

Our response to the Department for Education consultation on the Advanced British Standard

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This document outlines UUK's response to the [Department for Education \(DfE\)'s consultation](#) on a proposed new qualification framework for 16–19-year-olds, the Advanced British Standard (ABS).

Background

The Department for Education (DfE) has invited responses to a consultation on a proposed new qualification framework, the Advanced British Standard (ABS). The ABS is intended to combine A levels and T levels into a single qualification that can include a mix of both technical and academic education with increased teaching time and will cover 5 subjects, in a combination of major and minor study, with some form of maths and English to be compulsory to age 18.

We welcome the opportunity to explore how qualifications at level 3 can be reformed to better meet the needs of learners, employers, and support progression to higher education. However, any reform of 16–19 qualifications would have significant implications for how higher education is delivered and so changes must be developed in close consultation with the university sector to ensure that the suite of qualifications on offer deliver the knowledge, skills, and opportunity that young people need to succeed.

Chapter 1

Question 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.

We broadly support the overarching aims of the ABS, particularly in narrowing the disadvantage gap at 16–19 to improve equality of opportunity and support meaningful progression pathways. However, it is not clear that the proposed core principles will achieve the stated aims.

Ensuring parity of esteem between technical and academic education is important. However, imposing a ‘one size fits all’ approach to a diverse range of subjects will not work for all learners, and the ABS design would need to reflect this.

It is unclear how increased teaching time could be implemented given the current undersupply of teachers and whether this in itself will improve attainment. It may also risk adversely impacting the development of independent study skills needed for successful progression.

It is not clear that the ABS would actually increase breadth of study instead of continued specialisation through subject clustering (for example, around science subjects), and could have negative consequences on progression (especially for STEM subjects) given the loss of depth.

We support the introduction of an English and maths core, though this would need sufficient teacher supply to be achievable, and would need to be mindful that learners are not locked out of progression based on English or maths attainment alone.

It is important that the name of the proposed new qualification accurately reflects what it does, and the location in which it will be available. Most notably, the ABS would be a primarily English qualification so using the term ‘British’ could therefore be misleading.

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

The ABS offers a valuable opportunity to improve equality of opportunity in the education system and support more well-rounded, resilient learners prepared for the diverse and changing skills needs of the future.

Question 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 welcome the opportunity to feed into the early design of the ABS proposal. Any reform at level 3 will require close collaboration with the higher education sector to ensure that the reforms work for learners, institutions and employers.

When considering this reform overall, five key issues for the higher education sector (expanded throughout our response) will be:

- **Supporting opportunity and social mobility:** Addressing attainment gaps at 16–19 must be a key ambition of the proposals if it is to support continuing widening access to higher education.
- **Facilitating university admissions:** To embed the ABS into the complex process of admissions, universities must be included from the outset in wider ambitions to deliver appropriate information, advice, and guidance to learners, teachers and advisers, such that they can make appropriate offers to students in recognition of their achievement and potential.
- **Balancing breadth and depth of study:** While a meaningful increase in the breadth of study at 16–19 is important in developing well-rounded learners, it must not compromise the depth of study that is important for progression to further study or employment.
- **Increasing teacher supply:** Increased efforts to boost recruitment and retention of teachers are essential to provide the workforce required to deliver additional teaching hours, though this should not compromise the development of independent study skills.
- **Ensuring a smooth transition:** Transition to a new qualification framework must be carefully planned and funded to ensure a smooth process that does not disadvantage the first few cohorts, nor those with qualifications that exist currently.

Chapter 2: Section 1

Question 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.

It is important that all ABS programmes are able to support progression to a broad range of post-18 pathways, including to higher education. A key aim of the ABS is to unify academic, technical and vocational qualifications into a single framework to enhance parity of esteem of all choices. However, to retain a separation between the ABS and the ABS occupational route could indicate to learners that only the occupational route is technical and employer-focused, whilst only the ABS route supports progression to higher education.

