



OFFICIAL RESPONSE TO THE GOVERNMENT CONSULTATION THE ADVANCED BRITISH STANDARD

Community Union
465c Caledonian Road
London
N7 9GX

01332 372337

www.Community-TU.org

Official Response on behalf of **Community Union**

About **Community Union**

Formerly PAT/PANN and latterly Voice, the Education and Early Years section of **Community Union** represent thousands of serving teachers and support staff, headteachers, lecturers, nursery and early years workers, nannies and other education professionals in schools and academies, nurseries and early years settings, colleges, and universities across the whole of the UK.

We provide legal and casework support to our members and regularly engage with them in determining our response to policy proposals.

Community Union is affiliated to the Trades Union Congress (TUC), to the Irish TUC, Scottish TUC and Welsh TUC as well as the General Federation of Trades Union (GFTU).

This Official Response has been prepared on behalf of members of the Education and Early Years section of **Community Union** by:

Martin Hodge

Head of Education Policy

MHodge@Community-TU.org

As such this is a public document which will be published on our website following the consultation close.

The information shared within this response may be used and quoted as appropriate for the purposes it was gathered, and Community Union should be acknowledged as a contributor. We would be happy to discuss the comments in this response with the DfE or a research body acting on its behalf using the contact details supplied.



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.

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

Please explain: 250 words

England has a complicated relationship with qualifications. Titles such as A Level and O Level continue to carry much weight despite the fact that O Levels were replaced over 30 years ago, and the current A Levels have been reformed such that they bear little resemblance to the qualifications they supersede. However, they are highly regarded by the wider public. Vocational and occupational qualifications are often considered to be second class qualifications for those who could not achieve academically. This historic position has dogged education reform and has led to situations where vocational education is denied pupils at KS4, because it is not valued by the league tables and progress measures.

With this in mind, we are broadly supportive of the aims and principles of reforming the post-16 education landscape to delete the division between vocational and academic routes and to recognise the value that education brings.

There are barriers to change which must also be addressed. The accountability system in our schools and colleges must be reformed or removed. The unwavering focus on academic prowess must stop and all qualifications must be recognised as equal. Finally, the curriculum and exams in the formative years – especially KS3 and KS4, must also be reformed to feed into this new post-16 study.

These proposals will require significant investment and engagement with the sector directly. It will require cross-party collaboration and support and it will require us to put aside our historic, class-based, and personal views about what constitutes the best education.

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

(250 words)

The single most important thing for the Advanced British Standard to achieve will be for the education system to equally value all qualification pathways and for them to be recognised as such in accountability processes and league tables.

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)

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.

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

Please explain: 250 words

As previously mentioned, we oppose the current distinction between vocational and academic routes, therefore, whilst we appreciate there are differences between the occupational and academic routes, we do not feel that highlighting this in the qualification name will achieve the parity that these reforms seek to achieve.

We feel it would be equally wrong to similarly designate the academic route. It may be better for the routes to reflect the modules of study that students have undertaken after they have completed their qualification rather like university degrees, for example, ABS Business and English with Enhanced Workplace Learning.

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

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

Please explain: 250 words

Again as previously mentioned, we oppose any distinction or separation between vocational and academic routes, therefore, whilst we can understand why there may need to be different routes which reflect the different modules of study, we do not feel that highlighting this will achieve anything and may conversely perpetuate the current disparity between academic and occupational routes.

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)

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)

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 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

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

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

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)

There needs to be greater consideration of and better provision for Level 1, Entry level and other learners who fail to meet the entry requirements for level 2 and 3. These could include additional applied maths and English activities, as well as practical skills development in line with some of the courses at levels 2 and 3, to create a foundation block from which learners can develop.

Key to this will be ensuring that pathways, and the necessary funding, continue to be made available to schools and colleges. This will be particularly important for ensuring the qualification does not discriminate against those with disabilities, SEND, EAL, or are from minority ethnic groups.

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)

It is understandable for the Advanced British Standard to supersede the existing map of level 3 qualifications; however this must not be done at pace. We have already noted the issues being caused by the premature withdrawal of funding of vocational qualifications before all T Levels are fully rolled out and established.

