Department for Education

The Advanced British Standard

Our plans to change education for 16 to 19 year old students

Survey

Tell us what you think by 20 March 2024.

What this survey is about.

We are the Department for Education, part of the UK government.

We make sure **all** children and young people get a good education.

The **Advanced British Standard** is a new type of qualification for students aged 16 to 19 years old.

We call it the **ABS** for short.

Our ABS guidance booklet in Easy Read tells you about our plans for the ABS.

Please read it before you do this survey.

Tell us what you think about our plans for the ABS by filling in this survey.

We will use what you tell us to make our plans better.

This is the **Easy Read** version of the Advanced British Standard consultation.

When you have finished, please email your Word survey to ABS.consultation@education.gov.uk

Or you can print and fill in the paper survey. Then post it to

Advanced British Standard Consultation Team
Department for Education
Sanctuary Buildings
20 Great Smith Street
London SW1P 3BT

You can also fill in the standard survey on our website at https://consult.education.gov.uk/advanced-british-standards-directorate/the-advanced-british-standard/

The standard survey is **not** in Easy Read.

If you have any questions about this consultation or survey you can email ABS.consultation@education.gov.uk

Please send us your answers by 20 March 2024.

You can miss out any questions that you do not want to answer.

Questions about you

	**Question 1.** What is your name?
	Stella Fowler
	**Question 2.** What is your email address? We are asking for it so we can contact you if we want to know more about your answers. You do **not** have to give us your email.
	s.fowler@epc.ac.uk

	**Question 3.** Are you happy for us to email you about your answers?
	Yes ☒ No ☐

	**Question 4.** Are you doing this survey for
	• yourself? ☐ • an organisation? Like a charity. ☒

If you are doing this survey for yourself, go to question 7.

If you are doing this survey for an organisation, please now answer question 5 and question 6.

	**Question 5.** Only answer if you are doing this survey for an organisation. What is your organisation called?
	Engineering Professors' Council

	**Question 6.** Only answer if you are doing this survey for an organisation. What do you do in the organisation?
	Policy and Research Director

Please now go to question 8.

Question 7.

Only answer if you are doing this survey for yourself.

Tick 1 box that is the most important for this survey.

Are you…

A student, pupil, or learner? ☐

A parent or carer? ☐

A teacher, tutor, or lecturer? ☐

A researcher or education expert? ☐

An employer? ☐

Someone who advises people about jobs and work? ☐

Something else?
Tell us in the box below. ☐

Write here

	This survey is **confidential**. **Confidential** means not sharing your information with other people. You can tell us not to share your name or organisation with anyone.
	**Question 8.** Would you like us to keep your name or organisation confidential?
	Yes ☐ No ☒
	**Question 9.** If you said yes in question 8, please tell us why in the box below.
	Write here

Questions about chapter 1 – the aims of the ABS

	**Question 10.** How much do you agree with our main aims and ideas for the ABS?
	I really agree ☐ I mostly agree ☒ I do not mind ☐ I mostly do not agree ☐ I really do not agree ☐ I do not know ☐

	**Question 11.** What do you think is the most important thing that the ABS could make better?
	A wider curriculum to 18 is welcome, given the extent to which the UK – and England especially, is an outlier among developed countries in both the age and extent that learning tends to become specialised and narrow. Even though Engineering is often thought of as being specialist with a high need for Maths and Physics, it benefits from breadth at least as much as other disciplines and more than many. Good engineers are mathematicians, physicists, designers, business people, ethicists, psychologists and much else besides. Universities leading the way for change in the HE engineering sector in 2019 identified the need for

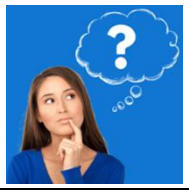
	greater interdisciplinarity as a key lever for readiness to address modern workplace challenges and global issues . However, the opportunities and risks of moving away from the UK's well-developed model need to be fully understood.

	**Question 12.** You can tell us anything else you want to say about Chapter 1 in the space below.
	The continued division of academic and technical routes (aka the divide between ABS and ABS occupational) perpetuates the longstanding binary academic and technical divide. This does nothing to create parity of progression, but rather reasserts disparity. a. The distinction is unnecessary, why not simply let students choose minors, majors and double majors, some of which may be aligned to IfATE standards and some of which may be focused more on transferable skills and attributes? b. The focus should be on establishing the benefits of a unified pathway – albeit with different mixes of more academic and occupational elements –, to key stakeholders, principally the students. Reforms may particularly disadvantage those providers who support the very students this proposal has at its heart. A revolutionary approach to the entire 16-19 curriculum (and beyond) creates instability and presents significant risk to a generation (or more) who will experience what is, in effect, an experimental education. That does not mean that innovation is not possible or welcome, but that it should advance slowly and incrementally. We must build a system with disadvantaged students and students with SEND in mind. a. There is little evidence that the proposed ABS will close the gap for SEND and disadvantaged pupils. b. Continual changes to accommodate non-A level students has created an uneven policy environment for providers (at all levels) that attract and support non-traditional learners. A perpetual cycle of learning and

