

## **Careers England Policy Commentary 15B (Final Version): The Coalition's Emerging Policies on Career Guidance**

This is a further revised version of Policy Commentary 15, originally published in April 2011. An initial revised version (Policy Commentary 15A) was published in September 2011. This final version has been updated to incorporate statements and reports published up to mid-May 2012. It is hoped that this will be helpful in informing subsequent national policy debates and discussions, including the work of the new National Council for Careers.

The main changes since the publication of Policy Commentary 15A are:

- The publication of the Statutory Guidance for schools.
- The publication of the policy document on the National Careers Service.
- Progress on professional standards and on the formation of a single professional body (the Career Development Institute).
- The launch of the Quality in Careers Standard.
- The second annual review of progress in implementing the recommendations of the Careers Profession Task Force.
- The establishment of the National Council for Careers.

## **Careers England Policy Commentary 15B**

*This is a further revised and final version of 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 at an early stage affirmed its intention to strengthen career guidance services in England. Its main rationales were two-fold: promoting social mobility; and moving towards a user-led skills system. In pursuit of this intention, the Government made three commitments, all of which were 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 have lain between these policies and the Government's policies relating to school autonomy. Schools will from September 2012 have a statutory duty to secure careers guidance services from an independent provider (a contractor-supplier relationship); but it is left to schools themselves to define the form such services should take. This undermines the partnership model; raises issues about how quality is to be assured; and effectively renders the statutory duty meaningless.

Veiled by these changes and related confusions, the existing funding for face-to-face career guidance services for young people has been allowed to vanish without trace, without any public announcement to this effect. Most existing Connexions career guidance services for young people have been eroded or dismantled by Local Authority cuts. Schools now have to pay for services they previously received free of charge. Early signs are that a variety of different internal and external models are being developed by different schools, but that in many schools (possibly most if not all) the extent of provision is likely to be significantly reduced.

Meanwhile, the NCS has been launched, and valuable work has been carried out on developing a potentially world-class quality-assurance framework for career guidance in England. But the original Department for Business, Innovation and Skills (BIS) vision for the NCS has been significantly eroded by lack of serious engagement from the Department for Education (DfE), with likely adverse impact on the services for adults too.

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1. The Coalition Government's emerging policies on career guidance have 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 Parliamentary speeches, other speeches, responses to Parliamentary Questions, and correspondence. These have recently been confirmed in the Education Act 2011, in related Statutory Guidance issued to schools<sup>1</sup> and in a policy document on the new National Careers Service<sup>2</sup>. This Policy Commentary presents an analysis of these statements and documents, updated to mid-May 2012. It is structured in six parts:

- Rationales (paras.2-4).
- Core principles (paras.5-11).
- Issues related to the interface with schools (paras.12-28).
- Issues related to the all-age NCS (paras.29-40).
- Issues related to funding and transitional arrangements (paras.41-55).
- Conclusions (paras.56-57).

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 articulated 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.’<sup>3</sup>

He linked social mobility to social cohesion and social justice.<sup>4</sup> He also referred to the Milburn Report<sup>5</sup>, on the role of career guidance in broadening access to the professions.<sup>6</sup> More recently, career guidance received prominent attention in the Government's Strategy for Social Mobility<sup>7</sup> and in the Hughes Report<sup>8</sup>. A DfE statement in April 2011 placed the link to social mobility within 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

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<sup>1</sup> Department for Education (2012). *The Education Act 2011: the Duty to Secure Independent and Impartial Careers Guidance for Young People in Schools: Statutory Guidance for Head Teachers, School Staff, Governing Bodies and Local Authorities*.

<sup>2</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*.

<sup>3</sup> John Hayes in Education Bill Committee, 29 March 2011.

<sup>4</sup> John Hayes in Education Bill Committee, 29 March 2011. Also, Hayes, J. (2012). The new National Careers Service: an important year for the careers profession. *Career Guidance Today*, 20(2), April, 5-6.

<sup>5</sup> 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.

<sup>6</sup> 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.

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

<sup>8</sup> Hughes, S. (2011). *Report to the Prime Minister and the Deputy Prime Minister from the Advocate for Access to Education*.

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.’<sup>9</sup>

3. A second core rationale is the role of career guidance in moving towards a **user-led skills/learning 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.’<sup>10</sup>

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):

‘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.’<sup>11</sup>

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.<sup>12</sup>

4. A number of **other rationales** have also been mentioned. These include increasing retention within education and reducing drop-out<sup>13</sup>, and more broadly the potential of informed career decisions to ‘transform lives’<sup>14</sup>.

5. **Core principles.** Five main principles underpin the Government’s 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).

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<sup>9</sup> Department for Education (2011). The role of schools and local authorities in careers guidance.

<sup>10</sup> Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.5.

<sup>11</sup> Independent Review of Higher Education Funding and Student Finance (2010). *Securing a Sustainable Future for Higher Education*, p.25. This emphasis was reaffirmed in the title of the subsequent Government White Paper on higher education. HM Government (2011). *Higher Education: Students at the Heart of the System*. Cm 8122. London: Stationery Office.

<sup>12</sup> 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.

<sup>13</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>14</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.13.

- 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’.<sup>15</sup> This had been advocated by John Hayes and by the Conservative Party for some time<sup>16</sup>, and was included in the Conservative Party Manifesto for the 2010 General Election<sup>17</sup> (though not in the subsequent Coalition Agreement<sup>18</sup>). 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 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.’<sup>19</sup>

The title of the service is the National Careers Service.<sup>20</sup>

7. The second principle is to ‘**revitalise the professional status of careers guidance**’.<sup>21</sup> 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’.<sup>22</sup>

<sup>15</sup> Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, p.42.

<sup>16</sup> 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.

<sup>17</sup> 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’.

<sup>18</sup> 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.

<sup>19</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>20</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*.

<sup>21</sup> 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).

<sup>22</sup> John Hayes in Education Bill Committee, 24 March 2011.

In the light of this:

‘I am clear that we need to restore a focus on specialist expertise in careers guidance for young people.’<sup>23</sup>

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.’<sup>24</sup>

More broadly, John Hayes stated:

‘I want the careers profession to return to a position of public recognition, prestige and value where guidance is seen as an essential part of life and experience. It is too important for us to do anything other.’<sup>25</sup>

He has subsequently referred to this as ‘the renaissance of the guidance profession’.<sup>26</sup> Accordingly, Ministers made a commitment to ‘implement the recommendations of the Careers Profession Task Force’.<sup>27</sup> This included ‘looking to the Careers Profession Alliance to establish common professional standards and a code of ethics for careers professionals’.<sup>28</sup> John Hayes indicated that he favoured this work leading to a ‘licence

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<sup>23</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>24</sup> 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.

<sup>25</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>26</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Brighton, 4 November 2011.

<sup>27</sup> 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* was issued in March 2011; a second *Composite Progress Report to Ministers* was issued in May 2012.

<sup>28</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010. The Careers Profession Alliance (CPA) was formed by a number of 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). A subsequent update reported that ‘from April 2012, there will be a new set of professional standards for careers advisers; a register of advisers holding postgraduate qualifications; and guidelines on how advisers can develop

to practise'.<sup>29</sup> 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.<sup>30</sup>

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'.<sup>31</sup> John Hayes 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'.<sup>32</sup>

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'.<sup>33</sup>

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.'<sup>34</sup>

9. The fourth principle is, within this partnership model, to '**change the balance of responsibility from the centre to schools**'.<sup>35</sup> The rationale for this is that:

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their own skills and gain higher qualifications' (Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.48). The four major career professional associations have agreed to merge into a new Career Development Institute from 1 January 2013.

