

A world-class education system: The Advanced British Standard Consultation

Association of Accounting Technicians (AAT)

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About AAT

- AAT is the UK's leading qualification and professional body for technical accountants and bookkeepers. We have around 51,000 members in over 100 countries and approximately 75,000 students studying our qualifications.
- Founded in 1980, AAT is a registered charity committed to increasing the availability of high-quality accountancy education and raising professional standards. We aim to advance public education, promote the study of accountancy, prevent crime, and promote and enforce standards of professional conduct for accountants.
- Over 600,000 small businesses are supported by more than 6,000 AAT licensed members to help build the businesses' financial capabilities. AAT also helps businesses of all sizes upskill and train employees to be the business leaders of the future.
- Our suite of qualifications is highly regarded across the profession and open to all. We help school leavers take their first steps in their career as well as thousands of career changers gain and develop new skills to equip them for careers in finance.

Response to Consultation Questions

Chapter One

We propose several overarching aims and principles that should underpin the introduction and design of the Advanced British Standard. To what extent do you support these proposed aims and principles? If you have further views on this, please share below.

*(Options: **Fully support**, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)*

- 1.1 AAT welcomes the aims and principles proposed to underpin the Advanced British Standard (ABS), which overall provide a good balance in terms of objectives and structural reform needed to achieve the Government's ambition in this area.
- 1.2 We welcome the proposals to increase the amount of contact time between students and teachers, but would welcome greater clarity on how this is defined and what it would look like in practice. Learning styles have evolved significantly in recent years, particularly since the pandemic, and are continuing to change to reflect increasingly rapid developments in technology. It is important therefore that time spent with a teacher is not so narrowly defined as to stand in the way of meeting the needs of students with different preferred learning styles. Ultimately, any new teaching framework needs to be appropriate to all students.
- 1.3 We are mindful however of the strain that continuous and large scale reform of the wider skills and post-16 system has placed and continues to place on all providers. Moreover there are real risks of confusion across the market, for not just with providers and learners, but also employers. We would welcome further details as to how all stakeholders can be best supported to meet the challenges posed by the new ABS framework.

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

- 1.4 AAT believes there are several important things which could be achieved by the Advanced British Standard. Foremost among these is the levelling of the playing field between academic and technical education, which is essential to ensure that all students are able to meet their potential, and are acquiring the right skills that are valued by employers. If delivered flexibly, it can also play an important role in addressing the skills gap which has become more acute in recent years. Moreover, by developing appropriate practical content through the occupational schemes proposed,

students could benefit from clearer and more structured pathways into employment after their studies.

- 1.5 The ABS also has a role to play with respect to social mobility, and providing equal opportunity to all students regardless of their background. Robust and internationally recognised qualifications can play a crucial role in improving social mobility, and AAT has seen this through its own accountancy qualifications which enable the development of power skills such as problem-solving and data analysis; providing good opportunities for career advancement, whilst also being sector generic, opening up multiple avenues for employment, including setting up a business. We would encourage the ABS to learn from this existing 'best-practice' in order to ensure students are as best placed as possible to achieve their potential and ambitions.
- 1.6 The Government should also use the introduction of the ABS as an opportunity to build more global recognition of this and other English qualifications, which have significant export potential for the UK globally.

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.

- 1.7 No further points to add.

Chapter Two

Section One

We propose two main programmes at Level 3: Advanced British Standard and Advanced British Standard (occupational). Each will contain a range of separate components to support students. To what extent do you support the proposed design for the Level 3 Advanced British Standard programmes? If you have further views on this, please share below.