	relearning to accommodate non-traditional pathways represents a tax on those responding most rapidly to change. c. This is compounded by punitive OfS HE metrics which discourage risk-taking and places responsibility for change-making on 'recruiting' universities. d. The current conflation of levels 2 and 3 is unclear and not well considered; this will disproportionately affect disadvantaged and SEND pupils. e. Government should consider an inclusive Universal Design for Learning approach which understands and pre-empts the needs of all pupils from the outset. f. Good change management might include an "assess, plan, do, review" approach including small pilots before scaling up. Continual reassessment is required to avoid the assumption that implementation of a new system will solve all problems. g. The culture change needed at levels 2 and 4+ is understated in the proposals. Students and their advisers may find it difficult to navigate between divisions, specialisms and generalisations. Resolving the teacher crisis is a critical dependency to the success of this initiative. There must be progress on teacher recruitment and retention before ABS can be introduced. a. More teaching time requires more teachers. However, there are well documented teacher recruitment and retention problems, especially in Maths and Physics. b. The introduction og a set of radical changes will not merely require a teaching workforce at full normal capacity, but a workforce with some in-built superfluity to manage change. c. EPC research shows that a future pipeline imperative, the students' own interests, and collaboration with university careers services are all key to encouraging graduates to become Physics teachers. d. Regional disparities in subject availability are problematic in Engineering, where single Science GCSEs and Maths / Further Maths A level are not consistently

	available. e. The proposed development timetable must be properly supported by a flexible and longer-term implementation timetable. There must be regular milestones for progress and if those milestones are not met, ABS introduction must be postponed accordingly. Any government that wishes to introduce such radical curriculum change must first be held to account to be on track to provide the teaching workforce to deliver such changes effectively.

Chapter 2 questions – how students will study

	**Question 13.** Level 3 ABS has 2 programmes. How much do you agree with these plans?
	I really agree ☐
	I mostly agree ☐
	I do not mind ☐
	I mostly do not agree ☐
	I really do not agree ☒
	I do not know ☐

	**Question 14.** Level 2 ABS has 2 programmes. How much do you agree with these plans?
	I really agree ☐
	I mostly agree ☐
	I do not mind ☐
	I mostly do not agree ☐
	I really do not agree ☒
	I do not know ☐

	**Question 15.** You can tell us anything else you want to say about Level 2 ABS in the space below.
	The current conflation of levels 2 and 3 is unclear and not well considered; this will disproportionately affect disadvantaged and SEND pupils. The continued division of academic and technical routes (aka the divide between ABS and ABS occupational) perpetuates the longstanding binary academic and technical divide. This does nothing to create parity of progression, but rather reasserts disparity. a. The distinction is unnecessary, why not simply let students choose minors, majors and double majors, some of which may be aligned to IfATE standards and some of which may be focused more on transferable skills and attributes? b. The focus should be on establishing the benefits of a unified pathway – albeit with different mixes of more academic and occupational elements –, to key stakeholders, principally the students.

	**Question 16.** Do you have any ideas how we can support students in the 1 year Transition Programme to move up to Level 3?

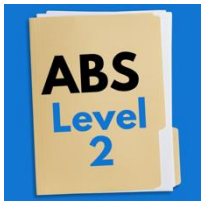
	Write here

Question 17.

What levels do you think we should have in the ABS?

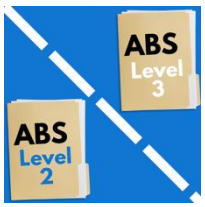
Tick 1 box only.

Both Level 2 and Level 3 in the ABS.
But it does not need to say what level a student is. ☐



Both Level 2 and Level 3 in the ABS.
But it should say if a student is Level 2 or 3. ☐

Level 2 programmes should have a different name. ☐



Level 2 programmes should be separate from Level 3. ☒

I do not know. ☐

	**Question 18.** How much do you agree with our plans for Level 1 and Entry Level students?
	I really agree ☐ I mostly agree ☐ I do not mind ☐ I mostly do not agree ☐ I really do not agree ☐ I do not know ☒

	**Question 19.** Do you have any ideas how extra teaching time can be used to support Level 1 and Entry Level students?
	Resolving the teacher crisis is a critical dependency to the success of this initiative. There must be progress on teacher recruitment and retention before ABS can be introduced. a. More teaching time requires more teachers. However, there are well documented teacher recruitment and retention problems, especially in Maths and Physics. b. The introduction of a set of radical changes will not merely require a teaching workforce at full normal capacity, but a workforce with some in-built superfluity to manage change.

	c. EPC research shows that a future pipeline imperative, the students' own interests, and collaboration with university careers services are all key to encouraging graduates to become Physics teachers. d. Regional disparities in subject availability are problematic in Engineering, where single Science GCSEs and Maths / Further Maths A level are not consistently available. e. The proposed development timetable must be properly supported by a flexible and longer-term implementation timetable. There must be regular milestones for progress and if those milestones are not met, ABS introduction must be postponed accordingly. Any government that wishes to introduce such radical curriculum change must first be held to account to be on track to provide the teaching workforce to deliver such changes effectively.

	**Question 20.** In the future, all students will do the ABS instead of other Level 3 courses like A Levels and T Levels. What do you think about this?
	To limit and curtail qualification choice at level 3 requires a radical overhaul of the existing content and structure of current A levels and T levels. The DfE must satisfy itself and the sector that other level 3 qualifications, such as BTECs, do not serve an important purpose which will be lost in implementation of the ABS. a. In Engineering, BTECs provide a stable, tested pathway to employment, particularly for disadvantaged learners. EPC research has shown that they are an effective driver of social mobility. b. Inconsistency of content and approach between A level exam boards has evolved an industry of provider decision-making re: 16-19 A level (and other) provision. The impact of an unknown landscape on pupil opportunity and success must be appraised. c. The challenges presented by the mutual exclusivity of knowledge within A level exam boards presents difficulties with interdisciplinarity. Addressing this is particularly important given the proposed "unique" qualification for any given subject. d. Technical routes are still less well understood by most stakeholders (learners, educators, shools, colleges, parents, universities and employers) than traditional pathways. An understanding of the significant problems that T levels are encountering, including capacity in the system for industry placements (particularly at a regional level), is essential. e. Employer-led Apprenticeship and T level development has led to narrow Standards representing a small number of large employers (with SME interests largely sidelined). We urge caution on overdependency on employers specifying what they want/need;their tendency will be to consider short term labour market undersupply and to act in their own interests. Meeting

