

Rt Hon Sir Keir Starmer KCB KC MP
10 Downing Street
London
SW1A 2AA

Dear Prime Minister

We, the undersigned, represent a coalition of organisations and membership and professional bodies across the construction and built environment sectors of the UK economy. Together, we set the standards, accredit professionals, and support employers and members in building the workforce capabilities that underpin the UK's economic and social prosperity.

The Governments pledge to build 1.5million new homes over the next 5 years will rely on the skills, knowledge, experience and behaviours (SKEB) of the workforce to deliver this objective.

This relies on having suitably trained individuals working in the construction sector. However, the recent announcement from Skills England that apprenticeship reforms are set to reduce the apprenticeship requirements is cause for concern as it will result in severely weakening the pathway to required training. The proposed reforms include shortening the minimum duration of an apprenticeship to just 8 months as well as mandating a new end point assessment (EPA) that favours a shorter, high-level assessment plan over the current final, impartial stage of an apprenticeship. These proposed government led changes, we believe, will spell disaster for the construction industry and undermine the Government's ambition to generate economic growth.

The Department for Education has unfortunately continued to ignore a key construction representative in the pilot scheme, British Woodworking Federation (BWF), and set an ambitious timeline which is not suitable for the industry at level 2. This view is endorsed by many within the construction sector, which is working post Grenfell to increase the SKEB of the construction industry to negate any such occurrence in the future on all buildings.

Ignoring industry voices

As one of five "test pilots" subjected to Skills England's "*ambitious timeline*", the BWF has seen, first hand, the negative impact these reforms will have; casting doubt on the competence of an individual who undertakes the Site Carpentry and Joinery Level 2 apprenticeship under these new plans. An effective consultation process should allow for formal discussion and the opportunity for all impacted stakeholders to provide feedback. However, this consultation process has been clumsily managed and forced upon industry with unrealistic timelines imposed. At every step of the process, the feedback provided by employers, awarding organisations, training providers and trade bodies has either been ignored or pushed aside by Skills England, with the line "*we are following principles set by the Department for Education*".

When the new assessment plan is released, it will not be reflective of employers and industry needs – undermining employer confidence and resulting in fewer apprentices taken on by

employers in the construction industry. We also believe that this is in breach of the Institute for Apprenticeships and Technical Education (Transfer of Functions etc) Bill setting up Skills England.

The race to the bottom

One of the most contentious parts of the proposed changes is the use of 'sampling' within a competence-based assessment. Previously apprentices needed to demonstrate they can meet all of the Knowledge, Skills and Behaviour criteria. Under the new proposals each assessment organisation will be asked to select a smaller sample of criteria to assess and use that to infer the apprentices' overall competence. Whilst Skills England have gone on to qualify the use of sampling somewhat, it is likely any form of sampling will create inconsistency across different assessment providers and stimulate a race to the bottom, as providers are incentivised to create lighter touch assessments to secure better pass rates and cost efficiencies.

Putting the industry at risk

What is clear is that once the five test assessment plans have been released, the new reforms will be applied to all apprenticeships in the construction sector. This threatens the whole skills system, including the issuing of CSCS cards, which are a requirement of the Construction Leadership Council (CLC) and the backbone of our industry. If the reforms move ahead, CSCS will no longer recognise apprenticeships as they will not be confident individuals who have met the minimum standard to demonstrate competence and safety. This removes a clear pathway to a skilled, qualified and competent workforce, and puts more pressure on an industry already suffering a widely acknowledged skills shortage and aging workforce.

Worryingly, the new planned reforms are in direct conflict with legislation set out in the Building Safety Act 2022 and the call from Dame Judith Hackitt for a "universal shift in culture" to ensure properly qualified and competent individuals work on buildings. The work of the Industry Competence Steering Group (ICSG) - in particular Sector Lead Group 10 Installer and Trades - is now in a precarious place as many of the competence frameworks have apprenticeships embedded as a route to competence.

If the reforms continue, the quality of training will be diluted or "dumbed down" and individuals will not be able to demonstrate they have the right skills, knowledge or behaviours to meet the occupational routes to competence. This disruption will lead to the removal of apprenticeships from the competence frameworks, which will be a big blow for the construction industry that has invested significant time and money in developing recognised and robust apprenticeships. As the apprenticeship has been led by businesses with industry at its core it is surprising that these reforms are not driven by, but in direct opposition to industry recommendations.

Cost over competence

Finally, the new Secretary of State for Housing Steve Reed MP has recently vowed to "build, baby, build", as part of the next phase of getting Britain building faster and the commitment to deliver 1.5 million new homes. It is estimated that an additional 250,000 new construction workers will be required to meet the housing target. However, the proposed changes to apprenticeships will threaten both the quality of training and build safety, if the very system that ensures competence is dismantled.

