



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

Association of Colleges response: March 2024

Association of Colleges (AoC) represents England's 225 colleges and this response is result of member consideration informed by current AoC policy lines. We have used the consultation period to engage member colleges in constructive discussion of the issues; in our Curriculum Strategy Group and 16-18 Reference Group as well as in regional meetings and national round tables, with the Department for Education colleagues and other key stakeholders such as Awarding Organisations, regulatory bodies, subject and teacher associations.

Overview

These proposals have the potential to be the most significant reform of 16-18 education for a generation and this consultation raises important questions which go to the heart of our aspirations for young people in England. With over half of publicly funded 16-18 students attending colleges, our sector is crucial to any reform of this phase of education.

Reform on this scale requires an ambitious future-focused vision which reflects the diversity of our society, takes a global view, responds to social, economic and technological change and promotes greater equity. Our ambition is for every young person to thrive, realise their talents and be supported to achieve their ambitions.

These proposals need to better reflect the fact that young people face a rapidly changing, complex world and will need to embrace learning throughout their lives. This phase of education needs to be the bedrock for the learning and development they will need as adults and as citizens. The proposals will also need to demonstrate how they would address achievement gaps linked to social and economic inequalities.

We have strong reservations about making qualifications the starting point for reform. Qualifications are simply measures of success used for progression; they should not define curriculum purpose or limit the educational experiences

we want to provide for every young person. Nevertheless, we welcome the inclusive scope of these proposed reforms at all levels of study, the focus on study programmes and commitment to new investment in bigger, broader and more coherent programmes for all learners at all levels.

The reforms should aspire for this phase of education to prepare young people to become skilled, well-informed, confident and critical citizens who can continue to engage in learning and personal and social development throughout life. The curriculum should engage and motivate students and promote learning and development across the range of key literacies: social, economic, cultural, scientific, technical, political and emotional, and provide opportunities for success and progression to employment and further study. Many of these proposals seem too backward-looking in their assumptions about design, content and assessment and they should also include reform of Key Stage 4.

Within this framework, qualifications should be valued and respected for their distinctive contribution rather than seeking uniformity of design or outcome. Assessment should have clear aims, promote learning, inclusion and equality, serve the needs of learners and the curriculum, value achievement and support progression, reduce workload and costs and apply new technologies. We don't agree that summative written exams are necessarily the best way to assess progress and certainly not the only rigorous approach.

Qualifications should value improvement and support progression rather than creating failure. There needs to be a recognition of the diversity of learner achievement, prior experience and starting points and 'spiky profiles'. These differences must not hold learners back in those areas where they can make more rapid progress.

English and maths qualifications at level 2 (GCSE and Functional Skills) need reform to reflect the fact that that all 16-18 year olds will study 'English and maths for all'. The review process should urgently consider changes at Key Stage 4 to end the GCSE grade 4 'cliff edge' at 16 and provide young people with a broader experience of technical education.

For these reforms to succeed, there are design and implementation issues which need to be addressed; about timing, capacity, resources and terminology. Some changes are urgent, others need to be phased in more gradually to help providers and stakeholders plan ahead. Successful implementation of any new framework will require a manageable, staged, reform process which builds support and confidence, including:

- More support for teacher recruitment and retention and a funded plan to harmonise teacher pay in colleges with that of schoolteachers as a minimum.
- Adequate system infrastructure funded through capital grants and loans to enable colleges to develop their offer to young people.
- Reform of the pseudo-market approach to 16 to 19 education which sees high competition for full-time Level 3 learners, particularly A Level students, a narrower offer and little or no competition for those young people who have not achieved a full Level 2 at age 16. Young people need equal access to all study programme options. This will require collaborative area offers and more local co-ordination of curriculum planning, teaching, accommodation, technology and transport arrangements for example.
- A coordinated Information Advice and Guidance system and common entry and progression requirements.

These are all important questions for government and for colleges, and whatever the outcome of this year's General Election there is an urgent need for reform. Our sector is ready to contribute positively to this important work and to help co-create a better educational offer to young people.

David Hughes, Chief Executive.

Chapter 1

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

Somewhat support.

We support the key principles underpinning the introduction and design of an overarching framework for 16-19 study programmes. We welcome the inclusive whole-cohort and whole-programme approach and the proposed new investment in more contact time and greater curricular breadth. Implementation needs to be phased, with urgent reform of English and maths prioritised. It is also important to bear in mind that any increase in overall programme hours also requires a proportionate increase in learning support.

