

Careers England Policy Commentary 20

This is the twentieth 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.¹

Government Response to Education Select Committee Report

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1. **Summary.** The Government has now published its formal response² to the report of the House of Commons Education Select Committee on careers guidance for young people³. The response rejects several of the report's key recommendations; others it defers until the results of the current Ofsted thematic review of careers guidance in schools are published in the summer. Of the few recommendations that appear to be accepted, most are broadly in line with existing Government policies: the phrasing of the responses requires minimal additional actions on the Government's part. The sole exception is the recommendation that the remit of the National Careers Service be expanded to enable it to perform a capacity-building and brokerage role for schools; however, the positive response to this includes no statement on funding implications. The response also attempts to emphasise outcomes at the expense of processes.

2. **Rejected recommendations.** Four recommendations are firmly rejected by the Government:

- That schools should publish a careers plan, to be reviewed annually (Recommendation 13).
- That each young person should be guaranteed a minimum of one personal careers interview with an independent adviser (Recommendation 16).
- That schools should be required to implement quality standards in relation to their careers provision (Recommendation 23).
- That the statutory duty on schools to provide careers education and work-related learning should be reinstated (Recommendation 24).

3. On the **school careers plan**, Recommendation 13 stated:

¹ Helpful comments from Paul Chubb and Dr Tristram Hooley on earlier drafts of this Policy Commentary are gratefully acknowledged. The author is however solely responsible for the views expressed.

² House of Commons Education Committee (2013). *Careers Guidance for Young People: the Impact of the New Duty on Schools: Government Response to the Committee's Seventh Report of Session 2012-13*. HC 1078. London: Stationery Office.

³ House of Commons Education Committee (2013). *Careers Guidance for Young People: the Impact of the New Duty on Schools*. HC 632-1. London: Stationery Office. For a detailed analysis, see Watts, A.G. (2013). *Education Select Committee Report on Careers Guidance for Young People*. Careers England Policy Commentary 18.

‘We recommend that the Department for Education introduces into the statutory guidance a requirement for schools to publish an annual careers plan, to include information on the support and resources available to its pupils in planning their career development. Schools should be required to review the plan systematically on an annual basis, taking into account the views of students, parents, employers and other learning providers.’

The Government response states:

‘The Government has radically cut back bureaucracy for schools. Since 2010 we have cut the volume of guidance issued to schools by more than half and removed a number of data collections. A mandatory careers plan would re-introduce bureaucracy of the kind we have tried so hard to remove, and it is not clear that the document would improve the quality of careers programmes. There would be numerous issues to resolve around responsibility for producing the plan, use of content and monitoring arrangements.

‘In their response to the Committee’s report, the Association of School and College Leaders suggest that an annual report would be “a bureaucratic exercise” and the NASUWT’s view is that this would be “completely inappropriate and a distraction from schools’ core purpose of focusing on teaching and learning”. We are confident in head teachers’ ability to plan their provision in a way that works best for them.’

It should be noted that what the Committee was recommended was not a ‘report’ but a ‘plan’. It is also worth noting earlier comments in the Government response which criticise the Committee on the grounds that:

‘... the report could have made more of the important role that local accountability has in driving improvement’;

and which state that:

‘... schools and colleges will ... wish to show parents and students the career and work-related activities they offer to support young people to help inform their choices.’

Yet it was precisely such local accountability and transparency, alongside school autonomy, that this recommendation was designed to encourage.

4. On the **entitlement to at least one careers interview**, Recommendation 16 stated:

‘Access to face-to-face guidance is an integral part of good quality careers guidance. All young people should have access to such provision from a qualified, independent provider, should they choose to take up the opportunity. We recommend that a minimum of one personal careers interview with an

independent adviser who is not a teacher should be available for every young person and that this is made explicit in the statutory guidance.’

The Government response states:

‘We believe that guaranteeing a personal interview for all young people is not the correct way to drive up standards of provision. Research shows that young people value advice and information from a wide range of sources. The choices young people make are influenced not just by careers advisers but also by their peers, family and friends. The duty gives schools the flexibility to commission support that is right for their pupils – and employers have an important role to play in this through the provision of inspirational talks, visits and mentoring.’