<sup>29</sup> John Hayes in Education Bill Committee, 29 March 2011. Also mentioned in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010. John Hayes subsequently reported that: 'The Careers Profession Alliance is committed to developing a register of career professionals, and wishes to achieve chartered status for careers professionals over the next three years' (John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011). But chartered status requires a membership body to be in existence with more than 5,000 members. There are concerns that the current job losses in Connexions (see para.51 below) may throw the project of chartered status into doubt (Hooley, T. & Watts, A.G. (2011). *Careers Work with Young People: Collapse or Transition?*, p.9. Derby: International Centre for Guidance Studies, University of Derby).

<sup>30</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>31</sup> John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

<sup>32</sup> 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.

<sup>33</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>34</sup> Ofsted (2010). *Moving through the System – Information, Advice and Guidance*, p.5. Cited by John Hayes in Education Bill Committee, 29 March 2011.

<sup>35</sup> 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,

‘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.’<sup>36</sup>

The Milburn Report<sup>37</sup>, produced under the previous Labour Government, is cited as the source of this view.<sup>38</sup> It is linked to the wider Government view, as set out in detail in the Schools White Paper,<sup>39</sup> that ‘school autonomy – alongside rigorous accountability – is at the heart of all highly performing education systems’<sup>40</sup>; 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’.<sup>41</sup> This principle is reflected in the Education Act 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’.<sup>42</sup> The latter is clarified in the accompanying Explanatory Notes as referring to the period between the ages of 14 and 16. 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.’<sup>43</sup>

On the same principle, the Act effectively repeals the previous statutory duty for schools in England and Wales to provide careers education to pupils between the ages of 11 and 16,<sup>44</sup> by confining this duty in future to Wales.<sup>45</sup>

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:

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however, historically incorrect. Legal responsibility for securing careers guidance has never previously lain with schools and colleges.

<sup>36</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>37</sup> 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. For a critique of this recommendation issued at the time, see: Watts, A.G. (2009). The Milburn proposals for funding careers services for young people: a note on relevant international evidence. Briefing paper prepared for Careers England.

<sup>38</sup> For example, by Michael Gove in House of Commons, 12 May 2011. Also by Lord Hill of Oareford in House of Lords, 13 July 2011.

<sup>39</sup> Department for Education (2010). *The Importance of Teaching*. Cm 7980. London: Stationery Office.

<sup>40</sup> Letter from John Hayes to Tony Watts, 9 February 2011.

<sup>41</sup> Letter from Nick Gibb to David Gauke MP, 16 March 2011.

<sup>42</sup> Education Act 2011, Section 29, sub-section (3).

<sup>43</sup> John Hayes in Education Bill Committee, 29 March 2011.

<sup>44</sup> 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.

<sup>45</sup> Education Act, Section 29, sub-section (3).

‘Competition will be important in avoiding the complacency that can cause quality to slide.’<sup>46</sup>

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’.<sup>47</sup>

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.’<sup>48</sup>

It is recognised that:

‘... significant cultural change is required in moving from central government blanket support to one where the market plays a stronger role.’<sup>49</sup>

The example of independent schools is invoked in support of this argument:

‘Independent schools have been using a wide range of services and advice for many years and now we want all schools to enjoy that same freedom of choice.’<sup>50</sup>

It is linked to a wider interest in developing a market in career guidance provision:

‘An important element of this new world of opportunity will be the opening up of the market for careers guidance.’<sup>51</sup>

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.’<sup>52</sup>

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<sup>46</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>47</sup> John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

<sup>48</sup> John Hayes in Education Bill Committee, 24 March 2011.

<sup>49</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>50</sup> John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011. See also Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, p.14.

<sup>51</sup> John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011

<sup>52</sup> Statement by John Hayes on National Careers Service for England, 13 April 2011.

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

- Issues related to the interface with schools (paras.12-28).
- Issues related to the all-age NCS (paras.29-40).
- Issues related to funding and transitional arrangements (paras.41-55).

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 (paras.16-17).
- The adequacy of the accountability measures and other incentives designed to encourage schools to secure high-quality career guidance provision for their pupils (paras.18-20).
- The adequacy of the accountability procedures (paras.21-22).
- The adequacy of the quality standards that are to be applied to external providers (paras.23-24).
- The future of careers education in schools (paras.25-26).
- How far the new arrangements apply to academies (para.27).
- The continuing responsibilities of Local Authorities (para.28).

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 – and that this is the avowed purpose of schools’ new statutory duty<sup>53</sup> – the fourth and fifth core principles (paras.9-10 above) effectively undermine it by giving schools control of the 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 effectively abandoned (para.8 above). This is reinforced by the provision in the Education Act for repealing the right of access of external persons (involved in providing education and training support services) to students and premises.<sup>54</sup> Schools will henceforth 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; that school-based

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<sup>53</sup> ‘The Government believes that primary legislation should be restricted to those areas where it is absolutely necessary; in this instance, to securing strong partnerships between schools and those providing independent, impartial careers guidance.’ Letter from Russell Broomhead (Quality, Support and Guidance Division, DfE) to Patrick Watson (ref. 2011/0053675).

<sup>54</sup> Section 44 of the Education Act 1997, and section 73 of the Education and Skills Act 2008.

systems suffer from systemic weaknesses (weak links with the labour market; lack of impartiality; unevenness in extent and quality) 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 (even though the funding was transferred, which has not been the case in England).<sup>55</sup>

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

‘... this would not prohibit a teacher from offering some careers advice.’<sup>56</sup>

The DfE communication to schools issued in April 2011 significantly modified 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.’<sup>57</sup>

This seemed to undermine the declared purpose of this section of the Bill (now Act) (though the phrasing of the statement left it unclear whether schools could make *new* careers adviser appointments on their own staff). In practice, it is clear that many schools are planning to make their own internal arrangements (which might or might not include appointment of a careers adviser) and not to buy in any external services.<sup>58</sup>

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:

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<sup>55</sup> 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. In response to a Parliamentary Question on this report, Nick Gibb stated: ‘We believe it is right to give schools greater freedom and flexibility to make decisions that are in the best interests of pupils, including in relation to careers guidance. We do not agree with the view that to trust schools in this way will have damaging effects. We must retain a focus on outcomes that show the extent to which young people are achieving and progressing to higher levels of education or training, or into employment, rather than on specific inputs such as the amount or type of careers guidance.’ Nick Gibb in response to Parliamentary Question 79218 from Ian Mearns MP, 9 November 2011. For the focus on outcomes, see paras.18-19 below.

<sup>56</sup> Education Bill, Explanatory Notes, para.159.

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

<sup>58</sup> Institute of Career Guidance (2012). *Facing Up to the Future*, p.8. Stourbridge: ICG.

‘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.’<sup>59</sup>

Nick Gibb (Minister of State for Schools) indicated that this consultation would start in summer 2011, 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.<sup>60</sup> The consultation was delayed, but was finally launched in May 2012, requesting responses by 1 August 2012.<sup>61</sup> It brings further education institutions more strongly into the frame of the policy debate, most of which has hitherto been confined to schools.<sup>62</sup> 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. On this latter issue, the consultation document states that:

‘Outside the scope of this consultation, we will also look at options for extending the new arrangements to 16-18 year olds in other educational settings, including apprentices and those in work-based education and training.’<sup>63</sup>

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<sup>59</sup> Education Bill: Note from the Department for Education to the Public Bill Committee on Clause 27 (Ref.: EBCC/2011/Note 7).

<sup>60</sup> 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*. Also in HM Government (2011). *Supporting Youth Employment*, p.8. London: Stationery Office.

<sup>61</sup> Department for Education (2012). *Consultation on Careers Guidance for Schools, Sixth Form Colleges and Further Education Institutions*.

