

**Careers England Ltd**

**Promoting Achievement & Economic Well-Being for All**

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## **Members' response to The Green Paper**

**“Youth Matters”  
(p) July 2005**

## Careers England's response to the Green Paper "Youth Matters" (July 2005)

### ➤ *Introduction and Summary*

*This response is the result of widespread consultation with the Full and Associate Members of Careers England. It is offered to the Consultation Unit in a format which concentrates upon Chapter 5 (Information, advice and guidance), questions 16-2. It also comments upon other parts of the Consultation document from the distinctive perspective of our Trade Association (for the career guidance industry in England).*

*Careers England welcomes the opportunity to contribute to the growingly important debate concerning the provision of more effective support services for all young people in England. We offer the comments below from our distinctive perspective as specialist and experienced providers of career guidance support services (for young people and adults), committed to assisting Government to promote achievement and economic well-being for all.*

*The rapid and significant changes to the demographic features of England during the coming decade, coupled with the economic and social changes in the international market place, provide a double imperative for Government to ensure that England's integrated youth support systems enable every young person to achieve in terms of educational performance, as well as gaining the skills to secure economic well-being and a positive role in society.*

*Effective career guidance support services, underpinned by strong universal careers education (to enable every young person to develop the personal skills for effective career planning and life management), represent both an individual benefit and a 'common good' for the economic and social health of the nation. Such provision has been recognised internationally as a matter of significant concern to public policy-makers, not least within the European Union.*

*Social inclusion, securing a cohesive society, will be best achieved not simply through encouraging and enabling all young people to participate in education and training, important though that objective is; in addition, all young people should be enabled to play a meaningful role in society. The best way to achieve this is through gaining the skills for career planning, life management and employability. As the Prime Minister<sup>1</sup> has rightly said: **"The best defence against social exclusion is having a job."***

*The Green Paper should be considered in the context of the "End to End Review of Careers Education and Guidance" (also published in July 2005). The conclusions of that Review and the Green Paper's proposals should secure actions which will enhance the success of 'key outcome 5' - achieving economic well-being - of "Every Child Matters", for all young people. Given these economic and social benefits, Careers England suggests that future policy for careers support in England, in the light of the current deficiencies identified in the Review and the questions raised by the Green Paper, should be informed by the European Union's Council Resolution (May 2004) on 'Guidance Throughout Life', and the subsequent Ministerial Agreements on European Political Priorities for Lifelong Guidance, which are supported by the jointly-published European Commission and OECD publication 'Career Guidance: A Handbook for Policy Makers' (2004).*

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<sup>1</sup> The Prime Minister's foreword to **Bridging the Gap: New Opportunities for 16-18 Year Olds Not in Education, Employment or Training**. Published by the Social Exclusion Unit (1998)

## ➤ **Key Issues to Address**

*The specific comments which follow identify issues which Careers England's Members (informed by the End to End Review), suggest need to be addressed following the Green Paper consultation and upon which Careers England stands ready to offer its active support to Government in determining actions and their implementation.*

*This response to the Green Paper begins with views from the perspective of the users of youth support services; and moves on to consider aspects of provision, supporting arrangements, and finally structures. References to certain Questions in the Consultation Document for the Green Paper are added where appropriate.*

### **1. Young People's Views**

Amongst the key positive outcomes from the establishment of Connexions has been the greater meaningful involvement of young people in shaping the nature of local service delivery - which should be maintained {cf Question 9 in the Consultation} - and the recognisable branding of service providers. In section 5 below, we say more about branding, but the crucial benefit of having a nationally recognisable brand to access the kind of enhanced *integrated youth support services* (IYSS) proposed in the Green Paper (especially chapter 5, pp44-54) should be retained (whether or not the services themselves remain being called 'Connexions').

Young people have consistently argued that the top priority they seek from Connexions is informed careers information and guidance. This should be the keystone of future IYSS provision (cf Question 6 in the Consultation).

### **2. Entitlements**

In responding to Questions 8 and 9 in the Consultation, Careers England would suggest that - as recognised in the 14-19 Education White Paper (February 2005, Cm 6476), and the Skills (for business and work) White Paper (April 2005, Cm 6483) - a critical element for success in learning and work is the acquisition of the skills to make choices (of options, routes and providers) wisely.

All young people should be entitled to an educational curriculum which enables them to acquire key skills for life planning and career management. They should also be empowered to access personal support concerning their life choices, including career planning support. This will require a national 'Specification' encompassing these entitlements (in the context of the statutory duties and powers of Ministers – see, for example the duties outlined in section 14 below) to inform all local commissioning (see section 15 below).

