

Advanced British Standard consultation – UA submission

About University Alliance

University Alliance (UA) represents 16 of the UK's leading professional and technical universities. Our members specialise in working with industry and employers. Their teaching is hands-on and designed to prepare students for careers. Their knowledge and research drive industry to innovate, thrive and meet challenges.

Our members are leading the way in innovation and business support in the green, tech, creative and healthcare industries. They are leading providers of teaching in healthcare, the creative arts, degree apprenticeships and more. We collaborate as UA to benefit our members and their communities, and to provide expertise to policy makers.

Summary

1. University Alliance is broadly supportive of the aims of the Advanced British Standard (ABS). As professional and technical universities, we see equal value in both academic and vocational subjects and do not believe students should be forced down one route or another. We also agree that all students need good literacy and numeracy skills to thrive and support the principle of compulsory maths and English to 18.
2. There is widespread support across the education sector for increasing the breadth of 16-19 education in England, which has narrowed in the past decade. However, the DfE will need to work closely with the higher education sector to ensure there will be no loss of breadth and depth under the ABS, especially for science subjects. It is essential that some of the problems encountered during the rollout of T Levels – notably the uncertainty of whether they would be accepted by higher education providers – are avoided with the ABS.
3. The ambitious rollout of the ABS offers the opportunity to establish a Bank of England-style independent body to oversee designing the curriculum and updating it as new evidence of best practice emerges, as recommended by numerous education experts over the years.
4. It is vital that the DfE works in partnership with the whole education sector, including universities, to ensure the ABS is rolled out with the maximum amount of consensus possible. It should seek to avoid a repeat of the sequencing problems encountered by the Level 3 reform programme, which is seeking to remove funding from many Applied General Qualifications before the full roll out and successful bedding down of T Levels.
5. The establishment of the ABS offers a unique, once-in-a-generation opportunity to rethink modes of 16-19 assessment and ensure they remain fit for purpose. The retention of the status quo in the proposals is therefore a missed opportunity to reflect increasing cross-party concerns that the current approach is no longer sufficient. We recommend that the DfE consult closely with a range of stakeholders,

including universities and employers, to design a new forward-thinking, inclusive and authentic assessment system fit for the future.

6. The significant shortage of teachers is by far one of largest obstacles to the effective implementation of the ABS. There needs to be a reversal of the sharp decline in teacher training applications and an increase in qualified teachers – particularly secondary maths teachers – to make the policy feasible. The DfE must work closely with teacher training providers, including universities, to find solutions.
7. There are numerous aspects of the 11-16 curriculum that are likely to have an impact on the success of the ABS. It is therefore imperative that the DfE also conducts a review of the 11-16 curriculum and is genuinely open-minded to making changes. In fact, there is arguably much stronger support for the reform of qualifications at Level 2 (notably GCSEs) than at Level 3.
8. A significant issue that needs to be looked at is the English Baccalaureate (EBacc) accountability tool, which is set to be retained under the ABS. If the DfE wants to see a wider number of subjects studied under the ABS, including a mix of academic and vocational subjects, it must consider the narrowing effect that the EBacc is having on the Level 3 pipeline.
9. The best – and arguably only – way to ensure the ABS provides effective pathways into post-18 education and study is to closely involve a wide range of different types of post-18 providers in the design and implementation of the new qualification from the outset. University Alliance is keen to be involved at all stages of the process.

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

Fully support

University Alliance has long called attention to the false divide between academic and vocational subjects. As professional and technical universities, we see equal value in both and do not believe students should be forced to go down a purely academic or vocational route. We also agree that all students need good literacy and numeracy skills to thrive and support the principle of compulsory maths and English to 18.

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

Ensuring we are making full and better use of all young people's potential to give them a better future, make our nation more productive and grow the economy.

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)

No comments

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)

Somewhat support

There is widespread support across the education sector for increasing the breadth of 16-19 education in England, which has narrowed in the past decade. The ABS bears similarity to the main recommendation of the [Times Education Commission](#) (2022). However, the DfE will need to work closely with the higher education sector to ensure there will be no loss of breadth and depth under the ABS, especially for science subjects.

We strongly support breaking down the false divide between academic and vocational routes, but it is not certain if the proposals will achieve this. More information is needed about how students will be supported to combine academic and vocational subjects. The creation of two Level 3 ABS programmes (ABS and ABS Occupational) effectively maintains the binary divide and is not dissimilar to having A Levels and T Levels.

Much more information is needed about the proposed ABS occupational routes. To what extent will these be based on current plans for T Levels? Will progression be the same as for same as ABS? It is essential that some of the problems encountered during the rollout of T Levels – notably the uncertainty of whether they would be accepted by higher education providers – are avoided here. It should be noted that industry placements are difficult to secure in certain geographies, notably in rural areas, and there is a huge gap in opportunities at present. Placements also come with increased costs (e.g., travel, lunch, work clothing etc) that need to be factored into school budgets to ensure students are not prevented from accessing them.

