

## A world class education system: The Advanced British Standard CST response to the consultation – March 2024

### Introduction

The Confederation of School Trusts (CST) is the national organisation and sector body for school trusts in England. This letter sets out CST's response to the Department for Education (DfE) consultation on the Advanced British Standard, opened on 14 December 2023 and closing on 20 March 2024.

CST represents 74% of all academy schools in England. This places us in a strong position to consider this issue from the viewpoint of the system's leaders in self-governing organisations (hereafter 'trusts'). CST is completely apolitical. We work with political parties and politicians across the spectrum to advance education for public benefit. It is important to emphasise that our work is 'for public benefit'. We advocate on behalf of trusts, and we strongly believe in a wider civic role for our trusts and a responsibility to act on the system itself to improve it.

We have taken the decision to respond to the consultation in writing rather than using the consultation portal because the format limits our ability to fully express our views.

### Summary

1. The consultation paper raises some legitimate questions about the current post-16 education landscape. In particular, we think the observation that teaching time is less than in many other countries is significant.
2. The question of curriculum breadth is also important, as is the observation that too many young people who don't achieve a grade 4+ at GCSE still don't achieve this when resitting post-16.
3. The wider question about whether all students should continue to study some form of English and maths until 18 is also worthy of consideration.
4. However, it is not clear that the Advanced British Standard (ABS) proposals are the only, or indeed best, way of addressing these issues. Furthermore, there are significant obstacles

that make it hard to see how something as ambitious as ABS can be achieved. Among these obstacles are long term funding pressures in post-16 education, a national teacher shortage, and a question over the ability of the school and college estate to cope with the additional draw on resources and facilities.

5. Partly because of these obstacles, and the arrival of this proposal towards the end of a parliamentary cycle, CST members have told us they are not convinced this plan can be sustained over the long term (currently it is forecast to be rolled out in ten years). This has itself created another barrier as there remains a job to do for government to convince the profession that the proposals are workable. This is reflected in much of the feedback our members have shared with us.
6. We believe the ABS reforms need to be seen as a curriculum issue as much as a qualifications issue. Changes to programmes post-16 will almost certainly require iteration of the wider curriculum ecosystem, including GCSE. Significant curriculum reform is likely to be a draw on capacity in schools and colleges.
7. Given the range of pressures facing the school system, including estates and workforce issues, and the strong international standing of A levels, it is questionable whether this reform is the right priority at the current time.
8. While CST does believe the issues raised in the 'aims and purposes' section are worthy of deliberation, consideration should be given to whether these can be addressed in alternative ways that are more commensurate with the capacity currently in the system. For example, the question of curriculum breadth be explored outside of the ABS proposal.
9. We hope our response to the consultation is helpful in refining the ABS proposal, or shaping other iterations to post-16 education in the years ahead should the ABS proposal not be implemented.

### **The aims and objectives of the Advanced British Standard:**

10. The name 'Advanced British Standard' is not appropriate given the proposals will only apply in England. It should be renamed. For the purposes of this response, however, we will continue to refer to it as ABS.

11. It is unclear what will happen to A Levels and whether these will be available for independent schools to continue with. If this is a possibility, work is needed to assess the risks associated with A Levels and ABS co-existing, for example in HE admissions processes. We must ensure disadvantaged children in particular are supported by these reforms and their progression is enhanced and not curtailed.
12. The proposal aims to create greater clarity for students by having a single list of subjects from which to choose. While this might be helpful at the point of selecting courses, the move to ABS will create new uncertainties, not least of which is the likely challenge of helping users of qualifications (such as universities and employers) to understand ABS and its value. Evidence from the rollout of T Levels shows how hard it can be to build understanding with employers.
13. The aim to increase the breadth of subjects students study appears right in the context of international comparators. However, more teaching time will be required, otherwise there would have to be a significant reduction in the depth of study. While some reduction in depth may be an inevitable trade off in ABS, increasing teaching time mitigates this to some extent, and this should be with high quality teachers. Achieving this will be challenging, however, given the current crisis in recruitment and retention. We say more on this below.