The Connexions years have shown the benefits which accrue when personal barriers to success are addressed alongside rather than in isolation from learning and work career-path choices. Differentiation of specialist support workers is crucial in successful referral to overcome the most complex of barriers. Separating support services within 14-19 education from those available to 16-19s in the labour market would seriously weaken the former (as section 6 below demonstrates further). Such a separation could also lead to the loss of expertise amongst support workers and the loss of economies of scale for the public purse in procurement.

To ensure that entitlements to support are meaningful and accessible, future IYSS procurement arrangements should ensure that the universal service (to which all young people are entitled

within both the pre- and post-16 phases), becomes the solid foundation in each locality in England upon which the additional targeted support may be secured.

Future arrangements should also continue to enable skilled advisers working within the adult labour market to contribute their expertise to targeted and universal service provision for young people; significant benefits accrue from this added labour market perspective.

### **3. Careers Education & Guidance (CEG)**

In the enhanced IYSS of the future, holistic Information, Advice and Guidance (IAG) needs to include enhanced CEG for all. Thus, it is important to consider the Green Paper in the context of the “End to End Review of Careers Education and Guidance” (also published in July 2005). The conclusions of that Review and the proposals of the Green Paper should bring actions which will enhance the success of ‘key outcome 5’ - achieving economic well-being - of “Every Child Matters”, for all young people.

Enabling every young person to achieve and secure their economic well-being is essential for the overall economic and social health of the nation. Careers Education and Guidance (CEG) is a pivotal component of the 13-19 curriculum, within which every young person should be enabled to gain the skills for effective planning of their learning and working lives. Whilst many people responding to the Review would have wished to see stronger measures – such as making the 11-19 National Framework for Careers Education and Guidance compulsory or introducing universal Individual Learning Plans – these were ruled out as not being consistent with the New Relationship with Schools (Review, para.6.50).

Actions should be taken, therefore, to ensure that in every school quality-assured CEG begins in the later years of primary schooling, and is further developed from Year 7 onwards, so that all pupils begin to acquire and practise decision-making and option-choice skills, alongside building the economic and industrial understanding which will underpin their future learning and work choices. Within the breadth of life management skills should sit the skills for effective career planning, including the development of employability skills. Only if the curriculum ensures that every young person gains these personal skills can support services become more effective.

### **4. Broader Statutory Curriculum**

The actions proposed in section 3 above would be assisted significantly, with the already welcomed changes to enhance the 14-16 statutory curriculum from September 2005, if the DfES reviewed the responsibility lines for CEG so that it becomes aligned with Work-Related Learning and Enterprise Education.

The Green Paper (p.46) recognises the importance of these changes, but stops short of making this important connection to CEG. The objective of embedding CEG and other support within broader IAG support provision would be significantly advanced through such an alignment of elements of the statutory Key Stage 4 curriculum.

### **5. Quality Standards**

The End to End Review supports the establishment and promotion of local quality standards for CEG (Review, paras.6.37-6.40). This welcome recommendation is taken up by the Green Paper in a strengthened form (p.48). This section of our response, therefore, addresses Questions 11 and 16-21 in the Consultation in respect of standards.

In order to secure the successful embedding of CEG in enhanced IAG for all, Careers England strongly supports the strengthening recommended in the Green Paper of quality standards. We suggest that a key measure for the future should be that every provider of CEG, within IYSS's enhanced IAG, should be required to meet a nationally-recognised quality mark. Existing local standards for CEG should be assessed against the '11-19 National Framework for CEG', and only 'recognised' if they fulfil the Framework's objectives. Potential service providers should face a mandatory requirement to meet such standards.

End-users of services (most notably young people and also their parents/carers – cf Questions 27-29 in the Consultation) should be assured through a recognisable 'mark' or 'brand' that providers and their staff have the specialist knowledge and skills to provide the quality of support they seek and deserve. One such measure should include staff competence at a sufficient NVQ level to provide informed and objective career guidance. This is wholly consistent with the principle outlined in the Green Paper (p.72).

According to the Green Paper (p.68), the current Connexions brand would no longer be the required national brand for the service delivery. We would strongly suggest, nonetheless, that its widely accepted recognition should not be lost. 'Connexions' should be retained as a recognised name, but with a changed meaning; in response to Question 7 in the Consultation, Careers England advocates that only those IYSS providers who meet the new national quality standards for IAG should be able to use the Connexions brand. This brand, therefore, would become the national identifier of organisations meeting the quality mark.

