

Careers England Policy Commentary 15: The Coalition's Emerging Policies on Career Guidance

Introduction from the Careers England Board:

In publishing this detailed review commissioned from Professor Tony Watts, we reaffirm that as the trade association for employers in the careers guidance business in England, we have supported the Government's proposals for an all-age Careers Service (aaCS) from the time it was first announced in November 2010.

Whilst we welcome some of the clarifications given by the Government in announcements on 13 April 2011 (including the naming of the aaCS as the National Careers Service), we remain deeply concerned that over the past few months very little progress has been made on turning the Government's vision for a world-class all-age strategic careers service into reality.

There are pressing, urgent and important matters which the Government must address. These are covered thoroughly in this Policy Commentary. They include the urgent issues of transition from current arrangements and statutory duties to the new proposals for careers services for all age groups, alongside the need for absolute clarity about the support to be available to young people in schools in the future. The announcements on 13 April clarified some of these, but raised alarm on others.

At a time of growing youth unemployment, the serious cuts by many local authorities to the Connexions Services – which it remains their statutory duty to provide until the new laws are in place – risk exacerbating the damage to many young lives. All local authorities are accountable to Parliament and their local electorates for the fulfilment of these duties, informed by local circumstances as well as national priorities. The unprecedented cuts made by many local authorities to careers support for young people in their areas also undermine the steps required to improve social mobility and achievement for these young people. By default rather than design, these cuts also weaken insidiously the foundations upon which the future careers support for adults through the National Careers Service should be built.

The Government says it wishes to re-professionalise careers guidance in England. We support this goal wholeheartedly. But without investment in the careers profession workforce, such a goal is no more than an empty aspiration. A professional careers service, properly resourced across England, is a crucial component in promoting employability skills for all age groups, reducing unemployment, and securing the economic and social health of the country.

We remain fully committed to help the Government to make its new policies for career guidance work. However, as this Policy Commentary demonstrates, there are grave doubts about whether the changes envisaged by the Government are achievable within the timescales set and the still uncertain resources that seem likely to be available.

Whilst the views expressed below in this Policy Commentary are those of its author, the Careers England Board commends this careful and thorough analysis to all who care for the future of careers services for all age groups in England.

Careers England Policy Commentary 15

This is the fifteenth in an occasional series of briefing notes on key policy documents related to the future of career guidance services in England. The note has been prepared for Careers England by Professor Tony Watts.

The Coalition's Emerging Policies on Career Guidance

A.G. Watts

Executive Summary

The current Government has affirmed its intention to strengthen career guidance services in England. Its main rationales are two-fold: promoting social mobility; and moving towards a user-led skills system. In pursuit of this intention, the Government has made three commitments, all of which have been widely welcomed: to establish an all-age National Careers Service (NCS); to revitalise the professional status of career guidance; and, in respect of support for young people, to safeguard the partnership model between schools and external career guidance providers.

The main sources of significant tensions lie between these policies and the Government's policies relating to school autonomy. Schools will in future have a statutory duty to secure careers guidance services either from the NCS or from other providers (a contractor-supplier relationship); but they may also appoint their own careers adviser, so long as they provide, at a minimum, access to online resources (which they could not realistically deny). This undermines the partnership model; it raises issues about how quality is to be assured; and the minimalist option offered as fulfilling the new requirements effectively renders the statutory duty meaningless. Veiled by these changes and confusions, there are also fears that much or all of the existing funding for face-to-face career guidance services for young people may well be allowed to vanish without trace, without any public announcement to this effect. Such a dramatic erosion of services for young people would seriously undermine the potential to build better services for adults as well.

There are many issues on which clarification is urgently needed. These include:

- The DfE funding contribution to the new all-age NCS.
- The structure of the NCS, and the extent to which it is viewed as a strategic body.
- The quality standards to be applied to the NCS, and also to other providers within the market in career guidance provision (including suppliers from whom schools can purchase such services).
- The proposed new kite-mark and other quality arrangements to encourage and help schools to develop high-quality careers programmes.
- How the data for the proposed destinations measure in schools are to be collected; how 'added value' is to be demonstrated; and what other accountability measures and procedures are to be introduced alongside it.

- The role of and relationships between current consultative mechanisms on the emerging policies.

Meanwhile, amidst these uncertainties, many existing Connexions career guidance services for young people are being eroded or dismantled by Local Authority cuts.

If the main elements of the Government's policies are to be implemented as planned, in a way which improves rather than damages services, there are a number of steps that need to be taken. These include not only establishing the NCS, but also persuading schools to pay for services they have previously received free of charge. There are grave doubts about whether these steps are achievable within the timetable Ministers have set. There are also concerns that:

- By the time the new market is established, much of the expertise for its professional base will have disappeared.
- In the meantime, there will have been a widespread collapse of careers help for young people.
- The original BIS vision for the all-age service will have been fatally eroded by lack of serious engagement from DfE, with adverse impact on the services for adults too.

1. The Coalition Government's emerging policies on career guidance have so far been presented in the form of a range of statements by Ministers (notably John Hayes, Nick Gibb and Lord Hill) and their civil servants: in House of Commons speeches, other speeches, responses to Parliamentary Questions, and correspondence. This Policy Commentary presents an analysis of such statements up to and including the series of statements issued respectively by the Department for Business, Innovation and Skills (BIS)¹ and by the Department for Education (DfE)² on 13 April 2011, following the Committee stage in the Education Bill currently working its way through Parliament. It is designed in part to inform discussions and lobbying strategies in the subsequent stages of the Bill. It is structured in six parts:

- Rationales (paras.2-4).
- Core principles (paras.5-11).
- Issues related to the interface with schools (paras.12-26).
- Issues related to the all-age NCS (paras.27-35).
- Issues related to funding and transitional arrangements (paras.36-48).
- Conclusions (paras. 49-52).

2. **Rationales.** A core rationale for the Government's policies in this area is a concern for the role of career guidance in promoting **social mobility**. This has been

¹ <http://www.bis.gov.uk/news/speeches/john-hayes-national-careers-service-for-england> This comprises a statement by John Hayes entitled 'National Careers Service for England'.

² <http://www.education.gov.uk/16to19/careersguidance/a0064052/the-role-of-schools-and-local-authorities-in-careers-guidance> This comprises a short 'general article' entitled 'The role of schools and local authorities in careers guidance', plus three 'associated resources': 'LA communication'; 'LA guidance' (Statutory Guidance for Local Authorities on Targeted Support Services for Young People); and 'School communication' (The Education Bill – changes to the delivery of careers guidance).

articulated clearly by John Hayes (Minister for Further Education, Skills and Lifelong Learning):

‘... part of my aim is to ensure that careers advice is a driver of improved social mobility, so that we provide people who do not receive best advice from other sources, such as familial and social networks, with the kind of advice that allows them to turn their ambitions into fulfilled reality.’³

He linked social mobility to social justice.⁴ He also referred to the Milburn Report⁵, on the role of career guidance in broadening access to the professions.⁶ Career guidance has recently received prominent attention in the Government’s Strategy for Social Mobility.⁷ The DfE statement in April 2011 placed this concern in a broader framework:

‘Access to information and guidance about the options that are open to them – and the progression routes to which these options lead – is an important factor in ensuring young people are able to make the most of the opportunities that are available post-16. This goes hand-in-hand with a focus on raising aspirations, broadening horizons and increasing social mobility, to the benefit both of young people, and of the economy and society in general.’⁸

3. A second core rationale is the role of career guidance in moving towards a **user-led skills system**. This was argued in the Department for Business, Innovation and Skills (BIS) strategy document:

‘For too long, the skills system has been micromanaged from the centre, with Government setting targets for the number and type of qualifications that ought to be delivered, and with learners and colleges following funding, rather than colleges responding to the needs of employers and the choices of learners... We want to turn the system on its head, so that it is those using the system, not the state, which drives the system. We will give them control over their funding and the support and information they need to make the right choices for the future.’⁹

Much the same rationale, it may be noted, drove the Browne Report’s strong advocacy of the importance of career guidance in relation to entry to higher education (see para.7 below):

³ John Hayes in Education Bill Committee, 29 March 2011.

⁴ John Hayes in Education Bill Committee, 29 March 2011.

⁵ Panel on Fair Access to the Professions (2009). *Unleashing Aspiration: the Final Report of the Panel on Fair Access to the Professions*. London: Panel on Fair Access to the Professions.