<sup>62</sup> 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. An RSA report on education and employment progression in further education emphasised the importance of informed and impartial IAG for progression, the difficulties many students experienced in accessing detailed careers advice in colleges, and the need for the new all-age careers service to ‘make provision for specific careers advice for 16-24 year olds that can be accessed in FE colleges’. See Norris, E. (2011). *Not Enough Capital?*, p.21. London: RSA. The National Careers Service is to be co-located in 250 colleges by the end of 2012 (Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.21). Under current policies, any availability of NCS face-to-face services to students up to 19 would seem incompatible with the policy in relation to schools.

<sup>63</sup> Department for Education (2012). *Consultation on Careers Guidance for Schools, Sixth Form Colleges and Further Education Institutions*, para.1.8.

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 suggested 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. There was indeed an attempt by at least one Minister to suggest that such online support is sufficient for most young people, though the evidence cited to support this was erroneous.<sup>64</sup> On the other hand, John Hayes stated that:

‘I find it inconceivable, or at least unlikely, that best practice will not include face-to-face provision.’<sup>65</sup>

The importance of access to face-to-face guidance was also strongly affirmed by the House of Commons Education Select Committee<sup>66</sup> and by the Hughes Report<sup>67</sup>. The wording in the higher education White Paper seemed to suggest a stronger stance on this issue:

‘Schools may continue to operate in-house arrangements but these must be supplemented by an external source of guidance which may include, but not be limited to, online or face-to-face guidance from a specialist provider.’<sup>68</sup>

A statement on this from the responsible civil servant, however, indicated that:

‘There has been no change to the policy that it is for schools to determine how best to meet their duty to secure independent, impartial careers guidance.’<sup>69</sup>

17. This issue received considerable attention in the House of Lords debates on the Education Bill, where the Liberal Democrats tabled an amendment requiring prescribed standards on the quality and frequency of careers guidance, the need for it to be face-to-face and provided by trained persons.<sup>70</sup> They were persuaded to withdraw this amendment on the basis of a statement from Lord Hill that:

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<sup>64</sup> Lord Hill of Oareford stated in the House of Lords (13 July 2011) that: ‘... evidence shows that young people receive advice on their futures from many different sources: parents, teachers and obviously careers advisers. Some may prefer to get their support from a helpline or by researching online. A YouGov poll this year showed that 9 in ten young people were comfortable with using the internet to access that kind of advice.’ An enquiry to the responsible civil servant indicated that the source for this statement had been not a YouGov poll but a Connexions Direct survey (email from Anna Paige to Tony Watts, 24 August 2011). The relevant question, however, asked respondents to indicate the extent to which they agreed with the general statement ‘I am really comfortable using the internet’. It did *not* refer to using the internet to receive ‘advice on their futures’, as Lord Hill had suggested it did. See Hall, L., Wreford, S. & Huckle, C. (2008). *Connexions Direct User Satisfaction Survey 2008*, pp.79, 91. Research Report DCSF-RW042. London: Department for Children, Schools and Families.

<sup>65</sup> John Hayes in House of Commons, 11 May 2011.

<sup>66</sup> House of Commons Education Committee (2011). *Participation by 16-19 Year Olds in Education and Training*, Volume I, p.58. London: Stationery Office.

<sup>67</sup> Hughes, S. (2011). *Report to the Prime Minister and the Deputy Prime Minister from the Advocate for Access to Education*, p.10.

<sup>68</sup> HM Government (2011). *Higher Education: Students at the Heart of the System*, p.58. Cm 8122. London: Stationery Office.

<sup>69</sup> Email from Anna Paige to Tony Watts, 7 July 2011.

<sup>70</sup> Education Bill: Amendment 87.

‘... listening to this debate, I recognise that it would be sensible to allow the scope for some short, focused guidance to be issued to schools to support them in fulfilling their new duty.’<sup>71</sup>

Baroness Jones asked for this ‘short, focused guidance’ to be made available to the House of Lords before the Report stage of the Bill, at least in draft form.<sup>72</sup> This was not done, but Lord Hill committed the Government to consulting on the Guidance.<sup>73</sup> A draft was accordingly discussed by the Government’s National Careers Service Advisory Group, and a number of important changes were made. The published version was promised for early in the New Year of 2012. Following long delays, John Hayes stated unequivocally in March 2012 that:

‘It will not be sufficient for schools to employ their own careers professional, good though they may be, and then rely on signposting to a website, excellent as that may be.’<sup>74</sup>

David Willetts (Minister of State for Universities and Science) reiterated this:

‘The Department for Education will publish statutory guidance for schools very soon, and it will make it clear that schools cannot discharge their duty simply by relying on in-house support or by signposting to a website.’<sup>75</sup>

But the Statutory Guidance belatedly published in April 2012 ignored these assurances. A detailed analysis indicates that in important respects it was weaker than the initial version sent out for consultation.<sup>76</sup> It offered no means for preventing a school from stating that it had discharged its responsibility by signposting to a website or helpline. All the school had to do was to state that it viewed such signposting, rather than providing independent face-to-face guidance, as ‘the most suitable support for young people to make successful transitions’.<sup>77</sup> The Guidance provided no basis on which a sustainable challenge to such a position could be mounted (cf. para.21 below). A survey of 238 schools conducted in autumn 2011 (prior to publication of the Guidance) indicated that 8% were ‘planning to offer nothing at all, or just refer pupils to websites and other online services’; 32% were still ‘unsure’.<sup>78</sup>

18. 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. John Hayes has affirmed the need for accountability:

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<sup>71</sup> Lord Hill of Oareford in House of Lords, 13 July 2011.

<sup>72</sup> Baroness Jones of Whitchurch in House of Lords, 13 July 2011.

<sup>73</sup> Lord Hill of Oareford in House of Lords, 24 October 2011.

<sup>74</sup> Quoted in Careers England press notice on the Quality in Careers Standard, 14 March 2012.

<sup>75</sup> David Willetts in response to Parliamentary Question 100025 from Damian Hinds MP, 15 March 2012.

<sup>76</sup> Watts, A.G. (2012). *Statutory Guidance for Schools on Securing Access to Careers Guidance*. Careers England Policy Commentary 16.

<sup>77</sup> Department for Education (2012). *The Education Act 2011: the Duty to Secure Independent and Impartial Careers Guidance for Young People in Schools: Statutory Guidance for Head Teachers, School Staff, Governing Bodies and Local Authorities*, section 13.

<sup>78</sup> Institute of Career Guidance (2012). *Facing Up to the Future*, p.8. Stourbridge: ICG.

‘It is important that schools are held to account for the quality of the services they secure and the impact they have on the progression of pupils.’<sup>79</sup>

Ministers in addressing this issue have tended, however, to subsume the former into the latter. In particular, they have referred persistently to the proposal in the Schools White Paper to ‘introduce a measure of how young people do when they leave school’.<sup>80</sup> 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 the kind of employment that they gain as a result of that progressive learning.’<sup>81</sup>

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’.<sup>82</sup>

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.<sup>83</sup> 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.’<sup>84</sup>

It seems highly unlikely that the destinations measure will address these longer-term effects. In the communication to schools, the claim for the measure was the modest one that it would ‘bring into focus the quality of the arrangements for careers guidance’.<sup>85</sup> Nick Gibb subsequently stated that:

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<sup>79</sup> John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011

<sup>80</sup> Department for Education (2010). *The Importance of Teaching*, p.13. Cm 7980. London: Stationery Office.

<sup>81</sup> John Hayes in Education Bill Committee, 29 March 2011.

<sup>82</sup> Letter from John Hayes to Tony Watts, 9 February 2011.

<sup>83</sup> HM Government (2011). *Opening Doors, Breaking Barriers: a Strategy for Social Mobility*, p.40.