	employers' short-term interests may often be a cheaper or quicker alternative for them than investment in technology and/or more efficient processes. However, by the time Standards start to deliver a workforce trained to the supposed needs, the investment may well have been necessitated and the labour shortfalls addressed. It is critical to be into the development of new qualifications and Standards voices that will represent the interests of learners over the longer term – their career lifetime, for which they need to acquire flexible and resilient skills that can develop over as circumstances and the labour market change. f. The proposed circa 70-90% and 50% coverage for each A level subject (majors and minors, respectively) and presumably reduced T level content, will impact on readiness for HE. A forensic subject-by-subject analysis is essential for all stakeholders to understand the standards in each. This cannot be left to HE to work out post-admission.

	**Question 21.** How much do you agree with how students can choose subjects for the Level 3 ABS programmes?
	I really agree ☐
	I mostly agree ☒
	I do not mind ☐
	I mostly do not agree ☐
	I really do not agree ☐
?	I do not know ☐

	**Question 22.** How much do you agree with how students can choose subjects for the Level 2 ABS programmes?
	I really agree ☐ I mostly agree ☐ I do not mind ☐ I mostly do not agree ☐ I really do not agree ☐ I do not know ☒

	**Question 23.** Do you have anything else you want to say about Level 2 or Level 3 subjects?
	We welcome greater Engineering's presence in the curriculum, but urge that government works with HE providers and subject experts to ensure that a single subject approach is fit for purpose and supports progression. a. This includes supporting opportunities for new subjects to plug existing skills gaps. b. The examples provided in the consultation appear to label engineering as an occupational route (through double majors). If occupational and academic subjects are mutually exclusive, how might the pathway vary

	between Engineering disciplines? c. Current IfATE Engineering standards should be reviewed as some are seen as too narrow. This arises because the development of a standard has been led by a small number of employers who base it on their experience of needs. Once a Standard has been established, competing Standards cannot be recognised. However, if the Standard does not reflect the wider needs of employers and the apprentices' need for skills, knowledge and behaviours, then the Standard blocks the space for a more widely appropriate standard. This should be reviewed to allow greater flexibility. A future-proof education system must recognise the importance of personal attributes that ensure our next generation is work ready (e.g., entrepreneurial, inquisitive, collaborative and ethical). 21st century 16-19 education should not be based only on knowledge and skills. a. There is ambiguity within the proposals around the distinction between skills and knowledge, and the value of this. b. A broader curriculum that focusses less on imparting knowledge and more on developing attributes might be delivered without a significant demand for more "teachers". c. There is an opportunity to learn from Engineering's development and regular review of AHEP, which has recently considered in detail the role and emphasis on skills and knowledge required to be a successful Engineer.

Question 24.

We plan to make sure students can spend more time with teachers.

This is instead of learning on their own.

How much do you agree with these plans?

I really agree	☐
I mostly agree	☒
I do not mind	☐
I mostly do not agree	☐
I really do not agree	☐
I do not know	☐

Question 25.

Do you have anything else to tell us about how many hours students should get for each subject?

Like if students should have the same amount of time for each subject.

Resolving the teacher crisis is a critical dependency to the success of this initiative. There must be progress on teacher recruitment and retention before ABS can be introduced.

a. More teaching time requires more teachers. However, there are well documented teacher recruitment and retention problems, especially in Maths

	and Physics. b. The introduction og a set of radical changes will not merely require a teaching workforce at full normal capacity, but a workforce with some in-built superfluity to manage change. c. EPC research shows that a future pipeline imperative, the students' own interests, and collaboration with university careers services are all key to encouraging graduates to become Physics teachers. d. Regional disparities in subject availability are problematic in Engineering, where single Science GCSEs and Maths / Further Maths A level are not consistently available. e. The proposed development timetable must be properly supported by a flexible and longer-term implementation timetable. There must be regular milestones for progress and if those milestones are not met, ABS introduction must be postponed accordingly. Any government that wishes to introduce such radical curriculum change must first be held to account to be on track to provide the teaching workforce to deliver such changes effectively.

	**Question 26.** Do you have any ideas about how to make **EEP** sessions better for students? **EEP** are activities that help students get skills for work and life. We want your ideas about how we can help students who need extra support.
	There is a valuable opportunity here to decompartmentalise the curriculum to harness the golden threads of education and join up all components within a unified approach. As currently proposed, the ABS framework does not appear to be aiming to realise that opportunity. a. EEP (including study skills) is currently commonly operationalised as an add-on, which is not assessed and is undervalued by learners or educators. EEP should be embedded in learning, instead of – or as well as – being a separate element. b. There is evidence that reflection and critical skills for metacognition are essential to good pedagogy and learning. A greater focus on independence and independent thinking, including self-led learning can be regarded on a spectrum or as progression (noting that there are inclusivity considerations here). c. CEIAG should be continuous (starting from an early level and ongoing throughout every educational stage) and contiguous (building incrementally on previous interventions and learning). d. Employability should focus on wide and reflective careers and skills education rather than repetitive "meet an employer" activities. These are useful, but need to be conducted within a metacognitive framework of understanding, otherwise for most students, most encounters with employers feel tangential if they are not specific to an idea they already hold about what they might want to consider doing. Ideally, all employer engagement should feel pertinent to all students

	because they are able to reflect on common features of employability rather than on the specifics of a potentially irrelevant job.

