Revised Statutory Guidance and Non-Statutory Departmental Advice on Careers Guidance and Inspiration in Schools

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1. **Summary.** The Government has published new Statutory Guidance (SG)\(^2\) and Non-Statutory Departmental Advice (NSDA)\(^3\) on ‘careers guidance and inspiration’ in schools. A close reading of these documents makes it clear that the statutory duty to ensure that all pupils are provided with ‘independent careers guidance’ can be met by involving a range of employers and further/higher education providers in a programme of activities related to the school. The role of professional careers advisers is given minimal and marginal attention; employers are expected to provide ‘advice and guidance’ but teachers are not; the concept of careers education is ignored. On quality assurance, there is no visible reference to the Career Development Institute, and the Quality in Careers Standard is not mentioned at all.

2. **Context.** The two documents replace the previous Statutory Guidance\(^4\) and Practical Guide\(^5\) published in 2012, and the updated version of the former document

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


\(^3\) Department for Education (2014). *Careers Guidance and Inspiration in Schools: Non-Statutory Departmental Advice for Governing Bodies, School Leaders and School Staff.*


published in 2013. The House of Commons Education Committee recommended that the two documents should be combined into one, and significantly strengthened in a number of specific respects: these proposals have not been implemented.

3. The two new documents are much longer than the original ones: a total of 42 pages as compared with 12. This is largely because of the additional space given to employer activities. The increased length is likely to reduce impact.

4. The distinction between the two documents is blurred. The principle is that the SG indicates what schools ‘must do’ or ‘should have regard to’, while the NSDA provides case-studies and suggestions on good practice. But while the NSDA includes detailed references to non-governmental organisations working in the employer-school interface, some of these also appear in the SG (para.30). And the NSDA includes some ‘should’ statements, which presumably have the same effective status as those in the SG.

5. **Statutory requirements.** The ‘must’ statements are the only ones which require schools to do something. There are four such requirements:

   (a) That the governing body must ‘ensure that all registered pupils at the school are provided with independent careers guidance from year 8 (12-13 year olds) to year 13 (17-18 year olds)’ and ‘must ensure that the independent careers guidance provided: is presented in an impartial manner; includes information on the range of education or training options, including apprenticeships and other vocational pathways; and is guidance that the person giving it considers will promote the best interests of the pupils to whom it is given’ (SG para.16).

   (b) That ‘in-house support for pupils must be combined with advice and guidance from independent and external sources to meet the school’s legal requirements’ (SG para.17).

   (c) That on the new duty to participate in education or training after 16, schools ‘must ensure that young people are clear about the duty and what it means for them’ and in particular ‘must be clear that young people are not required to stay in school; that they can choose how to participate which might be through: full time study in a school, college or training provider; an apprenticeship, traineeship or supported

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8 This requirement is repeated in SG para.34.
internship; [or] full time work or volunteering (20 hours or more) combined with part time accredited study’ (SG para.42).

(d) That ‘where a student has an Education Health and Care Plan, all reviews of that Plan from year 9 at the latest, and onwards, must include a focus on preparing for adulthood, including employment, independent living and participation in society’ (SG para.53).

6. In interpreting statutory requirements (a) and (b), the definition of key terms is crucial:

- ‘Careers guidance’ is not defined, but ‘advice and guidance’ is defined as referring to ‘a coherent programme of activities that inform, inspire and motivate young people, preparing them for work and helping them to understand where different education and training choices could take them in the future’ (SG para.1 footnote 1). In other words, it is used in a generic sense rather than as specifically referring to one-to-one advice and guidance, with no reference to the professional competence required.

- ‘Independent’ is defined as ‘external to the school’: examples given include ‘employer visits, mentoring, website, telephone and helpline access’ (SG para.16 footnote 5). Thus the school’s provision must include some external elements, beyond access to websites (SG para.17), and these ‘should include face-to-face support where needed’ (NSDA p.20). But what is viewed as meeting this requirement, including the sources of any face-to-face support, is very broad in nature, with no reference to professional face-to-face careers guidance.