⁶ John Hayes in Education Bill Committee, 24 March 2011. Also John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁷ HM Government (2011). *Opening Doors, Breaking Barriers: a Strategy for Social Mobility*, especially pp.40-41.

⁸ Department for Education (2011). The role of schools and local authorities in careers guidance.

⁹ Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.5.

‘We want to put students at the heart of the system... In our proposals... [s]tudents will be better informed about the range of options open to them. Their choices will shape the landscape of higher education.’¹⁰

In these terms, career guidance is viewed as a ‘market-maker’: a way of making the learning ‘market’ (as well as the labour market) operate more effectively.¹¹

4. A number of **other rationales** have also been mentioned. These include increasing retention within education and reducing drop-out.¹²

5. **Core principles.** Five main principles seem to underpin the Government’s emerging policies:

- To establish an all-age careers service (para.6).
- To revitalise the professional status of career guidance (para.7).
- For young people, to safeguard the partnership model between schools and external career guidance providers (para.8).
- To change the balance of responsibility from the centre to schools (para.9).
- To enable schools to choose their own external provider, and to encourage a broader market in career guidance provision (para.10).

6. The first principle is to **establish an all-age careers service**, as ‘the centrepiece of a programme of reform for careers guidance’.¹³ This had been advocated by John Hayes and by the Conservative Party for some time¹⁴, and was included in the Conservative Party Manifesto for the 2010 General Election¹⁵ (though not in the subsequent Coalition Agreement¹⁶). The rationale for it was outlined by John Hayes in his Belfast speech:

‘A single, unified careers service would provide major benefits in terms of transparency and accessibility. And a single service with its own unique identity would have more credibility for people within it as well as users than the more fragmented arrangements that are currently in place. There are a range of other benefits, including the ability to support young people more

¹⁰ Independent Review of Higher Education Funding and Student Finance (2010). *Securing a Sustainable Future for Higher Education*, p.25.

¹¹ In relation to the Government proposals relating to contestability and developing a market in careers guidance provision (see para.10 below), this raises issues about the desirability of marketising the market-maker. See Watts, A.G. (1995). Applying market principles to the delivery of careers guidance services: a critical review. *British Journal of Guidance and Counselling*, 23(1), 69-81.

¹² John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

¹³ Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.42.

¹⁴ Hayes, J. & Kelly, S. (2007). *Towards a Gold Standard for Craft*, p.25. London: Centre for Policy Studies. Conservative Party (2008). *Building Skills, Transforming Lives: a Training and Apprenticeships Revolution*. Opportunity Agenda Policy Green Paper No.7. London: Conservative Party. See Careers England Policy Commentary 11.

¹⁵ Conservative Party (2010). *Invitation to Join the Government of Britain: the Conservative Manifesto 2010*, p.17. The commitment was to ‘create a new all-age careers service so that everyone can access the advice they need’.

¹⁶ Prior to the General Election, however, the Liberal Democrats had indicated that they too supported the idea of an all-age careers service. See email to Tony Watts from James Kerry (Parliamentary Researcher to Stephen Williams MP, Liberal Democrat Shadow Secretary of State for Innovation, Universities and Skills), 29 October 2009.

effectively during their transition to adulthood... As we go about this, it's important to recognise that we're not starting from scratch. On the contrary, we will build on Next Step, and on Connexions because we must not lose the best of either.'¹⁷

The title of the service is to be the National Careers Service.¹⁸

7. The second principle is to '**revitalise the professional status of careers guidance**'.¹⁹ The context for this is the erosion of professional standards that was perceived to have taken place under Connexions in relation to career guidance for young people:

'In all kinds of ways, Connexions did not fail and did good work, but we asked too much of it to be a jack-of-all-trades and to excel in every area. It is a big ask to expect people to be high-quality, professional careers advisers as well as being able to offer good advice on a range of lifestyle issues'.²⁰

In the light of this:

'I am clear that we need to restore a focus on specialist expertise in careers guidance for young people.'²¹

In support of this principle, John Hayes cited the Browne Report's 'very clear recommendations' that careers advice should:

'... be delivered by certified careers professionals who are well informed, benefit from continued training and professional development and whose status in schools is respected and valued.'²²

Accordingly, Ministers made a commitment to 'implement the recommendations of the Careers Profession Task Force'.²³ This included 'looking to the Careers Profession Alliance to establish common professional standards and a code of ethics for careers

¹⁷ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

¹⁸ Statement by John Hayes on National Careers Service for England, 13 April 2011.

¹⁹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010. The term used in a later speech was 're-professionalising careers advice' (John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011).

²⁰ John Hayes in Education Bill Committee, 24 March 2011.

²¹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

²² Independent Review of Higher Education Funding and Student Finance (2010). *Securing a Sustainable Future for Higher Education*, pp.29-30. Cited by John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

²³ Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*. The Task Force, chaired by Dame Ruth Silver, was set up in January 2010 by the previous Labour Government. Under the new Coalition Government, an explicit statement that 'The Government ... have accepted the recommendations of the Careers Profession Task Force' was made by Nick Gibb in response to Parliamentary Questions 36925-36926 from Jenny Chapman MP, 14 March 2011. In addition, John Hayes indicated in his Belfast speech that 'I will be asking the members of the Careers Profession Taskforce to monitor the progress we are making across this range of work, and intend to follow their recommendation to ask them to do so via two reports to the Government, one in March 2011 and one in March 2012' (John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010). The Task Force's first *Progress Report to Ministers* (March 2011) has been issued.

professionals’.²⁴ John Hayes indicated that he favoured this work leading to a ‘licence to practise’.²⁵ Alongside this, he stated that ‘we will insist that the all-age service meets demanding quality standards’ and will ‘encourage its quality standards to be widely applied’ by other services.²⁶

8. The third principle is to ‘**safeguard the partnership model** in which schools draw on their knowledge of pupils’ needs and work closely with external independent advisers with expert knowledge and skills’.²⁷ John Hayes has elaborated the rationale for this commitment:

‘It is crucial that we place this at the heart of our new arrangements as with all that is expected on schools, it would be too much to ask them to provide careers guidance and keep up to date with the latest developments in careers and the labour market’.²⁸

He added to this the principles of ‘impartiality’ and ‘independence’:

‘Young people and adults need impartial advice, which is independent of any organisation with a vested interest, and which is underpinned by objective and realistic information about careers, skills and the labour market’.²⁹

He cited in particular an Ofsted report as noting that:

‘The information, advice and guidance given were not always sufficiently impartial about the options open to young people at the age of 16, for example where secondary schools had their own sixth forms.’³⁰

9. The fourth principle is, within this partnership model, to ‘**change the balance of responsibility from the centre to schools**’.³¹ The rationale for this is that:

²⁴ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010. The Careers Profession Alliance (CPA) has been formed by six careers professional associations in the UK. John Hayes noted that its work to date – to which ‘our public policy initiative’ had acted ‘as a catalyst’ – represented ‘an unprecedented degree of coherence on professional standards, training and accreditation’. In particular, he reported that: ‘The careers profession is committed to creating one professional body which will set standards, maintain a professional register leading to a licence to practice, and provide a range of professional services’. This gave him confidence that ‘the profession is up for it, in the popular parlance... We have yet to reach the destination, but we are making significant steps along the road’ (John Hayes in Education Bill Committee, 29 March 2011).

²⁵ John Hayes in Education Bill Committee, 29 March 2011. Also mentioned in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

²⁶ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

²⁷ John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

²⁸ John Hayes in letter to Tony Watts, 14 January 2011. Similar statements were included in his speech to the Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

²⁹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

³⁰ Ofsted (2010). *Moving through the System – Information, Advice and Guidance*, p.5. Cited by John Hayes in Education Bill Committee, 29 March 2011.

³¹ John Hayes in Education Bill Committee, 29 March 2011. In an earlier part of this debate (24 March 2011), John Hayes referred to the need for responsibility to ‘go back to schools and colleges’. This is, however, historically incorrect. Legal responsibility for securing careers guidance has never previously lain with schools and colleges.