	**Question 27.** Do you have any ideas about • how we can get more employers to offer work placements to students? • what other support schools and colleges will need to help find work placements for students?
	Write here

	**Question 28.** How much do you agree with our principles for English and maths?
	I really agree ☐
	I mostly agree ☐
	I do not mind ☒
	I mostly do not agree ☐
	I really do not agree ☐
	I do not know ☐

	**Question 29.** How much do you agree with our plans for knowledge and skills for maths and English?
	I really agree ☐
	I mostly agree ☐
	I do not mind ☒
	I mostly do not agree ☐
	I really do not agree ☐
	I do not know ☐

	**Question 30.** How much do you agree with our plans to have majors and minors for English and maths at ABS Level 3?
	I really agree ☐ I mostly agree ☒ I do not mind ☐ I mostly do not agree ☐ I really do not agree ☐ I do not know ☐

	**Question 31.** We want to help 16 year olds who got low marks in English and maths to go on to study these subjects at Level 3. Have you got any ideas on the best way to support them?
	A broader base and higher quantity of Maths at level 3 is welcomed in Engineering but we have reservations about making it compulsory. The term 'Maths' is off-putting to many (and is highly abstract), but functional numerical and data literacy is a skill for life and work. Similarly, English as an academic subject of study will encourage disengagement among some learners, but functional English as a tool for communication, rhetoric, developing empathy and creativity is valuable and may support an interdisciplinary development of skills. The devil will be in the detail, which is not yet available.

	a. Clarity and transparency are needed around who the Maths and English minors are for and what purpose they serve. b. What is meant by English and Maths, and their labels, should be fully considered. A broader base of functional and contextualised applied English and Maths for life is very different to a higher quantity of theoretical, abstract maths in preparation for, say, Engineering, Economics, or Science. Do we mean statistics, data literacy, digital skills (notable by their absence)? c. HE should be invited to help design Maths minors courses, in the same way that employers have for T levels. d. How compulsory English and Maths can for all work for everyone when some subjects are not suited to everyone warrants further consideration. Compulsory study doesn't widen the appeal, especially for those with strong passions or competencies elsewhere. It may also create a obstacle for progression for certain students who may even excel in all other areas.

	**Question 32.** We want to help students on the Occupational programme to do better at English and maths. Have you got any ideas on the best way to support them?
	A broader base and higher quantity of Maths at level 3 is welcomed in Engineering but we have reservations about making it compulsory. The term 'Maths' is off-putting to many (and is highly abstract), but functional numerical and data literacy is a skill for life and work. Similarly, English as an academic subject of study will encourage disengagement among some learners, but functional English as a tool for communication, rhetoric, developing empathy and creativity is valuable and may support an interdisciplinary development of skills. The devil will be in the detail, which is not yet available. a. Clarity and transparency are needed around who the Maths and English minors are for and what purpose they serve. b. What is meant by English and Maths, and their labels, should be fully considered. A broader base of functional and contextualised applied English and Maths for life is very different to a higher quantity of theoretical, abstract maths in preparation for, say, Engineering, Economics, or Science. Do we mean statistics, data literacy, digital skills (notable by their absence)? c. HE should be invited to help design Maths minors courses, in the same way that employers have for T levels. d. How compulsory English and Maths can for all work for everyone when some subjects are not suited to everyone warrants further consideration. Compulsory study doesn't widen the appeal, especially for those with strong passions or competencies elsewhere. It may also create a obstacle for progression for certain students who may even excel in all other areas.

	**Question 33.** Do you have any ideas on how we can use Level 2 courses like GCSEs in the new Level 2 ABS?
	Write here

	**Question 34.** Do you have any idea about our plans in Chapter 2?
	Write here

Questions about chapter 3 – tests and grades

Question 35.
Our ABS aims and principles help us test students doing the ABS.

How much do you agree with these?

☺	I really agree ☐
☺	I mostly agree ☐
😐	I do not mind ☐
☹	I mostly do not agree ☒
☹	I really do not agree ☐
?	I do not know ☐

	**Question 36.** How much do you agree with our plans to grade students' work on the ABS?
	I really agree ☐
	I mostly agree ☐
	I do not mind ☐
	I mostly do not agree ☒
	I really do not agree ☐
?	I do not know ☐

	**Question 37.** How much do you agree with our plan to give grades for each major and minor subject that students do on the ABS?
	I really agree ☒
	I mostly agree ☐
	I do not mind ☐
	I mostly do not agree ☐
	I really do not agree ☐
?	I do not know ☐

	**Question 38.** Do you agree that students should get the ABS Award as well as grades for each subject? Tell us why.
	A single grade for the ABS would be highly reductive and unhelpful. It would risk raising the stakes without adding value. a. The heuristic nature of an overall score is not in the interests of pupils; more detailed information will ensure a better match in employment or study progression. b. Grading is not necessarily an either/or approach; there may be scope for 'achieving ABS' (like high school graduation in the US or passing the Abitur in Germany), accompanied by a more detailed report. Individually graded elements and an overall summary, or GPA should be provided. c. A breakdown of module-based scores would allow for students who have a lower overall score to demonstrate module specific speciality when discussing employment opportunities and further employment. d. Level 2 and 3 information is helpful to support transition, recruitment and selection (data suggests GCSEs are a better indicator of HE performance than A levels). e. How grading will be presented to universities (i.e. transcript based) requires further consideration. f. A compulsory pass for compulsory minors may narrow opportunities rather than increase them; it may be worth exploring arrangements for 'compensation' and 'condonement' arrangements in terms of overall achievement. g. The increased focus on providing grading that is consistent across subjects is welcome. However there needs to be greater clarity about how the DFE will achieve this given current inconsistencies in grading.