*(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)*

- 1.8 AAT welcomes the proposed design of the ABS programmes for Level 3, but feels that further detail is required in a number of key areas. In particular, clarity on the secondary or 'double major' component of the occupational programme, and how these specialisms are identified and how closely they relate to the core subject is necessary in order to build an understanding of how effective the occupational programme will be in facilitating a clearer pathway to employment or further training.
- 1.9 Furthermore, if T Levels are to be used as a base for ABS, then there must be clear evidence to support that T Levels are achieving what they set out to do. This is particularly the case as they remain in their infancy, with the full outcomes not yet known, and in light of recent disruption posed by some T Levels being removed from the market.
- 1.10 We also note that reforms at Level 4 are also underway and currently subject to consultation. It is important that there is clarity about the interaction of these reforms with the ABS and how students will be supported to progress into any new Level 4 framework. A clear link needs to be maintained across all levels to ensure the system is robust and stable for the future, and to ensure progression between Levels 3 and 4 in particular are seamless, as well as equally accessible for both T Level graduates and apprentices.

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

- 1.11 AAT supports this broad design framework. However it is unclear from the consultation document what level of flexibility would exist within the new framework for those students whose circumstances or ambitions change during the course of their Level 2 programmes. For example, does embarking on the Level 2 Occupational programme preclude students from going on to Level 3 should they wish to pursue a different path during the course of their studies?
- 1.12 Furthermore, not all Level 2 students will have a clear idea of the pathway they want to pursue, so it is important that any new framework is not too rigid in its design, and that flexibility exists for those students that want to keep their options open.

If you have views or evidence on how additional teaching hours at Level 2 could best be used to benefit students, please share below.

- 1.13 The inherent assumption within these proposals is that the capacity for delivering the additional teaching hours envisaged will be met, however it is far from clear how this will be achieved or how realistic an undertaking such a significant recruitment exercise would be. Whilst additional teaching hours are welcome, more clarity is required on how this will be delivered and what form this will ultimately take.
- 1.14 **If you have views or evidence on how a transition year could best be structured to support progression to Level 3, please share below. This could include reflections on the existing T Level foundation year.**
- 1.15 No further points to add

In branding terms, how do you think the Level 2 programmes should be considered in relation to Level 3 Advanced British Standard?

- Both Level 2 and Level 3 programmes should be framed as the Advanced British Standard, with no level-based badge provided to students
- **Both Level 2 and Level 3 programmes should be framed as the Advanced British Standard, but it should be clear whether a student reached Level 2 or Level 3**
- Level 2 programmes should have a different name and framing, separate from the Level 3 Advanced British Standard; Don't know)

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

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

- 1.16 See answer 16. No further points to add.

Section Two

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.

- 1.17 Whilst AAT welcomes the broad alignment proposed in terms of bringing together academic and technical routes, we would urge caution in a number of areas. T Levels remain a relatively young qualification and the longer-term outcomes and effectiveness of T Levels as a qualification are still yet to be felt. However by contrast A Levels are a long and well-established qualification, first introduced over 70 years ago, and with a strong reputation internationally. AAT would urge the Government to give strong consideration to any potentially unintended consequences associated with such wholesale reform of English branded qualifications and, if it has not already, conduct a full risk assessment of the full range of transitional, reputational and other risks associated with reform on this scale. Broader international recognition of English qualifications is needed more generally across both academic and professional qualifications, and further work would be needed to ensure that the ABS sits at the heart of this.

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

If you have further views on how subjects will be included in these reforms at either Level 2 or Level 3, please share below.

- 1.18 No further points to add

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

- 1.19 It is clear that there are significant benefits to increased contact and teaching time for students versus self-directed study. However as reflected in our earlier responses, further detail is required as to how the Government intends to meet the resourcing necessary to achieve this, as well as ensure sufficient flexibility exists to meet the different learning styles of students.

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.

- 1.20 AAT broadly welcomes the proposals on the relative size of subjects within the new programmes. However as reflected above, further detail is required on the secondary or minor component of the occupational programmes as it is essential that these are genuinely complimentary to the major component, and offer the practical skills and knowledge required to support students into employment or further study.

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.