‘Individual schools and colleges know their own learners and are better placed to assess their needs than anyone else. So it follows that on them must fall the responsibility for ensuring that all learners get the best advice and guidance possible.’³²

This is linked to the wider Government view, as set out in the Schools White Paper,³³ that ‘school autonomy – alongside rigorous accountability – is at the heart of all highly performing education systems’³⁴; and that accordingly, ‘in order to raise standards, we need to trust head teachers and teachers to make decisions in the interests of their pupils’.³⁵ This principle is reflected in the Education Bill published in January 2011, which includes a new statutory duty for schools to ‘secure that all registered pupils at the school are provided with independent careers guidance during the relevant phase of their education’.³⁶ The latter is clarified in the accompanying Explanatory Notes as referring to the period between ‘the school year in which they reach the age of 14 until they have ceased to be of compulsory school age’.³⁷ John Hayes noted that:

‘... the spirit that inspires this legislation ... is to give schools more freedom to make these decisions, on the ground, closest to the point where they have effect, and in the interests of the school’s students. We trust governors, head teachers and teachers to make those judgments.’³⁸

On the same principle, the Bill includes provision effectively to repeal the current statutory duty for schools in England and Wales to provide careers education to pupils between the ages of 11 and 16,³⁹ by confining this duty in future to Wales.⁴⁰

10. The fifth principle is that **schools should be able to choose their own external provider** and that **a market in career guidance provision should be encouraged**. In short, there should be contestability:

‘Competition will be important in avoiding the complacency that can cause quality to slide.’⁴¹

Thus, in relation to the duty to secure career guidance, schools:

‘... will be free to decide how that guidance is secured – through the all-age service or through another provider, all of whom will be expected to meet exacting quality standards’.⁴²

³² John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

³³ Department for Education (2010). *The Importance of Teaching*. Cm 7980. London: Stationery Office.

³⁴ Letter from John Hayes to Tony Watts, 9 February 2011.

³⁵ Letter from Nick Gibb to David Gauke MP, 16 March 2011.

³⁶ Education Bill, Section 27, sub-section (2).

³⁷ Education Bill, Explanatory Notes, para.157.

³⁸ John Hayes in Education Bill Committee, 29 March 2011.

³⁹ The 1997 Education Act made careers education statutory in Years 9, 10 and 11, and also included a clause that enabled the Secretary of State to extend the age range by regulation. That power was used in 2004 to extend the duty to Years 7 and 8.

⁴⁰ Education Bill, Section 27, sub-section (3).

⁴¹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

In other words:

‘Schools and colleges will no longer be required to work in partnership with the local authority on the provision of careers guidance; they will be free to determine who to make these arrangements with in the best interests of their students.’⁴³

This is linked to a wider interest in developing a market in career guidance provision. Thus, in relation to the network of organisations to be funded by BIS as part of the NCS:

‘As well as providing free face to face guidance to priority groups, the network of organisations funded by BIS will be able to offer services on the open market to those individuals/organisations which are willing to pay.’⁴⁴

11. In applying these five principles to future provision, three sets of issues can be distinguished:

- Issues related to the interface with schools (paras.12-26).
- Issues related to the all-age NCS (paras.27-35).
- Issues related to funding and transitional arrangements (paras.36-48).

12. **Issues related to the interface with schools.** Ten main such issues can be identified:

- Whether the partnership model has been effectively abandoned (para.13).
- Whether schools can employ careers advisers or not (para.14).
- Whether the statutory duty is to be extended to 18 (para.15).
- What schools are required to do in order to meet their new statutory duty (para.16).
- The adequacy of the accountability measures and other incentives designed to encourage schools to secure high-quality career guidance provision for their pupils (paras.17-18).
- The adequacy of the accountability procedures (paras.19-20).
- The adequacy of the quality standards that are to be applied to external providers (paras.21-22).
- The future of careers education in schools (paras.23-24).
- How far the new arrangements apply to academies (para.25).
- The continuing responsibilities of Local Authorities (para.26).

13. The first issue is **whether the partnership model has been effectively abandoned**. Despite the fact that the third core principle (para.8 above) is to safeguard the partnership between school and external provider, the fourth and fifth core principles (paras.9-10 above) undermine it by giving schools control of the

⁴² John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

⁴³ John Hayes in Education Bill Committee, 24 March 2011.

⁴⁴ Statement by John Hayes on National Careers Service for England, 13 April 2011.

relationship and transforming it into a market. The relationship accordingly is one not of partnership but of contractor and supplier. The school is to determine what is contracted out, and to whom. Moreover, the schools that are being trusted to make these decisions (paras.9-10 above) are the very schools whose ‘vested interests’ have been identified by Ministers with support from Ofsted as part of the rationale for the partnership model that is being abandoned (para.8 above). This is reinforced by the provision in the Education Bill for repealing the right of access of external persons (involved in providing education and training support services) to students and premises.⁴⁵ Schools will be able effectively to act as gatekeepers of the active information and experiences to which their pupils have access. It is also noteworthy that, in relation to the international evidence cited by the Government as the justification for such school autonomy (para.9 above), a review of such evidence indicates that there is no common pattern which characterises the career guidance provision in highly performing education systems; and that in the two countries which have abandoned the partnership model in favour of school commissioning (Netherlands and New Zealand), this resulted in significant reductions in the extent and quality of career guidance provision.⁴⁶

14. The second issue, linked to the first, is **whether schools can employ careers advisers or not**. The Explanatory Notes to the Education Bill state that:

‘... a school cannot fulfil the duty by asking a teacher or another person employed by the school to provide guidance to all pupils’

– though they add that:

‘... this would not prohibit a teacher from offering some careers advice.’⁴⁷

The DfE communication to schools issued in April 2011 significantly modifies this:

‘Those schools that have already developed their own arrangements for providing impartial careers advice and guidance – for example, by employing their own careers adviser – may continue to do so. However, in such cases a school must also ensure pupils have access to a source of guidance which is independent and external to the school. This might include web-based or telephone services, and/or face-to-face guidance from a specialist provider.’⁴⁸

This would seem to undermine the declared purpose of this section of the Bill.

15. The third issue is **whether the statutory duty is to be extended to 18**. A note issued by the Department for Education (DfE) to the Education Bill Committee in the House of Commons (March 2011) included the following statements:

⁴⁵ Section 44 of the Education Act 1997, and section 73 of the Education and Skills Act 2008.

⁴⁶ Watts, A.G. (2011). *The Proposed Model for Career Guidance in England: Some Lessons from International Examples*. Paper prepared for the Department for Education and the Department for Business, Innovation and Skills.

⁴⁷ Education Bill, Explanatory Notes, para.159.

⁴⁸ Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

‘This Government is committed to raising the participation age to 17 by 2013 and to 18 by 2015... The decisions that young people make during the 16-18 phase of their education are just as important to them realising their future potential as the decisions they make pre-16. Our intention therefore is to ensure young people up to the age of 18 attending schools and institutions in the further education sector have access to high quality careers guidance.’

The note further stated that the Bill sought to allow the Secretary of State to amend the scope of the new duty by regulations, to cover over-16s in schools and colleges. It added:

‘We intend to consult on this issue and, subject to the outcome of that consultation, lay regulations to ensure that all young people attending schools and further education institutions will have access to high quality careers guidance up to the age of 18 in future.’⁴⁹

Nick Gibb (Minister of State for Schools) indicated that this consultation would start in the summer, and that it would also address the issue of whether the duty should also be extended downwards to Year 8 to take account of earlier option choices.⁵⁰ The consultation will bring further education institutions more strongly into the frame of the debate, most of which has hitherto been confined to schools.⁵¹ A related issue which this raises is whether (and if so, how) the duty will be extended to cover 16-18s in work-based learning.

16. The fourth issue is **what schools are required to do in order to meet their new statutory duty**. The use of the words ‘might’ and ‘and/or’ in the final sentence of the quotation from the communication to schools in para.14 above suggests that schools could fulfil this duty, at a minimum, by providing ‘access to online resources’. Since it is difficult to see how such access could be denied, such an interpretation would seem to render the formal duty meaningless.

17. The fifth issue is the **adequacy of the accountability measures and other incentives** designed to encourage schools to secure high-quality career guidance provision for their pupils. Ministers in addressing this issue have referred to the proposal in the Schools White Paper to ‘introduce a measure of how young people do when they leave school’.⁵² The rationale for this is elaborated as follows:

‘I believe... that the best indicator of good quality careers advice and outcomes is outcomes, destinations. The test of the new arrangements will be whether they make a difference to where people subsequently go to learn and

⁴⁹ Education Bill: Note from the Department for Education to the Public Bill Committee on Clause 27 (Ref.: EBCC/2011/Note 7).

⁵⁰ Nick Gibb in Education Bill Committee, 29 March 2011. Confirmed in Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

⁵¹ A distinctive issue in relation to colleges is the impact on careers activities of the reduction in provision for enrichment activities (from 114 to 30 guided learning hours). See Young People’s Learning Agency (2010). *16-19 Funding Statement*, p.7.