In other words, the Government evidently views informal influences and employer inputs as *alternatives* to a professional careers guidance interview, rather than as *complementary* to them. More fundamentally, the response also states:

‘Overall, we want to see pupils succeeding in education and schools supporting their transition into further education, training or employment that is right for them. This clear focus on outcomes, rather than the number of interactions a young person has with a careers advisor, is the right approach to getting the best for pupils.’

For further comments on this issue, see paras.14-18 below.

5. On **quality standards**, Recommendation 23 stated:

‘We recommend that the Government requires schools to:

- achieve the Quality in Careers Standard⁴;
- secure independent careers guidance from a provider with the Matrix standard;
- and
- ensure that advice is provided by a level 6 qualified careers advisers.’

The Government response states:

‘We agree that the quality of careers provision is vital if it is to help young people effectively. The practical guide for schools already suggests that schools should consider the three aspects of quality assurance highlighted by the Committee: the quality of the school careers programme, the quality of the independent careers provider and the quality of the careers professionals working with the school. Schools are free to work towards the Quality in Careers standard or the Matrix Standard should they wish.’

⁴ This recommendation is technically inaccurate: schools cannot achieve the Quality in Careers Standard; instead, they can achieve a Quality Award in Careers Education, Information, Advice and Guidance which is nationally validated by the Quality in Careers Standard (for details, see www.careersengland.org.uk).

In other words, the Government holds to its position that schools can implement these quality standards if they *wish*, but are not *required* to do so. In addition, presenting CEIAG Quality Awards (nationally validated by QiCS) and the Matrix Standard as alternatives ignores the important distinction that the latter can only accredit information, advice and guidance, not the full underpinning careers education provision.

6. On the **statutory duty to provide careers education and work-related education**, Recommendation 24 stated:

‘The Government’s decision to remove the statutory duty on schools to provide careers education and work-related learning has been heavily criticised by witnesses to our inquiry. We are persuaded of the benefits of both these former provisions and we recommend that the Government’s statutory guidance to schools is strengthened to require schools to provide careers education and work-related learning as part of their duty.’

The Government response states:

‘The removal of the careers education and work related learning duties reflect the fact that schools are best placed to decide how best to deliver the broad range of activities which make up careers education and work-related learning, within the framework of accountability set out elsewhere in this response. We do not believe it is necessary to underpin this with legislation, as this can lead, as it did in the past, to perverse incentives, poor provision and a lack of value for money.’

No evidence is offered for this latter statement.⁵

7. **Deferred recommendations.** A number of recommendations are deferred until the results of the current Ofsted thematic review are published in the summer. The grounds for such deferment are that the Committee’s judgements are premature:

‘The report cites evidence of one survey carried out by the careers sector that suggests a reduction in the overall level of careers provision. It chooses not to highlight the examples of excellent practice across the country where schools have welcomed the new duty as an opportunity to commission a service more tailored to the particular needs of their pupils. At the time of the inquiry the duty had been in place for only one term so we feel strongly that greater consideration could have been given to the need to allow the new arrangements time to bed in and evolve before drawing such firm conclusions.’

The opening statement here ignores the fact that the concerns expressed by the Committee were based not just on ‘one survey’ but also on the consistency of the

⁵ The Government’s stance on this appears to be based mainly on Professor Alison Wolf’s poorly-evidenced recommendation 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). For strong contrary 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.

extensive written and oral evidence it received. It is also noteworthy that the Government has done little to contribute to the public information available, including the extent of the claimed ‘examples of excellent practice’.

8. Recommendations deferred on this basis included:

- That the statutory guidance and practical guide be combined into a single document (Recommendation 6).
- That the statutory guidance be strengthened to emphasise the benefits of schools forming consortia and partnerships to adopt a collaborative approach to commissioning careers guidance services (Recommendations 7-8).
- That the Ofsted framework is not a credible accountability check on the provision of careers guidance by individual schools (Recommendation 10).
- That the statutory duty be amended to make it clear that the signposting of independent websites is insufficient to meet their statutory duty (Recommendation 17).
- That schools be required to publish details of the alternative education and training providers they allow to meet with their pupils (Recommendation 18).