Furthermore there will be the school and college-level challenges such as re-training and resourcing the new qualifications. It is unrealistic for this to be completed in one phase due to the staffing and funding implications. Course content will need to be rewritten to reflect the updated specifications, once they are available, which will take time in addition to the usual management and development time afforded to staff.

Therefore, we propose a period of at least three years to allow transition whilst maintaining the existing routes and qualifications for existing candidates. This must be funded by Government, to allow schools and colleges to be properly prepared and resourced ready for first teaching of the ABS, whilst also allowing for legacy teaching, assessment and resits to complete.

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

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

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

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

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)

As previously mentioned about Level 1, Entry level and other learners who fail to meet the entry requirements for level 2 and 3. Consideration must be given to those learners who are unable to access level 2 and 3 qualifications such as those with disabilities, SEND, EAL, or are from minority ethnic groups.

It will also be vital to ensure that there are routes through KS3 and KS4 which provide the necessary access into post-16 learning for subjects which are not available in schools. Community has long proposed reform of the KS3 and KS4 curriculum away from the purely academic route which, time and time again, fails to meet the needs of all learners.

This could lead to the removal of the need for formal assessment of pupils at 16, for if they are to remain in education until 18, there is little to be gained in high-stakes assessment which contributes to teacher workload and has negative impacts on both pupil and teacher mental health and wellbeing.

We believe that wholesale reform of the accountability system will be required in order for schools to feel they have the option to open up teaching pathways which meet the needs of their learners, but perhaps do not feature highly in league tables.

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

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

Please explain: 250 words

It is curious that the proposal for increased teaching time comes alongside proposals for reduced course content in majors compared to existing A Levels. For certain, the A Level curriculum is content heavy and would benefit from revision, but these proposals don't provide any additional time, instead any gained time is filled with English and maths, the specifics of which have yet to be defined and risk putting learners off those subjects.

College and post-16 study in school sixth-forms must be distinct in character from school. The maturity of learners is greater and self-directed study should be encouraged and developed. It is therefore vital that post-16 study is not a repeat of school and remains its own distinctive characteristics which make it attractive to students.

In addition, Community have yet to see a robust recruitment and retention programme to provide the necessary qualified teachers to meet the current need, let alone the expected need of an expanded post-16 curriculum, with English and Maths classes for all.

We also fear that these proposals could lead to significant staff movement from colleges, where conditions are historically less secure and pay is worse, into schools. We also worry that schools with post-16 provision will prioritise GCSE and post-16 learners leaving KS3 pupils without qualified teachers which will store up behaviour problems and pupil performance for the future.

Recruitment must be prioritised with better pay and conditions for all staff to ensure that these proposals are even workable.

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)

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)

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)

It has taken time and significant investment from awarding organisations and providers to engage with employers both nationally and locally so that they understand and see the value of the current suite of T Levels. And even there, there are some areas which are struggling with the occupational element of the course due to geographic issues.

Too many qualifications have too little employer or industry engagement at the development stage and too little involvement in delivery in a course which offers little in return. It must be remembered that businesses exist solely to make money and that activities which prevent them from doing this or distract them – such as providing mentor support for a student who is not an employee, will not be continued with. Therefore, it will be vital for employers to be properly engaged with and involved in the ABS to secure their support.

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?

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

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

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

Please explain: 250 words

It is difficult to discern from the 'high level' outline provided to adequately respond to this question. For example "each student should have a good understanding," but there is no definition of what 'good' looks like, nor is there yet any descriptor to explain the fundamental topics of study that will form this basic understanding.

We do agree that practical implementation and employment usage of maths and English is a useful and sensible approach, rather than the theoretical route which is followed for GCSE and A Levels.

We also have concerns that studying literature to 18 may not "unlock areas of interest, engagement with culture..." since this will be very dependent on the choice of literature and the dynamism of the teacher. Any literature list would need to be so incredibly diverse that it would be unwieldy.

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

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

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)

Community have concerns about the message that this proposal sends out to learners who have worked hard in order to achieve what are here described as “lower Level 2 passes”, but which are passes, nonetheless.