⁵² Department for Education (2010). *The Importance of Teaching*, p.13. Cm 7980. London: Stationery Office.

the kind of employment that they gain as a result of that progressive learning.’⁵³

The suggestion is that:

‘Such measures would ensure that schools are accountable to young people, parents and their local communities for the manner in which they fulfil their new duties’.⁵⁴

The Government’s Strategy for Social Mobility indicated that the measure would focus on ‘how many continue in education, training or employment’: it would be in place for young people completing Key Stage 5 by 2012/13, and would also include a Key Stage 4 destinations measure.⁵⁵ No information has been provided, however, on how the ‘added value’ element required to measure whether the arrangements ‘make a difference’ are to be distinguished from the raw outcomes, which are likely to be significantly determined by a range of other factors. Moreover, there is recognition that in order to address, for example, the issue of ‘how many people from underrepresented groups in higher education get the opportunity to fulfil their potential and ... the kind of jobs they end up doing’:

‘... we are talking not only about a short-term set of objectives, but about a medium and long-term set of effects.’⁵⁶

It seems highly unlikely that the destinations measure will address this. In the communication to schools, the claim for the measure is the modest one that it will ‘bring into focus the quality of the arrangements for careers guidance’.⁵⁷ Meanwhile, little attention seems to have been given to other possible accountability measures, though John Hayes has indicated that he would be willing, for instance, to look at the feasibility of publishing ‘figures on the percentage of school pupils receiving individual careers guidance’.⁵⁸

18. Further incentives mentioned by Ministers have included:

- Asking ‘relevant national bodies to work with the careers sector to help schools, colleges and training organisations to learn from and share examples of good practice.’⁵⁹
- Collating and publishing ‘clear evidence of the benefits and uses of careers guidance.’⁶⁰ This evidence base must be ‘concisely communicated’.⁶¹

⁵³ John Hayes in Education Bill Committee, 29 March 2011.

⁵⁴ Letter from John Hayes to Tony Watts, 9 February 2011.

⁵⁵ HM Government (2011). *Opening Doors, Breaking Barriers: a Strategy for Social Mobility*, p.40.

⁵⁶ John Hayes in Education Bill Committee, 29 March 2011.

⁵⁷ Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

⁵⁸ Letter from John Hayes to Tony Watts, 9 February 2011. This would seem congruent with his statement earlier in this correspondence that ‘We have ... removed ring-fences for budgets, but we do so within a clear framework of transparency and accountability’ (letter from John Hayes to Tony Watts, 15 December 2010).

⁵⁹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁶⁰ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁶¹ Letter from John Hayes to Tony Watts, 9 February 2011.

- Looking at ‘ways of recognising success and excellence, for example, developing awards for careers guidance professionals and those who have benefitted from it.’⁶²

No detail has been provided on any of these.

19. The sixth issue, linked closely to the fifth, is the **adequacy of the accountability procedures** that are to be provided. The Government’s general intention is ‘to reduce the burden on Ofsted and make more straightforward what is inspected in schools’. Accordingly, in relation to careers provision, John Hayes has indicated that:

‘I do not want to include that among the things that Ofsted must inspect in every school in every case, because that would be counter to the policy emphasis.’

However:

‘I would expect some consideration of these matters, because if the Ofsted inspector felt that there was a weakness in this area – perhaps something that was highlighted to them by teachers, learners, parents or others – clearly, as this would be a statutory duty and meeting that duty would be part of what being a good school was about, I would expect Ofsted to take a look at it.’⁶³

The procedures for stimulating such ‘highlighting’ are, though, unclear.

20. John Hayes also indicated that he would ‘consider asking Ofsted to carry out a further thematic review’, following that carried out in 2010:⁶⁴

‘That would allow us to make a direct comparison between the effect of the new arrangements and the problems that I have highlighted with the existing ones. It would also add to our knowledge of what schools are doing to secure careers guidance, provide examples of good practice from which other schools can learn and allow us further to improve as we progress with such a substantial public policy change.’⁶⁵

This was linked by John Hayes to a recommendation for such an Ofsted review from the Task Force on the Careers Profession,⁶⁶ the purpose of which was ‘to establish a baseline for future development’: it was to be followed by ‘a further such review within three years to evaluate the progress that has been made’. The response from John Hayes cited here was somewhat different from (though not necessarily incompatible with) the terms of this recommendation.

⁶² John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁶³ John Hayes in Education Bill Committee, 29 March 2011.

⁶⁴ Ofsted (2010). *Moving through the System – Information, Advice and Guidance*.

⁶⁵ John Hayes in Education Bill Committee, 29 March 2011. The commitment to carry out such a thematic review had already been made by John Hayes in brief terms, in his speech to the Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁶⁶ Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 13.

21. The seventh issue is the **adequacy of the quality standards that are to be applied to external providers**. As noted in para.10 above, John Hayes made a commitment in February 2011 to the notion that all such providers ‘will be expected to meet exacting quality standards’. He has also indicated that:

‘Government ... has a role in quality assurance, for example, by ensuring that schools understand what are the hallmarks of high quality careers guidance, and know which providers meet that standard. We are considering the introduction of a register of quality assured providers to help schools as they make arrangements for careers guidance for their students. Strong professional standards – as are being developed by the Careers Profession Alliance – will be at the heart of any national quality standard for careers guidance.’⁶⁷

A subsequent letter from Lord Hill expressed the establishment of such a register as an ‘intention’.⁶⁸ This potentially responds to the recommendation of the Careers Profession Task Force that:

‘... any organisation that is making arrangements for the provision of career guidance to young people should ensure that the provider meets a relevant, nationally approved quality standard, and that Government should support the development of such a standard.’⁶⁹

But the communication to schools issued on 13 April 2011, while reaffirming that the proposed national quality standard ‘will assist schools in making well-informed decisions about which provider to use’, falls short of requiring schools to select providers who meet such standards. It states:

‘Sources of independent guidance would include, but not be limited to, careers organisations funded by Government or other expert careers guidance providers.’⁷⁰

As this stands, it would seem explicitly to permit schools to draw upon inexperienced providers.

22. It has also not yet been confirmed whether or not the standard that will provide the basis of the proposed register will be based on the existing Matrix Standard (the national quality standard for advice and guidance on learning and work); nor what level of professional qualification will be incorporated within or alongside it. In relation to the latter, the only caveat expressed by John Hayes in relation to the recommendations of the Task Force on the Careers Profession was that:

⁶⁷ John Hayes in letter to Tony Watts, 9 February 2011. This resonated with his broader but looser statement in his Belfast speech regarding helping institutions to know where professional advice can be found: ‘We will discuss with the sector how best to do that, perhaps by establishing a register of providers who meet the highest standards, and by a kite-mark, and by awards for excellence’ (speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010).

⁶⁸ Lord Hill of Oareford (Parliamentary Under Secretary of State for Schools) in letter to Adrian Sanders MP, 8 March 2011.

⁶⁹ Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 11.

⁷⁰ Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

‘... we will consider the Taskforce’s recommendation on levels of qualification, particularly the speed at which we could move towards establishing Level 6 – equivalent to an Honours degree – as the minimum standards for practising careers advisers within the service’.⁷¹

Ministers have not yet commented on the Task Force’s further recommendation that ‘consideration should be given to raising the minimum level to level 7 [postgraduate level] within five years’.⁷²

23. The eighth issue is the **future of careers education in schools**. The announcement of the provision in the Education Bill to repeal the statutory duty for schools to provide careers education from 11 to 16 (see para.9 above) has caused great concern. In response, John Hayes has stated that the removal of the duty:

‘... is not an indication that the Government does not see the activities that come within a broad definition of “careers education” as important. We view careers education in the same way as Personal Social Health and Economic (PSHE) education, which although not statutory we recognise as being very important for students. The Government’s aim is to focus legislation on the areas we are concerned might not be addressed otherwise; careers education, as an ongoing process, is part of what schools do as a matter of course to prepare their students for the next stage in their learning/career, and we believe that we should trust schools to do that.’⁷³

In reply to the argument that under existing arrangements too many schools gave little attention to careers education, he commented:

‘This suggests to me that the current statutory duty has not been having the effect that we might wish, and that it will not be the answer to hold slavishly to the new arrangements. More generally, I do not believe that imposing duties on schools who are not yet convinced of the arguments underpinning a particular duty is an effective way of reaching the outcomes that we aim for. If the case for careers-inspired learning is made and made well, and appropriate incentive measures are in place, I do not believe that the removal of the statutory duty will have a significant effect on the behaviour of schools.’⁷⁴

Possible ‘incentive measures’ might include an overarching national kite mark to validated the different careers education, information, advice and guidance quality awards for schools, colleges and work-based learning providers, as recommended by the Careers Profession Task Force.⁷⁵ The Task Force and DfE officials have welcomed Careers England’s offer to facilitate the establishment of such a kite mark, but no specific public response has yet been made by Ministers to this

⁷¹ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

⁷² Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 4.

