

Careers England Policy Commentary 29

This is the twenty-ninth 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

National Careers Council Final Report

A.G. Watts

1. This document² is the second major report from the National Careers Council. It follows the Council's first report, published in June 2013.³ The Council's Chair, Dr Deirdre Hughes, states in her Foreword (p.2) that this will be the Council's final report.
2. The report is significantly stronger than the first report. In particular, it challenges current Government policies, in two main respects.
3. First, it is clear about the **complementary roles of employers and careers professionals**. Whilst its Chair's previous statements related to the Government's stance on this issue (which presents the two roles as alternatives) had been equivocal⁴, this report states unequivocally:

'The Council recognises the complementary roles of career development professionals and employer interactions with schools and colleges... Employer engagement activities in school and colleges should be promoted alongside careers education and access to impartial careers guidance, not as an alternative to impartial guidance' (pp.27, 29).

It further states that:

'Research findings indicate those institutions committed to strengthening links with employers generally do not view employer activities as a replacement for impartial careers guidance: instead, they view this as enhancing their careers provision' (p.14).

¹ Helpful comments from Paul Chubb and Professor Tristram Hooley related to this Policy Commentary are gratefully acknowledged. The author is however solely responsible for the views expressed.

² National Careers Council (2014). *Taking Action: Achieving a Culture Change in Careers Provision*.

³ National Careers Council (2013). *An Aspirational Nation: Creating a Culture Change in Careers Provision*. For an analysis, see Hooley, T. (2013). Careers England Policy Commentary 21.

⁴ See Watts, A.G. (2014). *Recent Developments on the Roles of Employers and of Careers Professionals: a Pivotal Phase in Determining Future Careers Provision for Young People*, pp.7-8. Careers England Policy Commentary 26.

The report does not, however, juxtapose its position with the Government's. It continues to 'welcome' the revised Statutory Guidance (p.13), without any mention of the fact that the Government document takes a very different stance from its own on this critical issue.⁵ It also continues to align itself unreservedly with the 'inspiration agenda ... at the heart of the Government's vision and reforms' (p.9), without any attention to the way in which this agenda co-opted the Council's recommendation for a 'culture change' to support a policy which excluded careers professionals.⁶ Nonetheless, the clarification of the Council's own position is helpful and welcome.

4. Second, the report makes a strong recommendation on the **need for Government funding for career development professionals' expertise:**

'The Government should provide schools and colleges with free and/or subsidised access to independent and impartial career development professionals' expertise. This would help in the transition phase to support schools and colleges to meet their new statutory duties' (p.26).

Three options are offered:

- Option 1: £131m, to provide all schools with access to a full-time qualified careers professional.
- Option 2: £43.7m, to provide all schools with access to a careers professional working across two or three local institutions.
- Option 3: £17.5m, to provide all schools with access to up to 30 days per annum, 'in the early transition phase of meeting their new statutory responsibilities' (p.28).

5. The inclusion of this option represents a significant shift on the part of the Council. Its first report included the statement that:

'The Council agrees with the views expressed in the Seventh Report of the House of Commons Education Select Committee that the National Careers Service remit be expanded to build capacity in schools, to ensure the effective and efficient dissemination of national and local LMI, and to promote the wide adoption of quality standards.'⁷

But all the relevant statements in the first report referred to expansion of the NCS's *remit*; the extent to which this was to be supported by expansion of *funding* was not addressed. The fact that it is addressed now is to be welcomed. It is also worth noting that Option 1

⁵ See Watts, A.G. (2014). *Revised Statutory Guidance and Non-Statutory Departmental Advice on Careers Guidance and Inspiration in Schools*. Careers England Policy Commentary 27.

⁶ See Watts, A.G. (2013). *Government Inspiration Vision and Other Recent Developments*. Careers England Policy Commentary 24.

⁷ National Careers Council (2013). *An Aspirational Nation: Creating a Culture Change in Careers Provision*, p.22.

is in excess of what the Education Select Committee recommended (£120m – see para.9 below).

6. There are, however, a number of important questions which are not addressed clearly in the Council’s discussion of this recommendation. The first is whether this is seen as a **short-term or long-term funding stream**. The reference to ‘transition phase’ in the main recommendation suggests the former; the wording of the three options suggests that Option 3 is viewed as a short-term measure, but that Options 1 and 2 *might* be longer-term in nature.

7. The second is whether the **funding is to be for the National Careers Service, or for schools to buy from any appropriately-equipped provider** (or, perhaps, to use to support their internal provision). The report suggests that the ideal would be the former:

‘Ideally, an all-age National Careers Service would help every local area develop high quality resources and expertise to deliver a “gold standard” model in every institution. The costs however would be considerable – perhaps of a similar scale to those estimated in full by PwC of implementing the National Career Benchmarks in the Gatsby Report (May 2014) namely £207 million in the first year and £173 million per year thereafter’ (p.26).