The aims are mainly framed in terms of progression, equity and economic benefits but are not clear how these will narrow achievement gaps. There

should be a commitment to key values, such as equality, democracy and human rights as well as the development of young people's essential skills, economic, cultural and political literacy. These values should also inform the planning of employability, enrichment and pastoral (EEP) activity. There needs to be some consensus about what the 'right' amount of breadth and depth of knowledge and skills are, and what it means for a young person to 'reach their full potential'. Rather than 'parity of esteem' or a standard model for qualifications, we would support a diverse range of valued and trusted qualifications of different types for different purposes. All stakeholders need to understand the opportunities offered by technical routes and simply rebadging qualifications doesn't necessarily change assumptions about the value of different routes.

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

This should be seen as the opportunity to establish a clear Young People's Entitlement for all 16-18 year olds, which can engage and motivate all young people and prepares them to become skilled, well-informed, confident and critical citizens who can continue to engage in learning, personal and social development throughout life. This suggests a curriculum which promotes learning and development across social, economic, cultural, scientific, technical, political and emotional literacies and provides opportunities for choice, success and progression.

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.

We support the key aims set out in Chapter One: clearer options, more teaching time, greater breadth and a core of maths and English should all help unlock potential. We particularly welcome the ambition to improve outcomes for young people with SEND and from disadvantaged backgrounds.

The terminology needs to be completely rethought as none of the three words properly represent the concept. It needs to be made clear that the framework is designed to include all 16-19-year-olds at all levels and in all settings, including apprentices in work-based learning.

We would support the inclusion of apprentices in the framework and the opportunity for adult learners to 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.

Somewhat oppose.

It will be important to create solid foundations for progression from level 3 to both employment and Higher Education. We welcome the development of a single common framework and are not convinced of the need for two distinct tracks: ‘academic’ and ‘technical’. While it may be useful to brand some routes which employers have specifically approved as being a good preparation for employment in a particular sector there should be no need to create different tracks. Any ‘occupational’ route should have parity with all others within a common framework and include opportunities for choice and broadening beyond English and maths. There should be no need for additional English and maths where they are already embedded.

We note that the ABS (occupational) programme might have less time for EEP because more time will be devoted to work placements, Employability is only one aspect of EPP and these students will gain as much from personal growth or citizenship content as other Level 3 students and EEP hours are essential for creating a broad curriculum.

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.

Somewhat oppose.

We do not support the distinction between ‘occupational’ and ‘transition’ as it could limit opportunities for students based on when they aim to progress to employment and make it more difficult for providers. Programmes should be designed to allow students to change their progression plans and group sizes need to be viable for providers.

Labels such as Advanced (level 3), Intermediate (level 2) and Foundation (level 1) would be useful to differentiate between levels in the new framework.

There needs to be some recognition that many learners have very 'spiky' profiles which reflect the fact that they are working at different levels and make progress at different rates. The needs of students who join the English system from other countries also need to be recognised. Students may require intensive English language development and additional time to achieve fluency. This should be via appropriate pathways not a deficit approach.

We support the idea of a coherent thread of common principles in the design of level 2 and level 3 programmes as this is key to successful progression from level 2 to level 3. We would argue that the same applies to Entry and Level 1 programmes and rather than different tracks, there should be parity between programmes at the same level.

Key Stage 4 is currently designed to prepare for progression to A Level. We need a new balance at level 2 which prepares for a broader offer at level 3. The development of the ABS raises many questions about the purpose of qualifications at Key Stage 4 and we support a 'stage not age' approach with clear differentiation between Key Stage 4 and post-16 programmes at level 2. We need to avoid students being expected to simply repeat courses or course content which they have already taken.

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.

We suggest that any additional hours should support the development of appropriate personal and social skills as well as economic, social, political, cultural and emotional literacies and provide opportunities for choice, confidence-building, success and progression to level 3 study, including via an entitlement to a range of enrichment opportunities including volunteering, work experience and participation in skills competitions and international projects. We agree that EEP hours at Level 2 and below should at least mirror those at Level 3. We agree that some flexibility about English and maths hours is needed as some students will need extra support to develop these skills. ESOL students will need many more hours of English and learners new to the UK may need more hours of maths.

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.