⁷³ Letter from John Hayes to Tony Watts, 14 January 2011.

⁷⁴ Letter from John Hayes to Tony Watts, 9 February 2011.

⁷⁵ Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 10.

recommendation: there is no reference to it in the April 2011 communication to schools.⁷⁶ Nick Gibb appeared to confuse it with a kite mark for careers guidance provision:

‘We will ... work with the sector to establish a “kite mark”, covering existing quality awards for schools and colleges that will recognise those who consistently offer good quality careers guidance to their students.’⁷⁷

Moreover, no reference has been made by Ministers or DfE communications to the existing quality standards for information, advice and guidance for young people, which could provide a useful starting-point for schools.⁷⁸

24. Nick Gibb’s confusion (para.23 above) reflected a wider difficulty that has also been evident elsewhere for Ministers to understand the distinction between careers education and careers guidance, and the relationship between the two. John Hayes has subsequently, however, clarified this relationship:

‘The broad range of activities encompassed within the terms of careers education are important in contextualising the careers guidance on offer to pupils and support the development of decision making and careers management skills.’⁷⁹ That point has been made to me by the profession, academics and others, and I understand it. What schools do in those terms matters just as much as what independent careers advisers offer, and to see careers advice in isolation from the supporting education provided by teachers would be a mistake. We will make it clear as we set up the new service that schools have a continuing responsibility to ensure that the context is provided, in the way that I have described, for the advice that young people are given.’⁸⁰

The communication to schools, however, stops short of referring to a ‘continuing responsibility’. It simply states that:

‘It will be for schools to decide how these activities should be delivered, taking into account the particular needs of their pupils. The removal of this provision is permissive; it does not imply that these activities are unimportant,

⁷⁶ Department for Education (2011). The Education Bill – changes to the delivery of careers guidance.

⁷⁷ Letter from Nick Gibb to David Gauke MP, 16 March 2011.

⁷⁸ Department for Children, Schools and Families (2009). *Quality, Choice and Aspiration: a Strategy for Young People’s Information, Advice and Guidance*, annex 2. London: DCSF. Although the 12 standards were designed for Local Authorities to discharge their duties for Connexions, 10 of them relate directly to careers education, information, advice and guidance for young people.

⁷⁹ John Hayes also indicated elsewhere in the Committee debate (29 March 2011) that this provision should include work experience, as ‘an important part of what is needed to prepare any young person for their working life’. His statement here referred specifically to work experience in Key Stage 4. This is significant in the light of the recommendation in the Wolf Report that work experience for 16-18-year-olds should be prioritised and that ‘the blanket requirement to give all KS4 pupils “work experience” ... has served its time’. Wolf, A. (2011). *Review of Vocational Education – the Wolf Report*, p.131. London: Department for Education. It is also worth noting, however, that the DfE funding for Education Business Partnerships has been withdrawn from 31 March 2011: schools now have to decide whether or not to buy in services from Education Business Partnership Organisations (letter from John Wilson, Young People’s Learning Agency, 28 March 2011).

⁸⁰ John Hayes in Education Bill Committee, 29 March 2011.

but that the Government considers that it is not necessary to legislate for them.’⁸¹

It also seems that the focus now is not on a ‘curriculum’ but on a range of ‘information and activities’:

‘We expect schools to offer their pupils information and activities to complement and enhance formal careers guidance, for example: “taster” sessions; open evenings and “next step” events; past students coming in to schools to talk about their experiences; employers visiting to talk about their jobs; and mentoring opportunities.’⁸²

25. The ninth issue is **how far these arrangements apply to academies**. Nick Gibb noted that:

‘We have always been clear that, while maintained schools are governed by legislation, one of the defining features of academies is that they are regulated contractually.’

Accordingly, he indicated that:

‘... all new academies, though their funding agreements, will be subject to a requirement to secure access to independent careers guidance for their pupils.’

Within a short time, this should be extended to existing academies through their funding agreements. In addition:

‘... academies will be subject to the destinations measure ... which will provide information to parents on the effectiveness of academies in preparing their students to move on to positive destinations.’⁸³

26. The tenth issue is the **continuing responsibilities of Local Authorities**. John Hayes in his Belfast speech suggested that these would be confined to two areas:

- Responsibility ‘for helping vulnerable youngsters to move forward in their lives and to participate in education, training or employment.’
- Responsibility for maintaining ‘accurate data on young people’s participation in order to target support effectively on those who would otherwise suffer advantage.’⁸⁴

The BIS strategy document clarified the former:

⁸¹ Department for Education (2011). The Education Bill – changes to the delivery of careers guidance. It is worth noting that the statutory duty which is being repealed was also ‘permissive’ in detail if not in principle, in that it required schools to provide careers education without specifying what it should comprise.

⁸² HM Government (2011). *Opening Doors, Breaking Barriers: a Strategy for Social Mobility*, p.40. The Strategy for Social Mobility includes provision for enhancing such activities through a variety of volunteering activities.

⁸³ Nick Gibb in Education Bill Committee, 29 March 2011.

⁸⁴ John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

‘Local authorities will provide wider personal support to vulnerable young people and those who are not in education, employment or training aged 13-19, and young adults with learning difficulties and disabilities up to the age of 25.’⁸⁵

John Hayes subsequently stated explicitly that:

‘When the all-age careers service is established, local authorities will no longer be expected to make available a universal careers advice and guidance offer to young people.’⁸⁶

Later, however, Nick Gibb stated that:

‘Local authorities will retain their statutory duty to make available services to encourage, enable or assist the effective participation of young people in education or training.’⁸⁷

In response to a query on this, the responsible civil servant issued this clarification:

‘This is all quite complicated, and PQs are never the best place to explain such things. The s68 duty is not specific about whether the “services to encourage, enable or assist the effective participation of young people in education or training” are the universal services or the targeted support services. Of course, under Connexions, they were both, but it has always been for local authorities to determine exactly what those services are and how they should be provided. We cannot, therefore, change the s68 duty to “remove” careers guidance, as it is not specifically referred to within the duty. Nor do Ministers want expressly to prohibit local authorities from offering careers services in the future (for example, I understand one of the Next Step prime contractors is a local authority). So they will retain the duty as it stands. But we will – as we have done – make clear (e.g. through statutory guidance) that they are not expected to provide careers services to young people once the all-age service is in place and the duty for making arrangements for careers guidance has passed to schools.’⁸⁸

The new Statutory Guidance does indeed state this latter point explicitly. It also affirms Local Authorities’ continuing responsibility for ‘tracking young people’s participation in order to identify those who need support’, using the local Client Caseload Information System to record young people’s post-16 plans and the offers they receive.⁸⁹

⁸⁵ Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.42. The duty relating to young people with learning difficulties and disabilities includes assessments of their transitional needs at 16-18+, under Section 139A of the Learning and Skills Act 2000, which are commonly completed by specialist careers/personal advisers.

⁸⁶ John Hayes in response to Parliamentary Question 37073 from Gordon Marsden MP, 14 February 2011.

⁸⁷ Nick Gibb in response to Parliamentary Question 47399 from Gordon Marsden MP, 17 March 2011.

⁸⁸ Email from Anna Paige to Tony Watts, 25 March 2011.

⁸⁹ Department for Education (2011). *Statutory Guidance for Local Authorities on Targeted Support Services for Young People*.

27. **Issues related to the all-age NCS.** Five main such issues can be identified:

- The proposed structure of the service (para.28).
- The proposed status of the service (paras.29-31).
- Whether the quality standards to be applied to the service are to be different from those applied to other providers (para.32).
- The links between the service and the Department for Work and Pensions (para.33).
- The relationship of the service to career development within workplaces (paras.34-35).