<sup>84</sup> John Hayes in Education Bill Committee, 29 March 2011.

<sup>85</sup> Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

‘If pupils are achieving and progressing then we should assume the school is providing effective support to inform the decisions that pupils make about their future education and career.’<sup>86</sup>

In other words, there is no discernible interest in the *nature* and *quality* of pupils’ progression. The House of Commons Education Select Committee stated:

‘... we do not see how those measures will identify or isolate poor careers guidance as a factor in low achievement at 19.’<sup>87</sup>

19. Meanwhile, little attention seems to have been given to other possible accountability measures. John Hayes indicated at one point that he would be willing to look at the feasibility of publishing ‘figures on the percentage of school pupils receiving individual careers guidance’.<sup>88</sup> Subsequently, however, he has stated that:

‘... we should expect them [schools] to answer for outcomes, not inputs such as the use of a particular service or a particular approach to providing careers guidance.’<sup>89</sup>

To provide transparency and accountability to pupils and parents, the Riots Communities and Victims Panel established after the riots of summer 2011 recommended that schools should ‘develop and publish a Careers Support Guarantee, setting out what a child can expect in terms of advice, guidance, contact with businesses and work experience options’.<sup>90</sup> No action has been taken on this recommendation.

20. 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.’<sup>91</sup> John Hayes subsequently announced ‘my intention to establish a network of school leaders to develop and share the most effective practice in securing careers advice for pupils’.<sup>92</sup> No action on this has been evident.
- Collating and publishing ‘clear evidence of the benefits and uses of careers guidance.’<sup>93</sup> This evidence base must be ‘concisely communicated’.<sup>94</sup> A draft

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<sup>86</sup> Nick Gibb in response to Parliamentary Question 62408 from Kate Green MP, 4 July 2011.

<sup>87</sup> House of Commons Education Committee (2011). *Participation by 16-19 Year Olds in Education and Training*, Volume I, p.57. London: Stationery Office.

<sup>88</sup> 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).

<sup>89</sup> John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011

<sup>90</sup> Riots Communities and Victims Panel (2012). *After the Riots*, p.66.,

<sup>91</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>92</sup> John Hayes in speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011

<sup>93</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>94</sup> Letter from John Hayes to Tony Watts, 9 February 2011.

paper on ‘The Research Evidence on Careers Services’, prepared by the DfE Education Standards Analysis and Research Division, was discussed at an invitational seminar held on 16 May 2011. It was subsequently indicated, in response to a request for the paper under the Freedom of Information Act 2000, that the Government had decided not to publish the final version of this paper.<sup>95</sup>

- Looking at ‘ways of recognising success and excellence, for example, developing awards for careers guidance professionals and those who have benefitted from it.’<sup>96</sup> No further information has been provided on this.

21. The sixth issue, linked closely to the fifth, is the **adequacy of the accountability procedures** that are to be provided. John Hayes has stated that:

‘... we will ask Ofsted to insure that schools take this duty seriously at a management level.’<sup>97</sup>

The House of Commons Education Select Committee recommended that:

‘... Ofsted inspections should, as part of the pupil achievement strand within the framework for inspection of schools, assess specifically whether schools are meeting their statutory duty to secure the provision of independent and impartial career guidance.’<sup>98</sup>

The Government’s general intention, however, is ‘to reduce the burden on Ofsted and make more straightforward what is inspected in schools’.<sup>99</sup> 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.’

Nonetheless:

‘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.’<sup>100</sup>

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<sup>95</sup> Letter from Clare Jones (Department for Education) to Denise Bertucci (Unison), 11 November 2011. Unison has appealed against this decision: the result of this appeal has not yet been received.

<sup>96</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>97</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>98</sup> House of Commons Education Committee (2011). *Participation by 16-19 Year Olds in Education and Training*, Volume I, p.58. London: Stationery Office.

<sup>99</sup> For a useful review of previous and current Ofsted practice in relation to the inspection of careers work in schools, see Association for Careers Education and Guidance (2011). *Ofsted and the Inspection of Careers Education and Guidance in Secondary Schools*.

<sup>100</sup> John Hayes in Education Bill Committee, 29 March 2011.

The Inspection Framework published in April 2012 indicates that inspectors must consider the extent to which pupils have gained:

‘...a well-informed understanding of the options and challenges facing them as they move through the school and on to the next stage of their education and training.’<sup>101</sup>

The procedures for making such judgements are, though, unclear. John Hayes subsequently stated that:

‘Where there is clear evidence of a school failing to meet its statutory duties, we will take action.’<sup>102</sup>

He added:

‘Complaints to the Secretary of State about a school’s failure to comply with their new careers guidance duty and the underpinning statutory guidance will be taken extremely seriously, particularly if evidence emanates from a variety of sources. We will also look to the new National Careers Council<sup>103</sup> to both highlight good practice in schools and inform us of any serious concerns about compliance.’<sup>104</sup>

But given the vague nature of both the duty and the Statutory Guidance, it is not clear what evidence of ‘a school’s failure to comply’ would comprise.

22. In addition, John Hayes indicated in March 2011 that he would ‘consider asking Ofsted to carry out a further thematic review’, following that carried out in 2010<sup>105</sup>:

‘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.’<sup>106</sup>

This was linked by John Hayes to a recommendation for such an Ofsted review from the Task Force on the Careers Profession,<sup>107</sup> the purpose of which was ‘to establish a

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<sup>101</sup> Ofsted (2012). *The Evaluation Schedule for the Inspection of Maintained Schools and Academies*, p.22.

<sup>102</sup> John Hayes in letter to Graham Hoyle (Association of Employment and Learning Providers), 28 April 2012.

<sup>103</sup> See para.31 below.

<sup>104</sup> John Hayes in letter to Graham Hoyle (Association of Employment and Learning Providers), 28 April 2012.

<sup>105</sup> Ofsted (2010). *Moving through the System – Information, Advice and Guidance*.

<sup>106</sup> 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.

<sup>107</sup> Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 13.

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. Subsequently, Nick Gibb has stated explicitly that:

‘The Government have ... accepted the recommendation of the Careers Profession Task Force to ask Ofsted to carry out a thematic review of careers guidance as a means of identifying excellent provision and establishing a baseline for future policy development. We are considering the most appropriate timing for this.’<sup>108</sup>

Moreover, Lord Hill of Oareford stated in the Grand Committee debate in the House of Lords that:

‘If this shows that there are serious issues, I would expect the Government to review the position’.<sup>109</sup>

He further indicated that:

‘... a post-legislative review will be conducted in three to five years following enactment ... I think we should aim to do it in three rather than five’.<sup>110</sup>

It has subsequently been announced that the Ofsted review will report in summer 2013.<sup>111</sup>

23. 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 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.’<sup>112</sup>

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<sup>108</sup> Nick Gibb in response to Parliamentary Question 62408 from Kate Green MP, 4 July 2011.

<sup>109</sup> Lord Hill of Oareford in House of Lords, 13 July 2011. A similar statement was made by John Hayes: ‘If the review uncovers problems then I will not hesitate to consider what could change for the better and what further support might be necessary’ (speech to Association for Careers Education and Guidance Annual Conference, Thame, Oxfordshire, 7 July 2011).

<sup>110</sup> Lord Hill of Oareford in House of Lords, 13 July 2011.

<sup>111</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.30.

<sup>112</sup> 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).