This risks giving the impression that the Government is focused on reducing the cost of an apprenticeship rather than ensuring people have the required skills, backed by industry

experts, needed to install correctly safety critical products across all the construction sector. If Skills England continues down this path, we risk another Grenfell on the 1.5 million homes, sending the message from the Government that construction needs to concentrate on cost cutting over skills. This is in direct contrast with the recent announcement at the Labour Party Conference to target more inclusive vocational careers and encourage young people to get a "gold standard apprenticeship". It is a very ambiguous claim to make when the reforms are reducing the standard. This will take us back to the pre Grenfell mentality rather than responsibly delivering quality construction, created by suitable trained workers delivering complete building safety and compliance.

Next Steps

We are calling for the following:

- The creation of Skills England under the Institute for Apprenticeships and Technical Education (Transfer of Functions etc) Act 2025 was set up to reflect all the processes that were under the governance of IFATE. However, Skills England is now in breach of the Act as it is creating the end point assessment plans excluding industry "*groups of persons, which typically means employer-led trailblazer groups*", which was the recognised route to end point assessment compliance.

The new approach negates industry involvement which means that the Awarding Bodies are now setting and marking their own homework with Skills England's endorsement resulting in apprenticeship assessment plans being exempt from industry input. We ask that this situation is corrected.

- Government to suspend application of the proposed apprenticeship reforms and to actively engage with the construction industry to help increase the competence of individuals.
- For Department of Work and Pensions and the Department For Education to actively work with Ministry of Housing Communities and Local Government and the Building Safety Regulator to support and recognise the Industry Competence Steering Group (ICSG) - in particular Sector Lead Group 10 Installer and Trades the SLG 10 routes to competence where an apprenticeship is embedded or one needs to be developed to support the Building Safety Act.
- To move away from allowing end point assessment organisations to develop their own end point assessment process as this leads to a race to the bottom to rush learners through and draw down funding whilst trying to demonstrate they are increasing numbers on programme.
- Reinstate the allowance of tolerances in the assessment plan, especially when this comes to practical trades and working with life safety critical products.
- Allow trailblazers and industry to set the mandatory requirements within the assessment plan and increase the 30/40% ruling where it's impossible to match this for demonstrating an individual's competence especially when working with life safety critical products.

- Against this background we would welcome a meeting or roundtable with the Secretary of State to discuss our concerns.

We look forward to your response and to working together to build a stronger, competent workforce.



Yours sincerely,

Helen Hewitt – Chief Executive Officer, **British Woodworking Federation**

Cc: Minister of State for Skills, Department for Education - Rt Hon Baroness Smith of Malvern, Secretary of State for Work and Pensions – Pat McFadden, Chief Secretary to the Treasury – James Murray MP, Chief Executive Officer of the National Infrastructure and Service Transformation Authority (NISTA) – Becky Wood

Signatories

- Pete Clark – Chief Executive Officer, **Association of Fencing Industries**
- Ken Price - Managing Director, **Automatic Door Suppliers Association**
- Wendy Belfield - **BEMS Controls Engineer Trailblazer** Chair and member of the **Industry Competence Committee**
- Mark Tovey – Chair, **British Drilling Association**
- Tom Bowtell – Chief Executive Officer, **British Coating Federation**
- Damian Walters - Chief Executive Officer, **British Institute of Fitted Interiors Specialists**
- Jill Nicholls – Director of Competence & Compliance, **Building Engineering Services Association**
- Catherine Walker - Executive Officer, **Building Controls Industry Association**
- Steven Mullholland – Chief Executive Officer, **Construction Plant-hire Association**
- Richard Catt - Chief Executive Officer, **Contract Flooring Association**
- Mike Smith - Director of Technical and SH&E, **Electrical Contractors Association**
- Brian Berry - Chief Executive Officer, **Federation of Master Builders**
- Ciaran Jennings - FPS Secretary, **Federation of Piling Specialists**
- Iain McIlwee - Chief Executive Officer, **Finishes and Interior Sector**
- Jay Parmar – Chief Executive, **Joint Industry Board**
- Clive Dickin - Group Chief Executive Officer – **National Access and Scaffolding Confederation & Construction Industry Scaffolders Record Scheme**
- Neil Ogilvie - Chief Executive, **Painting & Decorating Association**
- Jason Phillip Jermany - Sector Skills Manager, **Road Safety Markings Association**
- Andrew Orriss, Chief Executive Officer, **Structural Timber Association**
- Marion Marsland - Chief Executive Officer, **Thermal Insulation Contractors Association**
- Caroline Sudworth - Director, **Technical Apprenticeship Consortium (TAC)**
- Jason Poulter – National Officer (Construction), **Unite the Union**