- 1.21 AAT agrees in principle on the important role that EEP activities play with respect to the wider learning experience and personal development of students. The principles proposed to underpin this are therefore positive. However it is important that the language and expectations in terms of EEP participation are clear, and further details as to the rigidity of this element of the ABS framework is necessary. Experience shows that there is significant variation as to the levels and quality of EEP participation from institution to institution which in some cases has created a false construct with in turn a spillover effect into what should otherwise be learning time. We would encourage greater clarity on this which will help deliver more consistency across institutions delivering the ABS.

If you have views on how we can encourage employers to offer industry placements and what further support education providers will require, please share below.

- 1.22 Industry placements have an important role to play in enabling students to better apply their skills to a practical working environment, however we would ask how practical it is to deliver large numbers of such placements at scale and in a consistent way across England. Experience has shown that in some sectors trying to gain employer engagement in T Level industry placements has been challenging, and therefore serious consideration will need to be given to how this would be managed at a larger scale through the ABS. Early employer engagement will be essential in this regard.
- 1.23 There is already significant regional variation in the industry placements that students are able to access, with some needing to travel long distances; as well as significant differences in levels of employer engagement with these placements, as has been seen in some cases with apprenticeships. We would therefore urge the Government to look carefully at how placements can be integrated nationally into the ABS in a consistent way in order to ensure that all students are able to access meaningful and beneficial placements, and that employers can see the value, rather than the burden, of taking on students.

Section Three

We propose that we develop the English and maths offer within these reforms around certain principles. To what extent do you support these principles?

*(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)*

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

*(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)*

- 1.24 AAT broadly supports the principles and aims underpinning the ABS, which we accept aligns broadly with the design of Level 2 and 3 teaching frameworks seen in other jurisdictions. However we would urge caution and welcome further detail in a number of areas. For example, it is important to recognise that, at present, training providers are not currently set up or equipped to deliver this level of teaching to all students, and the scale of resources required to deliver the teaching staff necessary to provide this level of teaching to all students will be significant.
- 1.25 It is important also to consider, as the Government considers the design of the new framework, the extent to which the qualifications that exist currently are suitable to meet the needs of all students. AAT's experience is that much of the existing functional skills provision is already too demanding for many students, and therefore the effectiveness of the current pathways into Level 3 is worthy of further consideration.

- 1.26 We would also welcome further evidence on the extent to which mandating Maths and English up to Level 3 provides a fundamental requirement necessary to move into particular careers and professions, including accounting. Many current functional skills do not work for many learners and pose a barrier, so careful consideration on how this is implemented within the ABS is needed.

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

- 1.27 No further points to add.

How can we best support students who have secured lower Level 2 passes in English and maths at 16 (e.g. grade 4 or 5) to progress onto Level 3 study in these subjects?

- 1.28 No further points to add.

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

- 1.29 It is important that the ratio of Guided Learning Hours for English and Maths within the ABS occupational programme is appropriate for those students likely to enrol on the occupational programme, whilst also retaining sufficient flexibility for those with different or more flexible learning styles. Any applied teaching of these subject must be meaningful and at the right standard for those students, whilst also ensuring it is genuinely practical and applied which is essential to enable those students to progress. The capacity and capability of the current teaching workforce to deliver on this remains an unanswered question.

If you have views on how existing Level 2 qualifications (GCSEs and FSQs) could provide the basis for two-year Level 2 study for English and maths within the Advanced British Standard, please share below.

- 1.30 No further points to add.

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.

- 1.31 We would welcome consideration as to how the Maths curriculum can be best delivered to ensure learners leave with the practical skills needed for the future. Traditional maths teaching is not appropriate for all students, and many would benefit from more practical teaching that covered, for example, basic financial skills. This would address the widely understood lack of meaningful financial education in schools, and the ABS could therefore provide a perfect opportunity to ensure learners acquire skills that are vital for their future.