Many learners really struggle to achieve grade 4 and grad 5 passes, and they should be lauded for their achievements. Similarly those with learning difficulties who have excelled in order to achieve a grade 4, must not be denigrated by this. We believe that care must be taken to prevent learners from inferring that a pass is no longer sufficient.

There is also a risk that this proposal will undermine teaching and assessment in Key Stage 4, since some learners may feel there is no reason to achieve at 16 if they have to continue to 18. Taking this one step further, there is a risk to validity of Level 2 qualifications.

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

(250 words)

As previously mentioned, it is difficult to respond without the necessary level of detail which is not yet available in this high-level consultation, however we do have some observations.

- *Maths and English are often best delivered when embedded within course content. This is especially the case with T Levels, BTEC and other vocational programmes.*
- *Consider the practical elements of maths – such as interest, mortgages, percentages (wage deductions)*
- *Consider how words can be used in posters, signage, persuasion - marketing.*

It is important to note that although maths is one of the most popular A Levels, many students will not want to study maths nor English post-16. This may be because of the academic nature of the subject or the way it was delivered in school. It will be vital to recognise that sixth-form and college study is different to ensure that learners are not forced to relive their schooling which could have a detrimental impact on mental health and wellbeing.

Finally, learners must not be mandated to study maths and English purely to meet a political plan, rather they themselves must see the benefit of continued learning in order for it to be a success.

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)

As we have already mentioned GCSEs are an anomaly in our education system. Why do we have leaving certificates at age 16, when education or training is compulsory to 18? And as previously noted, the requirement to study maths and English to 18 could further undermine the validity of these qualifications.

The 2010 GCSE reforms lead to over-stuffed GCSE specifications. There is too much content and not enough time for explanation, experimentation and developing understanding which has impacted the enjoyment both of teaching and learning. GCSE qualifications will need revision and reform in order for them to provide any basis for study within the ABS.

But reform must go much deeper. We need to see vocational routes opened up into KS4 to allow learners to see what options are available and this will require changes to accountability in schools and the way that qualifications are valued by the system.

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)

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.

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

Please explain: 250 words

The assessment of learning will always need to be specifically tailored to the knowledge and skills that is being measured. This means that examinations, end-point assessments, skills observations, performances, oral viva, portfolio assessment and other means will all have a place with no one superior to another. To this end, we refute the statement regarding assessment that “in most instances this will mean exam-based.” All courses must be assessed using the “most appropriate and valid way to assess the skills and knowledge students need to demonstrate.”

We have observed in the past, that the current obsession with examination assessment does not support all learners nor staff and does not meet the needs of many subjects. Further, terminal assessment is high-stakes for the learner and for the centre, with the cost of failure high. This leads to accountability, which is focussed on assessment rather than competency, and contributes to the mental wellbeing issues many learners experience at assessment time.

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

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

Please explain: 250 words

We broadly agree with and support the high-level grading principles. But it will remain to be seen what these mean in practice.

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

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

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

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

Please explain: 250 words

At this point it is unclear what the value of the ABS qualification and its underlying components will be. The value will be especially important in determining knowledge, skills and competence in the varying majors and minors that constitute the study. Similarly it will be essential for the required work placement in the occupational route to have an award to recognise the amount of time required in that route and to place appropriate value on the placement.

Because of these and many other reasons, it will be necessary to recognise the ABS as more than just a wrapper for existing qualifications. If it is to replace the current A Level and T Level options, then it has simultaneously to encompass them and be more than the sum of its parts.

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

- **Pass all subjects at Level 3, except for English and maths (Level 2 pass accepted);**
- *Pass all subjects at Level 3, including English and maths;*
- *Pass a set proportion of subjects (e.g. 3 majors and 1 minor or 2 majors and 2 minors);*
- *Meet a minimum aggregate ABS score;*
- *No minimum attainment conditions;*
- *Don't know;*
- *Another condition not listed above (please specify - 250 words)*

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)

It is apparent that none of the three listed options meet the expectations or provide the additional value to learners that we would want an ABS to do, however they do provide a useful starting point.

In order for ABS to be conferred based on an aggregated score, systems and checks would need to be created to ensure parity between all major and minor qualifications of the same name, to allow awarding organisations to work together to aggregate scores, and for something to take ownership of the whole. They would also need to be responsible for accountability, making this proposal unworkable in practice.