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)

Neither support nor oppose

As the consultation document notes, a quarter of young people currently fail to achieve a pass in GCSE maths and English by 19. The problem is getting worse, with a doubling of maths resits in recent years. Simply requiring more of the same is not the answer. Instead, innovative thinking and creative solutions are needed to tackle this deeply entrenched problem, which has roots earlier in the education cycle. The DfE should work with education experts from the early years, primary, secondary, and post-18 education sectors to identify the key factors contributing to the persistent failure of large numbers of students to achieve good GCSEs in maths and English and find evidence-based solutions.

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 comments

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 comments

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)

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

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)

Neither support nor oppose

20. If you have views or evidence on how students at Level 1 and Entry Level would most benefit from additional teaching hours, please share below. (250 words)

No comments

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 vital that the DfE works in partnership with the whole education sector, including higher education providers, to ensure this process is rolled out with maximum amount of consensus. DfE should seek to avoid at all costs a repeat of the sequencing problems with the Level 3 reform programme, which is seeking to remove funding from many Applied General Qualifications before the full roll out and successful bedding down of T Levels.

It is not clear how highly regarded alternatives to A Levels and T Levels, notably the International Baccalaureate (IB) qualification, will fare under these proposals.

If a critical mass of independent schools decides to reject the ABS and retain A Levels and/or the IB, there is a strong risk that the ABS will be viewed as an inferior alternative and that inequalities between the state and independently educated students will be exacerbated.

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

The consultation proposes that subject content will be streamlined and specified by the DfE and IfATE. Whilst it is welcome that DfE will “work closely with employers, HE providers and

subject experts to choose the content which best supports progression”, it would be preferable for subject content to be wholly determined by an expert body free from political influence. The ambitious rollout of the ABS offers the opportunity to establish a new non-political independent body to design the curriculum and update it as new evidence of best practice emerges, as recently recommended by the [TBI](#) (2022) and a number of other education experts over the years.

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)

Somewhat oppose

See response to question no. 22 above.

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)

No comments

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

It is concerning that 16- to 19-year-old students receive a third less teaching time than their international counterparts, and we are supportive in principle of increasing teaching time. However, there are two notable barriers to effective implementation.

The first is that more teachers will clearly be needed. This will be challenging in practice as there have been too few people entering the teaching profession in the UK for the past decade, and in 2023-24, only half of the targeted secondary trainee teacher places were filled. According to the [NFER](#) (2024), 10 out of 17 secondary subjects are likely to under-recruit in 2024/25.

The second issue is that more teaching hours could adversely affect students' transition to higher education where a significant amount of independent study is required. Many new HE students already struggle with this change. The DfE should work closely with the higher education sector to identify strategies to mitigate against this risk.

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 comments

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 comments

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)

The HE sector, and professional and technical universities in particular, have a great deal of expertise working with industry and securing placements for students. We urge the DfE to work closely with both higher education providers and employer and industry bodies to design this element of the ABS.

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)

Somewhat support

We support the ambition for more students to study maths and English to18. The establishment of different English and maths options which reflect the diverse needs of the 16-19 cohort is crucial to the success of this. Further work with English and maths subject experts is needed to develop these different options. We are concerned that the proposed division between theoretical and applied is too simplistic and binary. For example, it is possible to take both a theoretical and an applied approach to both English language and English literature. It is likely there may be a need for more than two pathways.

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)

Somewhat support

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)

Somewhat support

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 comments

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 comments

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 comments

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 comments

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)

Fully oppose

The establishment of the ABS offers a unique, once-in-a-generation opportunity to rethink modes of 16-19 assessment and ensure they remain fit for purpose. The retention of the status quo – through the presumption of knowledge-rich content, and summative assessments primarily by exam – is a missed opportunity to reflect increasing concerns that the current approach is no longer sufficient.

There is a cross-party consensus forming that the national curriculum has tipped too far in favour of knowledge at the expense of skills, and that high stakes final exams are creating perverse incentives such as teaching to the test and narrow pedagogies.

For example, the final report of the [Times Education Commission](#) (2022) argues that the divide between knowledge and skills is a “false dichotomy”. The [TBI](#) (2022) claims that the overemphasis on knowledge is crowding out space for students to develop the so-called “4Cs”: critical thinking, creativity, communication and collaborative problem-solving. These will be essential skills in the increasingly digital workplaces of the future. The TBI calls for a new qualification drawing on the IB that is not wholly dissimilar to the ABS, but, in contrast to the consultation proposals, includes “multiple, rigorous forms of continuous assessment” that would blend summative and formative assessment.

The [TBI](#) (2022) is concerned that the current assessment model “fails to reflect a full range of pupils’ achievements and aptitudes”. This is a concern shared by much of the higher education sector, and University Alliance members in particular, who have been at the forefront of developing new models of more [inclusive](#) and authentic assessment. At the heart of these is a desire to ensure university assessments do not inadvertently exclude some students, and to embed employability skills into both the curriculum and assessments.

The [HMC](#) (2021) has asserted that exams serve the purposes of university selection and employers, but it is far from clear that is still actually the case, at least from the perspective of University Alliance and the employers with whom we work. We recommend that the DfE consult closely with a range of stakeholders, including higher education providers and employers, to design a new forward-thinking assessment system fit for the future.