Any transition programme must address the challenge of English and maths achievement by specifying what level of achievement is required to access Level 3 majors and minors. There may be a case for a nuanced sectoral approach which reflects the requirements of entry level employment in different sectors. The development of these programmes should be informed by learning from the current DfE funded Transition and Academic Progression pilots. Key Stage 4 needs to include opportunities to build towards vocational achievement and opportunities to access college from 14.

All programmes should offer a line of sight to both employment and further study rather than making assumptions in advance about students progression plans. The assumption should be that all learners will at some point seek employment as well as engaging in further study or training.

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

Both Level 2 and Level 3 programmes should be framed as part of the same framework, but it should be clear whether a student has reached Level 2 or Level 3.

The 'Advanced' terminology suggests that the whole framework is at level 3. We would support branding which emphasises the articulation of level 2 and level 3 elements within the same framework while also recognising the different levels of achievement. We would support a transcript system to record achievement. The example of a one-year Level 2 Transition programme seems much shorter and less demanding than the Level 2 occupational route. Labels such as Advanced (level 3), Intermediate (level 2) and Foundation (level 1) may be useful to differentiate between levels in the new framework.

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

Somewhat oppose.

We do not see the need to exclude level 1 study from the overall framework, although the 'Advanced' terminology is clearly not appropriate. We agree that these students would benefit from the changes

outlined in chapter one: clearer options, more teaching hours, greater breadth and core English and maths, though most students studying at this level already have English and maths in their programmes under the Condition of Funding. Current programmes at Entry Level often use a mixture of qualifications and non-accredited learning hours. This allows a level of personalised learning that is beneficial in itself and also allows outcomes from education, health and care plans to be addressed. This flexibility for personalisation should be retained at this level including vocational options which can be very valuable.

Over 30% of Entry Level students will have ESOL needs rather than SEND, particularly where there are substantial numbers of new arrivals from abroad. ESOL courses should be treated as equivalent to Functional Skills or GCSE English at the same level.

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)

Nearly half of Level 1 students will have SEND, but otherwise their needs will be similar to those of level 2 learners (see Q.16) set at an appropriate level. Smaller class sizes are often necessary, to support the development of basic literacy. Many students study at these levels as a result of negative or disrupted experience of previous learning at school. Some students will progress to higher levels of study, others will leave education to find work. It is important that programmes are designed to allow departure points to different destinations.

The inclusion in the ABS of employability, enrichment and pastoral (EEP) hours will especially benefit these students so some additional hours should be used for this purpose. The department's current work to develop a framework for Personal Social and Employability qualifications at level one and below will be useful in structuring and standardising what is delivered.

Many students at these levels will not have made up their minds about their future progress, so additional hours should allow students to infill onto courses at higher levels, have vocational tasters, or access a varied menu of work experience placements. Direct experience is often the best way to inform students' decisions.

For entry level students who will ultimately progress into adult social care, hours can be used to support this transition by treating adult social care hours in a way similar to work experience.

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.

We are not convinced that all current qualifications would need to be superseded or renamed. A Levels and T Levels could become component parts of a new overarching programme. A new overarching framework could gradually establish itself as a ‘standard’ over time, while component qualifications continue to have currency. Change should be phased to help providers plan and expand programmes gradually and to build support and confidence through a positive experience of reform. A transitional step could include introducing new minors to existing study programmes with one compulsory minor and a second optional minor. Colleges need time to plan their offers, recruit staff, ensure suitable accommodation and facilities, and inform potential students about their offer so that they can attract students. This means that reforms should be phased in clear, predictable stages without changes at short notice.

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?

Somewhat oppose.

Some overlap between subjects may be necessary and welcome, to support coherence, connectivity and reinforcement of content. The approach to subject titles needs to be sufficiently flexible to allow for the development of new subjects and the evolution of existing subjects . The process for selecting courses needs to allow sufficient time for decision and delivery. While encouraging a broad curriculum, the overall number of subjects should be limited, so that a viable entitlement to the full offer across the country is realistic.

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

Somewhat oppose.

See response to Q22 above. Viability (eg: of group size) will also be an important consideration for providers.

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.

There needs to be more clarity about the role of Minors in constructing a coherent programme. There should be a minimum of prescribed combination based on substantial duplication of content. We do not support rules of combination which would exclude students from following any coherent programme which they could benefit from.

If all students are to study both English and maths, there is a risk that the additional taught hours will not provide much opportunity for curriculum broadening. There is a case for developing some new broadening subjects such as: Humanities, Science, Global Studies, Citizenship studies or Cultural studies as well as some project-based learning including using employer-briefs and participation in skills competitions. Some of these could also be designed to cover the 'English for all' requirement. English teaching naturally requires texts to be read and written. Combining English with broadening subjects has the potential to make English classes engaging and to avoid student perceptions of simply repeating Key Stage 4 content.

