



SPECIAL
ISSUE:

Comprehensive

Guidance and

Counseling Programs

PROFESSIONAL

School

Counseling

Volume 4

Number 4

April 2001



Comprehensive Guidance Programs in an International Context

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A picture of comprehensive guidance programs in schools around the world could be of value in stimulating reflection on the different systems and cultures which now exist. It may even be of value in informing the development of guidance, as it responds to a range of issues in the changing world. The task of creating an international picture clearly presents challenges of language, of selection and of simplification. This account uses personal contacts and literature which reflect the author's restriction to the English language. It uses accounts which are self-selected, in that the authors cited have worked hard to write and publish: They may create a picture which others in the same context do not fully recognize. The risk of creating over-simple national pictures is also evident: Practice varies significantly both within and between countries, and it is not always clear which how this should best be explained. We cannot regard national systems as fully self-contained, since the amount of "educational borrowing" which goes on around the globe is considerable and, some would say, increasing. But it is not a simple process of exporting or transferring or applying ideas from one place to another. The social life of educational ideas as they travel between countries is worthy of greater study.

Diversity in terminology also needs to be recognised. The term *comprehensive guidance program* derives from the US. What may be called personal-social education in England and Wales may be remarkably similar to what is called life-

skills elsewhere, guidance in another context, or civic education in a fourth. And in the secondary schools of England and Wales the term *pastoral care* is used: This has no link with sheep or priests, but refers to the systems of tutoring and curricular provision led by teacher colleagues who in the US would be called home-room teachers. Across these varying terminologies, I have focused on planned educational programs for school pupils which raise and explore personal-social dimensions of their current and future lives. I have ordered the comments to move from large scale to smaller scale: from national differences and differences in education systems to school differences, and have then proposed some areas for development.

National Differences

The Christian liberal democratic culture to which English-speaking nations often attribute the growth of schooling in centuries past is not the norm around the globe. Notwithstanding the fact that educators in other countries may seek to present their systems as though they were similar to that history, differences in economic condition, social structure, religion, culture, and approach to identity are soon evident.

Nations where levels of wealth are both high and equitably distributed are more likely to have a number of years of schooling for all, and their guidance systems may have come to operate preventatively rather than reactively. Nations where wealth is high but inequitably distributed may operate guidance systems whose main role is to maintain privilege for the elite, for example through selective access to higher education. Liberal and Judaeo-Christian nations are more likely to espouse a view of individual determination and choice for their young people, although those with education systems which still reflect their historical roots in the monastery may claim they do this through the "ethos" rather than through explicit guidance provision. Nations whose religion and culture emphasize paternalism and duty may give comparatively little emphasis to guidance as seen by Western eyes. Although the US may emphasize self-regard, Japan may emphasize self-criticism (Heine, Lehman, Markus, & Katayama, 1999)

Larger than nations, regional differences exist, and sometimes reflect contemporary issues and changes in economic and political conditions. For example, countries of Eastern Europe since the changes of 1989 show great interest in an individual liberal approach to curriculum, contrasting with the state-dominated control of their past. It is unclear whether they will develop individualist "free market" views of schooling and guidance, or views which maintain social

solidarity and equity as a priority. Countries in Western Europe currently recognize an increase in movement across national boundaries, and expect guidance to help workers with this (Watts, 1992). Countries of sub-Saharan Africa which are currently being ravaged by AIDS may be allocating resources to cope, and guidance may be less of a priority or different in focus, especially where school counselors are full-time teachers and untrained (Maluwa-Banda, 1998).

Beyond these changes, a wider set of trends, simply described as globalization, emerging, especially in those nations described as post-industrial. Wider patterns of communication and different approaches to trading create new life opportunities for young people. Although access to these opportunities may be more apparent than real for many, enhanced communications are allowing young people to forge new international identities (Gergen, 1991).

System Differences

Conceptions of education.