Information, advice and guidance will be key here to ensure that both learners and employers recognise the value of both routes. Further, the lack of bridging between the two tracks which currently seems to prevent the ability for students to switch between the ABS or ABS occupational route is of concern. This is an area we look forward to seeing more detailed proposals on in the future, and where early engagement with universities will be crucial for progression.

Chapter 2: Section 2

Question 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.

Many existing Level 3 qualifications are held in high regard (especially A levels which have an international profile) and it is vital that the rollout of any new qualification framework seeks to uphold this reputation. Meanwhile, private schools and devolved nations could retain existing qualifications (including A levels) which raises questions

about how these qualifications will sit alongside the ABS in the wider British education system. This complexity illustrates why it is of importance that universities are consulted throughout development.

It is important that the transition to any new qualification system is carefully planned, over a number of years, to avoid the risk of potentially unequal outcomes for the first few ABS cohorts. This will allow time for providers to prepare for changing demands of the ABS framework, and for employers and higher education institutions to embed an understanding of how the ABS compares to existing qualifications and what the ABS qualification represents. Further, adaptations would be required in pre-16 education to dovetail with this new approach to the 16–19 education landscape to ensure that students are set up to succeed.

It is also important that a transition plan is made for less established qualifications such as T levels (should they be entirely superseded by the ABS framework) so that learners with these qualifications can be assured they remain meaningful with long-term progression opportunities. Further, it is important that succession plans do not harm the high standards and rigour of existing qualifications.

Question 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 programme?

It is important that the Level 3 subjects on offer support future skills needs, and thus will need to be continually reviewed as skills needs evolve in the future. It is also important that humanities, creative and arts subjects are not neglected in the drive to foster a skilled workforce of the future. These subjects will remain essential to the skills landscape of the UK economy and must be protected in the 16–19 education system and beyond.

Further, decisions about subject selection must be made following engagement with universities as well as Professional, Statutory, and Regulatory Bodies (PSRBs) to ensure that subject choices exist to support educational and professional progression.

Question 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.

The long-standing principle behind the education system in England is to create an increasingly independent learner by shifting the balance towards self-directed study away from guided teaching as a learner moves along their educational journey. International comparisons of teaching time at the 16–19 stage in isolation are therefore not entirely relevant and do not provide sufficient evidence of increased teaching time leading to increased attainment.

To shift the balance at 16–19 towards increased teaching time risks losing the opportunity for learners to develop valuable independent study skills that are vital for successful progression post-18, whether to higher education or the workplace.

Further, increased time in the compulsory curriculum reduces the time available for students to dedicate to valuable extra-curricular activities (which are an important part of the learning and development of young people to prepare for post-18 progression) and risks disadvantaging students who have part-time work commitments or caring responsibilities.

Question 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.

A key internationally recognised benefit of A levels currently is the depth of content that they cover that effectively supports progression. We need to ensure that enough depth can still be covered, even when the number of subjects studied is broadened, to allow for smooth transitions to undergraduate level study (especially important for STEM subjects).

If depth is compromised at level 3, universities would need to consider how they deliver the content required for qualifications at levels 4 and above. Possible consequences could be a need to adjust undergraduate curricula to cover additional content which could risk reducing the content and depth that can be covered at undergraduate level in a typical 3 year full-time degree. Such a shift would also have resource implications for university teaching staff. Therefore, sufficient consideration

would need to be given to preparedness for degree-level study from the ABS to ensure that barriers to higher education progression are not created.

Question 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.

EEP activities offer a valuable opportunity to expose students to a variety of post-18 pathways and raise aspirations, including to higher education. EEP activities could be important in offering students the opportunity to gain experience in potential future careers (such as volunteering) or areas of educational interest (to include in their personal statements).

If the balance is right, it would improve equality of opportunity to include this within the ABS curriculum so that students are equally able to access these opportunities via their school. However, it is also important to remain mindful of the impact of an expanded curriculum on students who have responsibilities outside of education (such as part-time work or caring responsibilities).

