

Introduction:

This response is from Careers England to the DCSF on its 81 page consultation document setting our Pupil and Parent guarantees.

The response is in two parts; firstly giving our views on the key guarantees we see as relating to careers education, information, advice and guidance (CEIAG); secondly we respond to the consultation questions themselves. We believe the Guarantees are comprehensive, but rather wordy and we have some concerns about ensuring they are deliverable and delivered. Monitoring of quality of delivery to national standards will need to be addressed if the standard is to be raised and achieved everywhere across the country.

The response has been prepared by the Careers England 13-19 Task Group following its meeting with Anna Paige of DCSF on 29th January 2010, and was approved by the CE Board on 17.2.2010.

Part 1: The Pupil & Parent Guarantees which relate to CEIAG

	Guarantee	Consultation Document Paragraph Reference	Comment
2.4	That every 11–14 year-old enjoys relevant and challenging learning in all subjects and develops their personal, learning and thinking skills so that they have strong foundations to make their 14–19 choices	<p>83. In the new secondary curriculum, there is stronger emphasis on the development of personal, learning and thinking skills (PLTS) – such as initiative, enterprise, ability to work in teams, and the capacity to learn independently – which will be taught across the curriculum.</p> <p>88. all pupils in years 7-11- no matter what route they are following – are required to be taught functional skills as part of teaching the</p>	<p>The potential to facilitate PLTS through investigative active learning opportunities within careers education, work-related learning and enterprise education are significant whether as lessons within PSHE education or embedded through the curriculum.</p> <p>There are opportunities to demonstrate and apply the functional skills of English, mathematics and ICT in work life contexts</p>

		National Curriculum	
2.5	That every learner from 14–19 will have the choice of learning route and qualifications from Apprenticeships, Diplomas, Foundation Learning and GCSEs/'A' Levels	86. IAG providers, learning providers, employers, higher education and the third sector must work through their 14–19 Partnerships to ensure that learners have access to these national qualifications routes. 87. the duty to deliver the 14-19 entitlements and ensure yp can choose from these four routes rests with the local authority	Working in partnership, with learning providers delivering a comprehensive Careers Education programme with external providers of IAG using the new DCSF resources and supplementing existing programmes of study, should enable the team to deliver against this guarantee
2.7	That every pupil understands they have, and are encouraged to take up, the opportunity to study at least two science GCSEs	92. Head teachers should make sure that it is made clear to pupils that do not wish to take up their entitlement how this could impact on their eventual choice of A level subjects and potential career opportunities.	All curriculum heads and subject teachers can access support from Local Authority Subject Advisory and CEIAG consultancy to enable the implications of subject choice to be built into their lessons appropriately. (See recent QCDA case studies) See also valuable STEM resources, materials and national advertising.
2.9	That every pupil aged 14–19 has the opportunity to undertake community service and high-quality work-related learning	102. Work-related learning, including work experience and enterprise education, is a key part of ensuring the economic wellbeing of young people. Schools should extend this programme across the entire age range 14-19.Work-related learning activities should be closely linked to provision for and pupils' entitlement to impartial information, advice and guidance.	High quality, well managed WRL including work experience motivates learners effectively. It allows students to develop effective intra and interpersonal skills (PLTS), evidences curriculum objectives and allows young people to experience the world of work first hand aiding them in effective transitions after KS4 and KS5 WRL for all at KS 4 is a statutory requirement, work experience can help to meet most of the nine elements in the Career and work-related learning and enterprise framework 11-19
2.10	That every young person is participating in education or training up to the age of 17 from 2013 and up to the age of 18 from 2015	103. However a significant minority are either not in employment, education or training ("NEET") or in a job without training between 16 and 18 and this includes a disproportionate number of disabled young people.	A delivery model for CEIAG must demonstrate effective partnerships between external providers of IAG and learning providers to address the most vulnerable and demotivated young people
3.5	That every secondary school pupil, from September 2010, receives personalised support from a Personal Tutor who knows them well, has an overview of their progress and ensures any learning needs or	132. Named members of staff should know the pupil well, should have an overview of the pupil's progress across the curriculum and must be able to direct the pupil towards advice, support or resources to help the pupil to address any learning needs and issues and to succeed at school.	This would be a really valuable addition to the CEIAG partnership. It is critical that tutors are sufficiently skilled and knowledgeable in respect of the main progression routes. A training needs analysis is carried out annually through the use of the Partnership Agreement negotiation to identify work force development opportunities for all.