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.

Neither support nor oppose.

More teaching time is an essential prerequisite to ensure greater breadth and this will require more staffing. Student need for additional teacher-directed support is variable and providers need some flexibility to address different student needs.

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.

The current design suggests that all Level 3 qualifications are 2 years long, which we feel is too large and should be broken down to at least one year units. There should be a minimum contact time for every qualification with some flexibility available to respond to additional student needs. As

students develop their study skills and become more confident independent learners during a course, there may be some opportunities to shift the balance between contact time and self-directed study.

There is case for more 'Increased Flexibility' provision for KS4 students to get hands-on experience of applied learning in a college context.

Technical qualifications aim to meet occupational standards and develop specific competences, and these will require qualifications of different sizes with different teaching time. Technical qualifications should not be expected to lead to full occupational competence and this is not an employer requirement.

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.

Employability, enrichment and pastoral (EEP) activities need to be seen as a subset of a wider Personal and Social Development (PSD) entitlement which should be more clearly defined and include the development of essential skills and political literacy. There will be different elements, with different levels of student choice and agency, with some opportunities embedded in courses and some covered in tutorial. Two hours per week is too limited to cover both entitlements and electives, particularly for those students facing additional challenges.

EEP hours can help support the social inclusion of marginalised groups such as new arrivals in the UK, or students with SEND who have progressed to college from special schools. EEP hours might also include skills for independent study so that students can make better use of independent study hours.

More clarity and definition are needed in this important aspect of curriculum. Terms like enrichment, tutorial, PSD and citizenship are used in different and overlapping ways. We need a clear vocabulary for EEP. We should learn from the findings of our AoC research with Derby University on the value of enrichment programmes and from the experience of other countries with greater curriculum breadth and opportunities.

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.

We need an overarching national strategy which can be implemented at a local level, possibly through LSIPs. Employers need to be informed about the benefits of engaging with education both for their skills pipeline and for the benefit of young people. Employers are best engaged via co-ordinated area-based strategies which include all post-16 providers. These need to be properly resourced and employer incentives could include the opportunity to set project briefs for students and to help shape specific aspects of curriculum provision. Students should also be supported with opportunities to participate in skills competitions.

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.

Any framework needs to recognise that students have ‘spiky’ profiles to different extents, working at different levels across their study programmes, including in English and maths.

English and maths are already embedded in T Levels and this approach could be applied to other programmes. It is important to avoid offering too many options and the offer has to be viable in terms of potential group sizes for each option. We do not recognise the distinction between ‘theoretical’ and ‘applied’ English.

The purpose of minors needs to be clearer. They seem to be pitched at the same level as majors in the same subject, but it is not clear whether the content of minors is nested within that of majors.

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.

The principles are reasonable as far as they go. The English curriculum should provide a stimulating, engaging and motivating grounding for a

lifetime of language use, including reading, speaking and listening and should support digital literacy and reflect the impact of social media on communication. The maths curriculum should reflect the wider need for statistical and economic literacies.

Programme design should make the most of the overlaps in between vocational and English and maths content. This can help to deepen and contextualise skills acquisition and motivate students.

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?

Oppose.

It is important to avoid offering too many options and the offer has to be viable in terms of potential group sizes for each option. These need to be carefully designed to meet students' needs.

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?

There is a need for reform of GCSE English and maths at Key Stage 4, to reflect the fact that there will no longer be a 'cliff edge' at 16. Qualification design pre- and post-16 need to support progression within the English and maths offer. We need qualifications which value and accredit achievement at level 1 and below and can support stepwise progression to levels 2 and 3 without the need for a special 'bridging' curriculum.

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

In principle this does not need to differ between routes – they key variable is the students' skills, needs and aspirations in English or maths.

Contextualisation and embedded delivery are already happening with T Levels and can be possible and beneficial on other programmes as well.

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.

GCSE and Functional Skills are in urgent need of reform. The GCSE and Functional Skills routes are not currently distinct, and this leads to confusion about purpose and value. Students will need appropriate English

and maths qualifications within the new framework, and these should be more flexible and modular to support progression.

We welcome the ambition to raise standards at pre-16, given the low success rates at 16, particularly for students with SEND or from disadvantaged backgrounds.