28. The first all-age service issue is the **proposed structure of the service**. John Hayes has indicated that he does not regard this as requiring new legislation:

‘The all-age careers service will be provided through an arrangement between the Secretary of State and the chief executive of Skills Funding, under existing legislation.’⁹⁰

He has also stated that:

‘We need to be clear what the architecture of the new service will look like.’⁹¹

So far, however, little detail has been provided. The current Next Step careers service for adults comprises regional contracts with ‘prime contractors’ for face-to-face services (each of which sub-contracts elements of service delivery to additional providers), plus one national contract for the telephone helpline. The statement on the NCS indicates that the DBIS-funded components of the service will comprise:

- An online and helpline service for adults, which from September 2011 will ‘be linked to similar services for young people, so there is a single point of access for all users of each service’.
- A funded ‘network of public, private and voluntary sector organisations to provide face to face career guidance to adults’.⁹²

In an earlier statement, John Hayes had indicated that:

‘Local community-based services will be expected to meet national standards, but will have flexibility to tailor their services to meet local need, including in response to schools...’⁹³

But the level of integration of the various services is unclear, both across the youth/adults interface and across different channels of service delivery. Is there, for

⁹⁰ John Hayes in response to Parliamentary Question 37071 from Gordon Marsden MP, 14 February 2011. The reference here to ‘Skills Funding’ is presumably to the Skills Funding Agency. The relevant legislation is understood to be Section 9 of the Employment and Training Act 1973.

⁹¹ John Hayes in Education Bill Committee, 24 March 2011.

⁹² Statement by John Hayes on National Careers Service for England, 13 April 2011.

⁹³ John Hayes in response to Parliamentary Question 40119 from Alison McGovern MP, 16 February 2011.

example, to be an integrated customer management system, and if so, how is this to be managed? It is also unclear whether or not there are to be regional contracts with ‘prime contractors’. If not, what? Will the community-based services be included within the quality arrangements for ‘all contractors delivering the all-age service’ (see para.32 below)? If their contracts are to be negotiated with ‘prime contractors’ (a quasi-market within a quasi-market) as well as potentially with schools (more like a real market, though still based on public monies) and with other organisations and individuals (a real market) (see para.10 above), what will the relationship be between these various contracting processes, with their differing and potentially conflicting contractor-supplier relationships? What will the transaction costs be?

29. The second all-age service issue is the **proposed status of the service**. To what extent is the NCS to be a strategic body, and to what extent a mere collection of competitors within a market? The other leading all-age careers services in the world – in New Zealand, Scotland and Wales – are clearly strategic bodies, effectively providing a strong professional spine for a lifelong career guidance system, and paying significant attention to supporting the development of career support capacity in educational institutions, in workplaces and in the wider community.⁹⁴ The recent career information, advice and guidance strategy document from the Scottish Government strongly reinforces this view, referring to the leadership role in this field of Skills Development Scotland (into which Careers Scotland has now been merged) and to its joint working ‘to build the capacity of guidance partners’⁹⁵; much the same position has been adopted in Wales⁹⁶. Will the all-age NCS in England have a similar strategic and capacity-building role? Or will its providers simply be encouraged to build their own service-delivery ‘businesses’?

30. Closely linked to this is the status of the all-age NCS in relation to other providers. Some Ministerial statements have suggested that, even if schools choose an alternative provider, they would be encouraged to have strong links with the all-age service.⁹⁷ This might include usage of its website and helpline resources (though these will presumably be freely accessible to all). A further issue, however, is the relationship to other providers of the NCS’s customer management system, with its potential relationship to tracking young people’s progress. Will they contribute to the system? How does this relate to Local Authorities’ continuing responsibilities for tracking (see para.26 above) and to the allocation of responsibilities in relation to the new destinations measure (see para.17 above)?

⁹⁴ Watts, A.G. (2005). *Progress and Potential*. Glasgow: Careers Scotland. Watts, A.G. (2007). *Career Services: a Review in an International Perspective*. Wellington, New Zealand: Career Services. Watts, A.G. (2009). *Careers Wales: a Review in an International Perspective*. Cardiff: Welsh Assembly Government. Watts, A.G. (2010). National all-age career guidance services: evidence and issues. *British Journal of Guidance and Counselling*, 38(1), 31-44.

⁹⁵ Scottish Government (2011). *Career Information, Advice and Guidance in Scotland: a Framework for Service Redesign and Improvement*, p.10.

⁹⁶ Edwards, H.E., Saunders, D. & Hughes, D. (2010). *Future Ambitions: Developing Careers Services in Wales*. Cardiff: Welsh Assembly Government. Plus the Written Statement issued alongside this report by Leighton Andrews (Minister for Children, Education and Lifelong Learning, Welsh Assembly Government), 16 November 2010.

⁹⁷ For example, letter from Lord Hill of Oareford to Adrian Sanders MP, 8 March 2011.

31. Such issues concerning the status of the NCS could be relevant not only to services for young people, but to the wider market in career guidance provision. John Hayes alluded to such a market briefly in his statement that:

‘Over time, I want to create an environment in which English careers guidance is recognised for the important public good that it is, in which young people, adults, schools, colleges, universities and whole communities see its value, use it and invest in it.’

The NCS could play an important role in supporting and quality-assuring a market of this kind.⁹⁸ But if it comprises some or many but not all of the providers within the market, as is suggested in para.10 above, it will not be in a position to play such a role.

32. The third all-age service issue is whether the **quality standards to be applied to the NCS** are to be different from those applied to other providers. The standards to be applied to the all-age service are demanding:

‘We will require all contractors delivering the all-age service to meet a predefined quality standard such as the matrix standard, which is used for the Next Step adult careers service. We will also monitor the quality of advice through a range of actions including independent and rigorous inspection by Ofsted, reporting of performance against contractual requirements and regular customer satisfaction surveys conducted at national and regional levels.’⁹⁹

In addition, organisations in the NCS will be expected to support their staff to achieve:

‘... common professional standards and codes of ethics, supported by appropriate initial training and continuing professional development.’¹⁰⁰

Will comparable demands be made for other providers? If not, this may be acceptable if the NCS is viewed as a strategic body; much less so if it is not.

33. The fourth all-age service issue is the **links between the NCS and the Department for Work and Pensions (DWP)**. The current contracts for the Next Step service include provision for signposting and referral of Jobcentre Plus customers, and also for some co-location of services in Jobcentre Plus premises as part of an integrated employment and skills offer. John Hayes has more recently stated that:

‘I am trying to forge an unprecedented level of co-operation between the DWP and ... BIS, on the subject.’¹⁰¹

⁹⁸ For a discussion of the issues involved, see Watts, A.G., Hughes, D. & Wood, M. (2005). *A Market in Career? Evidence and Issues*. Derby: Centre for Guidance Studies, University of Derby. Also Hooley, T., Hutchinson, J. & Watts, A.G. (2010). *Enhancing Choice? The Role of Technology in the Career Support Market*. London: UK Commission for Employment and Skills.

⁹⁹ John Hayes in response to Parliamentary Question 39553 from Alison McGovern MP, 14 February 2011.

¹⁰⁰ Statement by John Hayes on National Careers Service for England, 13 April 2011.

This statement referred particularly to joint working in relation to the engagement of disengaged young people: the need for maintaining close links with Jobcentre Plus is included in the Statutory Guidance for Local Authorities.¹⁰² But there could be significant benefits for the public and for the Exchequer if the Government was to view the new NCS as the provider of choice in relation to some DWP programmes with career guidance components, with potential economies of scale and quality-assurance benefits; or at least to apply to providers the organisational and professional standards that are currently being developed for and alongside the NCS (see paras.7, 21-22 and 32).

34. The fifth all-age service issue is the **relationship of the service to career development within workplaces**. The BIS strategy document indicated the Government's intention to continue to support UnionLearn (the TUC's learning and skills organisation) 'in building on the impressive track record of unions and Union Learning Representatives' in promoting learning within workplaces. It also stated that it would support ULRs 'to play a more active role in helping individuals in the workplace to access careers information and advice' – including helping individuals to use the online tools available through Next Step (soon to be merged into the all-age NCS).¹⁰³ In addition, John Hayes has indicated that the all-age service could have a role in supporting and increasing 'the involvement of employers in the career development of their employees', and that he is willing to consider the possibility of strengthening the career development element in a revised Investors in People kite mark.¹⁰⁴

35. This could open up possibilities for harmonising voluntary kite marks for organisations which wish to indicate that they invest in career development, whether they are schools (cf. para.23 above), institutions of further and higher education, or employers. Such kite marks for *organisations* could be viewed as complementing more mandatory provision for:

- Professional standards for individual career *practitioners* (see para.7 above).
- Organisational standards for *career guidance providers* (see paras.21-22 above).