In a time when national governments have less influence on international economics, they turn their attention to domestic matters in order to maintain their claims of potency. In countries such as the US, Canada, England, Australia, and New Zealand, a period of increased political influence on education systems has been characterized by the rhetoric of markets and "choice." At the same time some of these countries have been characterized by reduced levels of public trust. Watts (1991) analyzed the influence of the "New Right" on guidance policy in England and Wales during the Thatcher era and suggested the following three strands of influence: using guidance as a form of social control; supporting guidance as a means of making markets work; and making guidance services themselves more responsive to market forces. Hermansson and Webb (1993) analyzed how the change from a post-war welfare state to a free market economy in New Zealand has totally changed the fabric of society and led to markedly less government spending on education. As the conception of education changed from being an aspect of public good to a marketable commodity, the developmental stance which had been established for guidance became difficult to maintain. Additionally the increasing inequalities evident in such countries has meant that a specialist and crisis orientation has re-emerged. In such a context there are pressures to make guidance into job placement instead of supporting development of potentials. In England and to a lesser extent in Wales, government reforms from 1988 also changed the patterns of training for

teachers interested in counseling, guidance, and pastoral care. Such courses disappeared in favor of an emphasis on new curriculum, testing and so on, to the point that one European commentator concluded "England has discontinued a promising beginning" (Martin, 1993, p. 254).

Different trajectories may be occurring in different countries. Van Esbroeck (1998) described the changes over two decades of guidance services in Flanders. Here external guidance services developed close working relationships with teachers, although only in a minority of schools, through the 1970s. Such practice was mandated for all schools in the early 1980s, at which time the context of increased demand and economic cuts led to a

developmental, comprehensive approach, rather than an expert model with specialist roles such as counselors in schools. Despite later resource pressure, guidance teams in schools survive, with the work of first-line teachers supported by grade coordinators, who are in turn assisted by external services who offer second-line support. The view is held that expert-oriented systems are no longer affordable. In Flanders, as in countries like Ireland and Austria, less than 10 per cent of staff expenditure in primary and secondary education goes toward compensation of personnel other than teachers (a diverse category which may include non-teaching principals, school counselors, and more). In Denmark and the US the figure is over 20 per cent (OECD, 2000, p. 102).

The traditional organizational pattern which emphasized the position of counselor and their clinical skills of counseling now seems to have economic as well as educational arguments raised against it. Perhaps the role is as vulnerable as a small refuge hut with poor foundations on the side of a mountain when an avalanche starts: It's a risky place to be. The alternative pattern of connecting with educational programs of guidance for all raises complex issues about the curriculum, but may offer a more secure role in the mainstream. When the financial and educational avalanche has passed, the well-embedded guidance professional will be there with all the teaching colleagues to create the new shape of schooling.

Conceptions of national or state curricula.

Comprehensive guidance programs are crucially affected by the nature of the curriculum, yet guidance has rarely been a mandated feature

Exporting or applying educational ideas from one place to another is not a simple process; the social life of ideas as they travel is worthy of further study

of nationally prescribed curricula. As Sink and MacDonald (1998, also MacDonald & Sink, 1999) have shown, the work of establishing comprehensive guidance programs across the states of the US has advanced significantly during the past two decades. In other countries, much depends on the nature of the national curriculum.

In Norway, the core curriculum for primary, secondary and adult education refers to education of the Spiritual human being, the Creative human being, the Working human being, the Liberally Educated human being, the Social human being, the Environmentally Aware human being, the Integrated human being (Norwegian Royal Ministry, 1994). This creates a very fruitful context for guidance to be a

connected feature of schools, rather than a potentially marginalized add-on.

By contrast the National Curriculum which was introduced in England and Wales was defined by subjects and by tests. The legislation which created it in 1988 is not about curriculum, nor even about subjects, it is about testing. The assessment tail wags the curriculum dog. The result has been a narrowing of school aims, and an increase in subject divisions in the secondary school. The climate of accountability, which includes hostile inspections and the publication of "league tables" of pupils' test scores aggregated by school, has created a climate of fear for teachers in schools (Watkins, 1999a). This has weakened the possibility of connected provision across the school. "Cross-curricular issues and personal and social development do not have coherence of purpose or a high profile in the curriculum at the present time, despite schools' abiding interest in these matters. The requirements of the National Curriculum, assessment pressures and accountability weaken the place of cross-curricular issues" (Ford, Clark, Leat, & Miller, 1998, p. 8). Given the political nature of the introduction of this national curriculum, it is no surprise that it was cast in terms of subjects. School subjects may be undefinable and changing, but their arbitrary nature is ignored for the sake of convenience when constructing national paper and pencil tests. In this sense subjects are controllable and controlling, and contrast sharply with the more person-centered goals for education (Watkins 1995). Various attempts to overlay this subject curriculum with "cross-curricular themes," including health, careers, and so on, have had little impact, partly due to lack of political will. For example, in 1989 the minister instructed the

National Curriculum Council to stop development of a framework for the whole curriculum.

