



Llywodraeth Cymru
Welsh Government

RESEARCH

Careers Wales data linking feasibility study (summary)

The study explores whether a data intelligence hub could provide insights and understanding of the customer cohort across Wales for employability and skills support.

First published: 12 October 2022

Last updated: 12 October 2022

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Introduction and background

Careers Wales works to a remit set by the Education and Welsh Language Minister and support the Welsh Government's strategic objectives as identified in the Programme for Government. Since its establishment, Careers Wales's focus has been to support the Welsh Government's strategic objectives of ensuring the sustained progression of youth through education and into employment or further education/training, prioritising those who are most at risk of becoming disengaged and falling outside the education, training or employment system.

The Welsh Government, therefore, commissioned this study to consider the feasibility of linking the data held by Careers Wales to other administrative datasets. The study explores whether a data intelligence hub could provide insights and understanding of the customer cohort across Wales for employability and skills support, as well as providing evidence to the Welsh Government on the effectiveness of employability and skills support services. By assessing the feasibility of linking data, Careers Wales will be better placed to consider the potential influence a data hub may have in providing a more effective service that considers different circumstances and capabilities of customers and deliver on the aims set under the new Programme for Government.

The following research questions are addressed in this report:

- What data needs are created by organisational and national policy?
- Do, or can, the data holdings of Careers Wales and partners fulfil these needs?
- What is the legislative context for administrative data sharing?
- Are there legal, privacy or other issues or risks that prevent data linkage?
- What are the benefits and risks associated with data sharing?
- What, if any, are the feasible approaches to enhancing data utilisation and

effectiveness?

The research examines the policy and legislative context within which Careers Wales is operating, the utility of data holdings of Careers Wales and other organisations, and potential data sharing to support Careers Wales objectives. These issues informed the development of feasible approaches to the effective use of linked data. Options that Careers Wales could pursue were developed and considered in terms of operational, technical, economic, legal, and scheduling feasibility.

The main methods employed were desk-based research (including reviews of data documentation, web-based resources, literature and quantitative analysis) and interviews with key stakeholders. Desk-based research assessed three areas:

1. policy and legislative context
2. data content and availability
3. existing academic research and evidence

This firstly involved examination of information on employability and skill policies in Wales, notably the Employability Plan, the Youth Employment and Progression Framework and the Young Persons Guarantee, and Careers Wales' strategic objectives to identify data needs. The legislative context was explored at a Welsh, UK and European level of governance as influential parameters in data sharing and data access.

Examination of data held by Careers Wales was a key step to understanding whether this is sufficient to evaluate cohort needs and service provision in relation to Careers Wales objectives as well as to consider engagement with, and outcomes of, Welsh Government employability and skills programmes. This included Careers Wales documentation on data collections and privacy notice(s). This assessment of internal data holdings allowed for identification of strengths and weaknesses of the data in relation to data linkage. The second

stage was to consider the external data sources that could support the aims of a data intelligence hub in enhancing public policy delivery and improved service provision.

Interviews were also utilised in the project to examine in more detail the complexities of data linkage (barriers, benefits, legislation, access, data format, resources) as well as to consider the organisational requirements of Careers Wales and partners. This phase of the research provided a more nuanced understanding of the needs of Careers Wales, as well as the circumstances around the likelihood of gaining access to further data sources in a linkable format. The focus here was on the feasibility of accessing and linking to external sources, exploring further the benefits and potential challenges, and seeking to clarify or confirm the findings of the desk-based research.

Main findings

Context

The organisational objectives of Careers Wales and the national policy directives highlight the increasingly important role in delivering services to those who can most benefit from Careers Information, Advice and Guidance (CIAG) with a coordinated and strategic approach to engagement with employers and learning providers to nurture a thriving labour market and economy. There is increasing pressure to track outcomes for evaluation purposes, but also real opportunities to deliver this, especially for those accessing employment services via Working Wales.

Whilst Careers Wales operate within a complex legislation environment, and some legislation restricts the potential of data linkage, there is also potential for utilising data from higher education, Department for Work and Pensions (DWP) and local authorities to support service evaluation and monitor outcomes

relevant to a variety of schemes and programmes focused on employability. The feasibility of operating a data hub within this legal context means that significant responsibilities will be placed upon Careers Wales to ensure that the legal requirements associated with ensuring that privacy notices and data sharing agreements are appropriate. The development of agreements, processes and risk assessment can take an inordinate amount of time to negotiate. So, whilst there are legal avenues to various data, the time and capacity needed to create agreements across Wales will be substantial.