Question 39.

What grades should a student need to get a Level 3 ABS award?

Tick one box only

1 Students should pass all subjects at Level 3. But they only need Level 2 for English and maths. ☐

2 Students should pass English, maths, and all other subjects at Level 3. ☐

3 Students should pass some majors and some minors. For example, 3 majors and 1 minor. ☐

4 When you add a student's grades together, it is above a minimum score. ☐

5 Students should not need to pass a minimum number of subjects. ☐

I do not know. ☒

Something else. Please tell us below. ☐

Write here

	**Question 40.** Which of the 3 ideas for the ABS Award on page 16 of the consultation booklet do you like the most?
	We prefer a combination of ideas 2 and 3. Grading is not necessarily an either/or approach; there may be scope for 'achieving ABS' (like high school graduation in the US or passing the Abitur in Germany), accompanied by a more detailed report. Individually graded elements and an overall summary, or GPA should be provided. A breakdown of module-based scores would allow for students who have a lower overall score to demonstrate module specific speciality when discussing employment opportunities and further employment. How grading will be presented to universities (i.e. transcript based) requires further consideration. A compulsory pass for compulsory minors may narrow opportunities rather than increase them; it may be worth exploring arrangements for 'compensation' and 'condonement' arrangements in terms of overall achievement.

	**Question 41.** Do you have any other ideas on how to test and grade students?

	There is a crucial need and opportunity to look radically at the way we view and implement assessment at level 3. Flexible and innovative assessment sits pedagogically well within a modular structure. a. More teaching time, more subjects and greater summative exam load places unrealistic pressure on learners. This will come at a cost to the wellbeing of some young people, particularly the disadvantaged and SEND pupils who are supposed to be helped most. b. Exams are not the only measure and, arguably, they are not the best. They correspond poorly to most activities in careers and support students who can retain knowledge for the duration of the exam, rather than exhibiting aptitude and understanding over time. A diverse model of assessment that still includes exams, but also other forms of assessment might better reflect learning that is useful beyond the classroom. c. If we are prepared to countenance a radical shake-up of structure, curriculum and content, we should be willing to explore more innovative (or at least less antiquated) forms of assessment: continual assessment, practicals, project work, teamwork, self-assessment, peer assessment, average of multiple lower stakes exams, etc should all be considered credible approaches, especially in the light of both the challenges and opportunities of AI in assessment. 2.1 What are the most important factors we should consider when thinking about the assessment of the ABS? 1. It is essential to ensure that the ABS brand as well as the skills, knowledge and application of those, at each major and minor component, and each grade within, is well understood nationally and internationally. a. Ensuring that ABS is recognised across all four UK administrations and that its assessment, awarding and grading is understood across different education phases and the UK as a whole. b. Ensuring that ABS is recognised globally and that its

	assessment, awarding and grading is understood in the context of compatibility with international qualifications. This includes caution in maintaining the rigor of STEM subjects to ensure that students continue to attain the current standard of STEM proficiency and knowledge required for university admission as well as the workplace. c. Technical routes are still less well understood by most stakeholders and work should be undertaken centrally to address this. Existing technical education reforms not yet fully rolled out have created an uneven policy environment for providers (at all levels) tantamount to a tax on those responding most rapidly to change (those providers that attract and support non-traditional learners). This imbalance and burden needs to be addressed (including disadvantage through funding and HE success metrics) d. A forensic subject-by-subject mapping of standards, content and competency at each level of attainment is an important part of the rollout of new qualifications. This is not something to be established by onward education or employment partners post admission if decisions are to be non-experimental. e. The ABS assessment should not encompass level 2 work: it would be inappropriate and misleading. 2. There is a crucial need and opportunity to look radically at the way we view and implement assessment at level three. Flexible and innovative assessment sits pedagogically well within a modular structure. a. A radical shake up of assessment is more appropriate and more palatable than an overhaul of the 16-19 curriculum per se. Assessment, like the curriculum, should be considered holistically across the lifespan and benefit from continuous improvement. b. The principle to reduce assessment burden is admirable. However, additional breadth (teaching and learning load) on pupils will create an increased summative exam load which places unrealistic pressure on learners and a higher-stress, single point, assessment scenario than the current system. This will come at a cost

	to the wellbeing of some young people, already a concern, particularly for the disadvantaged and SEND pupils who most need support. c. Exams are not the only measure and, arguably, they are not the best. Summative assessment is not conducive to reflective practice. Continuous assessment, on the other hand, gives the learner an idea of where they are at key touchpoints, and they are not just left panicking at the end of the year. d. Summative examinations support students who can retain knowledge for the duration of the exam, rather than exhibiting aptitude and understanding over time. A diverse model of assessment that includes other approaches might better reflect learning that is useful beyond the classroom. e. Exams correspond poorly to most activities in careers and final summative examinations only is not a valid assessment method for real-life; a balance of assessment should be used to include examinations but also report writing, presentations and other formats to better prepare students for real-life situations and university studies. f. Employment is not assessed by examination and proliferation of approaches is key to mirroring work environments; educational assessment needs to keep up or will be obsolete before implementation of these proposals is completed. g. We should be willing to explore the opportunities presented by authentic assessment: continual assessment; practicals; project work; teamwork; self-assessment; peer assessment; average of multiple lower stakes exams; etc should all be considered credible approaches, especially in the light of both the challenges and opportunities of AI in assessment. h. Assessment reform should be evidence based. There is now much best practice scholarly research in innovative assessment approaches, heightened by the pandemic response in higher education. Engineering, for example, now widely deploys project-based learning and assessment, broadening the outlook on how to tackle problems. i. Evidence suggests that timed, closed book,