A three-level quality-assurance structure of this kind would help to avoid some of the current confusions on such matters.

¹⁰¹ John Hayes in Education Bill Committee, 24 March 2011.

¹⁰² Department for Education (2011). *Statutory Guidance for Local Authorities on Targeted Support Services for Young People*.

¹⁰³ Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, pp.46-47.

¹⁰⁴ Letter from John Hayes to Tony Watts, 15 December 2010. This could resonate with the statement in the BIS strategy document that: 'The UK Commission for Employment and Skills will work with employers, Sector Skills Councils, ACAS, CIPD, CBI and the TUC to develop a new ambitious strategy for Investors in People in 2011. This will include repositioning Investors in People so that it becomes the improvement tool of choice for businesses wishing to grow through smart acquisition and use of skills and through joint enterprise between employers and the employed.' Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.45.

36. **Issues related to funding and transitional arrangements.** Finally, there are two important general issues on which there continue to be grave concerns and uncertainties:

- Funding (paras.37-43).
- Transition arrangements (paras.44-48).

37. On **funding**, the working assumption had been that, in the light of John Hayes' statement in November 2010 that 'we will build on Next Step, and on Connexions because we must not lose the best of either' (see para.6 above), the funding for the new all-age NCS would be based on merging the budgets for the two pre-existing services. This expectation was encouraged by John Hayes's further statement in January 2011, in relation to Connexions services, that:

'Local authorities will retain a duty to provide the service and the new all-age service will begin to kick in from this autumn, so any hiatus ... should not be significant. I hope that local authorities would put in place arrangements to ensure that those people involved could move from one service to the other reasonably seamlessly'.¹⁰⁵

A serious strategy to achieve this, within the framework of the Government's principles and policies, might have involved, for example, a three-stage process, transparent to all from the outset:

- Ensuring that Local Authorities kept services in place during the initial stage.
- Transferring the Connexions career guidance funding to the all-age service for an interim stage, in order to maintain continuity of services while the work on quality standards and other arrangements was being developed and completed.
- Notifying schools that the bulk of this funding would subsequently be transferred into their budgets in order to enable them thenceforth to purchase the services.

No such strategy has been evident.

38. In the case of Connexions, the most widely-accepted basis for calculating the current funding is as follows:

- The notional sum allocated for Connexions in 2010/11 was £467m. This was one of a series of service allocations (totalling £2,482m) that have been merged into the Early Intervention Grant, which is to be reduced by 10.9% to £2,212m in 2011/12 and then increased by 3.8% to £2,297m in 2012/13.¹⁰⁶ Local Authorities are free to determine their own priorities between these services.¹⁰⁷

¹⁰⁵ John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

¹⁰⁶ Analysis confirmed in email from Anna Paige to Tony Watts, 30 December 2010.

¹⁰⁷ As they have been since full budgetary and management responsibility for Connexions services was transferred from Connexions partnerships to Local Authorities on 1 April 2008, effectively ending the 'ring-fencing' of this funding. See McGowan, A., Watts, A.G. & Andrews, D. (2009). *Local*

- This notional Connexions allocation covers two elements: (a) a career guidance service for all young people; and (b) a targeted holistic service for at-risk young people. A PriceWaterhouseCoopers study in 2006 suggested that around 42% of the Connexions allocation was spent on element (a). Applying that to the 2010/11 budget would give a figure of just over £196m.¹⁰⁸
- To this should be added the separate funding for Connexions Direct, which in 2010/11 was around £7m, making a total of £203m.¹⁰⁹

In respect of adults, the Skills Funding Agency – acting on behalf of BIS – has allocated £82.8m in 2010/11 for careers guidance to be provided by the Next Step careers service.¹¹⁰

39. The indicative BIS budget for information, advice and guidance services in 2012/13 has now been announced as being £84.4 million, subject to confirmation when budgets are agreed across the Department.¹¹¹ Conspicuously, however, this announcement on 13 April 2011 was not accompanied by a comparable statement about the DfE contribution to the new all-age NCS. This raised questions about whether such an announcement is to be made at all, or whether Ministers are attempting to cast a veil over the paucity of this contribution. Contrary to the expectations raised by earlier Ministerial statements (see para.37 above), there are now increasing fears that it will not include the bulk of the current notional Connexions career guidance funding of £203m, and indeed that it may be confined largely or wholly to the Connexions Direct element of £7m. John Hayes has explicitly affirmed the importance of face-to-face guidance and his wish to resource it:

‘...face-to-face guidance matters, too. I am determined to use the limited resources that we have available – we live in tough times and the Government are determined to deal with the deficit, so there is no money sloshing about – to maximise the amount of face-to-face contact that people can enjoy, because it is needed to supplement what they can gain online.’¹¹²

But there has subsequently been no further reference to DfE funding for face-to-face guidance for young people within the all-age service.

Variations: a Follow-Up Study of New Arrangements for Connexions/Careers/IAG Services for Young People in England. Reading: CfBT Education Trust.

¹⁰⁸ It is important to note that this figure is significantly lower than the budget provided to the former Careers Service, prior to its integration into Connexions. The figure for 2000/01 was £233m (Sion Simon in response to Parliamentary Question 254376 from David Willetts MP, 10 February 2009): this was equivalent to £303m at 2010 rates. This funded much more universal provision: under the Careers Service, most young people received at least one careers interview. Under Connexions, this was significantly eroded: by January 2008, only 40% of young people in England received an individual (i.e. one-to-one) interview with a Connexions personal adviser (who might or might not be a professional careers adviser) (cited in Watts, A.G. (2008). The partnership model for careers education and guidance in schools and colleges: rise, decline – and fall? *Career Research and Development*, 20, 4-8).

¹⁰⁹ Email from Anna Paige to Tony Watts, 30 December 2010.

¹¹⁰ John Hayes in response to Parliamentary Question 29819 from Gordon Marsden MP, 9 December 2010.

¹¹¹ Statement by John Hayes on National Careers Service for England, 13 April 2011.

¹¹² John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

40. If it is the case that the direct DfE contribution to the NCS is to be confined to web-based and telephone-based services, then any face-to-face career guidance services for young people will be dependent on what schools are prepared to pay for. Ministers have stated that:

‘Subject to the passage of the Education Bill through Parliament, from September 2012 schools will be responsible for securing access to independent, impartial, careers guidance for their pupils aged 13 to 16. They will be free to decide how to do so, including what resources may be required.’¹¹³

This was elaborated by John Hayes in the Education Bill Committee:

‘... schools have responsibility for securing guidance for their pupils. Members of the Committee have made reference to the pressure on schools budgets, and I do not want to suggest that schools, like all of us, will not face difficult decisions over the coming years as we seek to get our finances back on track.’

But, he claimed:

‘Whereas the Government have had to reduce funding in many areas, we have protected school funding. In addition, the pupil premium, which lies at the heart of our overall schools programme, provides £2.5 billion of extra money by 2014-15, following poorer children directly at the school they attend. There will be clear transparency requirements to ensure that it is spent on improving the life chances of our poorest young people.’¹¹⁴

Elsewhere, he stated that:

‘... given the urgent need to tackle the deficit that this government has inherited and given that there have been reductions in budgets across the private sector, it is not inappropriate to expect schools to strive to find efficiencies, which will then allow them leeway to translate those savings into spending in other areas.’¹¹⁵

There is no mention here of any Connexions career guidance monies being transferred to school budgets, even notionally (school budgets are funded through the Dedicated Schools Grant, which is not ring-fenced for specific activities¹¹⁶).

41. It is also worth noting that in addition to career guidance services for pupils, schools will now need to buy in – if they wish to sustain them – the staff development and programme development services that have previously been available free of charge from Connexions and/or Local Authorities, plus other elements of careers programmes which have been provided by other external services that have had their

¹¹³ Lord Hill of Oareford in response to Parliamentary Question HL8027 from Lord Beecham, 29 March 2011.

¹¹⁴ John Hayes in Education Bill Committee, 24 March 2011.

¹¹⁵ Letter from John Hayes to Tony Watts, 9 February 2011.

