

Careers England Policy Commentary 23

This is the twenty-third 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

Ofsted Thematic Review and Government Action Plan

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1. **Summary.** The Ofsted review of career guidance provision in schools describes in detail the erosion that has taken place as a result of recent Government policies, and the limited nature of current provision in most schools. A Government Action Plan issued alongside the review proposes revisions to the Statutory Guidance for schools, and a limited extension of the role of the National Careers Service in relation to schools, without new funding. The proposed actions fall substantially short of those recommended by the House of Commons Education Select Committee.

2. **Ofsted review.** The eagerly-awaited Ofsted thematic review of the impact of recent Government policies on careers guidance in schools² provides a detailed and authoritative picture, based on visits to 60 schools that included observations, interviews with relevant staff, governors and stakeholders, group discussions with students, and online surveys of parents. On the basis of the evidence gathered, the key findings included:

- The new arrangements were not working well in just over three-quarters of the schools.
- Only one in five schools was providing students in years 9-11 with the careers guidance they needed to support decision-making. These schools were characterised by strong support for careers guidance provision from school leaders and managers.
- Few schools demonstrated that they had the skills and expertise necessary to provide a comprehensive service.
- Few schools had purchased an adequate professional service from external sources; a quarter of schools did not use qualified external advisers at all.
- In most schools, careers activities were poorly co-ordinated, poorly monitored/quality-assured and poorly evaluated.
- Links with employers were particularly weak; about two-thirds of schools had cut down their work-experience provision for students in years 10-11.

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.

² Ofsted (2013). *Going in the Right Direction? Careers Guidance in Schools from September 2012*.

- Most schools were poor at promoting apprenticeships and labour market information.
- Awareness of the National Careers Service helpline and website was very limited in nearly all schools.

A more detailed analysis of Ofsted's key findings is provided in the Annex to this Policy Commentary.

3. **Government Action Plan.** Simultaneously, the Government has published an Action Plan³ which represents its response both to the Ofsted review and to the earlier National Careers Council report⁴. It also presumably (though no explicit reference is made to this) represents the Government's response to a number of outstanding issues in the report of the House of Commons Education Select Committee on careers guidance for young people⁵, which in the Government's initial response to that report⁶ were deferred until after the results of the Ofsted review were known.

4. Strategically, the most important actions promised by the Government are two-fold:

- To revise the Statutory Guidance for schools.
- To extend the role of the National Careers Service in relation to schools and young people.

5. **Revised Statutory Guidance.** On the decision to revise the Statutory Guidance, the Action Plan states:

'We will revise the statutory guidance for schools on their duty to secure independent and impartial careers guidance; ensuring schools are focused on having high aspirations for all students and place inspiration and appropriate support for students at the centre of what they do' (p.4).

More specifically, the Plan indicates (p.4) that the revised Statutory Guidance will:

- Highlight the need to build strong connections with employers.

³ Department for Education and Department for Business, Innovation and Skills (2013). *Careers Guidance Action Plan: Government Response to Recommendations from Ofsted's Thematic Review and National Careers Council's Report*.

⁴ National Careers Council (2013). *An Aspirational Nation: Creating a Culture Change in Careers Provision*. For a critical analysis, see Hooley, T. (2013). *Careers England Policy Commentary 21*.

⁵ House of Commons Education Committee (2013). *Careers Guidance for Young People: the Impact of the New Duty on Schools*. HC 632-1. London: Stationery Office. For a critical analysis, see Watts, A.G. (2013). *Careers England Policy Commentary 18*.

⁶ 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 a critical analysis, see Watts, A.G. (2013). *Careers England Policy Commentary 20*.

- Be clearer about what schools should do to ensure that they have information from, and ‘hear directly from’, all relevant education and training providers, including FE and apprenticeship providers.
- Indicate explicitly that signposting to a careers website is not sufficient to meet the statutory duty.
- Emphasise the importance of using destinations data in evaluating the impact of support to students.

Reference is also made (p.9) to the Ofsted recommendation that schools should ensure that ‘every school governing body has an employer representative’, though no clear response is made to this recommendation.

6. It is notable that a number of further recommendations made by the Education Select Committee for the revised Guidance are not mentioned. These include requiring schools to:

- Ensure a minimum of one careers interview with an independent adviser.
- Achieve a CEIAG Award nationally validated by the Quality in Careers Standard; secure independent careers guidance from a Matrix-accredited provider; and ensure that professional careers advice is offered by a careers adviser qualified at QCF level 6.
- Provide careers education and work-related learning.
- Publish an annual careers plan, with a number of specified components.

