

## **Unite submission to House of Commons Education Select Committee Call for Evidence on Further Education and Skills**

This response is submitted by Unite the Union, the UK and Ireland's largest trade union with 1 million members across the private and public sectors. The union's members work in various industries including transport, manufacturing, financial services, print, media, construction, energy generation, chemicals, local government, education, health, and not-for-profit sectors. Unite also organises in the community, enabling those who are not in employment to be part of our union.

### **Curriculum and qualifications in further education**

- 1) It is imperative any new reformed system, including the transfer of the Institute for Apprenticeships and Technical Education's (IfATE) functions into Skills England, is "industry led" and governed by industry for industry. This should consist of a full voice for working people and employers from the relevant and most representative independent employers' trade associations and trade unions, supported by industry subject matter experts from sector skills / standards setting bodies, clients and government, professional institutes, technical bodies, Further Education (FE) and Higher Education (HE).
- 2) Industry led national skills bodies should be in place at sectoral level, and coordinate between the four nations. UK wide recognition and consistency of occupations, skills and standards are essential for labour national mobility, standardisation, skills, and competence. Working closely with Skills England, the devolved administrations and industry, such UK wide sectoral industry bodies would also undertake LMI (Labour Market Intelligence) research for future skills forecasting, and prepare industry specific careers advice and signposting for both prospective entrants, learners and the existing workforce.
- 3) In line with above, since the demise of UKCES (UK Commission for Employment and Skills), National Occupational Standards (NOS) have been hosted for all the UK nations by Skills Development Scotland. Unite believes that Apprenticeship Standards and IfATE "Occupational Standards" (being different to NOS, creating confusion in terminology) in England, should in turn map to NOS as high-level reference points, not least in regard to avoiding occupational fragmentations and maintaining a common set of reference criteria recognised UK wide (for NOS see: <https://www.ukstandards.org.uk/en>).

### **Delivering further education**

- 4) Reforms emanating from a review of the Apprenticeship Levy converting into a Skills and Growth Levy should not have negative unintended consequences regarding available apprenticeship funding, e.g. when a more flexible levy is introduced, that this should not have any detrimental impact upon funding for apprenticeships.
- 5) The "Economic and Fiscal Outlook", published by the OBR (Office for Budget Responsibility) in October 2024 (<https://obr.uk/economic-and-fiscal-outlooks/>) shows annual Apprenticeship Levy receipts of £3.8 billion for the 2023-24 tax year, which it is predicted will further climb to £4 billion for the 2024-25 tax year, rising to £4.7 billion through to the 2029-30 tax year. With the current annual budget allocated by the previous government to Apprenticeships in England for 2024-25 standing at £2.7 billion, and £500 million for the devolved administrations, this would leave the

Treasury with an estimated £800 million of additional money generated by the Levy for the 2024-25 tax year alone.