### Programme design:

14. The ABS consultation proposes that all children would continue to study English and maths to 18 in some form. This ambition feels right when set aside international peers.
15. Furthermore, it also provides an opportunity for us to rethink how we support students to achieve when they have not achieved a grade 4+ at GCSE. The ABS proposal could provide the space for an iterated level 2 qualification instead of the current resit policy.
16. However, it is important not to underestimate the challenge involved. There are specific implementation issues outlined below, but there are cultural considerations too. The notion of choice is well established in the English system, with students effectively having freedom of choice after age 16 (within available offer and admissions practices). A move to make maths and English compulsory post-16 will have to overcome this.
17. It is not clear from the proposals what the nature of the compulsory content would be. While some people support the continuation of English and maths in some form in principle,

support from some in the sector is contingent upon the content being studied, for example whether it would be anchored in real-world contexts.

18. Thought is needed about specific instances too, such as the pupil who achieves 8/9 at GCSE in maths but does not want to take maths as a level 3 qualification. It would not be appropriate to make this student redo level 2. More detail is needed to explain what this student would do in order to meet the proposed requirement of continuing to study maths until 18.
19. The ABS plan could lead to the collapse of T Levels in the interim, with students not wanting to study a subject it is known will be phased out and thus risk losing currency. This is especially important given the relative infancy of T Levels as it risks implying a lack of stability in the qualifications system. Moreover, given the stated intent to improve the standing of vocational qualifications, it would be regrettable if these plans were to have the opposite effect on the existing vocational qualifications.
20. It is not clear whether ABS would resolve the perceived concern about 'parity of esteem': this is not something the qualification design process can necessarily bestow.
21. Regarding the compulsory English and maths element at level 2 and level 3, there is a question about whether and how these strands should be contextualised within subjects, particularly in the occupational pathway.
22. It will be important to consider the interplay with the wider curriculum ecosystem, especially what comes before (GCSE) and what comes after (HE). Care would need to be taken to avoid unintended impacts on the ability of students to access higher education courses with that appropriate foundation of understanding, and that the status of UK higher education itself, both domestically and internationally, is not adversely affected by the proposed changes to what students in England would study prior to entry.

## Assessment & Grading

23. It would be important for students to receive grades for the individual components of the ABS in order to reflect their achievements across the range of subjects.
24. It is not obviously desirable that an overall grade should be awarded. While an overall grade is attractive to some because it seems to certificate and acknowledge a level of overall

performance, there are problems in doing so. One issue is how a range of diverse components can be meaningfully and consistently aggregated into a single grade. This could be even more challenging if the component parts are delivered by different awarding organisations. This begs a further question - would ABS be awarded by an awarding organisation? Secondly, we know from current experience of the International Baccalaureate with HE admissions that universities tend to look beyond the overall grade to consider performance in the relevant components of the qualification – this is likely to be the same with ABS. Thirdly, it is not clear whether completion or meeting a certain standard across all components would be required in order to provide an overall grade. What would happen if a student did not complete one component? Would this mean they do achieve the overall ABS.

25. One view of the ABS as proposed is that it is not itself a course or a qualification but is in fact a suite of separate qualifications intended to ensure a certain breadth of study. As such, it may be that some sort of overall grade is unnecessary because the component grades carry the required information students and users need.
26. It is not clear how universities and employers will respond to majors, minors, and the different pathways. Rather than opening progression routes, there is a risk that particular combinations of qualifications could reduce or limit access. This would need careful consideration in advance of students selecting and starting ABS courses.
27. Care will need to be taken to ensure the additional number of subjects does not lead to an inappropriate assessment burden for students and centres.