Data

Data collected by Careers Wales, in provision of their service, provides a vast array of information with which to make informed decisions about the needs and requirements of customers, support evaluations and examine service trends. There are three core sources of internal data: administrative customer records, Career Check Survey and the Pupil Destinations Survey.

It is clear that Careers Wales' data can provide opportunity to assess the needs of customers through detailed records on interactions as well as additional survey data. However, the data do not provide opportunity to look beyond particular characteristics. Other administrative sources, such as educational records and DWP data could provide further detail in relation to the characteristics of Careers Wales customers. Such information can facilitate improved segmentation of the Careers Wales client base. Such analysis allows clients to be grouped together in terms of their shared characteristics, supporting effective service provision and service evaluation. The improved evidence base could support strategic planning, funding bids, resource allocation and the development of services. Data on client outcomes could support the evaluation of service impacts. External partners including school-based guidance counsellors, learning providers and those involved in the delivery of employment support programmes could benefit from the availability of more information about clients. This could support the early identification and support provided to those

who are at risk of becoming NEET (not in education, employment or training) and to track their progress. Data collected by public bodies in the provision of employment support services could increase understanding of the efficacy of provision for adults, leading to improvements for working-age customers.

Potential approaches

The options include:

- continuing current activity with no changes
- developing greater access and more effective data flows to establish a Datahub, building on current practices
- a 'Datahub Plus', that would allow partners editing rights to data fields
- a Data Portal for customers, use of secure data services provided by other organisations
- research based partnerships

The Options are not separate, heterogeneous avenues, except Option 1 (in this scenario no changes would be made to Careers Wales operations). Options 2 to 4 focus on expanding the use of administrative data in differing ways, building upon current Careers Wales work, and Option 5 focuses on external resources and relationships.

When considering the feasibility of data linkage and sharing as a key aspect of policy delivery, the question of which organisation should lead was explored. From interviews, Careers Wales were deemed to be the most suitable organisation for a number of reasons. Firstly, they already hold vast amounts of data on pupils, learners and the unemployed. Secondly, they were seen to be an organisation that operates at arm's length from Welsh Government that could not be said of other services provided by local authorities for example – understood as creating a level of impartiality and with a high degree of customer trust. Furthermore, Careers Wales was seen to be an organisation that would

promote engagement 'as a collective', working with partner organisations to ensure data flows led to successful and appropriate data sharing.

Local authorities were not deemed to be best placed due the variation in data collection mechanisms and software. Also significantly, in terms of operational suitability, the number of local authorities was seen to be a hindrance to successful and efficient organising. Central organisations, such as DWP, were not believed to be viable due the removed nature of its central government functions. When considering the potential of Welsh Government to develop and host a centralised system concerns were raised that this would lead to delays in data provision and that embedding this function was risky as it was felt there would be less accountability or critical engagement.

Should Careers Wales move forward as a lead for a data intelligence hub, there then remain questions about who the 'data owners' and 'data controllers' are. This is perhaps less problematic than it first appears. Each partner organisation can remain the data owner and controller of their information, and Careers Wales would in these cases be considered a 'data processor' or as a joint controller. As a data processor, Careers Wales would have to maintain a record of all processing operations (which is traceable with the Atlas /Dynamics environment), would be responsible for implementing appropriate security measures, and need processes to inform a controller immediately of any data breach. This remains in line with GDPR. For Careers Wales to be a joint data controller, they would need to be mentioned as such within organisational privacy notices.

Conclusions and recommendations

Careers Wales have made significant steps in improving their data coverage and access after the introduction of UK GDPR legislation impacted upon their ability to acquire nationally representative data to inform organisational decision-

making and service provision.

Our review of the legislative environment indicates the vast complexity and at times opaqueness of current legal arrangements. Two central issues come from this:

1. missing data on school pupils that could help Careers Wales to inform CIAG, schedule or evaluate provision
2. the difficulty in tracking outcomes of CIAG

Maintaining the current use of data has a number of limitations, however, a significant investment in Careers Wales resources and systems will be needed to support more effective use of data. It will also be reliant on significant cooperation and partnership with other organisations.

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Views expressed in this report are those of the researchers and not necessarily those of the Welsh Government.

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Social research number: 65/2022

Digital ISBN 978-1-80364-897-2



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