- 6) Therefore, government should ensure that all revenues (including those held after the 24-month period for drawing down levy funding) collected via the Levy by HMRC are subject to ongoing hypothecation (i.e. ring fencing) by HM Treasury for onward investment in apprenticeships. Hypothecation was originally recommended by Professor Dame Alison Wolf in 2015: (<https://feweek.co.uk/professor-wolf-calls-for-all-employers-to-pay-apprenticeship-levy-as-she-rejects-conservative-manifesto-funding-plans/>).
- 7) Funding allocation should ensure that any review should establish that Levy funding be particularly targeted at occupations critical to the success and wellbeing of the economy and society, identified by sound and objective LMI (Labour Market Intelligence) (e.g. identified critical occupations, including in construction and built environment, energy and utilities, technical, engineering, science, health and care, manufacturing, infrastructure, transport, aviation, aerospace, defence, environmental, education etc.).
- 8) Any reformed Levy with a broader remit should not fund identified low value “dead weight” training by employers, i.e. training that would have taken place, and will take place, regardless of levy funding.
- 9) Regarding apprenticeship funding for SMEs, the reforms for small businesses that came into effect on 1<sup>st</sup> April 2024 should be maintained, whereby apprenticeships commencing in micro and small businesses from 1st April 2024 have been fully funded for the cost of training for anyone up to the age of 21.
- 10) Concerning the above, consideration needs to be given to removing the 21 years old age cap and expanding this provision to all ages regarding apprenticeship funding. For younger apprentices and disadvantaged groups, enhanced incentives to employers also need to remain in place.
- 11) Further regarding the above two points, training providers with whom Unite work and supports can vouch that as they had to collect the previous 5% of the training and assessment costs for their apprentices from applicable employers, this has seen them pursuing many micro and SME businesses for outstanding (arguably negligible) amounts, in many cases to no avail. However, combined the amounts owed to a provider from multiple employers can build up significantly, in turn negatively affecting their training provision, infrastructure and resource. Considering the issues encountered by providers in collecting outstanding amounts from micro and SME (non-levy) businesses under the previous system, Unite believes that this reform should be maintained by the current government, and its impact monitored. (See: <https://www.gov.uk/government/publications/apprenticeship-funding/apprenticeship-funding>.)
- 12) Unite strongly believes that for effective and prudent utilisation of available funding, a ‘carrot and stick’ approach is required, with compulsion built into the system. The considerable leverage potential of procurement mandating meaningful quotas of apprenticeship placements and training into government, public and infrastructure contracts, projects and supply chains should be utilised to its full potential. Mandating such socially responsible procurement and contractual measures for securing the skills pipeline for future talent cannot be underestimated. This in turn would reward good employers who wisely and rightly invest in apprentices, people and skills, as well as introducing elements of both compulsion in the system to develop and upskill learners, alongside financial incentives and grants for employers to engage.

- 13) Skills England should undertake a meaningful and objective review of Apprenticeship Standard funding levels, which have steadily fallen behind in real terms since 2016, regardless of recent increases emanating from funding level reviews. This is to ensure the very best in resources, quality and standards in the delivery of UK skills and training provision for British industry, and that apprenticeships standards are attractive to deliver for providers, rather than some seeking the quickest and easiest apprenticeships to deliver for their own financial reasons rather than the long-term benefit of the UK skills base and economy.
- 14) Funding of expensive Higher and Degree Apprenticeships should be objectively and periodically reviewed. This is to ensure that funding is targeted and utilised for apprenticeships in required occupations (from intermediate, through to advanced, higher and degree apprenticeship programmes), importantly not least for young people, required for the wellbeing of the economy, environment, and society. Precious levy funding should not be drawn down to fund highly paid senior management undertaking degrees under the guise of an 'apprenticeship', which unfairly diminishes the pot of funding available for bona fide skills, apprenticeships and young people. There are examples of important degree apprenticeship programmes that have been developed in the sciences, medicine, technology and engineering etc. which should be supported.
- 15) The principle of the "free courses for jobs" funding initiative under the DfE should be maintained, and furthermore developed, promoted and expanded. Funding should be available to workers and employers for industry recognised upskilling and CPD (e.g. in construction, access to additional training and CPD for qualified craft and technical workers, for instance training in low carbon, environmental and new and emerging technologies, competence, fire safety in buildings and overall building safety etc., for the safety of residents, the public, consumers and workers), Furthermore, access to funding for industry recognised VQ and experienced worker assessments would be a sound investment in safety, competence and enhancing productivity and growth.
- 16) Financial safeguards must be in place, so that as the Levy evolves into a broader growth and skills remit alongside apprenticeships, that only industry recognised / regulated training, assessment and certification should be funded, delivered by regulated training providers, as is the case under the current Apprenticeship Provider and Assessment Register (APAR). Lessons must be learnt from the past where rogue providers gamed the system for nefarious financial reasons.
- 17) Notwithstanding the above, enhanced regulation of all training providers is required, as is already the case for providers registered with the APAR. Robust safeguards must be put in place by both government and awarding organisations to protect learners and employers investing in skills themselves or through public funding, eradicating misleading or scam training by rogue training providers, whilst supporting bona fide industry recognised and endorsed training, courses, qualifications, and assessments.
- 18) Safeguards are also urgently required to financially protect learners and employers should a training provider cease trading, to facilitate an orderly transfer of learners to a suitable alternative training provider should such an occurrence take place (the collapse of Options Skills in March 2024 being a prime example). (See <https://www.itv.com/watch/news/trainee-electricians-and-plumbers-have-qualifications-and-thousands-in-pre-paid-fees-taken-away/g70gshn> and <https://www.the-esp.org.uk/options-skills-ceased-trading-tesp-advice-to-learners/>).
- 19) Adult learners hoping to change careers or upskill should be able to do so with confidence but often struggle to obtain financial or any other support. Because of this, many learners never complete their training to become fully occupationally competent and qualified, locking thousands of potential future skilled workers out of the employment and careers they aspire to. A reformed