	unseen, written exams discriminate against students with Specific Learning Difficulties and that the adjustments provided to redress this inequality fail to fully eliminate the awarding gap create a level playing field. 3. Subject choice can be a limiting factor and further steps should be taken to limit subject discrimination based on place or wider disadvantage. a. A higher profile of engineering in the 16 to 19 curriculum is welcomed. b. However, engineering is a wide discipline and should not be confined to a single subject in an academic and technical pathway silo. The proposals perpetuate the common misunderstanding of what engineering is. c. As the proposals acknowledge, it may be difficult for all providers to offer the full range of ABS subjects. Engineering and Construction T levels, for example, are not available to all learners in England. Closer scrutiny is needed to ensure that next steps are not compromised by regional disadvantages. d. The occupational subjects double major route could reasonably lead to university education, but the quality of the content may not align with pre-requisites for university entry at all providers. It is known that students from disadvantaged backgrounds are currently encouraged to do T-Levels and BTEC's rather than A levels, but this can reduce their choices when looking at university and other further study options. e. Autonomous university admissions are enshrined in law. Providers will need to be clear on major and minor subject components when stating entry requirements and making offers in accordance with their individual missions. f. The potential impact of compulsory minors in subjects like maths or English on students' university or employment applications is questioned, especially considering the potential "fail" label for an overall ABS and the possibility of disadvantaging students in areas in which they are less skilled. This should be addressed by an all-through approach to core subjects to inspire

	interest and confidence rather than a factory model at level three. 4. University involvement in the formation of the ABS is essential to ensure proper university buy-in to the reforms. Thinking around pathways to HE is notably under-developed within the proposals. The sector must prepare for an HE system which can successfully build on and accommodate both 'occupational' and 'theoretical' ABS routes the new schema. It's value and utility for progression to HE requires clarity on how ABS content and assessments align with university entry requirements (and vice versa). a. Universities will require robust content, skills and attributes information on all components of the ABS and evidence of its transferability on which to base their autonomous decision-making about admissions and curriculum development to accommodate the learners of the future. b. There are lessons to be learnt from T levels design and implementation. c. T levels were not originally conceived as a basis for HE progression; and HE understanding and acceptance reflects this (as evidenced by entry requirements to Engineering which sometime cite the unlikely combination of both T level and A level Maths). Occupational majors should be conceived as a potential route to HE from the outset. Most university courses are – to a greater or lesser extent – largely vocational or directly applicable to the working world. With a few exceptions, it is usually a false and damaging dichotomy to design pathways that are explicitly academic or occupational. d. To help universities understand Maths in T levels as suitable for HE Engineering, the EPC has undertaken a research project to unpick and better communicate to higher education institutions what maths is contained within the T level and to help admissions staff understand the T level as a teaching mechanism. The research has found that T levels contain lots of maths but that it is not as explicitly evidenced (when compared to A levels). There are gaps and an inherent trade-off between

	applied and explicit learning. Further work across all of level three is planned for 2024. This work should have been completed by government before the roll-out of T levels and we urge that similar mistakes are not made with respect to ABS. e. In the implementation period when mismatches will need to be ironed out, Foundation years in Engineering are likely to become more important, not less (we note that T level foundation years are a model to support transition in the consultation). The future of HE foundation years should be assured. 2.2 Should students receive an overall ABS award, in addition to individual subject grades? 1. A single grade for the ABS is unnecessary and would be highly reductive and unhelpful. It would risk raising the stakes without adding value. a. A grading system that is easily interpretable by higher education institutions, employers, and apprenticeship providers is needed. b. How grading will be presented to universities and employers (i.e. transcript based) requires further consideration. c. Employers and HE providers will wish to see subject specific achievement to know what their foundational ability is in the subjects that matter. d. Recognising individual components is essential to ensure HE curriculum suitability. e. It is also crucial that students receive grades for each major/minor to help with the HE admissions process. Providers may require a pre-requisite knowledge/grade from a specific major (and not worry too much about the others). A single summary grade would not best support the learner. f. A breakdown of module-based scores would allow for students who have a lower overall score to demonstrate module specific speciality when discussing employment opportunities and further employment. g. The heuristic nature of an overall score is not in the interests of pupils; more detailed information will ensure a better match in employment or study progression.

	h. Assessment methods such as GPA, individual component assessments, and overall assessments should be fully considered. Grading is not necessarily an either/or approach; there may be scope for 'achieving ABS' (like high school graduation in the US or passing the Abitur in Germany), accompanied by a more detailed report. Individually graded elements and an overall summary, or GPA should be provided. i. Evidence of grading models successfully applied internationally should be examined. j. A compulsory pass for compulsory minors may narrow opportunities rather than increase them; it may be worth exploring arrangements for 'compensation' and 'condonement' arrangements in terms of overall achievement. k. The increased focus on providing grading that is consistent across subjects is welcome. However there needs to be greater clarity about how the DFE will achieve this given current inconsistencies in grading and exam board curricula and grading strategies. A single exam board for the A level component may be desirable, but could cause unintended consequences.