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.

We would encourage the development of a more modular approach to qualification design within the new framework, this would provide opportunities to demonstrate progress and growing confidence as well as to offer students more flexible routes. We would prefer all qualifications or modules to be achievable one-year at a time rather than being limited to two-year linear delivery.

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.

Somewhat oppose.

We support rigorous assessment and the aim of minimising the burdens of external assessment, which are taking up increasing teaching and planning time and resources.

Assessment methods should match what is being assessed rather than being predetermined. We do not agree that assessment should be primarily by written exam or always be summative. We would support the use of a range of appropriate assessment methods to suit the curriculum content, rather than an excessive dependence on written external exams which are not necessarily a measure of quality. A lot can be learnt from the way technical and vocational skills are assessed. There are different ways of ensuring rigour and quality and successful qualifications are characterised by a rich mix of linked skills and knowledge development. There should be room for modularity to help build success, mastery and confidence.

We believe that assessment can be motivating for students, should have clear aims and values, promote inclusion and equality, serve the needs of

learners and the curriculum, value achievement and support progression, reduce workload and cost and apply new technologies. This will mean considering smarter and less time-intensive options.

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.

We support these principles and we might want to consider the case for no more than 4 pass grades (eg: A-D or Dist* - Pass) as we feel there is excessive differentiation in the current system. This creates unnecessary pressure on learners and tends to encourage selective practices in university admissions.

Grading systems need to be clear and easily understood by employers, HE providers, students and their families. The comprehensibility of results is an important aspect of the currency of qualifications. One of the benefits of the new framework is a simpler and more coherent system, but this will be compromised if the grading systems is not too complex.

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?

This seems sensible. Individual marks should be helpful to all stakeholders and HEI's and employers should be consulted about this. Not all students will pass all elements of their course and the final outcome of a student's post-16 studies should not be 'all or nothing'.

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.

A new framework will start as a curriculum design tool and become a young people's entitlement with its own value. Over time, a 'full' framework award should provide a genuine sense of achievement. Awarding should be kept simple with a clear threshold for achieving the overarching award, supported by a transcript which employers or HE providers may find useful. Students should continue to be able to receive

individual component qualifications and any incomplete ABS awards should remain open to be added to in future.

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

"Pass a set proportion of subjects (e.g. 3 majors and 1 minor or 2 majors and 2 minors)". But we feel that it is too early to be making a definitive judgement on this.

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.

Option 1 seems reasonable, together with a transcript and the option to complete any incomplete awards in future. Individual component qualifications to be awarded as previously.

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.

We support the use of a diversity of assessment methods to suits different needs, including the use of internal and external assessment of various types. The burden of external assessment needs to be reduced.

Chapter 4

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

A choice of subjects and diversity of qualifications. The recognition of individual component qualifications achieved. The flexibility to respond to the diversity of student needs and a recognition of their mixed 'spiky' profiles and different rates of progress.

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?

Teacher recruitment and retention; particularly for maths, English and in a range of specific vocational areas as identified in recent workforce surveys.

These proposals imply a need for post-16 providers to work collaboratively and co-ordinate the curriculum across a travel-to-learn area, with the benefit that this could protect vulnerable and minority subjects. This requires a different skill set from staff. Increasing hours poses a challenge

for the recruitment and retention of support staff for students with SEND. AoC research in 2022 on staff vacancies in colleges reported that "recruiting and retaining support staff has become increasingly difficult as the labour market has changed..." and found widespread vacancies. Support staff pay, like teacher pay needs to align with the equivalent roles in schools.

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

How to timetable, teach, support and advise students across providers in a collaborative partnership. Hybrid and digital teaching and assessment. Support for all stakeholders to understand the implication of the changes.

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?

Area-wide capital investment strategies linked to ABS delivery plans.

46b. Technology?

The infrastructure to support collaborative hybrid, multi-site delivery while preserving the benefits of face-to-face learning.

46c. Provider landscape?

We do not currently have the system architecture to support an entitlement to ABS for all students and colleges have found it difficult to access sufficient industry placements.

Local co-ordination and capacity planning will need to be funded and incentivised to ensure sufficiency of the offer at area level. LSIPs could have a role in local sufficiency planning with post-16 providers expected to contribute to an inclusive local partnership. Smaller providers and those in rural or coastal and more disadvantaged areas will need additional support to ensure their learners can access the full range of opportunities.

46d. Accountability arrangements?