¹¹⁶ Nick Gibb in response to Parliamentary Question 47398 from Gordon Marsden MP, 17 March 2011.

funding withdrawn, e.g. Education-Business Partnerships¹¹⁷ and Aimhigher. This at a time when, despite Ministers' assurances (para.40 above), many schools are anticipating significant reductions in their overall budgets.¹¹⁸

42. If all this proves to be true (that the DfE contribution to the NCS is confined wholly to web-based and telephone-based services, without any discernible transfer of career guidance funding to schools), the reality will be that the existing notional funding for face-to-face career guidance services for young people under Connexions has not just been pruned in line with general cuts in public expenditure, but has been allowed to disappear altogether – without any public announcement to this effect. It should be noted that in the two countries which have previously adopted school commissioning (Netherlands and New Zealand), discernible funding was provided for the schools to buy in such services if they wished¹¹⁹: the fact that this is not the case now in England suggests that the significant reductions in the extent and quality of career guidance provision that subsequently took place in both of these countries (para.13) are likely to be much greater here.

43. It should also be noted that the current Connexions career guidance budget considerably outweighs the Next Step careers service budget (see para.38 above). Civil servants have confirmed that money from the BIS budget cannot be used to pay for areas that BIS is not responsible for (such as careers guidance for young people), and that the same principle applies to the DfE.¹²⁰ While this offers some protection for the BIS-funded services for adults, there are concerns about whether adults will receive the same levels of support under the new NCS all-age arrangements as under the current Next Step careers service. Some current Next Step arrangements are built significantly upon the foundations of services for young people through Connexions: where these are eroded or destroyed, this could seriously affect the future services which will be available for adults as well.

44. On the **transition arrangements**, the timetable announced in the BIS strategy document was that:

‘Both young people and adults will be able to begin accessing new arrangements for careers guidance from September 2011. The service will be fully operational by April 2012.’¹²¹

It has now been indicated that the new duty on schools to secure impartial and independent careers guidance is likely to come into effect in September 2012. Schools are, however, encouraged to consider what arrangements they might make in the year beginning September 2011, in anticipation of their new duties. They are further encouraged to do this ‘in discussion with local authorities, taking account of local

¹¹⁷ See footnote 79.

¹¹⁸ See e.g. ‘Teachers under threat as schools prepare to cut staff by up to a fifth’. *Guardian*, 14 March 2011.

¹¹⁹ Organisation for Economic Co-operation and Development (2002). *OECD Review of Career Guidance Policies: Netherlands Country Note*, p.5. Paris: OECD. Watts, A.G. (2007). *Career Services: a Review in an International Perspective*, p.42. Wellington, New Zealand: Career Services.

¹²⁰ Note of the first meeting of the Advisory Group on the All-Age Careers Service, 17 December 2010.

¹²¹ Department for Business, Innovation and Skills (2010). *Further Education – New Horizon: Investing in Skills for Sustainable Growth*, p.14.

arrangements for providing careers guidance to young people in advance of these changes'.¹²²

45. Steps have also belatedly been taken, in April 2011, to remind Local Authorities of their continuing responsibilities in the meantime:

‘Local authorities must consider what arrangements they should put in place to ensure provision of careers guidance to young people in advance of this new duty being placed on schools, and of the establishment of the new careers service... The Early Intervention Grant will support local authorities’ transitional responsibilities in respect of careers guidance in advance of these changes coming into effect.’¹²³

46. The delays in issuing this statement have however been very damaging. Many Local Authorities have announced major reductions and even closures of their Connexions services, including massive staff redundancies. Since Local Authorities are not in future to retain responsibility for career guidance services, and in the absence of any clarity about the extent and nature of the all-age NCS into which these services are supposedly to be merged, such services have in some cases been particularly hard hit.¹²⁴

47. Alongside the new announcement, John Hayes has indicated his willingness, in the light of the concerns expressed in the Education Bill Committee about the transition arrangements, to organise two ‘summits’:

‘I want to ... suggest ... that we put together a summit of interested parties, including local authorities, career professionals and representatives of the education sector to talk through the transitional arrangements and the set-up of the new service to make sure that they are seamless. I will hold a second summit of some of the users of the services... I think we should have a summit for young people – and other people, because this is all-age, after all – about the use of the service.’¹²⁵

These would be followed by an action plan:

‘I shall be happy ... to produce an action plan following the summits that we shall hold. That plan will contain staging posts that can be measured as we reach the destination of a fully fledged service next year. We said that our first step will be in place this autumn and that the service will be fully operational from next spring. Working with the taskforce that is built around the summits that we have already introduced, I am happy to cement that timetable with those staging posts and to work with the sector to deliver outcomes that will mark progress along that journey.’¹²⁶

¹²² Department for Education (2011). The Education Bill – changes to the delivery of careers guidance.

¹²³ Department for Education (2011). LA communication.

¹²⁴ Extensive evidence on these cuts and redundancies is available from Unison.

¹²⁵ John Hayes in Education Bill Committee, 24 March 2011.

¹²⁶ John Hayes in Education Bill Committee, 29 March 2011.

48. The relationship of these ‘summits’ and of this ‘taskforce’ to existing consultative mechanisms, notably the Advisory Group on the All-Age Careers Service and the Task Force on the Careers Profession¹²⁷, is unclear. Despite Ministers’ claims to have been ‘working with members of the profession ... to put in place the necessary components to deliver the kind of quality service that I want to put together’¹²⁸, such consultation has so far been very limited. In particular, the Advisory Group has so far met three times¹²⁹, but has not yet received a single substantive paper on the design of the new service and associated arrangements.

49. **Conclusions.** The current Government policies contain some important contradictions in relation to future provision for young people:

- Between the affirmation of the partnership model, and then undermining it by giving schools control of their relationships with external services, thereby converting them into contractor-supplier relationships (para.13).
- Between enacting legislation designed to ensure access to independent career guidance from professional careers advisers, and then undermining this by indicating that schools can employ their own careers adviser (para.14).
- Between enacting a statutory duty for schools to secure independent careers guidance for all their pupils, and then rendering this duty meaningless by indicating that it can be satisfied by providing access to online resources (which could not realistically be denied) (para.16).

All of these reflect unconvincing attempts to resolve the fundamental tensions between the original BIS vision for the all-age careers service and DfE policies relating to school autonomy. Veiled by these tensions and confusions, there are fears that most or all of the existing funding for face-to-face career guidance services for young people may be allowed to vanish without trace, without any public announcement to this effect. Such a dramatic erosion in services for young people would seriously undermine the potential to build better services for adults too.

50. There are many issues on which clarification is urgently needed. These include (but are not confined to):

- The DfE funding contribution to the new all-age NCS (paras.37-43).
- The structure of the all-age NCS, and the extent to which it is viewed as a strategic body (paras.28-31, 33-34).
- The organisational quality standard(s) to be applied to the all-age NCS, and also to other providers within the market in career guidance provision (including suppliers from whom schools can purchase such services) (paras.21, 31-32, 35).
- The proposed new kite-mark and other quality arrangements to encourage and help schools to develop high-quality careers programmes (paras.23-24).

¹²⁷ See footnote 23 above. John Hayes has subsequently referred to the role of the Task Force in ‘working closely with Government, not only to define professional standards... but to plan the transition process’ (John Hayes in Education Bill Committee, 29 March 2011).

¹²⁸ John Hayes in Education Bill Committee, 24 March 2011.

¹²⁹ On 17 December 2010, 28 January 2011 and 10 March 2011.

- How the data for the proposed destinations measure in schools are to be collected; how ‘added value’ is to be demonstrated; and what other accountability measures and procedures are to be introduced alongside it (paras.17-20, 30).
- The role of and relationships between current consultative mechanisms on the emerging policies (paras.47-48).

51. If the main elements of the Government’s policies are to be implemented as planned, in a way that improves rather than damages services, there are a number of steps that need to be taken. In particular:

- The architecture of the new all-age NCS service needs to be announced.
- The organisational and professional standards have to be confirmed, developed and implemented both for the NCS and for all providers secured by schools.
- The all-age NCS has to be designed, tendered and contracted.
- The basis for any local contestability has to be determined (including the issue of how any ‘competitors’ to the NCS are to relate to it).
- Schools have to be persuaded to pay for services which they have previously received free of charge (with clarification of what schools are now expected to buy).

There are severe doubts about whether these steps are achievable within the timetable Ministers have set.

52. There are also concerns that:

- By the time the new market is established, much of the expertise for its professional base will have disappeared.
- In the meantime, there will have been a widespread collapse of careers help for young people.
- The original BIS vision for the all-age service will have been fatally eroded by lack of serious engagement from DfE, with adverse impact on the services for adults too.

Tony Watts
16 April 2011

Published by the Careers England Board of Directors on 18 April 2011