Chapter 4 questions – changes for schools and colleges

	**Question 42.** What do you like about education for 16 to 19 year old students and think we should keep?
	In Engineering, BTECs provide a stable, tested pathway to employment, particularly for disadvantaged learners. EPC research has shown that they are an effective driver of social mobility.

	**Question 43.** We want to employ more teachers for the new ABS. What do you think could happen if we do this? These might be good or bad things.
	Resolving the teacher crisis is a critical dependency to the success of this initiative. There must be progress on teacher recruitment and retention before ABS can be introduced. a. More teaching time requires more teachers. However, there are well documented teacher recruitment and retention problems, especially in Maths and Physics. b. The introduction og a set of radical changes will not merely require a teaching workforce at full normal capacity, but a workforce with some in-built superfluity to manage change. c. EPC research shows that a future pipeline imperative, the students' own interests, and collaboration with university careers services are all key to encouraging graduates to become Physics teachers. d. Regional disparities in subject availability are problematic in Engineering, where single Science GCSEs and Maths / Further Maths A level are not consistently available.

	e. The proposed development timetable must be properly supported by a flexible and longer-term implementation timetable. There must be regular milestones for progress and if those milestones are not met, ABS introduction must be postponed accordingly. Any government that wishes to introduce such radical curriculum change must first be held to account to be on track to provide the teaching workforce to deliver such changes effectively.

	**Question 44.** What training will staff need to get ready for the ABS?
	Resolving the teacher crisis is a critical dependency to the success of this initiative. There must be progress on teacher recruitment and retention before ABS can be introduced.

	**Question 45.** We want to understand all the changes we might need to make for all students when the ABS starts. Like for students with SEND. What changes do you think we will need to make at schools and colleges? Like changes to buildings and transport.
	Government should consider an inclusive Universal Design for Learning approach which understands and pre-empts the needs of all pupils from the outset. The Government should take specialist advice from experts in designing space and working conditions for SEND and neurodivergent learners who may need support with sensory, organisational or other key factors to avoid discrimination. SEND support in schools is woefully underfunded and neurodivergent pupils chances of success are curtailed by the high-stakes assessment model which runs alongside the Equality Act. More teaching time, more subjects and greater summative exam load places unrealistic pressure on learners. This will come at a cost to the wellbeing of some young people, particularly the disadvantaged and SEND pupils who are supposed to be helped most. There is clear evidence that reasonable adjustments to summative, exam-based assessments do not level the playing field and disadvantage pupils with SEND and neurodivergence. There is little evidence that the proposed ABS will close the gap for SEND and disadvantaged pupils. Continual changes to accommodate non-A level students has created an uneven policy environment for providers (at all levels) that attract and support non-

	traditional learners. A perpetual cycle of learning and relearning to accommodate non-traditional pathways represents a tax on those responding most rapidly to change.

	**Question 46.** Do you have any other ideas about the changes that education providers might need to make for the ABS?
	If we are prepared to countenance a radical shake-up of structure, curriculum and content, we should be willing to explore more innovative (or at least less antiquated) forms of assessment. Education providers should be encouraged to explore continual assessment, practicals, project work, teamwork, self-assessment, peer assessment, average of multiple lower stakes exams, etc should all be considered credible approaches, especially in the light of both the challenges and opportunities of AI in assessment.

Chapter 5 questions – what the ABS will mean for all

	**Question 47.** What changes do you think we will need to make to education for students under 16 years old for the ABS to work well?
	The culture change needed at levels 2 and 4+ is understated in the proposals. Students and their advisers may find it difficult to navigate between divisions, specialisms and generalisations.

	**Question 48.** Do you have any ideas about how we can help students to make good decisions about their ABS or apprenticeship?
	CEIAG should be continuous (starting from an early level and ongoing throughout every educational stage) and contiguous (building incrementally on previous interventions and learning). Consultation thinking around pathways to HE is notably under-developed. This is a concern as it impacts heavily on student decision making from key stage 3. University involvement in the formation of the ABS is essential. The sector must prepare for an HE system which can successfully build on and accommodate the new schema. Universities will require robust content, skills and attributes information on all components of the ABS and evidence of its transferability on which to base their autonomous decision-making about admissions and curriculum development to accommodate the learners of the future. a. There are lessons to be learnt from T levels design and implementation. b. T levels were not originally conceived as a basis for

	HE progression; and university understanding and acceptance reflect this (as evidenced by entry requirements to Engineering which sometime cite the unlikely combination of both T level and A level Maths). Occupational majors should be conceived as a potential route to HE from the outset. Most university courses are – to a greater or lesser extent – largely vocational or directly applicable to the working world. With a few exceptions, it is usually a false and damaging dichotomy to design pathways that are explicitly academic or occupational. c. To help universities understand Maths in T levels as suitable for HE Engineering, the EPC has undertaken a research project to unpick and better communicate to higher education institutions what maths is contained within the T level and to help admissions staff understand the T level as a teaching mechanism. The research has found that T levels contain lots of maths but that it is not as explicitly evidenced (when compared to A levels). There are gaps and an inherent trade-off between applied and explicit learning. Further work across all of level 3 is planned for 2024. This work should have been completed by government before the roll-out of T levels and we urge that similar mistakes are not made with respect to ABS. d. Foundation years in Engineering are likely to become more important, not less (we note that T level foundation years are referenced in the consultation). Their future should be assured.