### Implementation:

28. It is an obvious but pivotal point that the deliverability of such an ambitious reform is contingent on the government's ability to recruit and retain sufficient teachers. The plan outlined in the consultation document is insufficient to achieve that. While the timeline for delivering ABS is ten years from now, the requisite trajectory of recruitment means inroads need into the recruitment and retention crisis need to be made immediately. Unfortunately, we are seeing little sign of this taking place. Indeed, the government has just reduced its recruitment [targets](#) for secondary. Even if the current staffing situation in schools implied this was appropriate, and we're not convinced it does, it seems incompatible with the recruitment that is required over the next ten years to successfully deliver ABS.

29. Accordingly, this raises questions about the viability of the entire ABS proposal. Until meaningful plans to tackle this are established and early success is seen, it is hard to imagine how ABS can be implemented in a way that ensures quality for young people. Pressing ahead without the right teaching quality is not in young people's interests.
30. Without a sufficient supply of teachers in post-16 education it is possible we could see the movement of subject specialist teachers from KS3 and KS4 into post-16. While this might benefit older children, this could be destabilising for the quality of teaching for younger children. This may prove counterproductive if it undermines achievement in more foundational aspects of subjects like English and maths.
31. It is not clear the school estate could cope with the demands ABS could place on it. The increase in teaching time and the number of qualifications students would study will mean that schools will need additional classroom space. This will require investment in the school estate, which is particularly important given the [evidence](#) from the National Audit Office that over a long period the treasury has not provided the funding necessary to maintain buildings (by the government's own assessment).
32. The costs and specialist staffing and equipment requirements for some courses will probably mean that providers will only be able to run a selection of courses rather than the whole ABS range. Schools and colleges might deal with this by working together to offer courses across a locality. However, there are risks here. One is that just operating such a model is likely to be a draw on capacity. A second issue is that this will be harder to achieve in particular localities, such as rural areas. It will be important not to create a programme design that drives inequities.
33. Another consideration is the level of transferability between institutions, for example when a student moves house. Similarly, will young people, or adults seeking retraining, be able to transfer between pathways if they discover they're not on the correct path?
34. It is not clear in the proposal whether majors and minors will be designed to be co-teachable (eg in the same classroom). This is an important logistical, pedagogical and curricular consideration that should be clarified as early as possible. Our working assumption is that it will be very hard to teach majors and minors concurrently in the same classroom in many subjects. Delivery of a breadth of subject qualifications could be prohibitively costly if schools and colleges were expected to offer both minors and majors

across the range of subjects. In practice, therefore, it is plausible that despite a broad ABS 'offer' nationally, the local offer available to student could be narrow.

## Conclusion

35. It is clear that in order to deliver reforms as ambitious as ABS that significant investment in staffing and estates is required as a prerequisite. Without this it is hard to see the system realising the potential benefits of ABS, and indeed there is the risk of destabilising or adversely affecting what works in the current curriculum and qualifications system.
36. In order to secure buy-in for its ABS vision, it will be essential for government to make early inroads in this investment so that schools and trusts can see government working towards the ambition on an appropriate trajectory. Further disappointing news on recruitment into the profession or the state of school buildings will undermine belief in the ability to undertake such significant reform.
37. We believe it is helpful to think of ABS as a curriculum matter as much as a qualifications issue. Doing so might provide the basis for useful reform even if it is not possible to deliver the full ABS vision. For example, the ABS pathway (not occupational) in particular looks very similar to a reformed suite of A levels, perhaps with students studying more subjects but at slightly less depth, possibly including major and minor versions. This is something the system could move towards without undergoing the full extent of change outlined in the proposals.
38. When viewed alongside the very recently introduced T Level offer, and a growing desire for apprenticeships in the system, it is possible to argue the qualifications system already has a range of pathways and the focus of reform should be on curriculum breadth and teaching time.
39. Given the range of pressures currently facing the school system, including estates and workforce issues, and the strong international standing of A levels, it is questionable whether this reform is the right priority at the current time.
40. While CST does believe the issues raised in the 'aims and purposes' section are worthy of deliberation, consideration should be given to whether these can be addressed in alternative ways that are more commensurate with the capacity currently in the system.