It rules out this ideal option on the grounds that:

‘In the current fiscal climate, securing such a level of funding might prove challenging’ (p.26).

It seems also, however, to move away from the notion that the funding would go to the NCS: all of the three options suggest that the funding would go to the schools. But this shift is implicit rather than explicit, and no reasons for it are offered.

8. The third is **from which Department the funding is to come**. The discussion simply refers to ‘the Government’. Elsewhere in the report (p.19) there is a reference to the sources of funding for the National Careers Service in 2012/13 and 2013/14, which indicates that the funding from the Department for Education was £4.7m in 2012/13 but nil in 2013/14. This is because, as announced in July 2014⁸, the funding for the helpline for young people has been transferred from DfE to the Department for Business, Innovation and Skills. No explicit attention is drawn to this in the Council’s report.⁹ It is however important, because it means that DfE no longer has a direct stake in the NCS. One of the clear features of this Government’s policies has been that the two Departments have taken very different stances in relation to career guidance in general and the NCS in

⁸ Department for Education (2014). *House of Commons Education Committee Careers Guidance Follow-Up Inquiry: Written Evidence Submitted by the Department for Education*. The rationale was that ‘this provides some flexibility in the way the National Careers Service is able to develop online and telephone advice for young people’ (para.32).

⁹ Though by contrast the ending in March 2015 of the Department for Work and Pensions funding (£1.5m) is noted (p.19).

particular: in essence, BIS has largely adhered to the promises made by the previous Skills Minister, John Hayes, in his 2010 Belfast speech; whereas DfE has not.¹⁰ Yet DfE is responsible for services for schools and young people. It is unclear whether the Council is addressing its funding recommendations to DfE or to BIS, or whether it regards this distinction as of no significance (though cf. para.14 below).

9. The fourth is **what precisely the funding is designed to cover**. The House of Commons Education Select Committee¹¹ drew a clear distinction between three possible roles for the NCS in relation to schools:

- *Service delivery*: providing face-to-face career guidance to young people in schools.
- *Capacity building*: supporting schools in the development of their own careers programmes.
- *Brokerage*: brokering employer/education activities.

The Education Committee rejected the first of these on the pragmatic grounds that the new duty on schools was only recently in place and that further change would lead to greater uncertainty and upheaval. It accordingly recommended the capacity-building and brokerage roles, citing a Careers England estimate that their cost would be around £120m per annum (£30,000 per school). The Government response¹² was effectively to reject the capacity-building role but to accept the *brokerage* role, which has subsequently been built into the new NCS contracts, at a level which the Council views as ‘a modest but helpful start’ (p.24).

10. The Council makes no reference to the Education Committee’s recommendations or to the Government’s response to them. Its own recommendations clearly extend beyond brokerage to include *capacity-building*:

‘The National Careers Service is well placed to enable and leverage the efficient provision of key national resources such as labour market intelligence/information (LMI) availability into schools and colleges, specialist careers professional expertise that can be used to strengthen local employer-led and careers initiatives, allowing teaching staff to operate with full confidence in the careers marketplace. The National Careers Service should provide joint training such as on-line practice-sharing workshops and careers development webinars, to teachers and key partners within LEAs, Local Authorities and the Jobcentre Plus’ (p.23).

¹⁰ See Watts, A.G. (2012). *The Coalition’s Emerging Policies on Careers Guidance*. Careers England Policy Commentary 15B.

¹¹ 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 an analysis, see Watts, A.G. (2013). *Education Select Committee Report on Careers Guidance for Young People*. Careers England Policy Commentary 18.

¹² 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. For an analysis, see Watts, A.G. (2013). *Government Response to Education Select Committee Report*. Careers England Policy Commentary 20.

This capacity-building role, however, is not covered in the three funding options (see para.4 above), which are addressed exclusively to *service delivery*, effectively going beyond the Education Committee’s recommendations.¹³

11. The Council’s recommendations on these matters are set against the background of strong comments about the **inadequate nature of current careers provision in schools**. It notes that:

‘There is compelling evidence that some schools are seriously struggling in the immediate period of transition to meet their new statutory responsibilities for careers guidance. Too many schools have not yet grasped the nettle of putting in place their own careers strategy. There are emerging examples of good and interesting practices, but not enough’ (p.26).

It cites a parent as stating:

“My two daughters attend different secondary schools, one has access to high quality independent and impartial careers guidance and the other is left to find her own way. How is this fair and equitable?” (p.16).