	**Question 49.** Do you have any ideas about the extra support students with SEND might need to do the ABS?
	Government should consider an inclusive Universal Design for Learning approach which understands and pre-empts the needs of all pupils from the outset. The Government should take specialist advice from experts in designing space and working conditions for

	SEND and neurodivergent learners who may need support with sensory, organisational or other key factors to avoid discrimination. SEND support in schools is woefully underfunded and neurodivergent pupils chances of success are curtailed by the high-stakes assessment model which runs alongside the Equality Act. More teaching time, more subjects and greater summative exam load places unrealistic pressure on learners. This will come at a cost to the wellbeing of some young people, particularly the disadvantaged and SEND pupils who are supposed to be helped most. There is clear evidence that reasonable adjustments to summative, exam-based assessments do not level the playing field and disadvantage pupils with SEND and neurodivergence. There is little evidence that the proposed ABS will close the gap for SEND and disadvantaged pupils. Continual changes to accommodate non-A level students has created an uneven policy environment for providers (at all levels) that attract and support non-traditional learners. A perpetual cycle of learning and relearning to accommodate non-traditional pathways represents a tax on those responding most rapidly to change.

	**Question 50.** Do you have any ideas about how we can support other groups of students that might have extra needs? For example, students who are carers.
	Write here

	**Question 51.** We want the ABS to help students to carry on with education after 18 if they want to. Do you have any ideas about how we can support ABS students to do this?
	Consultation thinking around pathways to HE is notably under-developed. University involvement in the formation of the ABS is essential. The sector must prepare for an HE system which can successfully build on and accommodate the new schema. Universities will require robust content, skills and attributes information on all components of the ABS and evidence of its transferability on which to base their autonomous decision-making about admissions and curriculum development to accommodate the learners of the future. a. There are lessons to be learnt from T levels design and implementation. b. T levels were not originally conceived as a basis for HE progression; and university understanding and acceptance reflect this (as evidenced by entry requirements to Engineering which sometime cite the unlikely combination of both T level and A level Maths). Occupational majors should be conceived as a potential route to HE from the outset. Most university

	courses are – to a greater or lesser extent – largely vocational or directly applicable to the working world. With a few exceptions, it is usually a false and damaging dichotomy to design pathways that are explicitly academic or occupational. c. To help universities understand Maths in T levels as suitable for HE Engineering, the EPC has undertaken a research project to unpick and better communicate to higher education institutions what maths is contained within the T level and to help admissions staff understand the T level as a teaching mechanism. The research has found that T levels contain lots of maths but that it is not as explicitly evidenced (when compared to A levels). There are gaps and an inherent trade-off between applied and explicit learning. Further work across all of level 3 is planned for 2024. This work should have been completed by government before the roll-out of T levels and we urge that similar mistakes are not made with respect to ABS. d. Foundation years in Engineering are likely to become more important, not less (we note that T level foundation years are referenced in the consultation). Their future should be assured.

	**Question 52.** We want the ABS to help young people get good jobs. Do you have any ideas how we can make sure the ABS is useful for employers?
	Employability should focus on wide and reflective careers and skills education rather than repetitive "meet an employer" activities. These are useful, but need to be conducted within a metacognitive framework of understanding, otherwise for most students, most encounters with employers feel tangential if they are not specific to an idea they already hold about what they might want to consider doing. Ideally, all employer engagement should feel pertinent to all students because they are able to reflect on common features of employability rather than on the specifics of a

	potentially irrelevant job. Exams correspond poorly to most activities in careers and support students who can retain knowledge for the duration of the exam, rather than exhibiting aptitude and understanding over time. A diverse model of assessment that still includes exams, but also other forms of assessment might better reflect learning that is useful beyond the classroom.

	**Question 53.** Do you have any ideas about what the ABS means for other groups of students over 16 years old doing other courses? For example • adult students in further and community education • students doing qualifications in other countries. Tell us in the space below.
	Write here

	**Question 54.** What do you think the ABS will mean for students with a protected characteristic? This can be good or bad.
	SEND support (which includes disability and mental health considerations) in schools is woefully underfunded and neurodivergent pupils chances of success are curtailed by the high-stakes assessment model which runs alongside the Equality Act. More teaching time, more subjects and greater summative exam load places unrealistic pressure on learners. This will come at a partuclar cost to SEND pupils who are supposed to be helped most. There is clear evidence that reasonable adjustments to

	summative, exam-based assessments do not level the playing field and disadvantage pupils with SEND and neurodivergence. There is little evidence that the proposed ABS will close the gap for SEND and disadvantaged pupils.

	**Question 55.** What do you think the ABS will mean for the environment? This can be good or bad.
	Write here

	**Question 56.** Do you want to tell us anything more about our plans in Chapter 5?
	Engineering at HE successfully attracts a high number and proportion of overseas students to the UK. If many of these will come with A levels used overseas, this may proffer them an advantage over home students with narrower science subject knowledge.

	**Question 57.** Do you want to tell us anything else about the ABS that we have not asked in this booklet?
	It is problematic that the scope of the Advance British Standard extends only to England. No mention is made of how this will be managed within a UK system. a. National and international parity is necessary. b. Authentic efforts will be needed to encourage the devolved administrations to make systems compatible.

	Please note that the we have also contributed to the NEPC consultation response and are broadly supportive of their narrative responses.

Thank you for doing our survey.

We will use what you say to make our plans for the Advanced British Standard better.

If you have any questions about this consultation, you can email ABS.consultation@education.gov.uk

Department for Education

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