EEP activities can also be used to help students develop valuable life skills needed for the transition to independent living post-18, such as personal finances and building mental health resilience.

Chapter 2: Section 3

Question 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?

Whilst we broadly support the principles behind the English and maths ABS offer, we believe that more thought needs to be given to the pre-16 English and maths curricula and achievement. It is unlikely that changes at this late stage in the educational journey will be sufficient to improve attainment. Further, it is important that there are not such a multitude of English and maths options available as to undermine the wider policy aims of ABS to provide a simple, clear offer to students.

Question 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.

We broadly support the proposed focus on applied skills for maths and English as components of the ABS. It is important that these applied skills are future-facing, taking into account how future technological developments might change how learners and workers are expected to utilise maths and English skills (for example, embracing the use of generative AI as a tool in developing written communications). Accessible options of English and maths (such as the existing Core Maths Level 3 qualification) will be important to prevent locking out learners from progression.

Again, it is important that the maths and English offer at 16–19 is not considered in isolation but builds on knowledge and skills developed pre-16 and prepares learners for progression into post-18 pathways. Particularly for progression to STEM pathways, it will be important that there remains a ‘stretch’ component to the maths offer at 16–19 beyond applied knowledge, akin to the current option of Further Maths A level for example.

Having said that, there should not be such a multitude of maths and English options such that it becomes confusing for learners or that 16–19 education providers are not able to offer all the options. IAG will be important for learners and universities so that there is a shared understanding of which maths and English options will be required for progression to higher education courses.

Question 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?

It is important that the English and maths offer can be both accessible and stretching, depending on the learner, if it is to be a compulsory component of the ABS. Performance in English and maths should not lock out learners from progression if they have otherwise displayed strong achievement in other subjects, and therefore it should be considered how English and maths components can be accepted through coverage in other subject curricula. In addition, there should not be such a multitude of options as to create a confusing system for learners and wider stakeholders, including employers.

Question 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.

Despite a key aim of the ABS being to increase the breadth of subjects that students will study at Level 3, it is not clear that these proposals will actually achieve a meaningful increase of breadth given that most students will study 5 subjects with the compulsory inclusion of English and maths. Instead, there could be continued clustering of subject choices as now exists within the A level system (such as around sciences), or that discordant subject choices could be made that do not provide opportunities for meaningful progression pathways. Effective information and guidance will be essential for students making their ABS subject choices to ensure that they sufficiently allow for future ambitions.

Chapter 3

Question 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.

Whilst we support assessment that is rigorous and reduces burden, the design of the ABS will need to capture both summative and formative assessment. If the assessment principles are too rigid then they will not take into account the diversity of subjects and content that the ABS will cover, nor equip the learners of the future for progression beyond school and in the workplace. Universities assess students through a diversity of mixed methods beyond summative examinations, and it is important that students arrive at university prepared for that.

Question 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.

We support these grading principles. Any system will need to balance the needs of learners, employers, and FE and HE providers. For learners, it is important that the grading system allows them to have a clear reflection of their achievement in the ABS. For employers, they need to understand and recognise the grading system in

order to have mass buy-in to the ABS system. For FE and HE providers, embedded understanding of the grading system is essential for them to be able to support progression from the ABS to further study.

Question 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?

We support students receiving individual grades or marks for each subject studied within the ABS so that students can understand their achievements. This will be essential for higher education providers to make informed admissions decisions and understand the capabilities of prospective students in the subjects relevant to their chosen courses.

Question 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?

We are unsure what added value an overall ‘ABS award’ could bring. For higher education providers the focus is likely to be on the individual component grades, in fact an overall award could complicate matters by obscuring achievement in individual subjects. It could also make entry requirements more complicated for learners to navigate, given universities are still likely to defer to individual subject achievements. However, we recognise there may be other benefits to both learners, schools, and employers. Therefore, more details would be needed to consider the value of the overall award, such as indicating engagement or a certain level of attainment in EEP activities, and what the implications for tariff points would be of an overall ABS award.

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

As above, we don’t believe there is significant value of having an overall ABS award.