	issues are quickly addressed	134. It is reasonable for pupils (or parents on their behalf) to complain if a particular need had been identified and discussed (e.g. referral to specialist careers advice) but there had been no direction as to where the appropriate provision might be found.	It will be important to ensure that Local Authorities continue to commission CEIAG consultancy services (furthermore to expand them) to guarantee that all levels of staff (governors, senior leaders, middle leaders, careers department leaders, tutors and all subject teachers) are able to assimilate the necessary information and can impart that information or signpost effectively.
3.6	All pupils in Years 7 to 11 have access to high-quality careers education and information, advice and guidance so they can make informed choices about learning, work and lifestyles and are well supported during transitions	138 – 150 The governing body must ensure that all pupils in Years 7 to 11 are provided with a programme of careers education. ...head teachers should ensure that a senior member of staff takes overall responsibility for careers education/IAG.. ...where responsibilities are devolved to a middle leader (the ‘careers leader’ or ‘careers coordinator’), that this person has the <u>skills and knowledge, and is allocated sufficient time</u> , to undertake their duties effectively. The school’s programme of careers education must include information on 16–18 education or training options and apprenticeships. The statutory guidance specifies the ‘Key Information’ that schools should provide, which includes details of Higher Education. 147. the provision of information and advice as of part of careers education is the responsibility of schools whereas local authorities are under a duty to provide IAG services	It will be important to ensure that Local Authorities continue to commission CEIAG consultancy services (furthermore to expand them) to guarantee that careers department leaders are up skilled to deliver against the new challenges set by RPA, the PPG and the Key Information and 6 Principles set out in “Statutory Guidance on Impartial Careers Education” It will be important to ensure that CPD is available from HEIs and other sources to guarantee the competence and professionalism of staff within the CEIAG curriculum area. It will be important to consider the role of CEIAG Quality Awards to provide independent assessment of provision. These will give assessors the opportunity to probe deeper into the provision, support Ofsted findings and provide evidence against which LAs can be measured in the autumn of 2011 Every local authority must provide access for all maintained secondary school pupils and students to one-to-one IAG and support from a specialist Connexions adviser when needed (this must be led by young people’s choice, not with any teacher acting as ‘gate-keeper’).
3.7	That every pupil goes to a school that identifies their particular needs quickly and is linked up to health and other specialist services, so they can access the help they need swiftly and easily	153. Some children with additional needs are vulnerable to becoming “children in need”. One of the first signs that a child or young person might be struggling, and they might be a vulnerable child, is through a decline in their engagement at school. For this reason, the classroom and the wider school environment is one of the most powerful places where early intervention can be initiated as part of skilled and effective teaching practice (and other work to	A partnership approach between learning providers and external providers of CEIAG and of specialist LDD CEIAG focused through a timely CAF process will help young people thrive and make successful transitions

		support learning).	
4.7	Every pupil should have access to activities out-of-school hours, which may include study support, play/ recreation, sport, music clubs, arts and crafts and other special interest clubs, and business and enterprise activities. And every young person should have access to a range of positive activities	215. Facilitating access in this context means either by providing activities itself as part of the school's offer to its pupils and/or by providing information and assistance to parents and pupils on other providers of activities.	Developing skills for work / training and skills for continuing in education (and fostering PLTS) through business and enterprise activities in or out of the classroom are invaluable for young people.
5.1	Promote the five Every Child matters outcomes of: be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic wellbeing	221 -227 the governing bodies of all schools, must , in discharging their functions relating to the conduct of the school, promote the wellbeing of pupils at the school. ...promote wellbeing such as anti-bullying and safeguarding policies.. have effective arrangements in place ... have regard for the CYP and must have regards to the views of parents	The parent and pupil surveys in the CEIAG Resource pack will provide evidence for Ofsted
5.2	That every pupil receives personal, social, health and economic education (PSHE)	229. Governing bodies and head teachers must ensure that pupils are taught PSHE Covering e. personal finance; f. individual safety, and g. careers, business and economic education.	It will be important to ensure that Local Authorities continue to commission CEIAG consultancy services (furthermore to expand them) to guarantee that careers department leaders are up skilled to work collaboratively with Citizenship and PSHE Departments to deliver against the new challenges set by RPA, the PPG and the Key Information and 6 Principles set out in “Statutory Guidance on Impartial Careers Education” which include personal finance, safety, careers, business and economic education. This is not a requirement that this knowledge, skill and understanding is delivered by the business studies department. It will be important to work with the lead PSHE/Citizenship teams in the local authority
6.11	Parents get high-quality information and advice on the career and subject choices open to their child	294. All parents need high-quality information and advice through schools about the career and subject choices open to their child. Head teachers must ensure that each pupil has a named Personal Tutor at their school who must be able to signpost parents to additional resources or support and advice.	Information that is accessible to parents both paper based and electronically and access to a Personal Tutor, Careers Department Leader, supported by external providers of CEIAG will facilitate a much greater shared understanding of the processes and times lines required for young people to make successful transitions. Once these relationships are secured parents will feel more permitted to engage with

		<p>Head teachers must ensure that all members of school staff providing careers advice provide impartial information and advice that promotes the best interests of the pupil.</p> <p>295. Governing bodies should provide parents with information and advice that enables them to consider local learning and work options. In particular all parents should be made aware of local Connexions services and the information available on-line through the 14–19 Prospectus and Apprenticeships Vacancies On-Line.</p> <p>296. Local authorities must arrange for a s139(a) learning difficulty assessment to be carried out during a child's last year of compulsory schooling</p>	<p>them.</p> <p>It will be important to ensure that Local Authorities continue to commission CEIAG consultancy services (furthermore to expand them) to guarantee that all levels of staff (governors, senior leaders, middle leaders, careers department leaders, tutors and all subject teachers) are able to assimilate the necessary information and can impart that information or signpost effectively to parents.</p>
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Part 2: The Pupil & Parent Guarantees which relate to CEIAG