- ‘Impartial’ is defined as ‘external to the school’: examples given include ‘employer visits, mentoring, website, telephone and helpline access’ (SG para.16 footnote 5). Thus the school’s provision must include some external elements, beyond access to websites (SG para.17), and these ‘should include face-to-face support where needed’ (NSDA p.20). But what is viewed as meeting this requirement, including the sources of any face-to-face support, is very broad in nature, with no reference to professional face-to-face careers guidance.

Together, these definitions significantly alter the meaning of the statutory duty. Earlier Parliamentary debates about access to impartial, external, face-to-face guidance were based on the assumption that what was being discussed was access to individual careers guidance from a trained careers professional.9 It is clear that this is not the meaning that

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is now being adopted. Instead, the requirement for such guidance can apparently be met simply by involving a range of employers and further/higher education providers in a programme of activities related to the school. While the latter provides a welcome stronger entitlement for colleges and other post-16 providers to gain access to schools, this is at the expense of access to impartial professional guidance which is also very important in supporting the interests of the student within a competitive post-16 marketplace.

7. **Roles of employers and careers professionals.** Connections with employers, in particular, are accorded central importance:

   ‘Every school should engage fully with their local employer and professional community to ensure real-world connections with employers [which] lie at the heart of the careers strategy’ (SG para.29).

This is identified with the ‘inspiration’ which is included in the title of both documents:

   ‘More contact with real employers, enthusiastic and passionate about their own careers, not only inspires pupils but also challenges pre-conceived ideas about jobs. Having the opportunity to talk to people in those jobs and visit workplaces helps to build knowledge and understanding of the full range of careers available in a particular sector. This can help to broaden horizons, challenging stereotypical thinking about the kind of careers to which individuals might aspire’ (SG para. 26).

Such contacts could include:

- ‘Mentoring and coaching
- Speakers from the world of work in schools
- An insight from Jobcentre Plus, or the National Careers Service into the labour market and the needs of employers
- Workplace visits and work experience placements
- Work “taster” events such as games and competitions
- Careers fairs and career networking events
- Access to open days at further and higher education institutions
- Access to creative online resources and labour market intelligence
- Help with basic career management skills like CV writing, CV building, job searches and job interviews’ (SG para.29).

Almost all of the case-studies in the NSDA are concerned, primarily or exclusively, with outlining ways in which employers can be involved in working with schools.
8. The complementary role of careers professionals, by contrast, is given minimal and marginal attention. In the main body of the document, they are conspicuous by their absence. For example, there is a reference to the fact that:

‘Schools should also consider the needs of pupils who require more sustained or intensive support before they are ready to make career decisions’ (SG para.17).

One might have anticipated that this would be followed by a reference to career guidance from a careers professional, but it is not: instead, the only reference is to mentoring, which is clearly associated with employer contacts (see para.7 above):

‘High quality mentoring can be an important part of delivering against the duty’ (SG para.17).

Again, there is a strong statement on the need for individualised support:

‘Some will need convincing that having a successful career is a positive and attainable option. Some will need help in thinking about their current position; their strengths; the opportunities and risks in different career paths and what it will take to get there. Others will be more advanced in their thinking but will still benefit from encouragement to explore alternative options before finalising their choices. Schools should ensure that the individual needs of all pupils are considered’ (SG para.37).

But this again is followed by references not to careers professionals but to the National Careers Service website, and to Plotr where:

‘Teachers and students can access expert careers advice [sic], knowledge and information from one single source’ (SG para.38).

The short passage on the National Careers Service includes a reference to the availability of ‘information and professional advice about education, training and work to people of all ages’ (SG para.32), but this is only available to school pupils and other young people through a helpline and web chat, not face-to-face.