system must eliminate such issues and enable meaningful access to funding for individuals as well as businesses and organisations. With this in mind, the UK Government should look at initiatives in Wales such as Personal Learning Accounts (PLAs), Young Person's Guarantee for education, training, apprenticeships and jobs, and for people having been made or facing redundancy, ReAct+.

20) World class lecturers, teachers, assessors, and training infrastructure are essential. Attracting skilled people into FE roles (teachers, assessors, IQA, EQA etc.) is inextricably linked to the successful delivery of routes into industry, and subsequent supply of skilled, qualified, safe, competent people for delivering quality, safety and the drive for net zero. FE/HE cannot sustainably continue along the path of austerity in wages over the past 15 years. In order to retain staff and attract the necessary skilled recruits from industry into Further Education and training roles, employment reward needs to be attractive and meaningful, not least taking into account and matching industry rates of pay and benefits etc.

### **Skills and apprenticeships**

21) Unite sees a major role for increasing apprenticeships to end skills gaps across sectors of the economy. The following six points utilise the Unite apprenticeships charter, outlining key principles that a quality apprenticeship programme should entail:

**I. An apprenticeship will be an identifiable job with a purpose.**

All apprenticeships will have identifiable job roles, progression opportunities and a secure pathway to future employment. Successful completion of a quality apprenticeship should create a firm foundation for the rest of an individual's working life, leading to a recognised occupational status and qualification.

**II. All apprentices will receive a fair rate for the job and rights at work.**

Apprentices must have parity of terms and conditions with other employees. All apprentices must be treated with dignity and respect in the workplace, enjoy the same rights as any other worker and not be used as cheap labour. Rates of pay for apprentices should be agreed within collective bargaining arrangements where these exist at the relevant company/sectoral/national level.

**III. Apprenticeships should deliver high quality training and provide clear skills development.**

The completion of an apprenticeship should embed key skills sets for future employment. Successful completion of an apprenticeship must provide a worker with a recognisable occupational qualification. An apprenticeship should be of meaningful duration, ensuring that the necessary competence requirements are delivered, featuring high quality on and off-the-job training in pursuit of the chosen occupation. Upon completion of an apprenticeship workers should be offered permanent skilled jobs

**IV. Offer apprenticeships to existing staff and employees to enable upskilling and occupational opportunities for the workforce.**

Workers currently employed should continue to be able to undertake apprenticeships. Developing these opportunities will allow existing staff to upskill and support the positive occupational outcome that access to an apprenticeship can bring.

**V. Trade union engagement and involvement with apprenticeships at every level**

Trade unions must be involved in the development and delivery of apprenticeships at company/sectoral/national level. Best practice sees union representatives with industrial knowledge as central in the negotiation of apprenticeship programmes, including a clear role in supporting and representing apprentices with any related concerns with their employer, training provider or delivery of the apprenticeship.

**VI. Ensure apprenticeships are accessible and achievable for everyone.**

A good apprenticeship programme can play a crucial role in building a more diverse and inclusive workforce through positive wide-ranging engagement, recruitment and selection, helping everyone realise their potential. Apprenticeships provide a greater opportunity for employers to go into the community and reach out to more women, black and Asian ethnic minority, disabled and LGBT+ workers encouraging them to take up these roles.