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.’<sup>113</sup>

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’, fell short of requiring schools to select providers who met such standards. It stated:

‘Sources of independent guidance would include, but not be limited to, careers organisations funded by Government or other expert careers guidance providers.’<sup>114</sup>

This seemed explicitly to permit schools to draw upon inexperienced providers. The subsequent formulation in the Statutory Guidance stated:

‘Schools can commission independent careers guidance from providers engaged in delivering the National Careers Service or from other providers or individual careers guidance practitioners, as they see fit... The Skills Funding Agency will require providers of the National Careers Service to be accredited to the revised version of the matrix Standard by April 2013. The existence of this national quality standard will assist schools in making well informed decisions about which providers to work with. The organisation responsible for administering the matrix Standard on behalf of government, emqc Ltd, will provide schools with access to information about which organisations hold the Standard and are suitably accredited to provide independent careers guidance services.’<sup>115</sup>

In other words, schools if they so wish can use the Matrix standard as a quality guide in determining from whom to secure careers guidance, but are not required to do so.

24. It has not yet been confirmed what level of professional qualification will be incorporated within or alongside the Matrix standard. John Hayes stated that:

‘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.’<sup>116</sup>

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<sup>113</sup> Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 11.

<sup>114</sup> Department for Education (2011). *The Education Bill – changes to the delivery of careers guidance*.

<sup>115</sup> Department for Education (2012). *The Education Act 2011: the Duty to Secure Independent and Impartial Careers Guidance for Young People in Schools: Statutory Guidance for Head Teachers, School Staff, Governing Bodies and Local Authorities*, section 14.

<sup>116</sup> John Hayes in letter to Tony Watts, 9 February 2011.

But the only caveat expressed by John Hayes in relation to the recommendations of the Task Force on the Careers Profession was that:

‘... 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’.<sup>117</sup>

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’.<sup>118</sup> Meanwhile, the only relevant statement in the Statutory Guidance is that:

‘Where schools deem face-to-face careers guidance to be appropriate for their pupils, it can be provided by qualified careers professionals’.<sup>119</sup>

The key here is the use of ‘can’ rather than ‘must’ – which reduces it to a statement of the obvious.

25. 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.’<sup>120</sup>

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

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<sup>117</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>118</sup> Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 4.

<sup>119</sup> Department for Education (2012). *The Education Act 2011: the Duty to Secure Independent and Impartial Careers Guidance for Young People in Schools: Statutory Guidance for Head Teachers, School Staff, Governing Bodies and Local Authorities*, section 14.

<sup>120</sup> Letter from John Hayes to Tony Watts, 14 January 2011.

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.’<sup>121</sup>

It is unclear where and by whom this ‘case’ is to be made. Possible ‘appropriate incentive measures’ include the overarching national kitemark to validate 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.<sup>122</sup> John Hayes has welcomed the establishment of such a kitemark, facilitated by Careers England, in the form of the Quality in Careers Standard:

‘The standard will provide national validation of the quality awards used by schools, colleges and work based learning providers to demonstrate they are offering strong support to young people through careers education, information, advice and guidance. This is a really good example of an initiative which will help providers to do their best for all their learners.’<sup>123</sup>

The Standard is also mentioned in the NCS policy document.<sup>124</sup> But although a link to information on the Standard is provided on the DfE webpage where the Statutory Guidance is located, there is no reference to the Standard within the Statutory Guidance itself.

26. The distinction between careers education and careers guidance, and the relationship between the two, have been affirmed by John Hayes:

‘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. 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.’<sup>125</sup>

The communication to schools, however, stopped short of referring to this ‘continuing responsibility’. It simply stated 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

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<sup>121</sup> Letter from John Hayes to Tony Watts, 9 February 2011.

<sup>122</sup> Careers Profession Task Force (2010). *Towards a Strong Careers Profession: an Independent Report to the Department for Education*, recommendation 10.

<sup>123</sup> John Hayes in speech at West Lancashire College, 8 March 2012.

<sup>124</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.49.

<sup>125</sup> John Hayes in Education Bill Committee, 29 March 2011.

provision is permissive; it does not imply that these activities are unimportant, but that the Government considers that it is not necessary to legislate for them.<sup>126</sup>

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

‘Schools should consider a range of wider careers activities such as engagement with local employers and work-based education and training providers to offer all young people insights into the world of work, and with local colleges and universities for first-hand experience of further and higher education. Schools are free to determine the most appropriate forms of engagement but might consider mentoring, workplace visits, work experience<sup>127</sup>, work shadowing, enterprise clubs, employer talks and links with local higher education institutions.’<sup>128</sup>

27. 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:

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<sup>126</sup> 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.

<sup>127</sup> The inclusion of work experience here 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). The Government in its response to the Wolf Report indicated its intention to remove (through legislation in early 2012) the statutory duty to provide every young person at Key Stage 4 with work-related learning, and its anticipation that this would ‘release support for more work experience for older pupils’ (Department for Education (2011). *Wolf Review of Vocational Education: Government Response*, p.12. London: DfE). It is also worth noting that the DfE funding for Education Business Partnerships was 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). For strong evidence of the benefits of pre-16 work experience, see Mann, A. (2012). *Work Experience: Impact and Delivery – Insights from the Evidence*. London: Education and Employers Taskforce.

<sup>128</sup> Department for Education (2012). *The Education Act 2011: the Duty to Secure Independent and Impartial Careers Guidance for Young People in Schools: Statutory Guidance for Head Teachers, School Staff, Governing Bodies and Local Authorities*, section 15.

‘... 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.’<sup>129</sup>

28. 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.’<sup>130</sup>

The BIS strategy document clarified the former:

‘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.’<sup>131</sup>

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.’<sup>132</sup>

Later, Nick Gibb affirmed 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.’<sup>133</sup>

But Lord Hill of Oareford stated:

‘It is for local authorities to decide how they should make arrangements for supporting young peoples’ participation, taking into account the needs of their local communities. They are under no obligation to retain a particular service.’<sup>134</sup>

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<sup>129</sup> Nick Gibb in Education Bill Committee, 29 March 2011.

<sup>130</sup> John Hayes in speech to Institute of Career Guidance Annual Conference, Belfast, 4 November 2010.

<sup>131</sup> 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.

<sup>132</sup> John Hayes in response to Parliamentary Question 37073 from Gordon Marsden MP, 14 February 2011.

<sup>133</sup> Nick Gibb in response to Parliamentary Question 47399 from Gordon Marsden MP, 17 March 2011.

<sup>134</sup> Letter from Lord Hill of Oareford to Ian Mearns MP, 17 April 2011.

In response to a query on this matter, 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.’<sup>135</sup>

The new Statutory Guidance for Local Authorities does indeed state this latter point explicitly.<sup>136</sup> 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.<sup>137</sup> In the consultation on the Statutory Guidance for schools, it was suggested that – in addition to confirming these various responsibilities – it would be helpful to refer to the fact that some local authorities are planning to offer careers guidance services for schools to purchase, while others are supporting schools with the commissioning process or quality-assuring potential providers: no such references were included.<sup>138</sup>

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

- The proposed structure of the service (para.30).
- The proposed status of the service (paras.31-34).
- The extent to which the service will be publicised and marketed (para.35).
- The level of access to face-to-face services (para.36).
- The links between the service and the Department for Work and Pensions (paras.37-38).
- The relationship of the service to career development within workplaces (paras.39-40).

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

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<sup>135</sup> Email from Anna Paige to Tony Watts, 25 March 2011.

<sup>136</sup> The fact that the s68 duty is nonetheless not felt to require amendment demonstrates how vague and insubstantial it is, and how difficult it is likely to be to mount any legal challenge based on it.

<sup>137</sup> Department for Education (2011). *Statutory Guidance for Local Authorities on Targeted Support Services for Young People*.

<sup>138</sup> Watts, A.G. (2012). *Statutory Guidance for Schools on Securing Access to Careers Guidance*, para.11. Careers England Policy Commentary 16.