9. It is only after all this, in a section on ‘face-to-face advice and guidance’, that there is finally a reference to direct access to:

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10 For a clear statement of the complementary nature of these roles, see Careers Sector Stakeholders Alliance (2014). *The Roles of Employers and Career Professionals in Providing Career Support to Young People in Schools and Colleges*. CSSA Briefing Note 13.
‘Careers advisers who can help pupils to locate ambitious education and career options, by identifying opportunities and assessing pupils’ abilities, interests and achievements’ (SG para.39).

But this is the last in a list of four sources, the preceding items being overlapping employer-based groups (role models, alumni and mentors/coaches). The full list blurs the reference point for the subsequent statement that:

‘Schools should secure access to face-to-face advice and guidance where it is the most suitable support for young people to make successful transitions. While most young people can benefit from face-to-face guidance, it is likely to be particularly useful for children from disadvantaged backgrounds, those who are at risk of disengaging or those who have special educational needs, learning difficulties or disabilities’ (SG para.40).

The clear implication is that this might include access to careers advisers, but might not.

10. In the NSDA, the role of careers advisers is confused with that of careers coordinators:

‘Schools can retain in-house careers advisers. In fact, it is helpful to ensure a member of staff within the school takes overall responsibility for advice and guidance. Feedback from businesses suggests that employers find it much easier to engage with schools where there is a named contact within newsletters or on the school’s website’ (NSDA p.20).

In schools, the two roles are now sometimes combined, but in principle and often in practice they remain distinct. Slipping from the careers adviser role to the careers coordinator role effectively marginalises the former.

11. There is some modification here of recent ministerial statements which have removed careers advisers from the policy script, and in particular of the recent statement by the Secretary of State for Education (Michael Gove) that he wanted to ‘cut out the middle man’ (i.e. careers advisers). But while this latter intent has not been carried out to the letter, it remains clearly evident. The coverage of the role of careers


advisers could hardly be more marginal. If not ‘cut out’ altogether, they are pushed to the side, with minimal acknowledgement of their distinctive role and distinctive professional expertise.

12. **Roles of schools and of teachers.** The role of schools in relation to careers guidance and inspiration seems to be largely viewed as being concerned with their general ethos:

   ‘Schools have a critical role to play in preparing young people for the next stage of their education or training and beyond. Expectations should be set high, including for the most vulnerable and those with special educational needs and disabilities, so that every pupil is stretched and acquires the attributes that employers value. This will help every young person to realise their potential and so increase economic competitiveness and support social mobility’ (SG para.11).

Remarkably, teachers are not expected to provide advice and guidance themselves:

   ‘The duty sets no expectations for teachers to advise pupils. However teachers should know where to signpost pupils to for further support’ (NSDA p.20).

So employers are expected to provide advice and guidance, but teachers are not, in either their tutor or subject-teacher roles. The main role of schools, it seems, is to harness the contributions of employers and other external resources, with the careers adviser as an optional and marginal extra.

13. There are, of course, constraints on what teachers can be expected to know about the labour market. But they know their pupils, and about the current structures of learning opportunities and subject/course choices. The reverse is the case with employers. Both teachers and employers have contributions to make to offering advice and guidance, and these are complementary to one another. But it is only careers advisers that bring all these elements together, within a professional framework: that is their distinctive contribution. By marginalising careers advisers and ignoring the role of teachers, the SG massively reduces the support endorsed for availability to young people.

14. On a more positive note, the need for ‘a coherent programme of activities’ within schools is recognised within the SG:

   ‘Schools should have a strategy for the advice and guidance they provide to young people. The strategy should be embedded within a clear framework linked to outcomes for pupils rather than an ad-hoc set of activities. This should reflect the school’s ethos and meet the needs of all pupils’ (SG para.17).
Notably, however, there is no reference in either the SG or NSDA to the concept of careers education within the curriculum, based on classroom work interspersed with experiences and contributions from employers and others, with these being embedded into a coherent programme designed to develop pupils’ career decision-making and other career management competences in a systematic way. This concept, developed and widely implemented in schools over many years\(^\text{14}\), seems to have been excised from the current Government’s policies\(^\text{15}\), totally ignoring the clear evidence that a curriculum-based model is the strongest model for the delivery of careers work in schools\(^\text{16}\).