If the Ofsted thematic review confirms the evidence received by the Committee, it will be interesting to see how speedily and fully the Government acts on these recommendations.

9. On the **single document**, it is worth noting that Recommendation 6 was not simply editorial in nature (one document rather than two), but was linked to giving a mandatory status to four key elements currently viewed as purely advisory within the practical guide: since in all four cases such a change has now been rejected by the Government (see paras.3-6 above), any implementation of this recommendation is likely to be largely cosmetic. It is also noteworthy that the revised statutory guidance issued recently to take account of the extension of schools’ careers guidance down to year 8 and up to years 12 and 13 simply extends existing provision, without amending it in any substantive way (see Annex below).

10. On the **Ofsted inspection framework**, the Government response to Recommendation 10 states:

‘Careers guidance is an important area for Ofsted. Ofsted will draw on the findings of the thematic survey and will consider if any changes are required to its inspection frameworks. Any changes will be disseminated to the sector once agreed.’

This is linked to a more recent statement by Sir Michael Wilshaw (Her Majesty’s Chief Inspector of Education, Children’s Services and Schools) to the Education Select Committee, in response to the following question from one of its members, Pat Glass MP:

‘When Matthew Hancock, the Minister, appeared before us recently, we were looking at careers advice and guidance, and he said he was looking to Ofsted to inspect and monitor that. I pointed out that Ofsted had stated very clearly that they

did not see it as their role to inspect the statutory duty in schools, and asked him if he was going to have a word with you. Has he had a word with you about it?’

The Chief Inspector replied:

‘It is important that we do monitor it effectively. It is really important that impartial advice is given to students on progression routes, and I am not sure that is the case. In our adjustment to our inspection framework from September, we will give the inspection of careers advice a priority.’⁶

The Government response does not fully reflect this more definitive statement.

11. On the **requirement to publish details of alternative providers allowed to meet pupils**, the Government’s rejection of the requirement to publish a careers plan (see para.3 above) removes the stated vehicle for this further requirement. The response accordingly states simply that:

‘We will consider if any changes need to be made to the statutory guidance to underline the importance of schools cooperating with other education and training providers in the light of Ofsted’s report.’

12. **Accepted recommendations.** Of the few recommendations that appear to be accepted, most are broadly in line with existing Government policies: the phrasing of the responses requires minimal additional actions on the Government’s part. This applies, for example, to the following recommendations:

- That local authorities should promote greater consistency in careers provision in their areas (Recommendation 4).
- That the Government should continue to pursue the inclusion of employment as well as improved destination measures, over an expanded timeframe (Recommendation 12).
- That teachers should be encouraged to undertake regular professional development to enhance their understanding of the world of work, but cannot substitute for fully-qualified, independent and impartial advisers (Recommendations 20-21).
- That best local authority practice in identifying and delivering services to targeted young people should be shared (Recommendation 25).
- That discussions should take place between local authorities and regional Youth Contract providers about the delivery of the Youth Contract at local level (Recommendation 26).

13. Potentially more substantive is the Government response to the recommendation:

- That the remit of the National Careers Service be expanded to enable it to perform a capacity-building and brokerage role for schools (Recommendations 14-15).

⁶ Oral evidence to House of Commons Education Committee, 13 February 2013, Q27-28.

The response here states:

‘The National Careers Service is already an important player in the local infrastructure that supports growth, employment and the development of the local economy through supporting a more effective labour market. We agree with the Committee that this role can be developed further to bring together business, schools and colleges. The re-procurement of the National Careers Service from April 2014 provides Government with a good opportunity to strengthen its role as a facilitator for schools, colleges and employers.’⁷

Pertinent in this respect is the further statement that:

‘Government is also strengthening the links between local employers and the National Careers Service to ensure that there is an improved flow of local labour market intelligence available to all its users and partners. From July 2013 Local Enterprise Partnership (LEP) local skills priorities will be published on the National Careers Service website, supported by local labour market information brought together by the LEP.’