A statement without any required minimum conditions would very quickly prove to be a worthless piece of paper. And the lead option does not outline what value the overall ABS wrapper would bring over and above the grades of the major and minor components either. It would simply be a certificated list of the achievements which is similarly worthless on its own.

What we need is for the ABS to have an intrinsic value of its own. It must take the component parts and bring something else into the mix in order for it to have value and be valued by the learners, teachers, higher education centres and employers.

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)

Examinations are all-too-often is over-valued, whereas observation, practical and skills-based assessment is under-valued, often because it is difficult to objectify. What is important here is that students are assessed in the most appropriate way for the subjects, or even for the topics within the subjects. Many vocational subjects are assessed using practical, skills-based assessments as befits an occupational qualification, therefore we would not expect exams to be the default assumption.

We would expect awarding organisations to identify what needs to be assessed and determine how best to do that. There must not be an assumption that terminal exams are the only option nor that they are always best.

By opening up the possibility to all the appropriate assessment methods more careful consideration can be given to the increasing number of learners who require additional support and access arrangements at the qualification design stage. Once assessments are designed with inclusivity and accessibility from the outset, the need for special arrangements is reduced and we have a qualification that meets the needs of all candidates, rather than just the few.

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)

For all its flaws, the current approach to 16-19 education in England has something to cater for every need. The breadth of courses and their geographic availability ensures that learners can usually find something that meets their needs and opens the doors to future study or employment.

Employers and HEI understand the current suite of qualifications and how they interact with each other often using A Levels as benchmarks for other qualifications, to establish quality or for shortlisting for employment. Furthermore A Levels have the “gold standard” and exported around the world such that they have international recognition. It will be important to retain this assurance of quality and recognition for ABS to be successful.

Finally, whatever form the ABS takes we need to ensure that there is sufficient breadth of study for those who are unable to access the ABS at Level 3. Access courses and Level 1 and 2 study courses will be essential to provide a valid route into further study and employment just as happens at present.

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)

The ABS does provide opportunities for and will require additional teaching and support staff, however, Community Union have already raised concerns about capacity within the sector. The current recruitment and retention strategy has failed to secure additional teachers with statistics showing a failure to recruit enough to meet current targets in ten of the last eleven years, with massive under-recruitment to maths positions.

It will be important to reflect on the wide differences in pay, and terms and conditions between schools and colleges - college pay is inferior to that of qualified teachers. This could result in a drain of talent from one to the other for improved pay, conditions, opportunities, and experiences. Further, the courses that centres will be able to offer will be hugely dependent on staffing, accommodation, and resources.

The fact that not every centre will be able to offer a full suite of course could provide opportunities for collaboration, as happened with the “14-19 Diploma”. However, this was stymied by financial implications and accountability issues – who is responsible for the performance of the learners?

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

(250 words)

As previously mentioned, it will be necessary for sufficient teachers to be recruited and trained in order to deliver this proposal. Existing staff will need time and resources in order to prepare for transition from the current suite of qualifications and schools and colleges may need additional accommodation to be constructed.

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)

We have already mentioned that there will be insufficient accommodation available to meet the demands of the additional English and Maths components. Additionally, too much of the current infrastructure is in poor repair and will need significant investment to make safe.

If learners are to be on-site for more of each day, there will be an additional need to invest in and develop catering and leisure facilities specifically for post-16 learners in school sixth-forms, and to expand provision in FE colleges. There will also be associated staffing costs which will need to be considered in centre budgets.

46b. Technology?

(250 words)

The proposal document identifies that it will be more difficult for learners to access the ABS subjects within reasonable distance if they live in rural areas. It is equally important to note that rural areas also suffer from poor internet connectivity making online learning impractical and extremely expensive. Therefore, technology is not the solution to accessibility.

46c. Provider landscape?

(250 words)

The provider landscape in England is very messy with a multiplicity of academies, LA schools with sixth-forms, colleges, and FE providers all in competition for the same learners. It is often difficult for providers to collaborate and issues around funding and accountability must be overcome in order to improve this.

Funding is often dependent on the number of learners signed up. This means courses (and course leader employment) is vulnerable to whim and fashion and provision is difficult to predict. This leads to wastage if resources and accommodation for specific courses is not fully used.