## **6. Labour Markets**

International evidence underlines the importance of policy-makers ensuring that providers of career guidance are informed by knowledge of the labour market.<sup>2</sup> Careers England suggests that the logical recommendation arising from this is for all staff of future IYSS providers to pay more attention to labour market information and intelligence (it is much more difficult for school-based staff to be expected to do so, as section 10 below indicates).

To meet the needs of the nation's employers, career guidance (as is rightly implied by the Green Paper, p.46) should be informed by knowledge of local, regional, national and (increasingly) international labour markets. By serving the needs both of young job-seekers and of employers in recruiting young trainees and workers, specialist IYSS providers assist the effective working of the labour market, as well as gaining critical labour market intelligence to inform their contributions to CEG programmes.

## **7. Enhancing the Status of CEG as a key element of IAG for all**

Based upon the evidence of the End to End Review, and the practical knowledge and experience of its Members, Careers England is concerned that the clearly acknowledged need to raise the status of CEG is hampered by its lack of profile within the current targets and performance measures for Connexions.

The current statutory base for CEG (see section 14 below) does provide the framework to achieve a stronger partnership between learning providers and the external provider of the statutory 'careers service' (currently, Connexions; in future, as part of the enhanced IYSS).

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<sup>2</sup> *Organisation for Economic Co-operation and Development (2004). Career Guidance and Public Policy: Bridging the Gap. Paris: OECD.*

To secure the enhanced status of CEG within the broader context of overall IAG in the IYSS (which the Green Paper seeks) will require two policy changes: (i) the CEG statutory base throughout years 7-11 and within 16-19 publicly-funded learning should be strengthened (as section 14 below proposes); and (ii) universal performance measures including CEG will need to be established (as section 8 below proposes).

## **8. Performance Measures**

The required improvements in CEG provision would demand changes in the performance measures set for CEG providers within the new IYSS. One of the concerns with the current Connexions arrangements has been that its performance targets have related exclusively to the targeted 'NEET' group, and that there have been no targets specifically for CEG (Review, para.6.41).

Accordingly, a clear methodology should be developed for measuring the success of CEG programmes in outcome terms {cf Question 8 in the Consultation}. The work already taking place to develop measures of success in post-16 learning (Review, para.6.43) will provide a valuable starting-point, but further important and urgent work on this from a universal 13-19 perspective is required. Careers England wishes to support such developmental work to ensure that future measures incorporate an adequate 'performance measurement and evaluation programme for career development and progression planning' (Review, para.6.42), for all young people.

## **9. Sustainable Impartiality**

Given this context, Careers England believes that securing sustainable impartiality is the single most important task when the Green Paper and the Review are considered together, from the perspective of enhancing CEG within broader IAG for all.

The key is how to ensure that the proposed measures will guarantee the impartiality of career information and guidance. Careers England's view is that what is proposed in the Green Paper (p.48) is desirable but is certainly not sufficient. Access to independent career guidance provision is **the** essential component if impartiality is to be secured for all young people.

Unless explicit steps are taken to ensure that labour market knowledge, and independence from opportunity providers, is guaranteed, impartiality will not be sustained over time. In the early years of potential transition to the proposed enhanced IYSS (see also section 16 below) staff that may be knowledgeable of the labour market and all options, routes and providers might retain a measure of impartiality; but rapidly that would be diminished and, once lost, would lead to serious deficiencies in the CEG provided to many young people. This should be avoided.

Independence from the provider of opportunities in learning and work should never be confused with being 'disinterested' in the outcomes for the young person of their choices; effective CEG is founded upon ensuring that young people's interests are paramount and their decisions are accurately informed. Equally, decisions about providing access to additional targeted service support should also be young person-led and driven by impartial and objective motives, not by vested interest.

## **10. Schools and Colleges**

The Green Paper (p.47) echoes the principal recommendation of the Review, that ‘the greatest potential for improving CEG delivery lies in driving up the quality and relevance of careers education in schools’ (Review Summary, p.5).

Careers England argues that schools and colleges alone will not be able to bring the improvements required. Partnership with an external specialist agency is a prerequisite.

International evidence needs to be considered, including the OECD Career Guidance Policy Review<sup>3</sup> (based upon 14 countries). This persuasively indicated the serious limitations of an exclusively school/college-based model of career guidance delivery, in three respects:

- Its weak links with the labour market and its tendency to view educational choices as ends in themselves without attention to their longer-term career implications.
- Its lack of impartiality, and the tendency for schools to promote their own provision rather than college-based or work-based routes.
- Its lack of consistency: the policy levers on schools and colleges to deliver services in this area tend to be weak, and services to be patchy both in extent and in quality.