‘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.’<sup>139</sup>

The Next Step careers service for adults comprised 12 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; all providers had to meet the Matrix Standard. These contracts are to ‘continue in their present form until at least 2013’<sup>140</sup>, with the funding allocations for the 2012/13 financial year being broadly similar to those for 2011/12<sup>141</sup>. These are being linked to the helpline for young people, with a single all-age website. The National Careers Service thus comprises:

- Separate helpline and webchat services for adults and for young people aged 13+, linked by integrated access points (e.g. single telephone number).
- A website available to both adults and young people.
- A contracted network of public, private and voluntary sector organisations to provide face-to-face support to adults aged 19+ (or 18+ if on Jobseeker’s Allowance).<sup>142</sup> Such services to be provided in a range of locations, including dedicated NCS premises, but also further education colleges, jobcentres, community centres, housing associations, libraries and council service outlets.

The rationale for the NCS providing face-to-face services for adults but not for young people is that:

‘... provision of this guidance is crucial for adults because there is no routine institution that is responsible for their needs in this regard.’<sup>143</sup>

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...’<sup>144</sup>

He subsequently stated:

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<sup>139</sup> 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.

<sup>140</sup> BIS paper issued to the Careers Guidance Stakeholder Advisory Group, 23 May 2011.

<sup>141</sup> John Hayes in response to Parliamentary Question 64048 from Gareth Thomas MP, 11 July 2011. There are concerns that this denies other providers the opportunity to bid for NCS prime contract roles.

<sup>142</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*.

<sup>143</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>144</sup> John Hayes in response to Parliamentary Question 40119 from Alison McGovern MP, 16 February 2011.

‘I want organisations which are part of the national careers service to provide information, advice and guidance of such quality that schools will commission their services.’<sup>145</sup>

But any such commissioning will be outside the NCS:

‘Providers involved in delivering the National Careers Service will also be free to offer their services to schools, although they will not do so under the national careers service brand.’<sup>146</sup>

The rationale for this is that:

‘... BIS and the Skills Funding Agency will have no contractual basis for monitoring use of the brand for face to face services for young people.’<sup>147</sup>

31. 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.<sup>148</sup> 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’<sup>149</sup>; much the same position has been adopted in Wales<sup>150</sup>. In England, it seems unlikely that the NCS will have a similar strategic and capacity-building role. But the plan to create a new Head of Careers post within the Skills Funding Agency – ‘who will champion the National Careers Service within the market for guidance, and speak on Government careers guidance policy’<sup>151</sup> – could be interpreted as indicating some more limited strategic role for the NCS (though no such appointment has yet been made); as could the establishment of a National Council for Careers, ‘made up of key figures from the

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<sup>145</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>146</sup> DBIS/DfE paper issued to the Advisory Group on the National Careers Service, July 2011.

<sup>147</sup> BIS paper issued to the Careers Guidance Stakeholder Advisory Group, 23 May 2011.

<sup>148</sup> 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.

<sup>149</sup> Scottish Government (2011). *Career Information, Advice and Guidance in Scotland: a Framework for Service Redesign and Improvement*, p.10.

<sup>150</sup> 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.

<sup>151</sup> BIS paper issued to the Careers Guidance Stakeholder Advisory Group, 23 May 2011.

profession, to advise on the management and direction of the service as it continues to develop'<sup>152</sup> (the Council's membership was announced in May 2012).

32. 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.<sup>153</sup> 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. On this matter, the Government has indicated that:

'At this stage, we do not intend to link the Next Step Client Relationship Management system to the Client Caseload Information System, because the CCIS will not be used as the basis for a centrally-funded careers service for young people, as in the past; although we will encourage LAs to consider how any support they provide for NEET young people can dovetail into National Careers Service support at 19.'<sup>154</sup>

33. 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 (see para.10). 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.<sup>155</sup> But its role in this respect seems to be confined to acting as an exemplar:

'I want the National Careers Service to be the gold standard in careers guidance. It will not manage the market – the Government's approach is to remove regulation, not increase it. But it will set a standard of quality and professionalism that all providers of guidance should seek to match.'<sup>156</sup>

This will include:

'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

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<sup>152</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

<sup>153</sup> For example, letter from Lord Hill of Oareford to Adrian Sanders MP, 8 March 2011.

<sup>154</sup> BIS paper issued to the Careers Guidance Stakeholder Advisory Group, 23 May 2011.

<sup>155</sup> 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.

<sup>156</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

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.<sup>157</sup>

It will also need to include outcome measures:

‘We must continue to look for new and better ways of measuring and recording the positive outcomes to which guidance can lead.’<sup>158</sup>

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.’<sup>159</sup>

They will thus provide:

‘... a visible public platform which champions the quality and professional standards.’<sup>160</sup>

34. In the longer term, options suggested for the future development of the National Careers Service include<sup>161</sup>:

- Opening up use of the NCS brand so that providers in the service could use it to take their services to organisations (including schools) and individuals willing to buy charged-for career guidance services.
- Franchising out the NCS brand and associated collateral to organisations, which would pay the Government a fee. The organisations would earn their income from customers, whether schools, adults or others. This would allow a wider range of providers to operate as part of the service.
- Binding the NCS with community organisations in a way which would extend the reach of both. This could build upon the ‘advancement networks’ trialled in 2009/10.<sup>162</sup>

35. The third all-age service issue is the **extent to which the service will be publicised and marketed**. The massive volumes previously achieved by the helpline and web-based services for adults were based on extensive marketing.<sup>163</sup> The volumes for Connexions Direct tended to be proportionately lower, partly because of the absence of such marketing and also, perhaps, because of the existence hitherto of a

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<sup>157</sup> John Hayes in response to Parliamentary Question 39553 from Alison McGovern MP, 14 February 2011.

<sup>158</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

<sup>159</sup> Statement by John Hayes on National Careers Service for England, 13 April 2011.

<sup>160</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

<sup>161</sup> BIS paper issued to the Careers Guidance Stakeholder Advisory Group, 23 May 2011.

<sup>162</sup> See, for example, Newton, B., Gloster, R., Sissons, P., Fearn, H & Whitehurst, D. (2010). *Evaluation of the Advancement Network Prototypes: Second Interim Report*. Coventry: LSC.

<sup>163</sup> See Watts, A.G. & Dent, G. (2008). The evolution of a national distance guidance service: trends and challenges. *British Journal of Guidance and Counselling*, 36(4), 455-465.

fairly extensive face-to-face service. Since the Coalition Government came to power, there has been an embargo on marketing and advertising budgets for all such services. Volumes of usage have declined massively<sup>164</sup>, though no official figures have been published. If, in particular, the sole national provision for young people in future is to be the helpline and web-based services, this raises issues about the extent to which services will be actively marketed, and increases in demand resourced. John Hayes reported that the Next Step service for adults in 2011/12 had the capacity to provide guidance to 700,000 adults a year, and to handle up to 1 million telephone guidance sessions and 20 million website sessions.<sup>165</sup> The policy statement on the NCS volumes (covering young people too) repeated these figures, adding only an extra 370,000 helpline calls from young people.<sup>166</sup> John Hayes also indicated that the NCS

‘... will be promoted at a national level, so that its profile and visibility are high’.<sup>167</sup>

Much depends on the extent and sustainability of the marketing budget: no information on this has yet been provided.

36. The fourth all-age service issue is the **level of access to face-to-face services**. As already noted (para.30), it is clear that the NCS face-to-face services will be confined to adults. The level of the current offer was defined by John Hayes as follows:

‘The National Careers Service targets several priority groups who can receive up to three free separate face to face careers guidance sessions; these include those distant from the labour market. This group is defined as adults who are not in receipt of benefits but who are not working and who are interested in returning to the labour market. The group includes those who have had caring responsibilities, women returners and learners who have just completed full-time training or education and have not registered as unemployed.<sup>168</sup> Any adult aged 19 or over who approaches the National Careers Service can receive one free face to face careers guidance session.’<sup>169</sup>

He also stated elsewhere that:

‘... we will continue to explore how we make best use of available funding to support Growth and Social Mobility – for example, by reviewing the groups which are eligible for more than one session of face to face support.’<sup>170</sup>

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<sup>164</sup> Information provided to the National Careers Service Advisory Group.