46d. Accountability arrangements?

(250 words)

Before we can have a system that works for all learners, we need an accountability system which recognises and values all learners, all courses, and all outcomes. Ofsted will need to amend their inspection framework to take account of the radically different provision across centres offering ostensibly the same course.

We have already mentioned concerns around accountability and the concern over which provider is responsible for learners and their outcomes. It is clear that achievement cannot solely be measured by grade, and this will need to be recognised.

Finally, our current system simply does not place equal value on vocational and academic routes. This parity must be addressed.

46e. Admissions?

(250 words)

46f. Transportation?

(250 words)

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)

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)

As Communities have noted in articles and Government responses over the past few years, it is our opinion that GCSEs have now passed their useful life. The current specifications (following the 2010 reforms) are unwieldy and content heavy, requiring the regurgitation of facts but lacking the development of understanding. Similarly, the unyielding determination to assess learning solely with terminal examinations makes them wholly unsuited to informal or developmental programmes.

The reforms have had a significantly detrimental effect on vocational pathways which have been left undervalued and excluded from accountability measures meaning that many learners who would have benefited have been prevented from doing so. As a consequence of schools pulling these courses, the routes to further post-16 study have closed with resources, skills and experience lost to the schools' sector.

What we need are significant revisions to the accountability system to allow schools to diversify the KS4 programme, for vocational courses to be made more widely available and for all courses to encourage a love of learning rather than being about the acquisition and regurgitation of knowledge in a high-stakes terminal examination.

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)

The funding changes which caused the withdrawal of careers services and mandatory work experience for KS4 learners need reversing in order for schools and colleges to be able to make learners aware of the options that can be available to them.

Websites, surveys, and app-based solutions have a part to play in this, but they rely too heavily on hard data when soft skills are much more important for employability, therefore only with a funded careers advisor can these skills be identified and taken into account.

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)

As mentioned in the responses to previous questions there are a number of issues with the ABS proposals which make them unsuitable for students with SEND.

It is too early to comment on the proposed course content, but we have already raised concerns around the proposed assessment methods which do not take into account the diverse needs of all learners, nor the fact that accessibility should be built in at the design stage for the benefit of all.

The reduction in funding over the past decade has had a profound impact on learners with SEND. Too many do not have appropriate support in place in a timely fashion, meaning that parents and schools strive to secure EHCPs for learners in order to obtain funding and support when it is long overdue. Schools and academies divert funds into providing their own speech and language therapists, OTs, and other specialist provision because it is not available within the local authority, taking funding away from the whole student body.

Finally we have questions around how appropriate this qualification will be for those learners in special schools or alternative provisions due to their SEND which the document almost completely ignores.

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)

Due to the pandemic and other life-changing events over their short lives, many of today's learners have significant additional needs and responsibilities. In the past, some of the financial needs could be met by the learner taking on a part-time job, but the expansion of taught time will make it very difficult for poorer learners to access courses without support. Previously, the education maintenance allowance was made available to poorer learners and provided financial support to cover transport, equipment, and resources costs to allow poorer learner to attend college without detriment.

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)

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

(250 words)

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)

The 14-19 education landscape is a complex mix of education, qualifications, and training, but the qualifications offered are also delivered in Prison settings with adult learners, specific adult education and also in Alternative Provision. It is difficult to conceive how the full range of courses will be able to be made available by all of these different providers – indeed it may not be desirable due to safety and security reasons.

If A Levels are completely withdrawn it will be vital that courses within the ABS programme are available to learners in these settings and that majors and minors are able to be studied as standalone courses separately from the ABS wrapper. It may also be useful for learners who take courses in this way, to be able to bank their qualifications so that over time they may be able to achieve the full ABS, even though it is not all studied for at the same time. This will be essential to ensure that there is no detriment to those who study in non-mainstream settings.

A Levels are widely understood as the UK gold standard across the world, and International A Levels are delivered in independent schools and British schools overseas. This begs the question; will the ABS be available to and attractive to learners and providers outside the UK? And if not, what offer will be available?

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)

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)

Travel between sites, between providers – increased use of personal car.

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)

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)