This comment strikes at the heart of the implications of the Government’s current policies.

12. The report also comments on the **problematic nature of the ‘careers marketplace’** which the Government’s policies have stimulated. Its summary of its ‘heat map’ survey of careers provision across England (which seems loosely framed, and is not confined to services for schools) demonstrates ‘gaps in provision in certain geographical areas’, but also ‘competition and duplication in the “careers offer” to schools and colleges with significant differences in costs and quality of provision’, and ‘in some geographical areas schools and colleges’ overload in targeted promotional material’ (p.15). In general, most schools ‘are not informed consumers and buyers’ in this marketplace (p.16), and this carries severe risks:

‘Many schools and colleges report difficulties when it comes to deciding on whom best to trust in supporting them to fulfil their new statutory duties... At present, schools and colleges generally lack time and resource to sift and make sense of this new and fragmented landscape.

¹³ Interestingly, the Council comments that ‘we are clear that option 3 *alone* will not deliver on the statutory duty for every young person to have free access to a qualified, impartial and independent careers development professional’ (p.27). But a close reading of the Statutory Guidance makes it clear that the Government’s interpretation of the duty is that it can be met without *any* access to careers professionals. See Watts, A.G. (2014). *Revised Statutory Guidance and Non-Statutory Departmental Advice on Careers Guidance and Inspiration in Schools*. Careers England Policy Commentary 27.

‘There are issues of cost escalation and how to contain it, quality and inequality in terms of access to trusted careers information and support. The reality of “market failure” brings significant costs to individuals, families, communities and our economy’ (pp.14-15).

13. Within this context, there is a welcome affirmation of the **National Careers Service as a ‘public good’**:

‘The National Careers Service is not only a private good for those using the service but also a public good, with potential benefits extending beyond individuals to families, communities and Britain’s economy’ (p.17).

The NCS is viewed as playing an important role in relation to the wider ‘careers marketplace’:

‘In its role of trusted, independent and honest broker, the National Careers Service stands at the interface between career development professionals, educational/training institutions and employers. It provides a framework for scalable provision, economies of scale and reductions in transactional costs for careers services to young people and adults across England’ (p.17).

It is not clear, however, whether the NCS is envisaged as playing this role through its own service provision and/or through some kind of co-ordinating/market-regulating/supportive role, and how the latter is to be implemented.

14. The report includes an imaginative recommendation to establish a **careers investment fund**:

‘The Government should also create a careers investment funding framework of around £20m–£25m, administered by the Department for Education (DfE), to accelerate the necessary culture change in careers provision for young people, parents and teachers. This could also facilitate closer working links between the DfE Local Authorities and LEPs.

‘The creation of such a fund would be a major catalyst for relevant organisations to rapidly scale up and help schools and colleges to achieve their statutory duties.

‘In addition this could also be used to promote innovation and pilot different approaches, for example, a series of controlled trials, working with national and local providers to support young people’s learning and work destinations and research evidence on the impact of local careers provision’ (p.30).

It is interesting that this proposal is addressed specifically to DfE (cf. para.8 above); the concept of ‘controlled trials’ (with, presumably, evaluation) is particularly welcome. It is unclear, however, whether the funding would go direct to Local Authorities and LEPs, separately or in partnership, and/or to other organisations to enable them to ‘scale up’. It

is also unclear whether it is designed to grow the market and/or to introduce more quality assurance into the market; and whether the NCS would have any role to play in relation to this fund, linked to its wider role outlined above (para.13). Elsewhere, the report states that:

‘The National Careers Service should work closely with partners such as Local Authorities, Local Enterprise Partnerships (LEPs), Chambers of Commerce and, where appropriate, City Deal Initiatives, to develop “career hubs” in community settings so that best practice can be replicated within or outside their area’ (p.24).

The relationships between this and the investment-fund proposal, and between the organisations involved, require clarification.

15. On **quality assurance**, the report mentions the Matrix standard:

‘Government could make better use of its own matrix standard as a lever to control the current careers marketplace’ (p.20).

It also refers to the work of the Career Development Institute on professional standards:

‘So far, very limited progress has been made in embedding the directory and register of career development professionals onto the National Careers Service website. We encourage both parties to engage more rapidly towards achieving this goal so that adults, parents and teachers can made effective use of this resource’ (p.18).

Conspicuously, however, it fails to make any mention of the Careers Education, Information, Advice and Guidance Quality Awards and their overarching validation by the Quality in Careers Standard (apart from a brief reference on p.24 to the Hull Gold Standard Quality Award¹⁴). This compounds the Government’s recent ignoring of the QiCS¹⁵, despite the previous encouragement and support the Government provided in developing it. In the light of the substantial voluntary work that has gone into reinvigorating the CEIAG Quality Awards and establishing the QiCS, it is disappointing that the Council, too, has chosen to ignore it.