15. There is encouragement in the NSDA for schools to publish information about their careers provision:

‘Schools are encouraged to publish information on their website about the support provided to help pupils to progress into further education, training or work. This could include information on the school’s links with employers and how pupils at the school have access to inspiration and mentoring opportunities’ (NSDA p.6).

In addition, there is encouragement to seek feedback from pupils, parents and employers:

‘Schools can also take into account pupils’ feedback. This can be done informally or formally, for example via school councils or other mechanisms. Feedback from parents and from employers engaged in the activities can also be useful. Schools can use this feedback to evaluate different activities and delivery options to inform future provision’ (SG para.56).

This could be viewed as representing some limited movement towards the recommendation of the House of Commons Education Committee that schools should be required to ‘publish an annual careers plan’ and ‘to review the plan systematically on an annual basis, taking into account the views of students, parents, employers and other learning providers’\(^\text{17}\). This recommendation had earlier been rejected by the Government as ‘bureaucracy of the kind we have tried so hard to remove’.\(^\text{18}\) It is reintroduced here,

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but in a very weak form. The reference in the new SG is to ‘information’ rather than a ‘plan’, the publication of which is ‘encouraged’ rather than ‘required’.

16. A significant change in the new SG is the increased prominence given to the role of governing bodies. The statutory duty is now addressed not to schools in general (as in the earlier versions) but to governing bodies in particular (SG paras.15-16). This is then spelt out:

‘The governing body should provide clear advice to the head teacher on which he/she can base a strategy for advice and guidance, which is appropriately resourced and meets the school’s legal requirements’ (SG para.17).

Curiously, however, no reference is made to the Ofsted recommendation that schools should ensure that ‘every school governing body has an employer representative’.

17. **Quality assurance.** The previous DfE Practical Guide effectively adopted the quality-standards model promoted by Careers England and others on the basis of the recommendations of the Careers Profession Task Force, by distinguishing three aspects:

- The quality of the school careers programme – with references to ‘the various quality awards which exist for CEIAG provision in schools and colleges’, and to ‘the national validation, the Quality in Careers Standard’ as a means ‘to determine an appropriate quality award to pursue’.
- The quality of the independent careers provider – with a reference to the ‘online register of organisations accredited to the matrix Standard’.
- The quality of careers professionals working with the school – with references to the work of the Careers Profession Alliance (now replaced by the Career Development Institute), the Qualification in Careers Guidance, and the new online register of careers professionals.

The House of Commons Education Committee subsequently recommended that these standards should be mandatory.

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18. Instead, the coverage of quality standards in the two new documents is much weaker than in the Practical Guide. The new SG includes only a brief and vague statement that:

‘Schools should satisfy themselves of the quality of any external organisations they plan to work with, and can use quality standards where these are available’ (SG para.55).

The NSDA includes a specific reference to the Matrix standard, though viewing it as an optional resource:

‘The recognised national quality standard for information, advice and guidance (IAG) is the matrix standard. If the provider is not accredited, the school can use the matrix quality statements as a guide to the quality of the careers services offered’ (NSDA p.21).

On professional standards, the NSDA states that:

‘Schools can view a register of careers professionals or search for a career development professional who can deliver a particular service or activity’ (NSDA p.21).

Under the term ‘register of careers professionals’ there is a hot link to the Career Development Institute website, but there is no reference to the CDI within the document itself, even in the long list of organisations at the end of the document. Moreover, this is followed by the damaging statement that:

‘Ofsted’s thematic review of careers guidance found some of the ineffective careers interviews they observed were led by qualified careers professionals.23 Schools should therefore ensure their own quality checks are in place, including feedback from pupils on the quality of provision’ (NSDA p.21).