Question 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

Of the proposed options, we would prefer option 1 of a certificate or statement of achievement with minimum attainment conditions, although we are not yet clear on what the 'overall ABS' award would add beyond individual grade breakdown. We would not support an aggregate ABS score or grade, since this can obscure differences in attainment between subjects and draw unhelpful equivalences.

Question 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.

University admission offer-making is a sophisticated and nuanced practice based on the university having a track record of student behaviour and achievement. A practical way of ensuring this is by having some achievement to the ABS build up within year 1 of the programme, offering institutions access to evidenced attainment of applicants. It is important that work is done with universities to build a shared understanding of how previous grading of achievement maps onto any new qualification, to ensure that ABS can be fully embedded into complex offer-making practices.

It is also important to consider how the ABS would carry tariff points, especially given the change in size of content covered in comparison to current A levels. An unintended consequence of this could be that ABS students are able to achieve fewer maximum tariff points across their three major subjects compared to A level students taking three subjects, thus putting the ABS students at a disadvantage in getting high tariff offers.

Chapter 4

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

The current 16–19 education landscape offers a diversity of qualification levels and types to cater to different types of learners. T levels being based on a set of employer standards means that employers have influence over skills development at the 16–19 stage. A levels are widely understood by employers and HE providers and well recognised for their rigour, thus meaning that prior achievement can be understood and facilitate progression to employment or higher education.

Question 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?

There is currently a shortage of teaching staff, particularly in maths. To deliver the compulsory core as well as the increased guided learning hours proposed in the ABS, significant resource will have to be dedicated to attract, train, and retain talented teaching staff. More universities should be encouraged back into offering initial teacher training (ITT) to help address the undersupply of high quality teachers. Likewise, more students should be encouraged into undertaking teacher training to secure the pipeline of teacher workforce. To boost retention of teachers, there should also be investment in Continuing Professional Development (CPD) for teachers on the job and concerns about teacher workload addressed in order to improve the attractiveness of the teaching profession. This is essential (starting from now) to achieve an effective transition to the ABS system and secure a sustainable future for the education system.

Chapter 5

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

It is important that the 16–19 educational stage is well-integrated and aligned with the aims and principles of the rest of the UK educational system. To raise attainment in English and maths at 16–19, more attention will have to be given to these subjects and their respective curricula pre-16. A broader range of subjects may also need to be considered pre-16 to allow for pathways into a broadened 16–19 offering under ABS, which will have implications for learners in areas without provision in certain subjects. To improve this, there might be a need for increased sharing of resources between FE colleges, schools, and sixth-form colleges.

Most importantly, effective information and guidance about the ABS and the progression options from it must be widely delivered to teachers, advisers, parents and pupils so that students can be empowered to make choices about the ABS that will facilitate their chosen progression pathway post-18. To deliver this crucial IAG effectively, upfront resource from government and others will be required.

Question 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.

Universities should be included in the design and implementation of IAG delivered to students making choices about their ABS programme or apprenticeship so they can make informed decisions in how their choices can facilitate future ambitions to higher education.

Question 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.

It is worth bearing in mind the impact that an increased curriculum and teaching hours will have on students who might have additional responsibilities outside of the classroom, including part-time employment or caring responsibilities.

Question 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.

Higher education providers must be a part of the wide-ranging IAG needed to effectively embed the ABS into the wider education landscape. Universities will need to understand how ABS maps onto other qualifications and measures of achievement to make admissions decisions, and students must understand how their choices within the ABS programme can facilitate progression to higher education.

Question 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.

The name of the new qualification is misleading, since despite being called 'British' it would primarily only apply in England due to the devolution of education across the home nations. It is important that the name of the new qualification accurately captures what it delivers, especially for an international audience.

Having said that, it is clear that any reform of Level 3 in England would have implications for the devolved administrations and thus it is important that the government commits to close working with respective governments in Scotland, Wales, and Northern Ireland, not least so that no learner in the UK is disadvantaged by reforms.