16. On **provision for adults**, the Council reaffirms its previous concern to avoid erosion:

‘The Council continues to emphasis [*sic*] the importance of not diluting the current level [of the] careers service for adults’ (p.21).

¹⁴ This Gold Standard Quality Award is still in its infancy, is not yet nationally validated by the Quality in Careers Standard, and thus is far from being the best example the Council could have chosen to highlight. The eight Quality Awards which have been nationally validated are given no mention.

¹⁵ Watts, A.G. (2014). *Revised Statutory Guidance and Non-Statutory Departmental Advice on Careers Guidance and Inspiration in Schools*, pp.10-11. Careers England Policy Commentary 27.

It indicates that the NCS services for adults continue to perform well in terms of satisfaction and outcome measures (p.20) and that there has been some expansion of face-to-face provision as well as a doubling of the number of website visits (p.19). This contrasts with a steady decline in the use of NCS distance services by young people, which remain puny in relation to the potential level of demand by young people (pp.21-22). Some concern is expressed about the ‘risks’ associated with the new NCS contracts being managed on a ‘payment by results’ basis (p.26), but the nature of these risks, and ways of alleviating them, are not discussed.

17. In general, **marketing** remains a crucial issue for the NCS. The Council recognises that:

‘There are challenges for the service to gain a level of recognition with the general population (both young people and adults). The level of public awareness and usage of the Service remains low... It is currently difficult to identify how people will access, other than by direct referral, chance or happenstance. Restrictions on marketing the National Careers Service have held back its progress and development’ (p.23).

But, disappointingly, it makes no recommendation on how this might be addressed.

18. There is a strong welcome for the concept of a ‘clear, well-explained entitlement’ to a ‘professionally led’ **mid-life career review** recently piloted by the National Institute for Adult Continuing Education (NIACE). A particularly significant feature of this initiative is that it is designed at mid-life for all, and not just for ‘adults who are not in secure, paid work’ – which has hitherto been (‘of necessity’) the main focus of the NCS’s work (p.23). But, again, there is no recommendation on how this initiative is to be funded.

19. It is surprising that none of the **four formal recommendations** relate to provision for adults. Alongside the recommendations on funding for professional careers guidance for young people in schools and colleges (see para.4 above) and for a careers investment fund (see para.14 above), the third recommendation relates to improvement of the **NCS website** related to young people:

‘The National Careers Service should, as a matter of high priority, improve its website to make it attractive and appealing to young people, parents and teachers’ (p.29).

20. The final recommendation (listed first in the ‘Taking Action’ section) repeats the Council’s proposal in its first report to establish a **strategic body** to guide the work of the NCS:

‘The Government should establish an Employer-led Advisory Board reporting directly to relevant ministers comprising senior representatives from employers, education and the career development profession. Such a body would advise on

careers provision, guide the work of the National Careers Service and ensure value for money’ (p.25).

In the Council’s first report there was some ambiguity about whether this proposed body was to sit alongside, or to replace, the Council itself. Now, however, since this is the Council’s final report, the body is clearly designed to replace it – and indeed, reports suggest, is about to be established to do so.

21. **Conclusion.** The Council’s second report is, in several respects, stronger than its first: this is to be welcomed. It is weakened in several parts by lacking clarity and precision, and stopping short of making further recommendations on key issues (including those identified in paras.17 and 18 above). Nonetheless, its two key recommendations – on funding for professional careers guidance for young people and on a careers investment fund – require clear action from the Government, which will represent a shift in its previous policies. Both of these recommendations merit wide support.

22. **Final comment.** The Council was established as an independent body to advise the Government on careers provision for young people and adults in England. Throughout its life it has resisted making any overt public criticism of Government policies, which have been widely criticised by many other bodies and individuals. The basis of this stance has presumably been the Council’s belief that it is more likely to have impact on the Government through a mixture of public support¹⁶ and private influence. Hitherto there has been no evidence to justify this stance: indeed, the Government’s shift to marginalise careers professionals came after the Council’s first report, and utilised its rhetoric (see para.3 above). If now the Council’s two key recommendations are accepted and implemented, then the stance will be demonstrated to have been effective. If not, it will be open to the criticism that the Council sacrificed its independence to collude with policies that have severely damaged the sector and its services to citizens.

© Careers England

Published by the Careers England Board of Directors on 15 September 2014

The author is solely responsible for the views expressed in this Policy Commentary

¹⁶ Linked, perhaps, to some (wilful or negligent) misreading of Government policy statements – see e.g. footnote 13 above.