(Consultation responses)

Consultation Question		Comments
1 Is the Pupil and Parent Guarantee document clear about the requirements it imposes on Local Authorities and schools? If there are areas which are not clear, please explain where.	Yes	The range of educational providers from KS1-5 is complex, and this is not helped by additional opt outs accorded to academies. None the less all through the consultation document providers that are included and those expressly excluded are identified explicitly and consistently
2 Is the description of the complaints system clear?	Yes	The systems for making complaints are complex, varied and layered so it is not possible to describe the systems without some difficulty and confusion. LA processes are layered, school systems are not the same for every issue and furthermore parents are encouraged to exhaust all informal means before resorting to formal processes and systems, this adds a (necessary?) further

		layer of complexity
3 a) Have we explained clearly enough what we mean by 'must' and 'should' - in relation to each element of the Guarantees?	Yes	The distinction between mandatory requirements and statutory guidance is clear to professionals working in education (but would it be clear to parents, especially parents with additional needs themselves?). Though “must / must not” and “should / should not” is explicitly referenced all through the document would everyone retain the distinct understanding of meaning between “must and should” / mandatory requirements/ statutory guidance?
3 b) Is there anything else we could add to make any of these clearer?	Yes	Could a colour coding system be used to bond the defining criteria to the “Must/should” meanings?
4 Do you consider that any of the "must" provisions in the Pupil and Parent Guarantee should be changed to "should" provisions and, if so, which ones?	No	
5 Similarly, do you consider that any of the "should" provisions in the Pupil and Parent Guarantee should be changed to "must" provisions and, if so, which ones?	Yes	<p>We have only really focused on guarantees that impact on careers education, information, advice and guidance</p> <p>In respect of the relationship between para 86 and 92, in relation to career choice being impacted on by science option choice this ought to be a “must” to be consistent with the “must” in para 86</p> <p>With the government’s express aspiration to make CEIAG statutory to 19 then to change para 102 to must from should in respect of work-related learning opportunities being extended to all ages would be consistent.</p>
6 Do the guarantees strike the right balance between making clear the entitlements of individual pupils/parents and giving schools sufficient flexibility to adopt approaches that best suit their particular circumstances?	Yes	The schools do not seem to be asked to behave differently in respect of a response to any existing entitlements or new entitlements.

7 a) Is it useful to also describe existing entitlements in the Pupil and Parent Guarantee?	Yes	It seems sensible to capture everything in one place, our concern is only about the sheer size of the PPG document.
7 b) Are they described at the right level of detail?	Yes	Broadly, but the territory and detail to be covered over all is large. Less detail would be meaningless. But is the current level of detail unfathomable for some? Perhaps.
8 Is the balance of responsibilities and entitlements - for schools and for pupils - in the document right	Yes	Subtle, the document stresses rights of parents and pupils but is uncompromising in respect of pupil and parent responsibilities in return. Could schools and LAs be driven to a stand still managing, deflecting, administrating complaints to start with?
9 Do the guarantees work for children with particular needs: such as disabled children and children with special educational needs?	Yes	The needs of young people are stressed and taken in to account sensitively consistently.
10 Do the guarantees work for parents who may have particular needs, such as disabilities, English as an additional language etc?	Yes	The needs of parents and carers are stressed and taken in to account sensitively consistently.
11 Is there anything missing from any of the guarantees that we should include?	Yes	<p>Critically CEIAG can work to ensure effective transitions as enshrined in the new publications “Quality, Choice and Aspiration” together with “Statutory Guidance for Impartial Careers Education” KS2-5 and reinforced by elements in the ASCL Act, 2009. This could be strengthened as could the relationship between effective CEIAG and Ofsted inspection and the part that parents/pupils/tutors and guidance professionals play.</p> <p>Our major concern is the lack of robust national quality standards as requirements for all who provide CEIAG. This deficiency causes the ‘patchy’ provision which current Ministers, rightly, are concerned about. We need robust standards and universal assessment of performance against those =</p>

		<p>measure, measure, measure. Poor performance must be identified and addressed or the Guarantees become meaningless.</p> <p>There is very little “guarantee” in the document concerning access to high quality ICT integrated into learning? This is a major platform for CEIAG as it is for other curriculum areas in terms of imaginative teaching and learning.</p> <p>Should the guarantee of an appropriate learning option for all learners 16+ be “guaranteed” after all it is called a “Guarantee” already?</p>
12 Is the tone and language of the document right?	Yes	It is understandable, clear, consistent in manageable chunks, but still remains a huge piece of work and hence may not be accessible to all easily, (even though pupils, parents and carers are to be given support to understand their entitlements).
13 Please use this space for any other comments or views relating to the Pupil and Parent Guarantees	-----	Can there be a very short executive summary (of no more than two pages)?

**Careers England/13 to 19 Task Group & BOARD
February 2010**