22) Regarding defining genuine quality apprenticeships, Unite would remind the Committee of item 46 of R117 - Vocational Training Recommendation, 1962 (No. 117) by the International Labour Organisation (ILO), who still identify it as a key reference point, stating that: "*All in all, Recommendation No. 117 provides a valuable and precise starting point for defining apprenticeships.*". The Recommendation clearly defines an apprenticeship as: "*Systematic long-term training for a recognised occupation taking place substantially within an undertaking or under an independent craftsman should be governed by a written contract of apprenticeship and be subject to established standards.*"

(<https://www.ilo.org/topics/apprenticeships/publications-and-tools/digital-toolkit-quality-apprenticeships/what-are-quality-apprenticeships/ilo-definition-quality-apprenticeships>), and further the ILO's R208 - Quality Apprenticeships Recommendation, 2023 (No. 208) corresponding to a Framework for Quality Apprenticeships ([https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_INSTRUMENT\\_ID:4347381](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:4347381)).

23) In regard to the above, recent Department for Education announcements regarding "*shorter apprenticeships*" (<https://www.gov.uk/government/news/10000-more-apprentices-as-government-slashes-red-tape-to-boost-growth>) have caused some serious concerns within industry, not least in regard to safety critical occupations. Competence is key, encompassing skills, knowledge, experience and behaviours. Within that, experience can only be achieved in a meaningful timeframe in order to deliver suitably qualified and experienced personnel, who can work safely, competently and efficiently, and work to industry pace and quality.

24) Notwithstanding this, under specific circumstances, for suitable candidates who have relevant mappable experience and/or learning, accelerated apprenticeships can, and have, been delivered utilising accreditation and recognition of prior learning (APL/RPL). It should also be noted that for older workers, an Experienced Worker Assessment approach may prove more suitable and cost effective to an apprenticeship, for the delivery of competence-based qualifications to the recognised industry standards. However, the correct route can only be ascertained on a case-by-case basis specific to the individual. The announcement states that "*One of Skills England's first orders of business will be to identify which apprenticeships would be best served by the shorter duration approach*". Unite points out that there are also potential industrial relations issues here, whereby skilled working people will not tolerate the deskilling or undermining of their craft or occupation that they proudly hold dear. Therefore, any review must be done with the participation and consensus of stakeholders from the relevant representative employers' trade associations, trade unions, technical, educational, and training bodies, and professional institutes.

25) Unite will also not support a ‘modular’ piece meal approach to the delivery of training and qualifications, whereby workers are promised jam tomorrow, believing they will achieve the occupational status they aspire to. However, they then find themselves being taught to undertake tasks, rather than becoming competent in broader occupational functions towards achieving full occupational status. People are then left marooned at an unqualified or under-qualified level and utilised as cheap labour.

### **Supporting young people, widening access, and narrowing the attainment gap**

26) Pathways to apprenticeship for e.g. full-time Further Education (FE) learners should be properly integrated into the system, including a “clearing house” approach, with apprenticeships guaranteed for those achieving the requisite grades for entry into corresponding apprenticeship programmes. Investing in the domestic labour pool for the future is essential. The longstanding and current absurd scenario seen in industries like construction and engineering services, where demand for apprenticeship placements far outstrip the number of places available cannot continue. The number of learners in full-time college provision persists, with for many their learning then not translating into apprenticeship placements and good quality employment with prospects. This is whilst substantial Labour Market Intelligence continues to identify areas of industry that stand at a skills cliff edge, in regard to addressing skills gaps and skills shortages, and delivering the growth and improvements the UK economy needs.

27) Linked to the above, as an example of issues in the current FE system, the electrical contracting industry through TESP (The Electrotechnical Skills Partnership) upon which Unite sits with the ECA (Electrical Contractors’ Association) and SELECT employers’ trade associations, combined with further research by ECA and the industry’s charitable training provider for England and Wales JTL, LMI research published in November 2023, identified that *“In almost every LSIP area, classroom based enrolments outnumber apprentice starts – in some cases by very considerable margins.”* and *“ECA is calling for LSIP areas to adopt measures to rebalance local provision away from potentially ‘dead end’ classroom-based courses and towards more apprenticeship places.”* and *“typically fewer than 10% of learners enrolled on these classroom based qualifications subsequently progress into an apprenticeship. Such low progression rates give an impression of a scandalous waste of talent, alongside serious doubts about value for money.”*. The ECA’s 2023 Skills4 Electrification report can be viewed here: <https://www.the-esp.org.uk/wp-content/uploads/2023/12/ECA3740-LSIP-Summary-A4-web-2.pdf>.