There is also, remarkably, no reference here or elsewhere to the Quality in Careers Standard (QiCS), on which so much voluntary effort has been expended by Careers

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23 As noted in the Policy Commentary on the Ofsted review, it was unclear how far this Ofsted finding was due to lack of competence or to imposed time constraints. See Watts, A.G. (2013). Ofsted Thematic Review and Government Action Plan, para.A6. Careers England Policy Commentary 23. It is also worth noting that no quantification was provided for the finding, and that the competence of Ofsted inspectors (ex-teachers rather than ex-careers advisers) to evaluate the quality of careers interviews is open to question.
England and others\(^{24}\), based on a recommendation from the Careers Profession Task Force which was accepted and actively welcomed and supported\(^{25}\) by the current Government.\(^{26}\) The statement that schools should make ‘their own quality checks’ without even mentioning the existence of the support structure provided by the QiCS (and the quality awards it validates) is extraordinary.

19. In terms of accountability and quality assurance, much faith is attached to the role of Ofsted inspections:

   ‘Ofsted inspectors will take account of the quality of independent advice and guidance in making their judgement on leadership and management’ (SG para. 57).

It is noted that:

   ‘Ofsted has been giving careers guidance a higher priority in school inspections since September 2013’ (SG para.10).

The ‘frequently asked questions’ section of the NSDA poses the question: ‘how will they do this, given the short amount of time they are able to spend on each inspection?’ The answer is:

   ‘Ofsted have a great deal of expertise in carrying out their inspections and making sound judgements on what they see. They are best placed to decide how they will organise their time in order to give sufficient focus to consideration of advice and guidance and students’ destinations within the overall inspection’ (NSDA p.21).

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\(^{24}\) The QiCS is managed by a Consortium Board which includes representatives of the Association of School and College Leaders, the National Association of Head Teachers, the Association of Colleges, the Association of Employment and Learning Providers, the CDI, the Higher Education Liaison Officers’ Association and Careers England. The process of validating the various quality marks has been rigorous and time-consuming. See [http://www.careersengland.org.uk/quality.php](http://www.careersengland.org.uk/quality.php)

\(^{25}\) See Watts, A.G. (2012). *The Coalition’s Emerging Policies on Careers Guidance*, para.25. Careers England Policy Commentary 15B. Financial support from the Department for Business Innovation and Skills was crucial in enabling the QiCS to be established.

\(^{26}\) This may or may not be linked to the statement in the Ofsted review – in relation to the quarter or so of schools that had achieved or were working towards an external quality award for careers guidance – that while in general this correlated with good-quality careers provision, this was not always the case. Ofsted (2013). *Going in the Right Direction? Careers Guidance in Schools from September 2012*, para.61. While this Ofsted finding (on which no quantification was provided) might provide a basis for reviewing and possibly refining the QiCS process, it provides no basis for ignoring it.
In view of the recent Ofsted announcement\textsuperscript{27} that the 80% of schools judged ‘good’ or ‘outstanding’ will henceforth be visited for a day by a single inspector every two or three years, covering the full inspection framework, this is unconvincing.

20. The other key accountability instrument is seen as being pupil destinations:

‘Schools can measure the effectiveness of their careers and inspiration activity by considering both the attainment and the destinations of their pupils. Success will be reflected in higher numbers progressing to apprenticeships, universities – including selective universities, traineeships, and other positive destinations such as employment or a further education college’ (SG para.13).\textsuperscript{28}

For this purpose:

‘Schools can use the Destination Measures data, published by the Department for Education, to assess how successfully their pupils make the transition into the next stage of education or training, or into employment’ (SG para.14).

‘These measures will help schools to be held to account locally as well as feeding into judgements by Ofsted’ (SG para.58).

It is important to note, however, that such data merely record pupils’ destinations, not the appropriateness of such destinations in relation to their distinctive abilities, interests and aspirations – which should be the concern of a good careers programme. They can valuably inform reviews of careers programmes, but do not provide a direct measure of their quality.