<sup>165</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

<sup>166</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.16.

<sup>167</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

<sup>168</sup> For a fuller list, see Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, p.12.

<sup>169</sup> John Hayes in response to Parliamentary Question 105342 from Gordon Marsden MP, 24 April 2012.

<sup>170</sup> John Hayes in speech to Institute of Careers Guidance Annual Conference, Brighton, 4 November 2011.

37. The fifth all-age service issue is the **links between the NCS and the Department for Work and Pensions (DWP)**. The contracts for the Next Step service included 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 stated that:

‘I am trying to forge an unprecedented level of co-operation between the DWP and ... BIS, on the subject.’<sup>171</sup>

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 was included in the Statutory Guidance for Local Authorities.<sup>172</sup> 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 being developed for and alongside the NCS (see paras.7, 23-24 and 33). There appears to have been little movement in this direction.<sup>173</sup>

38. More specifically, the £1 billion Youth Contract for 18-24-year olds announced in November 2011 included, in addition to job subsidies and work-experience placements:

‘Extra support through Jobcentre Plus in the form of weekly, rather than fortnightly signing on meetings, more time to talk to a Jobcentre adviser and a careers guidance session with the National Careers Service.’<sup>174</sup>

The original announcement about this indicated that the NCS interview is to be ‘in the first three months of their claim’<sup>175</sup>; the NCS policy document, however, stated that the provision is for those who ‘have been seeking work for up to three months’<sup>176</sup>. For 16/17-year-olds who are not in education, training or employment, there is separate Youth Contract provision (to receive £126 million of funding over three years in England) which ‘might include intensive personal support, work experience and volunteering’<sup>177</sup>: although mentioned in the NCS policy document<sup>178</sup>, the NCS has no

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<sup>171</sup> John Hayes in Education Bill Committee, 24 March 2011.

<sup>172</sup> Department for Education (2011). *Statutory Guidance for Local Authorities on Targeted Support Services for Young People*.

<sup>173</sup> An early version of John Hayes’s Derby speech (13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011) seemed to move towards this position: ‘I want the national careers service to be recognised as an important partner for public, private and voluntary sector programmes of community support’. But this was deleted from the published version.

<sup>174</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.35.

<sup>175</sup> HM Government (2011). *Building Engagement, Building Futures: Our Strategy to Maximise the Participation of 16-24 Year Olds in Education, Training and Work*, p.53.

<sup>176</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, p.12.

<sup>177</sup> HM Government (2011). *Building Engagement, Building Futures: Our Strategy to Maximise the Participation of 16-24 Year Olds in Education, Training and Work*, p.35.

<sup>178</sup> Department for Business, Innovation and Skills (2012). *The National Careers Service: the Right Advice at the Right Time*, para.36.

remit for this group, and there is no indication that provision for them includes access to careers guidance. No rationale has been provided for this significant difference between the two schemes.

39. The sixth 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).<sup>179</sup> 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 (IiP) kite mark.<sup>180</sup> There is, however, no reference to this in the NCS policy document.

40. The IiP option could open up possibilities for harmonising voluntary kitemarks and quality awards for organisations which wish to indicate that they invest in career development, whether they are schools (cf. para.25 above), institutions of further and higher education, or employers. Such kitemarks and quality awards 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.23-24 above).

A three-level quality-assurance structure of this kind would help to avoid some of the previous confusions on such matters. It would also provide a quality framework that would be ahead of most if not all other countries in its comprehensiveness.

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

- Funding (paras.42-48).
- Transition arrangements (paras.49-55).

42. 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

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<sup>179</sup> Department for Business, Innovation and Skills (2010). *Skills for Sustainable Growth*, pp.46-47.

<sup>180</sup> 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.

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’.<sup>181</sup>

The phrasing of this statement suggests that at this point it was envisaged that most if not all Connexions staff would move to the NCS. 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 NCS, at least 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 was mounted. Instead, almost all of the funding for the Connexions career guidance provision was allowed to disappear, and many Connexions staff have been made redundant (see para.51 below).

43. The most widely-accepted basis for calculating the Connexions career guidance funding was 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.<sup>182</sup> Local Authorities are free to determine their own priorities between these services.<sup>183</sup>
- 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

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<sup>181</sup> John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

<sup>182</sup> Analysis confirmed in email from Anna Paige to Tony Watts, 30 December 2010.

<sup>183</sup> 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 Variations: a Follow-Up Study of New Arrangements for Connexions/Careers/IAG Services for Young People in England*. Reading: CfBT Education Trust.

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.<sup>184</sup>

- To this should be added the separate funding for Connexions Direct, which in 2010/11 was around £7m, making a total of £203m.<sup>185</sup>

Complementing this, in respect of adults, the Skills Funding Agency – acting on behalf of BIS – allocated £82.8m in 2010/11 for careers guidance to be provided by the Next Step careers service.<sup>186</sup>

44. The indicative BIS budget for information, advice and guidance services for adults in 2012/13 was announced as being £84.4 million, subject to confirmation when budgets were agreed across the Department.<sup>187</sup> 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, to cover young people. This raised questions about whether Ministers were attempting to cast a veil over the paucity of this contribution. John Hayes had 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.’<sup>188</sup>

Subsequently, the House of Commons Education Select Committee recommended explicitly that:

‘... the all age careers service should be funded by the Department for Education for face to face career guidance for young people.’<sup>189</sup>

But, contrary to the expectations raised by earlier Ministerial statements (see para.42 above), it is now clear that the DfE contribution to the NCS does not include the previous notional Connexions career guidance funding of £203m, or indeed any funding at all for face-to-face services. Instead, since the web offer is now hosted on

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<sup>184</sup> 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).

<sup>185</sup> Email from Anna Paige to Tony Watts, 30 December 2010.

<sup>186</sup> John Hayes in response to Parliamentary Question 29819 from Gordon Marsden MP, 9 December 2010.

<sup>187</sup> Statement by John Hayes on National Careers Service for England, 13 April 2011.

<sup>188</sup> John Hayes in Adjournment Debate on Careers Advice (Schools), House of Commons, 27 January 2011.

<sup>189</sup> House of Commons Education Committee (2011). *Participation by 16-19 Year Olds in Education and Training*, Volume I, p.58. London: Stationery Office.

DirectGov (for which there are no distinct costs to DfE), the contribution is confined to £4.7 million for the youth element of the NCS helpline.<sup>190</sup>

45. Any face-to-face career guidance services for young people is thus now dependent on what schools are prepared to pay for. Ministers have stated that:

‘... 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.’<sup>191</sup>

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.’<sup>192</sup>

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.’<sup>193</sup>

There was 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 activities<sup>194</sup>). Indeed, John Hayes in his evidence to the House of Commons Education Select Committee seemed to imagine that the monies already spent by schools to careers activities might be sufficient:

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<sup>190</sup> Email from Anna Paige to Tony Watts, 15 July 2011. Confirmed in a DBIS/DfE paper issued to the Advisory Group on the National Careers Service, July 2011.

<sup>191</sup> Lord Hill of Oareford in response to Parliamentary Question HL8027 from Lord Beecham, 29 March 2011.

<sup>192</sup> John Hayes in Education Bill Committee, 24 March 2011.

<sup>193</sup> Letter from John Hayes to Tony Watts, 9 February 2011.