Colleagues in the Netherlands have analyzed the relation between subjects and wider themes, and concluded that any attempt to promote a coordinated approach to personal-social themes or indeed to guidance will fail if it does not address the coordination of the subjects (Boersma & Hooghoff, 1993). There is currently no sign of any framework to do this in England, although there have been attempts to make personal-social education more like an additional subject, through specification of measurable targets of attainment.

Boersma and Hooghoff (1993) also highlighted that in the personal domain there are a large number of outside pressure groups, each wanting to get their special interest into the school curriculum and generally ineffective at working together. Their analysis helps me cope with experiences such as being telephoned by the English Health Authority asking to advise them how they might get folic acid onto the curriculum.

Perhaps it is worth concluding this section with an example which suggests that central prescriptions will not be successful if they have a poor fit with the wider culture. In the centrally controlled Japanese education system with its emphasis on the academic and a bureaucratic approach to school management, social studies is a subject for all years at every stage. Hashisako (1990) takes the view that the post-war attempts to have this subject engender interdependent democratic relationships have made little headway, and that the original idea has vanished completely as the subject has fragmented with successive central prescriptions. It promotes obedience to the existing social order, an individual/medical view of health, and a gender-biased approach to "home life".

School Differences

The above discussion of national and system differences could inadvertently create a more homogenized view of school reality than is really the case. In every country, school differences are now seen as significant, and in some cases are seen as a source of knowledge for improvement. As we move to this smaller level of analysis, school matters which impact on comprehensive guidance programs will be mentioned.

Programs for the personal-social domain, and explicit considerations of personal-social matters can be easily marginalized by a secondary school which is under pressure to perform in subject domains. In the early 1970s some school counselors trained in a mental health model found themselves in UK schools

"counseling in a cupboard" - that is given a minimum and marginalized space to meet with a minority of young people, often those whom the school saw as disturbed or disruptive. Similarly today the operation of a personal-social education (PSE) program for all students can, in a secondary school which does not afford priority to the personal domain, become encapsulated in a low-status slot on the timetable, what Brown (1990) provocatively called a timetable ghetto. Sometimes the teachers of a PSE program play a part in creating the very marginalization of which they complain. For example they may portray their work as an antidote to the subject-based curriculum, rather than an adjunct. Or they may develop topics for which students see little application in their real lives. Schools differ significantly in these varying dynamics of marginalization.

School structure.

The structural arrangements of the typical secondary school often do little to help a comprehensive approach. First, the fragmentation of teams into subjects can make for difficulties, which are beyond the power of individuals such as guidance coordinators to resolve. "For the past decade, the secondary school's habitual response to a problem has been to throw a coordinator at it. Many of these have been keen young teachers, more often than not women, given a minimal allowance and a set of roller skates to get off round the corridors: lots of responsibility but no power" (Watkins, 1994, p. 146). In this worst case scenario, the life of such coordinators consists of much running backward and forward to a multitude of colleagues, instead of having a central and empowered role in the school decision-making and planning structure.

In Hong Kong, where both students and teachers endorse a proactive problem-solving rather than remedial approach to guidance (Hui, 1998), a whole-school approach has been forged over a number of years (Hui, 1994, 2000), and is now reflected in policy documents. However at the school level, significant differences remain, sometimes associated with the co-existence of separate guidance and discipline teams in a secondary school, which in some cases promote contrasting approaches. In other cases, the value of guidance is recognized by the school community, teacher relationships are positive, and the guidance team acts as a catalyst for change (Hui & Lo, 1997). Nevertheless, in a city which has been characterized as the most stressful in the world, and in schools where the class size is 40, guidance teachers experience more stress than their colleagues of similar experience (Hui & Chan 1996, Chan & Hui, 1998).