Significantly, however, the response includes no comment on the Committee’s linked recommendation that:

‘Clearly, this would have funding implications and so we further recommend that the Department of Education instructs the Skills Funding Agency to cost the options of the National Careers Service remit being expanded in this way.’

The only statement on funding resources in the document is to assert a more detailed rationale than previously⁸ for the failure to transfer the Connexions funding to schools:

‘While there was no explicit transfer of resources, when we made the decision to stop the Connexions service, by making savings on that and other centrally driven budgets we were able to prioritise and protect expenditure devolved to schools during this Spending Review period.’

14. **Focus on outcomes.** A final feature of the Government response that merits close attention is its attempt to focus attention on outcomes at the expense of processes. It combatively asserts:

⁷ This is presumably linked to the statement in the Government’s recent skills strategy that the National Careers Service should ‘play a proactive role in connecting employers, education institutions and local partners’, all of which ‘must work together to make opportunities and information available to young people’. Accordingly, the service will ‘identify and promote opportunities for young people through direct work with employers, schools and colleges, including encouraging business leaders to visit schools and colleges’. Department for Education and Department for Business, Innovation and Skills (2013). *Rigour and Responsiveness in Skills*, p.39.

⁸ For previous statements on this, see Watts, A.G. (2012). *The Coalition’s Emerging Policies on Career Guidance*, para.45. Careers England Policy Commentary 15B. The elaborated rationale was articulated for the first time by Lord Nash (Parliamentary Under-Secretary of State for Schools) in the House of Lords on 4 March 2013.

‘We were ... disappointed that the Committee’s report focuses on the process of planning and providing careers guidance, whereas the Government’s priority is outcomes for young people. The inquiry prompted interesting debate about the strength of the evidence base for particular approaches to careers support. So far there is not, in our view, enough soundly based evidence for what works in improving choices and increasing aspirations to justify the Government narrowly prescribing particular approaches. Instead we have set guidance for how schools can implement the duty to meet the needs of their pupils and to develop their own practice continually to improve outcomes.’

It goes on to use this argument as a rationale for rejecting the international evidence submitted to the Committee:

‘International evidence submitted to the inquiry provides some interesting descriptions of careers delivery models in other countries but we have yet to see any clear evidence that ties a model directly to impact on attainment and progression outcomes for young people. Our priority is the impact of careers policy on those outcomes rather than the specific elements of a careers programme and we do not start from the assumption that more careers guidance activity necessarily leads to better outcomes. Our continued commitment to developing Destination Measures is encouraging schools to focus on ensuring pupils have the support they need to progress to the next stage of their education or training.’

15. On the international evidence, a review of existing qualitative evidence comparing different national career guidance systems, based heavily on well-respected OECD studies, clearly indicates the deficiencies in current Government policies identified by the Committee.⁹ The OECD review also pointed out some of the difficulties of collecting more definitive quantitative evidence.¹⁰ The absence of such cross-national quantitative evidence is not a defensible excuse for ignoring the qualitative evidence.

16. On the Destination Measures, the Government’s claim is that:

‘The Destination Measures capture sustained participation at the next phase of education. This puts a particular emphasis on good choices: if students take a choice which they conclude isn’t right for them, and drop out, this is reflected in the figures.’

The response goes on to report that:

‘We are making a number of improvements to the Education Destination Measures in preparation for their publication in summer 2013. This includes plans to provide information on the admissions policy of the institution and data on the

⁹ For a review of such evidence, see 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.

¹⁰ Organisation for Economic Co-operation and Development (2004). *Career Guidance and Public Policy: Bridging the Gap*, pp.33-37. Paris: OECD.

characteristics of students. We are also making the tables easier to manipulate by users and providing clearer explanations of the data. We will publish Key Stage 4 Education Destinations on the Performance Tables website and, subject to data testing and evaluation, we also plan to publish employment destinations for the first time this year. In the longer term we will investigate the possibility of expanding the range of institutions for which Destination Measures are published and of expanding the timeframe of the measures.’

17. But whether the data will be sufficiently clear and sensitive to permit the claimed inferences to be drawn about the quality of guidance provision is highly questionable. Moreover, the time-lags involved severely restrict the practical applicability of this approach to quality assurance. More fundamentally, the response itself states:

‘We recognise that Destination Measures are not, in themselves, a direct measure of the quality of careers guidance provision in a school and that the destinations reported in the measures depend on many factors, not just the quality of careers guidance provision in a school.’