In the event that any school, college or cluster of institutions should be enabled to ‘opt out’ of the local IYSS provision (p.47, Green Paper), the most serious implications include the real possibility that - without hypothecation of the funding - CEG might receive less dedicated resources, and broader IAG enhancements would be hampered. This would weaken entitlements even further, and lead to loss of economies of scale in the provision of essential infrastructural support, such as labour market information and management information on destinations of young people.

Arrangements concerning the commissioning of quality assured service delivery arrangements, should any such ‘opt out’ be approved, will be critical. In considering the weaknesses of an exclusively school/college-based model, the OECD accordingly strongly favoured a delivery model based on a partnership between schools and colleges on the one hand, and on the other an external service that is closer to the labour market and is able to provide impartial guidance at a consistent standard. This should be the route followed in England.

Clarity is also needed on responsibility/accountability for the future of targeted support, rather than universal IAG and specialist careers support, should any school/college ‘opt out’ occur.

## **11. Further Education and Work-Based Learning**

Under the current arrangements there are real concerns about the equity of provision of information on opportunities in these two sectors to pre-16 year-olds and their parents. Subject teachers are often a significant influence upon the choices of their students; unwittingly, their influence may undermine the impartiality of the support provided from specialist CEG sources.

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<sup>3</sup> *Organisation for Economic Co-operation and Development (2004). Op. cit.*

The cultural prejudices against Further Education which persist in some communities, and arguably even more so against the work-based route, are unlikely to be challenged and overcome unless their 'second-class' status is manifestly changed.

This calls for changes in the resourcing and funding of these post-16 options; it also requires all post-16 young people to have access to ongoing CEG, with independent specialist career guidance support. In turn this would have benefits to the economy, with consequential reductions in the likely numbers of discontinuing students (both within FE and in Higher Education) and trainees, and improvements both in achievement and in successful future progression to further learning.

## **12. Independent Schools**

Young people within the independent sector will need to be able to access support at appropriate stages in their learning and work career pathways. They form an increasingly important part of the future workforce of the nation, in the light of the changing demographic features of the economy. The Green Paper is silent on meeting these needs.

## **13. ICT**

The invaluable expansion of ICT resources for CEG and broader personal support for young people should not lead to an over-reliance upon such provision.

Many poorer families - and 'deprived' community areas (both inner city and rural) - do not have ready access to such facilities. National evidence also shows that users of ICT support (such as 'Connexions Direct' and 'learnirect') are more likely to wish to access local face-to-face support having accessed ICT. In particular, they are often either more ready to access certain education and training options, requiring local support; or are more informed about their options and now seek impartial advice and guidance.

Recognising the clear additional benefits of remote ICT resources alongside locally accessible face to face services, Careers England advocates an 'as well as', not an 'instead of', approach in developing ICT contributions to the enhanced IYSS proposed in the Green Paper.

## **14. The Statutory Base of CEG and the 'careers service'**

The Green Paper and the Review need to be set in the context of the current statutory base for CEG and the 'careers service'. Careers England's Members are especially concerned that many sections of the Review - which indicate not only the current deficiencies of careers education (CE) provision in schools, but also the difficulties of addressing them - should be acted upon following the Green Paper consultations in a way that will increase the universal entitlements of England's young people to the quality of support that they seek and deserve, and that the nation should provide for its economic and social success.

The current statutory base for CEG and the 'careers service', which should provide the basis for the future, is as follows:

- Section 8 of the 1973 Employment & Training Act (as amended by the 1993 Trade Union Reform & Employment Rights Act) places a duty upon the Secretary of State to ensure the provision of a 'careers service' in each locality in



England. This duty is currently discharged through the powers the Secretary of State has under the Learning & Skills Act 2000.

- The 1997 Education Act (Sections 43 and 44) places a duty upon all publicly-funded schools to have in place a policy for careers education for all pupils in years 7-11 (the extension from years 9-11 to include years 7 and 8 took effect from September 2004).

These duties would be rapidly strengthened if Section 45 of the 1997 Education Act were to be implemented: this provides the power to the Secretary of State to require all publicly-funded 16-19 learning providers to put in place a policy for CEG. Bearing in mind the economic and social benefits which would accrue, Careers England advocates that the Secretary of State should exercise this power at the earliest possible opportunity.