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)

Somewhat 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)

Somewhat support

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)

No

We are not in favour of an overall ABS award. Individual subject grades are significantly more important to UK universities, and we are concerned the creation of an overall award could have perverse incentives, for example over students' subject choices. It would also be difficult to calculate in view of individual subject resits.

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))

No minimum attainment conditions

We are not in favour of an overall ABS award, and universities will set their own entry requirements for individual degree courses. For example, for some courses a Level 2 and/or Level 3 in English or maths might be required, but for others they will not. Therefore, we do not support any minimum attainment conditions imposed by government, as this could infringe on the autonomy of higher education admissions and is likely to have the overall effect of restricting access to higher education, particularly to disadvantaged students.

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)

No comments

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 comments

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)

The main strength of the current approach, particularly of A Levels, is that it is widespread (both geographically and in different types of post-16 providers, including the independent sector) and well understood, including by universities and employers. This means it has a great deal of popular currency. A significant amount of resource must therefore be dedicated to communicating and building understanding and "currency" of the ABS amongst key stakeholders. It cannot be underestimated how much time and effort this will take.

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 significant shortage of teachers is by far one of the largest obstacles to the effective implementation of the ABS. There needs to be a reversal of the decline in teacher training applications and an increase in qualified teachers – particularly secondary maths teachers – to make the policy feasible. The DfE must work closely with teacher training providers, including universities, to find solutions.

University Alliance members have a long history in delivering teacher training. As we identified in our April 2023 [evidence](#) to the Commons Education Committee's inquiry into teacher recruitment, training and retention, the main factors leading to difficulties recruiting and retaining qualified teachers are: 1) increases in the cost of living; 2) excessive application bureaucracy; 3) complexity and confusion around routes into teaching; 4) the status of teaching as a profession; and 5) lack of incentives. We make several recommendations, including a long-term cohesive programme of financial incentive and reward for teacher training; reform and restructure of the teaching profession to allow for more flexible working and professional development opportunities; and a phase 3 to the ITT market review accreditation process to allow for "near miss" providers to achieve accreditation and ensure universal geographical coverage of teacher training opportunities and placements is in place. These chime with recommendations made by the [NFER](#) (2024) and GuildHE's [Teacher Education Manifesto](#) (2023).

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

No comments

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:

No comments

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)

No comments

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)

There are numerous aspects of the 11-16 curriculum that are likely to have an impact on the success of the ABS. It is therefore imperative that the DfE also conducts a review of the 11-16 curriculum and is genuinely open-minded to making changes.

In fact, there is arguably much support for the reform of qualifications at Level 2 (notably GCSEs) than at Level 3. In the past few years, a wide range of influential cross-party stakeholders, including the [Times Education Commission](#) (2022), the [House of Lords Education for 11–16 Year Olds Committee](#) (2024), the [TBI](#) (2022), the [HMC](#) (2021), and the [Rethinking Assessment](#) coalition, have called for significant reform to or the abolition altogether of GCSEs. There have been repeated calls for fewer high stakes exams and a greater emphasis on technical, digital and creative study. The [Times Education Commission](#)

(2022) found that 65% of parents think that the education system puts too much emphasis on exams, and the [HMC](#) (2021) found 94% of teachers surveyed from both the state and independent sectors believe GCSEs need either complete or partial reform.

A significant issue that needs to be looked at in the 11-16 curriculum is the impact of the English Baccalaureate (EBacc) accountability tool, which is set to be retained under the ABS. Since the EBacc was introduced 2010, it has led to a precipitous decline in creative and digital subjects being taken at GCSE. the [Times Education Commission](#) (2022) found that there has been a huge reduction in the number of students sitting GCSEs in design and technology (-80%), music (-36%), drama (-40%) and computing or ICT (-40%). [The Times Education Commission](#) (2022), the [House of Lords Education for 11–16 Year Olds Committee](#) (2024), and the [TBI](#) (2022) have all called for the EBacc to be scrapped. University Alliance and our [#ArtsEssential](#) coalition partners have called for creative arts subjects to be included in the EBacc in order to help protect the critical talent pipeline that feeds the UK's successful creative economy, and with it the economic backbone and cultural identity of the country.

If the DfE wants to see a wider number of subjects studied under the ABS, including a mix of academic and vocational subjects, it must consider the narrowing effect that the EBacc is having on the Level 3 pipeline.

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)

No comments

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 comments

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)

No comments

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)

The best – and arguably only – way to ensure the ABS provides effective pathways into post-18 education and study is to closely involve a wide range of different types of post-18 providers in the design and implementation of the new qualification from the outset. University Alliance is keen to be involved at all stages of the process.

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

No comments

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)

For the ABS to be considered a success it must be widely adopted by the independent education sector. If this does not occur, it is likely to be considered inferior to the existing system and will serve to further exacerbate inequalities between state- and privately educated students. The DfE must therefore work closely with the entire education sector, including the independent sector, to secure a consensus on the design and implementation of the ABS.

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)

We recommend a full Equality Impact Assessment is carried out.

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 comments

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)

No comments

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)

No comments