Chapter Three

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

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

(Options: Fully support, **Somewhat support**, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

- 1.32 AAT broadly supports these principles to underpin the new grading system, and recognise that these are not untypical criteria for this level of qualification.

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

(Options: **Fully support**, Somewhat support, Neither support nor oppose, Somewhat oppose, Fully oppose, Don't know)

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

(Options: **Yes**, No, Don't know)

1.33 AAT supports the proposals for individual grades for the different major or minor components undertaken within the ABS, and the proposal for an overall award that sits above this. A clear indication of competence and achievement in particular subject areas is the primary driver for progression into many careers and professions, and it is right therefore that these sit at the heart of the new framework.

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

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

1.34 AAT agrees that there should be minimum attainment conditions to receive an overall Advanced British Standard award. However the occupational and standard ABS routes are very different in terms of the outcomes that students are seeking and can expect to achieve, and therefore we would welcome consideration as to whether the minimum attainment conditions should differ for each programme.

Which of the Advanced British Standard award options outlined do you prefer and think would add most value? Please include any evidence if available.

1.35 Whilst AAT recognises the broad value that option 1 would bring to students, as stated above, there does need to be further consideration as to how the outcome and standards within the occupational and standard ABS programmes can be consistently applied.

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.

1.36 It is important that consideration is given to the overall assessment burden for students within the new framework. AAT has seen first hand a range of wellbeing issues linked to the volume and intensity of external assessment and necessary levels of revision. Excessive reliance on external assessment over other forms of teaching assessment during the course can have the indirect effect of narrowing the curriculum. It is essential that flexibility for all learners, and the ability of the ABS framework to adapt to different working and learning styles sits at the heart of this new initiative.

Chapter Four

What strengths in the current approach to 16-19 education should we aim to preserve under the Advanced British Standard?

- 1.37 The current 16-19 framework has been broadly successful in avoiding regional biases and ensuring that students are able to access good quality teaching and broadly equivalent routes into their preferred profession irrespective of where they are located. It is essential from a social mobility perspective that this important outcome remains at the heart of the new ABS framework. This will be a major challenge as existing schools and teaching providers must inevitably scale up their levels of provision in order to accommodate the significant increase in demand anticipated, but it should remain a priority nevertheless.
- 1.38 We would also encourage the Government to give serious consideration to how the new qualification framework can attract high levels of recognition by employers at an early stage. Seven years after they were first announced, there remain continuing questions as to whether T Levels have the right level of recognition, and we would urge ministers to consider how best to avoid a repeat of this under the new proposals.

What opportunities and challenges do you see for the recruitment, retention and deployment of staff as a result of implementing the Advanced British Standard?

- 1.39 The new framework proposed in this consultation document will have a huge impact on the education sector, and will place a significant burden and increase demands on existing providers. It is clear that a huge programme of upskilling and recruitment to ensure teaching capacity exists will be required, but it is far from clear how the Government proposes to go about this.
- 1.40 It is essential that the Government publishes a comprehensive strategy on how it intends to meet this significant increase in demand and to sustain and deliver this over the long-term. Assurances will be needed to ensure that teaching providers have confidence that a pipeline of suitably equipped teaching talent is in place for decades to come, as well as a consideration of the impact on students if this significant increase in resourcing cannot be met.
- 1.41 From an accountancy perspective, AAT has already seen cohorts of adult provision being dropped at some T Level adopters due to the lack of teaching resource available in the sector. It is important to understand therefore what plans will be put in place to address the need for more skilled accountancy delivery staff if hours per programme are to increase as proposed.

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

- 1.42 We repeat our feedback above on the need for a proper strategy to deliver the continuing and ongoing need to ensure supply exists to meet the significant increase in demand anticipated to deliver the proposals that have been set out. This needs to go beyond short term measures, with a longer-term focus on succession planning for future generations of teaching staff to ensure the delivery of the provision can continue to be maintained.