In the future arrangements for the commissioning of service providers (see also section 15 below), it will be essential that all commissioned providers (including schools and colleges should this option be chosen) are accountable for their role in respect of the effective discharge of these statutory duties outlined above.

## **15. Commissioning the Best Providers**

Excellence in delivering all publicly-funded services should be assured in all localities. In respect of the enhanced IYSS proposals, this will call for customised commissioning arrangements to ensure that best value for the public purse is achieved in every locality in England.

In line with the Green Paper's proposals on quality standards (see section 5 above), Careers England advocates that in testing choice and competition of potential service providers, the drivers should be evidence of quality and value of service delivery. A rich mix of voluntary, public and private providers would result – providing a real base for future growth of quality through minimising monopoly, increasing quality-assured competition, and never condoning poor quality.

The future position of Children's Trusts (in the context of Local Area Agreements) should involve assurances of clarity that their primary role is to commission the best deliverers of both targeted and universal services with open transparency. In such an open context, the widening of those elements of the proposed enhanced IYSS which would be subject to commissioning would be welcomed. Guidelines from Central Government to Trusts on commissioning procedures and principles will be important.

Careers England is also concerned that measures will need to be put in place by Central Government to ensure that Children's Trusts not only enhance child protection services and support for the 'targeted' groups of teenagers {cf Questions 23-26 in the Consultation}, but also secure the enhancements to the universal 13-19 support services which are so widely acknowledged as being too often inadequate today {cf Questions 16-21 in the Consultation}.

Lessons should surely be learnt from the past so that checks and balances ensure that an appropriate balance is maintained between targeted and universal services; with the former being built upon a solid foundation of the latter.

As in the provision of Information, Advice and Guidance (IAG) for adults on learning and work - where many organisations (including most of Careers England's Members) have developed expertise in both service delivery as well as in contract management - Careers England's

Members are ready to offer their expertise and potential involvement, including as potential lead local partners in the new IYSS arrangements. In this context Careers England welcomes the multi-agency arrangements, as envisaged in the “Every Child Matters” Fact Sheet (“Multi-Agency Working”, July 2005), which enable the development in localities of shared core support skills amongst support workers, coupled with access for young people to those in the ‘partnerships’ who provide distinctive specialist support.

The position of the existing Connexions Partnerships - many of which involve so-called ‘direct-delivery’ Connexions companies (others involve primarily commissioning Connexions Partnership Boards) - should be clarified. The ‘best’ of those Connexions companies may well win delivery contracts under new commissioning arrangements; but their starting position should obviously involve no ‘privilege’ (cf p.47, Green Paper).

## **16. Transition**

Until Ministers have resolved the future pattern of the enhanced IYSS provision that they wish to see procured in every locality, it is essential that the coming two years secure a sufficient position of stability of service provision upon which to build for a better future.

‘Contract Specifications’ for the coming two years (2006-8) should be set nationally, which would then require Government Offices to ensure that commissioned contracts secure no reduction of quantity and quality of provision, with no detriment to the discharge of current statutory duties, and neither advantage nor disadvantage any sector (voluntary, public, and private) wittingly or unwittingly.

And after the initial transition to the new arrangements has been successfully concluded, learning from past experience, there should be significant lengths of contracts offered to those commissioned to deliver so that investment in development of enhanced services can be planned over a period of years. Careers England would advocate that, provided that quality of service provision is assured, contracts should then be awarded for at least 3 years’ duration.

## **17. An All-Age Strategy**

Lifelong learning requires accessible lifelong career guidance and IAG support. Whilst many older teenagers will wish and need to access seamless local support, the needs of adults of all ages in every locality should also be addressed. The current review of IAG for adults - established following the Skills White Paper - should include direct involvement of the planners, procurers and deliverers of support services for young people; through this there should be a clear expectation that recommendations for the future will address the need for an all-age strategy.

An all-age strategy in respect of career guidance and IAG support is an essential component for the future economic success of the nation. In determining the best outcome for England, the options available should be considered in the light of evidence. Recent reviews of both Careers Wales and Careers Scotland<sup>4</sup>, for example, have produced positive findings that contrast markedly with the deficiencies of CEG in England presented in the End to End Review. These should feature in the review of options for the future of support for people of all ages in England.

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<sup>4</sup> Moulson, R. & Prail, S. (2004). *Careers Wales Review – Final Report*. Cardiff: Welsh Assembly Government. Watts, A.G. (2005). *Careers Scotland: Progress and Potential*. Glasgow: Careers Scotland.