In the UK secondary school, teachers are also tutors to a group of students, so that every teacher is a member of two teams; subject and pastoral. In the past this has led to easy accusations of the “pastoral-academic split,” but more recently improvements in coordination have been tried, in light of common school goals. In those schools where “coordination” was attempted through planned meetings of subject and pastoral team leaders, there seems little improvement. In other schools a more radical reorganization of team composition has taken place (Watkins, 1999b), so that the separate subject and pastoral teams are overtaken by a combined team for the year (grade), called, for example the year learning team). It is composed of teachers and tutors of that year group of students, and addresses their academic and personal-social learning in a much more connected fashion. Such restructuring for learning challenges the underlying metaphor of the organization as machine which is characteristic of many policy views of schooling, and re-asserts the idea of the school as a learning community and, therefore, a guidance community.

Husbands and Lang (2000) provided a recent account where restructuring for learning has been even more radical. In one state of Germany where 15 comprehensive schools were introduced in the 1980s, a team / small group structure is used. Between Years 5 and 9 pupils work in the same “table group” of between six and eight students, generally for all their subjects. The impact on pedagogy is such that tasks are planned for collaborative learning and for interpersonal development: “considerable effort is invested in helping pupils to resolve any tensions or difficulties in the table group, rather than breaking up the group or moving individuals” (p. 49). Teachers are also deployed in teams of approximately eight, who work collaboratively to teach the whole curriculum, have their own team room, and are attached to a year group for a 5-year cycle. Specific work on personal-social themes is handled through the weekly class parliament session, in which the meeting is chaired and minutes are taken by students. In the two schools which were observed, a relaxed style was evident from teachers, and in neither school did a teacher raise his/her voice, and there was no student misbehavior.

School curriculum.

“Good guidance is total school guidance” stated colleagues from Canada (Levi & Ziegler, 1991). This means guidance receives strong support, contributes to the atmosphere, permeates the curriculum, and includes a proactive developmental program. Whether or not

there are national or state curriculum prescriptions, how the school as an organization handles, interprets, and mediates these leads to significant differences between schools. In turn, how the school views guidance provision can make the difference between guidance being seen as an antidote, an add-on or a connected provision.

Notwithstanding the common fragmentation by subjects, which can be increased or decreased by school practices and school structures, the way guidance programs present themselves can also contribute to their fate. In many countries where it has become fashionable to present curriculum as lists of learning objectives (or, worse, “planned learning outcomes”), the tendency can be to lose the sense of connection and purpose which is crucial to any learning and especially crucial to learning in personal-social domains. The risk in UK has been that guidance is fragmented, so that small elements of guidance in one area are unrelated to small elements of guidance in other areas (Watkins, 1998). It seems that a similar picture has emerged in Australia where sometimes tutoring is “a jumble of fragmented, superficial and unrelated activities, which purported to satisfy the ‘core’ needs of students” (Theile & McCowan, 1994, p. 169). In some UK schools, the tutor’s time with the tutor group is spent on a program which I have come to call “sex and drugs and litter.” I find that teachers know exactly what I mean by this characterization. It denotes a curriculum driven by adults’ anxieties and moral panics about young people and their behaviour, a small part of the timetabled day, which is open to “dumping” of any concern which is raised and a quick fix is sought.

In one attempt to move towards a more learner-centered perspective, and at the same time to increase the possibility of real coordination across the curriculum, I have worked with schools on the following framework. The seven headings call up aspects of young people’s development and interests

- bodily self
- sexual self
- social self
- vocational self
- moral / political self

and, because we are considering the school context,

- self as a learner
- self in the organization

This is not an original conception; it was developed from Wall (1948). The use of the notion of self is not meant to encourage sloppy or individualistic thinking. Self cannot occur in

isolation; therefore, examination of the self in action demands examination of the social, cultural, and political context. Considerations of race and gender are central to the person and cannot be omitted. Thus, this is not another curriculum of depersonalized knowledge, but one which focuses on young people and their key relationships. I have even found that subject teachers readily describe how their subject teaching contributes to young people's development under these headings. Since 1985 I have used this framework in over 20 publications. Sultana (1992) presented a similar framework for PSE in Malta, claiming that it would reconcile the self-knowledge goals of humanist educators with the activist goals of critical educators.