We are interested in the changes that may need to be made to deliver the Advanced British Standard for all students, regardless of where they live. What changes do you think may be required in the following areas:

46a. Buildings/estates?

- 1.43 We do not see issues in this respect unless it is proposed that all additional teaching hours must be delivered in-person. The current training provider estate is used to delivering 16-19 programmes, however if all provision is to be face to face, there will be a challenge with respect to timetabling those extra hours into an already busy timetable where classroom space is at a premium in many cases.

46b. Technology?

- 1.44 Greater clarity is needed on how ABS programmes will be delivered, however blended delivery could have an important role to play and, in turn, could ease the resourcing challenges if all teaching is not required to be in-person. Many training providers already deliver blended programmes following the pandemic and have existing learning platforms to support learners in this way. It is however the case that blended learning for 16-19 year olds could put those students best suited to self-study at an advantage over those who are not, which in turn could have consequences for retention and completion. Consideration should also be given to barriers to entry and social mobility implications if blended programmes are pursued, particularly for those without home access to IT or wi-fi.

46c. Provider landscape?

46d. Accountability arrangements?

46e. Admissions?

46f. Transportation?

If you have further views on how the Advanced British Standard could impact 16-19 providers, or anything else covered in Chapter 4, please share below.

- 1.45 No further points to add.

- 1.46 Chapter Five

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

- 1.47 AAT agrees that there will be a need to align vocational and technical qualifications for pre-16 students with the new ABS framework. However it is important that this is the case for all pre-16 qualifications, not just vocational and technical qualifications, as building all existing qualifications into this new framework would provide greater consistency and a more holistic learning experience for all students.

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.

- 1.48 There is an issue currently with respect to the adequacy of careers support, and in particular the balance and consistency with which this is accessed by students and delivered by institutions across England. In particular, much of the careers advice students have received in recent years has focused too much on Higher Education at the expense of Further Education. It is essential therefore, through the broader opportunity afforded as part of these reforms, that the Government ensures proper resources, funding and training are in place in order to deliver genuine parity between these two important pathways available to students, which in turn must filter through and be reflected throughout the entire post-16 framework. We would urge the Government to consider closely how careers advice can be best improved and integrated into the new framework, so that

students can consistently access high quality careers advice wherever they are in England, and whatever their chosen pathway.

If you have views or evidence on the additional support that may be needed to enable students with SEND to access the Advanced British Standard, please share below.

1.49 AAT welcomes the Government's recognition that additional support will be required for those students with SEND. It is important that the teaching framework is appropriate for students with all needs and requirements, and that sufficient flexibility exists to deliver this effectively.

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.

1.50 No further points to add.

If you have views on how to ensure the Advanced British Standard provides effective pathways into post-18 education or study, please share below.

1.51 No further points to add.

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

1.52 It is essential that the ABS is an attractive qualification to all employer groups across all sectors, and that all employers can have confidence in its robustness and the genuine levels of attainment achieved by students. A Levels have become a strong internationally recognised brand with high levels of employer confidence in the qualifications students achieve – the Government should seek to achieve the same outcome with the new ABS. We would urge the Government to engage closely with employer groups and representatives throughout the design process to help build levels of employer confidence and to inform the overall shape of the new framework with a clear careers and employability perspective in mind.

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.

1.53 No further points to add.

If you have views on the impacts (positive or negative) of the Advanced British Standard reforms on any group with a protected characteristic, please share below.

1.54 No further points to add.

If you have views on the impacts (positive or negative) of the Advanced British Standard reforms on the environment, please share below.

1.55 No further points to add.

If you have further views on the wider implications of the Advanced British Standard, or anything else covered in Chapter 5, please share below.

1.56 No further points to add.

If you have further views on anything else associated with the Advanced British Standard not covered in the questions throughout the consultation, please share below.

1.57 No further points to add.

Further Information

For further information on any of the points raised in this response, please contact adam.harper@aat.org.uk