These had already been rejected in the Government’s earlier response to the Select Committee report.⁷ None is reinstated here. There is also no reference to two Select Committee recommendations on which a response had been deferred: that the Statutory Guidance be strengthened to emphasise the benefits (a) of schools forming consortia and partnerships to commissioning careers guidance services, and (b) of the efforts made by some Local Authorities to help schools in these respects and more generally in helping schools in taking on their new duty. Finally, there is no reference to the deferred Select Committee recommendation that the Statutory Guidance and Practical Guide be combined into a single document, though the lack of any reference to the Practical Guide could be taken as tacit assent.

7. **Extension of NCS role.** On the role of the National Careers Service in relation to schools and young people, the major new role envisaged is ‘to act as a facilitator to bring schools and employers closer together so that young people can be inspired, mentored and coached by employers’ (p.6). Accordingly, when NCS service delivery is re-procured in 2014, ‘Prime Contractors delivering the service will be expected to have a strategy for partnership working which will include their plans for engaging with schools, young people, parents and employers as well as FE and HE institutions’ (p.11). Meanwhile, work will start on ‘piloting one or more approaches’ with existing Prime Contractors (p.6). In addition:

⁷ See Watts, A.G. (2012). Careers England Policy Commentary 20.

- The local labour market information available on the NCS website will be enhanced (p.6).
- Existing plans to market the NCS website more actively to, and review its accessibility and relevance to, young people will be pursued (p.7).

8. No reference is made, however, to the Education Select Committee's recommendation that the extended NCS relationship to schools should include broader capacity-building roles, helping them to develop their career plans and undertaking regular professional development to enhance teachers' knowledge and understanding of workplaces. In addition, no reference is made to the Select Committee's statement that any extension of the NCS role to schools would require additional funding from the Department for Education. The only reference to funding is the statement that:

‘The National Careers Service is a vital part of the careers guidance resourcing that Government has put in place, alongside schools’ contribution. But more needs to be done to maximise its effectiveness in helping young people and all those engaged in helping them decide on their career options. In recognition of this we have maintained the National Careers Service budget in the spending review for 2015, against a reduction in the overall BIS budget’ (p.6).

This presumably indicates that the services for schools are to be funded from the existing BIS budget. If this is so, it will be at the expense of existing services for adults, and will infringe the existing principle that services for young people aged under 19 should be funded by DfE, not BIS.⁸ It is also unclear what scale of activity is being proposed, whether it would be feasible to deliver this within the existing funding envelope, and which elements of the adult service are earmarked for cutting to free up resources for the schools-oriented work.

9. **Other actions.** Three other elements of the Action Plan are noteworthy. First, the Government indicates that it is keen to further strengthen schools’ Destination Measures. In particular, steps will be taken to:

- Investigate ways of improving the completeness of such data.
- Gain legal authority for linking the data to employment and benefits data.
- Publish the data earlier.
- Produce different breakdowns of the data, e.g. by prior attainment.

The Ofsted review welcomed such measures, as a tool for schools to review the adequacy of their careers provision. But it also noted the important caveat that:

⁸ As the Ofsted review notes (p.9), DfE has provided BIS with funding of £4.7 million for the young people’s helpline in 2013/14 and 2014/15. The web offer is funded separately through DirectGov. See also Watts, A.G. (2012). Careers England Policy Commentary 15B, para.48.

‘Information on students’ destinations is not the only measure of the impact of careers guidance: countless factors can influence a student’s progression route at the end of Year 11’ (p.26).

10. Second, existing policies in relation to the role of Local Authorities are reiterated. These include the statement that LAs are expected to ‘prioritise their resources to focus on those who are NEET or at risk of becoming NEET’ (p.8). No reference is made, however, to the more extended role in supporting schools’ careers programmes adopted by some LAs.

11. Third, it appears that the National Careers Council is to continue. No explicit reference is made to this, or to any review of its role. But in response to the NCC’s recommendation that the development of the NCS should be assisted by the creation of an Employer-led Advisory Board – the roles of which seemed to overlap substantially with the NCC’s own roles – the Government states that the membership of the Skills Funding Agency’s existing Advisory Board will be refreshed in consultation with the NCC (p.10). The responses to the NCC’s other recommendations are very general in nature, as indeed were the recommendations themselves, and do not commit the Government to any significant actions beyond those already outlined above.

12. **Final comment.** The reactions in Parliament to the Ofsted review and the Government’s response will be interesting to follow. The widespread criticisms of current policies have included Liberal Democrat attempts to ameliorate these policies. Could Parliamentary debates lead to the proposed revisions to the Statutory Guidance being strengthened?