It goes on to affirm that:

‘Overall, we want to see pupils succeeding in education and schools supporting their transition into further education, training or employment that is right for them.’

The crucial phrase here is ‘that is right for them’. No indication is provided of how any envisaged outcome measures might capture this essential element in timely fashion.

18. As a supplement to quality measures addressed to processes, the practical value of such outcome measures remains to be proven. But in no way can they credibly be advanced as an adequate replacement for measures addressed to processes. The argument is seductive but barren.

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Annex: New statutory guidance for schools and colleges

A1. **Schools.** The statutory guidance for schools¹¹ was updated in March 2013 ‘to help schools plan for the extension of the duty to secure independent and impartial careers guidance down to year 8 and up to years 12 and 13 from September 2013’ (para.1).

A2. Apart from one or two very minor clarifications, the document repeats the previous version, simply extending it to cover the additional year-groups. Thus, for example, the previous version stated:

‘Careers guidance must be presented in an impartial manner and promote the best interests of the pupils to whom it is given. Careers guidance must also include information on all options available in respect of 16-18 education or training, including apprenticeships and other work-based education and training options’ (para.11).

By contrast, the new version states:

‘Careers guidance must be presented in an impartial manner and promote the best interests of the pupils to whom it is given. Careers guidance for those under compulsory school age must also include information on all options available in respect of 16-18 education or training, including Apprenticeships. In year 8, information should include options available at age 14 such as University Technical Colleges, Further Education Colleges, Sixth Form Colleges and Studio Schools. For those over compulsory school age, information should include higher education and employment options post-18, including Apprenticeships. Schools will be held to account for the destinations of their leavers through the annual publication of Destination Measures’ (para.13).

A3. The new version also extends a little the definition of what it means by ‘independent’ careers guidance. The previous version simply stated:

‘Independent is defined as external to the school’ (footnote to para.11).

By contrast, the new version states:

‘Independent is defined as external to the school. Schools can retain any in-house arrangements but should supplement them with external sources of careers guidance – which could include an external careers provider, employer visits, mentoring, website and telephone helpline access. Taken together, these external sources should include information on the full range of education and training options, including Apprenticeships’ (footnote to para.13).

¹¹ See Watts, A.G. (2012). *Statutory Guidance for Schools on Securing Access to Careers Guidance*. Careers England Policy Commentary 16.

The phrasing ‘could include’ and ‘taken together’ effectively mean, however, that this requirement could be met by reference to an ‘independent’ website.

A4. Finally, the new version elaborates a little the liaison arrangements between schools and local authorities. The previous version stated:

‘Schools should work with local authorities to support them in recording young people’s post-16 plans and the offers they receive along with their current circumstances and activities.

‘Section 72 of the Education and Skills Act 2008 requires all schools to provide relevant information about pupils to local authority support services. Schools should also work in partnership with local authorities to ensure they know what services are available, and how young people can be referred for support. From 2013 schools will be under a duty to notify local authorities whenever a 16- or 17-year old leaves education’ (paras.18-19).

The corresponding statement in the new version reads:

‘Section 72 of the Education and Skills Act 2008 requires all schools to provide relevant information about pupils to local authority support services. This includes information that helps to identify those at risk of ending up not in education, employment or training (NEET) post 16, young people’s post-16 plans and the offers they receive along with their current circumstances and activities.

‘Schools should also work in partnership with local authorities to ensure they know what services are available, and how young people can be referred for support.

‘From September 2013, Section 13 of the 2008 Education and Skills Act places a duty on all educational establishments (including schools and Academies) to notify local authorities whenever a 16 or 17 year old leaves an education or training programme before completion. It is for schools and local authorities to agree local arrangements for ensuring this duty is met’ (paras.20-22).

A5. In essence, however, the new version simply extends the previous guidance to the additional year-groups.

A6. **Colleges.** New statutory guidance is also to be issued shortly for further education colleges and sixth-form colleges.