views on how English and maths can be delivered for students taking the occupational programme, please share below. (250 words)

No comment.

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. (250 words)

No comment.

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. (250 words)

No comment.

Chapter 3

36. We have proposed assessment principles to underpin the ABS. To what extent do you support these assessment principles? If you have further views on this, please share below. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know. Free text box: 250 words)

Somewhat support.

We believe there should be more recognition of the work, expertise and experience of awarding organisations.

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. (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know. Free text box: 250 words)

Fully support.

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? (Options: Fully support, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

Fully support.

This will be of fundamental importance for key users of the ABS i.e. HEIs particularly and employers. For access to specific HE programmes an HEI will need to know how well or otherwise a student did in each major. It will inform the HEI in terms of ensuring the student can undertake the course and the course is appropriate for the student. HEIs also need this information to ensure admissions are fair. Similar observations could be made in respect of employers.

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? (Options: Yes, No, Don't know. Free text box: 250 words)

Yes.

DfE must decide if the ABS is simply a qualifications framework as it has been described to this point in the consultation or an award and therefore a qualification in its own right. By providing an overall award for the ABS i.e. a certificate or statement of achievement the ABS will in effect be seen as and become a qualification. Providing a breakdown of achievement across all components would still be of critical importance to demonstrate to employers and HEIs what the student had achieved in majors and minors. For HEIs this would relate to assessing aptitude for an HE programme, entry requirements and fairness in admissions.

Providing an overall award for the ABS would demonstrate the value of the entire programme and the value of depth and breadth in the programme. Without an

overall ABS Award all the value of the study would be reflected in the majors and to a far lesser extent the minors. In the absence of an overall award students may just focus on the components of the ABS they needed for HE entry or for initial employment? Without an award, few would understand what the ABS was or intended to deliver. If the ABS was, however, an award or qualification in its own right DfE would need to consider how the benefits of the ABS were made available for older individuals. If it did not this could impact on disadvantaged learners who had 'missed the bus', at 16-19.

40. What minimum attainment conditions, if any, should a student need to achieve to receive a Level 3 Advanced British Standard award? (Options: 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 ABS score; No minimum attainment conditions; Don't know; Another condition not listed above (please specify - 250 words))

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

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. (250 words)

We prefer DfE's current lead option (1): a certificate or statement of achievement recognising a student has completed their ABS programme and met the minimum attainment conditions to receive an overall award. We would recommend that this was a certificate incorporating a statement of achievement.

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. (250 words)

No comment.

Chapter 4

43. What strengths in the current approach to 16-19 education should we aim to preserve under the Advanced British Standard? (250 words)

A levels are a trusted and well-known brand. Individuals, employers and HEIs understand A Levels. Schools, HE, parents and students understand how A Levels work in supporting progression to and access to an HE programme. In STEM subjects specific combinations of A levels are understood to provide the depth of study and basis for providing progression to a STEM degree programme. Government must ensure quality and of equal importance the perception of quality is maintained in the

transition in the ABS. T Levels although a new qualification potentially have an important role in developing technical education and a route through technical education to, for example, HTQs.

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? (250 words)

We would hope that the ABS offered more opportunities for individuals working in industry (across a variety of private/public and industry/service sectors) to contribute to the delivery of 16-19 provision. Similarly, we would hope that the ABS would provide more opportunities for some 16-19 staff to seek industry placements, work part time in industry and support the delivery of training for employers. Teaching staff could update their industry knowledge and skills, while business could utilise 16-19 staff to help develop appropriate training programmes for their workforce. We recognise the substantial challenges associated with such an approach, but it could deliver.

Throughout the consultation there is not enough connection made to other programmes, particularly Apprenticeship. Many of those delivering Advanced Apprenticeships could play a key role in supporting the delivery of the ABS, particularly the ABS occupational programme. We would also hope considerable attention was given to the potential contribution of Independent Training Providers (ITPs) who play the key role in the delivery of Advanced Apprenticeships. ITPs often have excellent contacts with employers and proven track records in the delivery of level 2 and level 3 work-based learning programmes.

45. What staff training do you think may be required to implement the Advanced British Standard successfully? (250 words)

The analysis in the consultation focuses on 16-19 teaching staff. Training and developing teaching staff to implement and deliver the ABS is obviously of critical importance. DfE must, however, look at the bigger picture. The ABS represents a fundamental change for HE admissions staff – training needs and awareness raising must be considered here. HE programme designers and lecturers will need a good understanding of the ABS, its operation, implications for HE entry and study etc.

IAG staff need training to advise young people on choosing their ABS options and the opportunities/implications of particular choices.

Finally, the DfE needs to consider how employer awareness and understanding of the ABS will be raised. How will the DfE ensure employers are, in general, committed to and appropriately engaged in the development and delivery of the ABS? How will the DfE ensure that when an individual presents their ABS to an employer, the employer understands the award/qualification?

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:

46a. Buildings/estates? (250 words)

No comment.

46b. Technology? (250 words)

No comment.

46c. Provider landscape? (250 words)

We would note our earlier comments regarding encompassing all providers and using the expertise of schools, FE colleges, independent training providers and employers. Greater provider partnership and collaboration will be needed.

46d. Accountability arrangements? (250 words)

No comment.

46e. Admissions? (250 words)

Prospective students will need to be fully aware of what their choices re the ABS mean for employment and further study. All students will need such advice. How will this advice be provided? Who will oversee this advice and safeguard its quality?

As noted in our response to early consultation questions the introduction of the ABS will pose significant challenges for HE admissions staff.

46f. Transportation? (250 words)

No comment.