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Annex: The Ofsted Thematic Review

A1. The title of the Ofsted review – *Going in the Right Direction?* – could be interpreted as questioning whether the direction adopted by the Coalition Government’s policies is the right one. In general, however, any such challenges are implicit rather than explicit. The key finding is that ‘the new statutory duty for schools to provide careers guidance is not working well enough’ (p.4). To be more specific, the new arrangements were not working well in just over three-quarters of the 60 schools visited (para.12).

A2. The main failures identified by the review include:

- Weak co-ordination, monitoring and evaluation.
- Limited use of external services.
- Excessive but also inadequate attention to students at risk.
- Lack of competence and quality assurance.
- Weak links with employers.
- Lack of attention to apprenticeships and labour market information.
- Lack of awareness of, and limited appreciation of, the services offered by the National Careers Service.

A3. On *co-ordination, monitoring and evaluation*, the report states:

‘... in about three quarters of the schools, especially where no member of staff had an adequate management responsibility for the activities, they were often poorly coordinated. Their quality was not evaluated sufficiently to check their usefulness, and participation in the different activities was not monitored adequately’ (para.23).

Even of those schools that had made careers guidance a strategic priority (see A10 below), only around a quarter had evaluated effectively the impact of their provision on supporting their students’ decision-making (para.58).

A4. On *use of external services*, the report indicates that in the majority of schools, the proportion of individual interviews by an external careers guidance professional had fallen considerably – by up to 75% (para.18). Only around one in six schools offered individual careers guidance interviews to all students in Years 9-11 (para.19). Further erosion seemed likely in areas where Local Authorities were still funding services, as their funding was further diminished (para.18). A quarter of schools already did not use qualified external advisers at all (para.19). Too many of the schools that used external organisations to provide careers information and advice to their students did not have adequate systems to monitor the quality of the service (paras.20, 57).

A5. On *attention to students at risk*, the review found that schools which had not given a strategic priority to careers guidance tended to focus it on their vulnerable students (para.18). Yet few schools worked well enough to target careers guidance for

students who had special educational needs, were disabled, or were at risk of not entering education, employment or training (NEET) (para.33). Moreover, the focus on supporting these young people to progress to some form of education, training or employment at age 16 was sometimes at the expense of providing them with good-quality career guidance for their future, tapping into their potential (para.35).

A6. On *competence and quality assurance*, about a quarter of individual career guidance interviews observed were not fully effective: these included some sessions led by external qualified careers professionals (para.31) (it was unclear, however, how far this was due to lack of competence or to imposed time constraints). Recording of interviews was generally weak (para.32). Many careers guidance professionals as well as teaching staff interviewed were not well-informed about apprenticeships (para.46). Only around three-quarters of the schools using external professional advisers were aware of whether or not the external organisations had achieved or were working towards the Matrix standard. Around a quarter of schools had achieved or were working towards an external quality award for careers guidance: while in general this correlated with good-quality careers provision, this was not always the case (para.61) – an issue which the recently-established Quality in Careers Consortium might wish to pursue with Ofsted.

A7. On *links with employers*, this was viewed as the weakest aspect of career guidance in the 60 schools visited. About two-thirds of schools had cut down on their work-experience provision for students in years 10-11, both for budgetary reasons and because of the relevant recommendation in the Wolf report⁹ (para.39). Sourcing work placements was a major barrier, linked to competition with other schools and colleges at the same time of the year (para.41).

A8. On *attention to apprenticeships and labour market information*, the review found that very few schools promoted the full range of progression routes that were available (paras.21). Few students had sufficient exposure to the wide range of available career pathways, or were aware of growth areas or skill shortages (para.38). Most schools were poor at promoting vocational training in general and apprenticeships in particular. In half of the schools providing relevant data, no students had progressed to apprenticeships in 2011/12 (para.45).

A9. On the *National Careers Service*, the review found that awareness of the National Careers Service helpline and website was very limited in nearly all schools. Many of those who had used the website felt that it was mostly for older students and adults (para.48). Only 11 schools had promoted the helpline (para.49). Most parents had not

⁹ The Wolf Report recommended that work experience for 16-18-year-olds should be prioritised and that ‘the blanket requirement to give all KS4 pupils “work experience” ... has served its time’ (Wolf, A. (2011). *Review of Vocational Education – the Wolf Report*, p.131. London: Department for Education). The Government subsequently removed the statutory duty to deliver work-related learning at Key Stage 4, despite 89% of consultation respondents favouring its retention (Department for Education (2012). *Consultation on Removing the Duty to Deliver Work-Related Learning at Key Stage 4*), and despite the clear research evidence on the benefits of pre-16 work experience (Mann, A. (2012). *Work Experience: Impact and Delivery – Insights from the Evidence*. London: Education and Employers Taskforce).

heard of either service (para.50). More generally, most students needed help in using websites for career exploration purposes (paras.27, 55).