The accountability and inspection frameworks will need to reflect the changed entitlement for students and expectations of providers. Area accountability will need to be considered for sufficiency, quality, sufficiency and efficiency with area inspections of collaborative provision.

46e. Admissions?

Information Advice and Guidance pre-16 will need to be enhanced to support student decision-making for a new framework. This could be integrated into new common admissions processes and entry requirements which support the interests of students rather than providers, and information should be shared seamlessly in the transition process.

46f. Transportation?

There will need to be a recognition of the additional infrastructure and resources needed for travel to ensure student access to a sufficient offer, particularly in remote rural areas.

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)

There will need to be greater investment in student financial maintenance to support equal access to the new entitlement and to address the barriers to participation caused by material poverty and disadvantage. For many students, more contact time will mean less opportunity to contribute to the household income through part-time work.

Chapter 5

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

There will need to be a broader Key Stage 4 curriculum which prepares for progression to the full post-16 offer (see Q.15) with opportunities to engage in practical and vocational learning at college pre-16 to support skills acquisition and effective transitions. There is also an urgent need to reform GCSE, particularly English and maths. The articulation between GCSE and post-16 level 2 qualifications needs to be clarified.

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)

We will need co-ordinated area Information Advice and Guidance linked to the coherent area coordination of provision. There will need to be

agreement about entry and progression requirements between levels of study (see Q46e). The introduction of T Levels has shown how long it takes for awareness of new qualifications to percolate through to consistent information advice and guidance across the system. There will need to be a substantial effort to inform all key stakeholders and influencers (parents/carers, school staff, HEI admissions staff, employers etc.) about the available options and progression routes.

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.

In colleges 26% of 16–18-year-olds and 17% of students aged 19 or over have special educational needs or disabilities (SEND). Many of these students will want to access the Advanced British Standard at level 3 or lower levels. At all levels students with SEND, like other students, will benefit from more hours and a broader curriculum. Three crucial issues for these students are staffing, assessment and pathways.

Many students with SEND depend on additional learning support, so more learning hours imply that more hours of support are required. There is already a crisis in the recruitment and retention of learning support staff, who are some of the least well-paid staff in education. Wages are held down by the constraints of SEND funding: high needs funding for students with higher levels of need and disadvantage funding for others. An expansion of the support workforce is only deliverable if the current SEND reforms lead to changes to both these funding streams.

The way that students with SEND are assessed is important to their success. An over-emphasis on summative assessment under exam conditions will especially disadvantage some students with SEND whose skills can more validly be assessed by more diverse means including practical assessments.

Assessment approaches also need to be aligned at different levels so that achieving at one level meets the requirements for the next. Without such alignment there is a risk that students with SEND will not be able to access pathways from one level to another.

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.

Any change which impacts on programme size and the expectation of college attendance is likely to have an impact on students with caring responsibilities or part-time employment. Support for students will be essential to ensure that young people living in poverty, or otherwise vulnerable or marginalized young people are not further disadvantaged.

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.

A system approach to co-ordinating 16-19 provision in localities in England. AoC has policy proposals on this in our 'Opportunity England' report.

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

There will need to be a more coordinated approach to supporting local employer engagement with education, including industry placements, and understanding the local labour market and future skills needs.

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.

It will be necessary to consider the impact of a large level 3 qualification such as the proposed new framework will have on potential adult learners. Barriers to adult participation are widely known and include, amongst others, the need to work, caring responsibilities etc. For many adults, qualifications need to be in smaller chunks of learning which can be accessed flexibly. Some thought will need to be given to how to promote the inclusion of literacy and numeracy within ABS for adults, when many may just be looking for an occupational qualification to upskill or reskill. Similarly, there will be some adults requiring literacy and/or numeracy as Basic Skills requirements who will not, necessarily want to undertake major components of the ABS. What provision will remain for adults? Will ABS supersede Access to HE for adults wishing to progress to a degree level qualification? How will a large qualification work in prison education delivery settings?

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.

There needs to be a serious commitment to reflecting diversity and promoting inclusion and equalities together with a system for monitoring the impacts of curriculum change on different types of student, including those with protected characteristics and those with SEND. The curriculum will need to be culturally inclusive and avoid class-based or culturally exclusive assumptions. The support needs of care-experienced students must be planned for at least as effectively as those of High Needs students.

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

We suggest that the impact of all curriculum reforms should be mapped to the UN Sustainable Development Goals.

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.

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.

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