21. **Role of the National Careers Service and of Jobcentre Plus.** The SG includes confirmation of the new role of the National Careers Service (NCS) in relation to schools and colleges:

‘The National Careers Service will broker relationships with and between schools, colleges, local communities and employers, working with the local Jobcentre Plus where appropriate, to help young people benefit from first-hand experience of work and the opportunities available in the local and national labour market. Schools can contact the National Careers Service through the National Contact Centre, which will provide information and support on engaging with employers.

\textsuperscript{27} Ofsted (2014). Press release: Ofsted chief unveils new blueprint for inspecting good and outstanding schools. 21 March.

\textsuperscript{28} The sequencing in this paragraph is intriguing, with apprenticeships placed ahead of higher education, but separated from traineeships with which one would have expected them to be associated.
Local area based contractors will also be able to work with schools on local arrangements’ (SG para.33).

It is important to note that this falls well short of the broader role recommended by the House of Commons Education Committee, which also included capacity-building. The SG also states that:

‘Schools can choose to commission additional support from contractors engaged in delivering the National Careers Service’ (SG para.33).

This would presumably, however, be outside the current NCS contract, and therefore on a fee-paying basis. Interestingly, the NSDA includes a case-study outlining how some schools have used NCS support with web-chat for groups of pupils in Years 9 and 11 (NSDA p.7). NCS distance resources can be used by schools in this way; its face-to-face resources, however, cannot.

22. The SG also includes a new reference to working with Jobcentre Plus, in relation to:

- ‘Jobcentre Plus sharing its knowledge and experiences of the needs of employers with schools’

- Schools and Jobcentre Plus pooling their knowledge on setting up successful work experience placements

- Forging greater links between Jobcentre Disability Employment Advisers to support the transition for those with special educational needs or disabilities into work’ (SG para.54).

No reference is made to this in any of the case-studies in the NSDA.

23. **Working with local authorities.** The sections on working with local authorities focus on information sharing and targeted support for young people at risk. Schools should provide the information needed by local authorities to support continued participation in education or training post-16:

‘This may include for example, information to help identify those at risk of becoming 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’ (SG para.46).

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In addition:

‘Schools should work with local authorities to identify young people who are in need of targeted support or who are at risk of not participating post-16. They will need to agree how these young people can be referred for intensive support drawn from a range of education and training support services available locally’ (SG para.48).

No wider role for local authorities in relation to careers programmes is envisaged or discussed either in the SG or in the NSDA case-studies.

24. **Other matters.** Other issues addressed within the SG include recruitment into STEM subjects (para.20), developing entrepreneurial skills for self-employment (para. 21), the relevance of voluntary and community activities (para.23), and ensuring adequate support for pupils with special educational needs or disabilities (paras.52-53).

25. **Conclusion.** The SG and NSDA provide a deeply disappointing if predictable coda to the evolution of the Coalition Government’s policies on career guidance, as tracked in these Policy Commentaries (Nos.15-27). The Government started by making a series of inspiring promises, including:

- Establishing a new all-age careers service, to build on the best of Connexions and Next Step.
- Revitalising the professional status of career guidance.

The first of these promises was undermined by the removal of all the Connexions funding and the reduction of the remit of the new National Careers Service to exclude face-to-face guidance for young people. Now, the second promise too has been betrayed. Far from revitalising the professional status of careers guidance, the Government is undermining this by using the term loosely, by marginalising professional careers advisers, and by ignoring the importance of underpinning quality-assured careers programmes.

26. The ‘inspiration’ agenda, involving employers much more actively, would have been widely welcomed by the whole careers sector had it been added to the implementation of the initial promises. But the SG and NSDA present it as a substitute for, rather than a complement to, professional career guidance and professionally-

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managed careers education programmes in schools. There is no basis in evidence or
reasoned argument to support such a position.

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