A10. On all of these issues, the review identifies – alongside the widespread deficiencies – examples of good practice which demonstrate what schools can and should do. In most of these cases, the programmes involved were characterised by strong support from school leaders and managers, who ‘had made it a central part of their work to support their students’ longer-term achievements and economic well-being’ (para.13). Careers guidance was viewed as a strategic priority; the governing body, often through a designated governor, had responsibility for overseeing the quality of the careers guidance offered (para.14).

A11. *Commentary.* While the report in general is helpfully clear and authoritative, there are three important respects in which it lacks clarity and/or specificity.

A12. First, there is lack of clarity about the concept of *careers education* and what it comprises. The term itself is used very sparingly. It is mentioned in the DfE definition of ‘careers guidance’ cited early in the report (para.8), as one of the range of services and activities which this broad term encompasses. But thereafter the references (notably in para.24) tend to be to one-off activities or lessons, rather than to a coherent element of the curriculum providing a sequential, coherent and broadly-based programme over time designed to develop students’ self-awareness, opportunity awareness and career management skills. The strengths and weaknesses of different models of careers education provision – e.g. as part of personal, social, health and economic education (PSHE), infused into academic subjects, or in tutorial periods – are not discussed (though it is noted that tutorial periods are often too short to be effective (para.25)).

A13. Second, there is ambiguity about whether or not schools can provide adequate provision from their own staff resources, or whether it is essential to bring in external professional careers guidance resources. Reference is made to the fact that some schools had made ‘new internal appointments that gave members of staff full-time or part-time responsibility for coordinating the overall provision of careers guidance’ (para.14), and also that in some schools effective careers guidance interviews were given by ‘an internal specialist who had had significant experience in providing individual career guidance’ (para.30). No statement is made, however, about whether such arrangements, in cases where no external services were used, were viewed by inspectors as sufficient. This reflects, but fails to illuminate or resolve, the ambiguity in previous Government statements on this issue.¹⁰ The issue needs to be resolved in the proposed revision to the Statutory Guidance: the test of sufficiency in fulfilling the statutory duty should be unambiguous.

A14. Third, there are two conspicuous omissions from the review:

- The lack of any reference to school careers plans. The Education Select Committee report attached considerable importance to the need for schools to

¹⁰ See e.g. Watts, A.G. (2013). *Careers England Policy Commentary 17*, para.8.

publish such plans, and to review them on an annual basis, taking into account the views of students, parents, employers and other learning providers. This recommendation was rejected by the Government.¹¹ It is surprising, however, that the review makes no mention of the extent to which schools voluntarily choose to prepare such plans, and make them transparent to students, parents and others: both to indicate what services students and parents can expect, and to provide a basis for evaluation and review.

- The lack of any significant attention to the extent to which schools have formed consortia and partnerships to support a collaborative approach to commissioning careers guidance services. As noted in the main part of this Policy Commentary, the Education Select Committee recommended that the Statutory Guidance should be revised to reflect more strongly the benefits of such approaches, and also of the efforts made by some Local Authorities to help schools in forming such consortia and partnerships and more generally in helping schools in taking on their new duty.¹² The value of such Local Authority support is evident in one of the examples of good practice outlined in the Ofsted review (para.15). But neither topic is given any broader attention within the review.

A15. In general, however, the Ofsted review provides a strong and valuable picture of the extent of the erosion that has taken place in the extent and quality of careers guidance in schools following the Coalition Government's policies. The report also makes a number of recommendations for remedial action, the most important of which are addressed in the main part of this Policy Commentary. The key underlying issue is the extent to which the responsibility for the current situation is perceived as lying primarily with schools for failing to implement the policies effectively, or with the Government for the nature of the policies themselves (including the removal of all of the funding on which the provision of external services was previously based¹³). The deficiencies and dangers in the proposed Government policies were strongly articulated in these Policy Commentaries¹⁴ and in Parliament as the 2011 Education Act passed through its various stages. The warnings were not heeded.

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¹¹ See Watts, A.G. (2013). Careers England Policy Commentary 20, para.3.

¹² See Watts, A.G. (2013). Careers England Policy Commentary 18, para.10.

¹³ See Watts, A.G. (2012). Careers England Policy Commentary 15B, paras.42-47.

¹⁴ See especially Watts, A.G. (2012). Careers England Policy Commentary 15B