Nations whose religion and culture emphasize paternalism and duty may give comparatively little emphasis to guidance as seen by Western eyes

Curriculum is not content alone; the approach to teaching is also crucial. Watkins and Mortimore (1999) have reviewed current voices on pedagogy, and highlighted the many pressures on teachers to simplify their classroom practice and goals. These pressures are what can sometimes make guidance and personal-social education into a scenario of "death by 1,000 worksheets" or "death by photocopier." A clearly learner-centered pedagogy is demanded if guidance, pastoral care, and personal-social education are to fulfil their mission, which was influentially described in UK as embedding counseling in the daily life of the school (Hamblin, 1974). It remains the case that the forces against such an approach are strong, and if a proactive program is not well established, then it is common to see curriculum and other provision becoming reactive again. On such occasions the pastoral system becomes distorted into discipline, and non-compliant pupils are shoved off to counselors to have their personhood processed. When this distortion is strong, the whole basis for judging effectiveness becomes biased, as in a study of some Hong Kong schools. "Findings indicated that a majority of the [discipline teachers] were custodial in their management style and they evaluated those discipline measures which had immediate effects to deter students' disruptive behaviour as most useful" (Kwok, 1997, p. 220). In order to put in place a multi-level proactive approach to minimizing behavior difficulty, other approaches are needed which demonstrate the counter-productiveness of reactive measures, and accentuate the building of proactive learning communities (Watkins & Wagner, 2000).

Areas for Development

Pupil guidance needs.

Schools which offer comprehensive guidance programs or personal-social education courses often do so having justified their construction in terms of pupils' needs. But there are questions to be raised about the validity of their conceptions. A study from Finland (Eskelinen, 1991) highlighted one important aspect. This investigation was into 16 year-old pupils' perceptions of their weekly counseling lesson and their relevance. From the teachers' planned perspective, these lessons prepared pupils for further study and career choice, through information and self-awareness, and through learning from work experience. In the specific lessons studied, the guidance counselors' aim was that pupils should establish an order of importance for what they sought in work. Pupils were later interviewed about their view of the purpose, and only a minority agreed with the aim of their teachers. The majority of 16 year-olds gave explanations along the lines of "we work for the teacher," and between one fourth and one half answered "I don't know." This seems to show a paradox of the classroom as a learning environment: In order to learn in the traditional mode of this context, pupils have to give up their power to the teacher, however they often do not share the goals of the teacher. Sarason (1990) remarked that this feature of classroom life, and the power relations it illuminates, is the main intractable feature working against school reform.

Even when pupils do articulate their needs, they may not concur with the conceptions offered by those teachers who know them well. A study in the UK by Sharp and Thomson (1993) indicated that the view of "pastoral teachers" about what stressed pupils was markedly different from what pupils themselves reported. Apart from items on arguing with friends and difficulty with school work, none of the teachers from any of the schools mentioned the sources of stress which appeared in the pupils' "top ten," which included illness, bereavement, boredom, or poor student-staff relationships. At worst, it is possible to develop a "separate worlds" analysis of student and teacher perspectives.

A study of guidance in Scotland, however, found that teachers did not talk about students' needs for very long. "When asked, teachers

frequently began by telling us about needs but quickly moved on to telling us about provision and guidance teachers' tasks at each stage" (Howieson & Semple, 1996, p. 38). In part, this is unsurprising when national documentation comes in the form of describing provision, but it can contribute to the worrying tendency to drive provision by other voices than those of the pupils. The Scottish study also found that none of the schools in the project conducted a regular comprehensive review of pupil needs. This is particularly sad when one knows how simple yet influential such reviews can be, through brain-storming and prioritizing in a group, to more develop practices in which older students interview younger ones and present a report on their stated needs.

Explicit processes for identifying pupils' guidance needs are likely to keep any program in a healthy state. On some occasions there may be need for the large survey, such as that with 1084 15 to 18 year olds in Australia which showed that "planning, decision-making and taking responsibility" may be central to young people's perspectives of life skills (Poole & Evans, 1988, p. 139) Or even for children who grew up during the troubles of Northern Ireland, surveys of their concerns found some time-honored dimensions: *Myself, At Home, Assertiveness, Opposite Sex, Communication, Powerlessness, School Work, Coping with Change, Choosing a Job, Job Finding, Job Information Seeking, Starting Work, Money Matters* (Millar, Gallagher & Ellis, 1993; Gallagher, Millar, Hargie & Ellis, 1992).

On most occasions, however, local and small-scale identification of needs is most likely to be profitable since it more easily leads into improved communications between teachers and students. At best such practices can shift the guidance agenda from one which is built on assumptions about students' deficits, to one which is informed by areas in which they seek to become more competent. There may also be a productive connection with development of peer-led approaches to provision, through which young people fully engage their informal and formal knowledges in the construction of improved knowledge construction. A contribution to more learner-centered conceptions of teaching is likely to follow.