28) Pre-apprenticeship entry level programmes, traineeships and bootcamps etc. have been delivered in England with mixed success and result over recent years. Unite would point to a straightforward initiative in Scotland for pre apprenticeships, between SECTT (Scottish Electrical Charitable Training Trust), local colleges and industry. Approximately 80 per cent of pre-apprenticeship learners who undertake the programme have been converting to successful apprentice starts. The other 20 per cent have gained work ready skills for other areas of industry. An example is here: <https://www.glasgowclyde.ac.uk/courses/53993-preapprenticeship-electrical-installation-level-5-august-to-january>.

29) Enhanced promotion of apprenticeships in schools and colleges is also required, as a vocational route leading to rewarding lifelong careers and occupational identity and status, alongside the academic route. In many advanced European and western countries, and indeed globally, apprenticeships are held in equally high esteem as Higher Education via university.

- 30) Regarding the need to promote equal value between apprenticeship/vocational and University pathways, a positive suggestion can be seen at the following link by the LSE's Centre of Economic Performance, on applying the 1963 Robbins Principle to apprenticeships, whereby apprenticeships would: "*be available to all who were qualified for them by ability and attainment*". See here:  
[https://cep.lse.ac.uk/\\_NEW/PUBLICATIONS/abstract.asp?index=10493&mc\\_cid=aae297e53d](https://cep.lse.ac.uk/_NEW/PUBLICATIONS/abstract.asp?index=10493&mc_cid=aae297e53d)

### **Additional points on skills and industry**

- 31) A serious industrial strategy which addresses skills requirements for a low carbon economy, and in anticipation as part of an economic policy securing industrial futures, skilled jobs and pathways to work.
- 32) An emphasis on quality as well as quantity of apprenticeships, with skills and levy funding investing in targeted future skills and workplace skills development.
- 33) Bogus self-employment / false employment, and the gig economy undermine skills investment across industry. The government's plans to introduce a single status of worker are imperative for strengthening skills delivery. Direct employment is precursor to positive apprenticeship outcomes. (See Construction Leadership Council and JIB positions:  
[https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2019/06/CLC-Skills-Workstream\\_Future-Skills-Report\\_June-2019\\_A4-Print-Version.pdf](https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2019/06/CLC-Skills-Workstream_Future-Skills-Report_June-2019_A4-Print-Version.pdf) and  
[https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2019/06/CLC-Skills-Workstream\\_Future-Skills-Report\\_June-2019\\_A4-Print-Version.pdf](https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2019/06/CLC-Skills-Workstream_Future-Skills-Report_June-2019_A4-Print-Version.pdf) and  
<https://www.jib.org.uk/campaigns/direct-employment/>).
- 34) Effective 'Just Transition' sectoral policies must include opportunities for the existing workforce to develop the new and updated skills required for future work and industry – this should involve creating tripartite agreements involving unions/employers/government.
- 35) Consideration of models to ensure no loss of skills because of closures – including the ability of workers to be seconded across high technology manufacturing sectors.
- 36) Necessary investment in STEM vital for industry, aerospace, manufacturing. Unite is seeing shortages of engineering/craft skills commonplace among certain sectors (oil and gas, aerospace).
- 37) Unite is calling for a 'risk register' to identify workplaces at risk and a serious upskilling and skills retention programme. Workers within sites/industries at risk either already have the necessary skills to work on new products or have the willingness and potential to be upskilled to work on new products (e.g. automotive, oil and gas, manufacturing).
- 38) MoD and other governmental departments to work with business and trade unions to support and develop a wider national apprentice programme. Create a UCAS style apprentice clearing system and 'apprenticeship passport' so that all defence (and civil) manufacturing benefits and shares the pool of young talent. This would be extremely popular as it would counter the ongoing skills shortage which left unchecked will become a crisis and potentially endanger the ability to deliver on defence programmes.

39) Automotive - Unite's view is that developing and supporting the component supply chain is critical to 'anchoring' large vehicle assembly plants in the UK and allowing the industry to positively compete with new entrants by leveraging the cost benefits of vertical integration.

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