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. (250 words)

We note this chapter focuses on supporting 16-19 providers to implement these reforms. This is fundamental. Government must, however, recognise the vast challenges for others. HE providers will face challenges in reviewing and revising entry requirements, considering how they support learners to adapt from various learning styles in the ABS to HE. The suitability of various ABS options and combinations of double majors, majors and minors will need to be considered for

different HE programmes. Parts of HE programmes may need, in some circumstances, to be redesigned. The needs of pre -16-19 providers also need to be considered.

Finally, we are surprised that the key role of IAG advisors is not sufficiently recognised. Potential ABS students will need advice on their choice of options and implications of their choice of options for employment and post-18 education.

Chapter 5

48. What changes to pre-16 education do you think will be needed to create effective pathways into the Advanced British Standard? (250 words)

No comment.

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. (250 words)

As providers of Higher Education, Higher Apprenticeships and Degree Apprenticeships and HTQs, HEIs have a fundamental role to play in determining and advising on what different choices re the ABS mean for higher-level programmes. PSRBs will also have a key role to play.

Throughout the consultation we have struggled to understand how Apprenticeship relates to the ABS. This question summarises our point. Could a level 2 Intermediate Apprenticeship lead to the ABS? Presumably not if the ABS was restricted to 16 – 19 year-olds. A level 3, Advanced Apprenticeship could be an alternative to the ABS. Alternatively, the ABS could lead to an Advanced Apprenticeship. Indeed, in certain circumstances a level 2 Intermediate Apprenticeship could be chosen by an individual completing an ABS. Some options in an ABS will well prepare a student for specific Higher and Degree Apprenticeships, others will not. Sometimes the consultation gives the impression that progression is linear, upwards and age based. Life, work and education is rather more complex.

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. (250 words)

No comment.

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. (250 words)

The ABS is for 16 - 19-year-olds. One key question would be whether disadvantaged students who 'miss the bus' would be able to secure the advantages of the ABS at an older age? This is a key issue if the ABS is an award/certificate (and effectively a qualification). An award is DfE's current preferred option.

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. (250 words)

HEIs and other providers of post-18 education need to have a pivotal role in the specification and design of the ABS and options within the ABS to ensure they are appropriate for and support entry to HE. Some programmes e.g. STEM HE programmes will have very specific requirements and will need a specific and defined depth of study re key subjects. The ABS will need to support progression to HE in terms of how it equips and prepares students to learn in different ways e.g. self-led, reflective learning. Crucially key progression routes from ABS and ABS options to different types of bachelor degree programmes, HTQs and Higher and Degree Apprenticeships will need to be outlined. This will call for substantial work with and support for HE admissions staff, programme designers and those delivering HE programmes.

53. If you have views on how to ensure the Advanced British Standard reforms meet the needs of employers, please share below. (250 words)

Government has a tremendous asset in the Occupational Standards (together with Occupational Maps) developed by employers under the auspices of the IfATE. Maximising the appropriate use of Occupational Standards in the development of the ABS will help ensure the needs of employers are met. It will also be crucial to safeguard and indeed grow T levels during the period before the introduction of the ABS. Employers understand A levels (or think they do), the T level has potentially a good brand and aim that can easily be understood. Employers understand Apprenticeships. The ABS is a more difficult and complex programme to explain and understand. A massive communications exercise will be needed with employers.

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. (250 words)

Our main point concerns Advanced Apprenticeship learners (students) and their relationship with the ABS. The consultation document has a massive blind spot here. Terminology does not help. To some, Apprenticeships are not seen as a post-16 qualification. In reality they are qualifications. Ofqual externally assures end point

assessment for Advanced Apprenticeships and a certificate is awarded. Apprentices may be first and foremost employees but they are also learners and students. We believe it is critical that Government works with the Apprenticeship sector to understand the implications of having a key level 3 learning option and 'qualification' i.e. Advanced Apprenticeship outside of the ABS. What implications does this have for students and the perception of Advanced Apprenticeships with employers, PSRBs etc.?

We would also like to raise the issue of adult learners. What opportunities will there be for those individuals who, for varying reasons, did not take or complete the ABS at 16-19? Too often the consultation focuses overly on age rather than stage of learning.

Finally, we are not sure of the position of Governments, stakeholders and employers in Scotland, Wales and Northern Ireland re the development of an Advanced "British" Standard for England.

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. (250 words)

No comment.

56. If you have views on the impacts (positive or negative) of the Advanced British Standard reforms on the environment, please share below. (250 words)

No comment.

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. (250 words)

Focus should be on ensuring the successful implementation of the ABS. The ABS could, however, have implications for issues concerned with wider education and skills policy. UVAC would be interested in exploring the potential of the ABS for widening access for under-represented groups to higher education, particularly individuals following ABS occupational programmes. Likewise we would like to explore how employers could develop a larger role in supporting 16-19 education and how developments with the ABS could help employers develop relationships with providers and invest more in the training and development of their employees.

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. (250 words)

We are surprised that relatively little detail is provided about the transition period to the ABS and in particularly maintaining, growing and safeguarding delivery of T Levels. To some T levels may be seen as an obsolete qualification, yet they are still a good choice for some young people. How will DfE overcome this challenge and change such perceptions? How will DfE continue to explain T Levels to employers in the context of the introduction of the ABS? Consideration will also need to be given to how individuals with T Level qualifications are supported in a new ABS landscape.

We are surprised about the level of detail re IAG systems and capacity in the context of the development and introduction of the ABS. How will students know their choices and determine what is the best option for them in what (at least superficially) will appear a complicated qualification/programme offering?