Conceptions of development.

Comprehensive guidance programs have founded their rationale on a view of development

Decades of research have demonstrated that a focus on learning can enhance performance, whereas a focus on performance can depress performance.

which is close to that of a stage theory. In the domain of science curriculum, Metz (1995) has argued that developmental assumptions are frequently regarded as constraints, purporting to explain that school children cannot function at later developmental levels because they have not yet attained the appropriate stage characteristics. Thus abstract ideas and experimentation are in large part postponed until higher grades. Such practices are not supported by the researchers to whom they are frequently attributed, and are less supported by contemporary developmental theory and research, which is more likely to emphasize authentic inquiry developing contextualized tools in local communities.

In a number of fields of development, it is thought that twentieth century assumptions have under-estimated young people. Perhaps this also applies to the guidance field. Certainly there are indications that guidance programs based on developmental conceptions are likely to downplay some wider social processes such as intercultural learning (Sink & MacDonald, 1998). Perhaps the metaphors and concepts employed to understand adolescent identity and development need to be reviewed, and reach towards thinking which embraces the multiplicity of selves, multiplicity of contexts, and the new issues in composing a life (Watkins, 2000).

A focus on the future and on learning.

Schools and classrooms claim to be sites which prepare young people for their various futures, yet they regularly fail to promote exploration of possible futures. Here I am considering how and when the experience of school stimulates and supports young people in thinking ahead to their own futures, in both particular and general ways. The curriculum is overcrowded with subject knowledge generated by previous generations. This will need to change for schools to have a future, and the guidance element may be a key force in such change.

As the pace and scale of change increases we become less able to predict what will emerge, but in a fast-changing context and in a wider range of life contexts, learning will be at a premium. Although this point may be fairly well recognized, the practices are not currently well developed for helping the school to help students be more effective learners and to contribute to

learning communities in various life contexts. Part of what will be required are the guidance activities which build and enrich students' conceptions of learning and of its elements. Thus learning about learning, or meta-learning, is a fruitful area for the guidance curriculum (Watkins, Carnell, Lodge, Wagner & Whalley, 2000). In countries where political influence has led schools to focus on "standards" and "performance", a shift of emphasis will be required. Decades of research by investigators such as Dweck (1999) have demonstrated that a focus on learning can enhance performance, whereas a focus on performance can depress performance. In the context of strong performance pressures on UK secondary schools, evidence is already emerging which shows that schools which focus on learning as an overarching theme are the ones which most improve their performance (Gray et al., 1999)

The factory school and the egg-crate curriculum are inadequate for twenty-first century learning, and our whole conception of school needs to be more that of a knowledge-generating community. This will entail challenging the twentieth century image of regarding schools as effective if they resemble well-oiled machines. "This metaphor leads to describing the jobs as interlocking parts, each playing a clearly separated function, talk of 'line managers,' monitoring performance, organisational charts and so on. It has given us the view that a 'good' organisation is an efficient organisation, and is ingrained in our everyday conceptions of organisation and order, particularly in the minds of policy makers." (Watkins, 1998, p. 170). If any constituency can help us develop our view of schools as communities it should be those who can enrich our understanding of human relations and social processes: within the school this could at best include all teachers (not solely those with a responsibility in the personal-social guidance domain), human resource managers, knowledge managers and those counselors who have managed to embed their expertise into the life of the organisation.

Concluding Remarks

Comprehensive and developmental guidance programs seem to have been most easily established in conditions of relatively high stability, adequate funding, and low political influence. Whether these conditions are likely to prevail in any country for the near future is an open question. Developments in the US have been remarkably effective at the difficult task of carving out a role and a space in high schools. On the best of occasions these doubtless make a significant contribution to the ethos and achievements of the whole school. In the future

will they be judged to have made a significant contribution to the learning orientation which young people take with them into many corners of life? The answer depends in part on how schools develop as organizations and whether they can enhance their flexibility and complexity to manage complex demands. But it also depends on the vision and voice of each professional working within the schools, and the extent to which they actively embrace the future: there lies our clearest chance. If counsellors in particular support those comprehensive guidance programs which really respond to students' needs and which really contribute to the building of learning communities, their contribution will stand to be properly valued, in any country.

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