<sup>194</sup> Nick Gibb in response to Parliamentary Question 47398 from Gordon Marsden MP, 17 March 2011.

‘... remember that schools already spend money on careers advice and guidance. They do so patchily – some schools do it rather well; some do not do it well enough. So, given that they now have a duty to secure independent advice, they will have to make a judgement about how they use the resource that they have already allocated to the provision of careers advice in a new and fresh way.’<sup>195</sup>

46. 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 – 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 funding withdrawn, e.g. Education-Business Partnerships<sup>196</sup> and Aimhigher. This at a time when, despite Ministers’ assurances (para.45 above), many schools are anticipating significant reductions in their overall budgets.<sup>197</sup>

47. Since the DfE contribution to the NCS is to be confined wholly to the helpline service, without a discernible transfer of any career guidance funding to schools, the reality is 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 vanish altogether – without any public announcement to this effect. As noted earlier (para.13), 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 wished<sup>198</sup>: 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 are likely to be much greater here.

48. It should also be noted that the 2010/11 Connexions career guidance budget considerably outweighed the Next Step careers service budget (see para.43 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 career guidance for young people), and that the same principle applies to the DfE.<sup>199</sup> While this offers some protection for the BIS-funded services for adults, it is important to note that many previous Next Step arrangements were built significantly upon the foundations of services for young people through Connexions: where these have been eroded or destroyed, there are concerns that this could affect the future services which will be available for adults as well.

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<sup>195</sup> House of Commons Education Committee (2011). *Participation by 16-19 Year Olds in Education and Training*, Volume II, Ev 71. London: Stationery Office.

<sup>196</sup> See footnote 127.

<sup>197</sup> See e.g. ‘Revealed: winners and losers on funding merry-go-round’. *Times Educational Supplement*, 29 April 2011. This report indicated that 40% of schools would see a decrease of funding, while 39% would see an increase; the rest would see no change.

<sup>198</sup> 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.

<sup>199</sup> Note of the first meeting of the Advisory Group on the All-Age Careers Service, 17 December 2010.

49. 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.’<sup>200</sup>

The new duty on schools to secure impartial and independent careers guidance is to come into effect in September 2012. Schools have, however, been encouraged to consider what arrangements they might make in the year beginning September 2011, in anticipation of their new duties. They were further encouraged to do this ‘in discussion with local authorities, taking account of local arrangements for providing careers guidance to young people in advance of these changes’.<sup>201</sup>

50. Steps were also belatedly 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.’<sup>202</sup>

51. The delays in issuing this statement were however very damaging. Many Local Authorities announced major reductions and even closures of their Connexions services, including massive staff redundancies. Since Local Authorities were 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 were supposedly to be merged, such services tended to be particularly hard hit.<sup>203</sup> This effectively undermined John Hayes’s declared intention to build on the best of Connexions (see para.6 above).

52. Alongside the new announcement, John Hayes indicated his willingness, in the light of the concerns expressed in the Education Bill Committee about the transition arrangements, to organise two ‘summits’: one for ‘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’; the other for young people – and other people, because this is

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<sup>200</sup> Department for Business, Innovation and Skills (2010). *Further Education – New Horizon: Investing in Skills for Sustainable Growth*, p.14.

<sup>201</sup> Department for Education (2011). The Education Bill – changes to the delivery of careers guidance.

<sup>202</sup> Department for Education (2011). LA communication.

<sup>203</sup> For a detailed analysis, see Hooley, T. & Watts, A.G. (2011). *Careers Work with Young People: Collapse or Transition?* Derby: International Centre for Guidance Studies, University of Derby. In at least 12 Local Authorities, the Connexions service has been radically cut; in at least 49 others, it has been restructured to focus exclusively on support for vulnerable young people; many of the rest have adopted a ‘wait and see’ policy, though often with considerable resourcing costs; only 15 or so have worked to maintain a substantial universal careers element in their service provision. There have so far been at least 2,627 job losses; the Unison estimate is 4,000.

all-age, after all – about the use of the service’.<sup>204</sup> The first of these ‘summits’ was held on 15 July 2011. On the second, a ‘user summit’ with a group of young people was held in Hertford on 12 May 2011. John Hayes stated later in May 2011 that:

‘... I intend to spread these summits to other locations across the country so that we can shape the service to meet young people’s needs.’<sup>205</sup>

No subsequent announcement, however, was made about further such ‘summits’, either with young people or with adults.

53. The status of the summits as consultative events was unclear. The original statement of their purpose (see para.50 above), and the use of the term ‘summits’, suggested that they were to be viewed as consultations. A clarification from the responsible civil servant, however, indicated that the purpose of the meeting on 15 July was not to advise Government but to provide ‘an opportunity for us to clarify policy intent to local government representatives and to share examples of good practice’.<sup>206</sup> This suggested that the meetings were largely cosmetic in nature, and ‘summits’ in name only.

54. The relationship of these ‘summits’ to existing consultative mechanisms, notably the Advisory Group on the All-Age Careers Service and the Task Force on the Careers Profession<sup>207</sup>, was also 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’<sup>208</sup>, such consultation was very limited. The Advisory Group on the All-Age Service was reconstituted as the Advisory Group on the National Careers Service, with more limited terms of reference, and chaired by BIS rather than being jointly chaired by BIS and DfE – a significant symbolic indication of DfE’s limited commitment to, and involvement in, the NCS. The ‘lay’ (non-government) members of the group issued a press statement indicating their deep concerns about the significant reduction in the Group’s remit and in the scope of the new service, as well as about the destruction of careers services for young people.<sup>209</sup>

55. The pattern of delays combined with lack of serious consultation was repeated with the Statutory Guidance for schools. As noted in para.17, the Guidance was promised for early in the New Year of 2012, but was not published until April 2012. Meanwhile, many schools had been setting their budgets for 2012/13, without Guidance of any kind. Moreover, the published version was weaker than the version initially sent out for consultation, revealing the consultation as a sham.<sup>210</sup>

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<sup>204</sup> John Hayes in Education Bill Committee, 24 March 2011.

<sup>205</sup> John Hayes in House of Commons, 23 May 2011.

<sup>206</sup> Email from Anna Paige to Tony Watts, 29 July 2011. The sharing of good practice is also being encouraged through the Local Government Association’s ‘communities of practice’ website.

<sup>207</sup> See footnote 29 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).

<sup>208</sup> John Hayes in Education Bill Committee, 24 March 2011.

<sup>209</sup> ‘Government Advisory Group voices concerns on widespread destruction of careers services for young people’. Press release, 5 August 2011.

<sup>210</sup> Watts, A.G. (2012). *Statutory Guidance for Schools on Securing Access to Careers Guidance*. Careers England Policy Commentary 16.

56. **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 career 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, it is clear that most or all of the previously existing funding for face-to-face career guidance services for young people has been allowed to vanish without trace, without any public announcement to this effect. The detrimental effects of these actions have been exacerbated by the persistent delays and unfulfilled promises recorded throughout this Commentary, and the confusion they have caused.

57. John Hayes affirmed that his intended goal was to create ‘the best of careers services’.<sup>211</sup> This seems impossible to reconcile with the impact of the Government’s policies to date. If the main elements of the Government’s policies are to be implemented in a way that improves rather than permanently damages services, there are a number of steps that need to be taken. In particular:

- The organisational and professional standards have to be confirmed and implemented not only for the NCS but also for all providers secured by schools.
- Schools have to be persuaded to pay for services which they have previously received free of charge.

Meanwhile, there are widely-expressed 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.

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<sup>211</sup> John Hayes in 13<sup>th</sup> Annual Lecture, International Centre for Guidance Studies, University of Derby, 16 June 2011.

Tony Watts  
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