

Industry Training Board Reform Government consultation

Before submitting your responses, please ensure you have fully read the ITB reform consultation document.

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

Privacy Statement

As part of this consultation, the Department for Work and Pensions (DWP) will collect, store, and analyse the responses you provide. We may use AI-assisted tools to help us review and understand the themes and issues raised across the responses. These tools may form part of the analysis process and could be used alongside wider analytical approaches. The information you provide may be shared with relevant teams within DWP, and with other government departments. We may draw on your responses when producing summaries of the feedback received and when preparing a published consultation report.

About you

1. If you are happy to provide the name of your organisation, please do so here. This is not required to complete your response and will not form part of any published data.

Unite the Union

2. What type of organisation are you responding on behalf of?

Construction employer

Engineering construction employer

Employer in another sector

ITB Prescribed Organisation

Other trade body or federation

Certification body

FE College

Other training provider

Assessment Organisation

Union ✓

Other business (e.g. a client, developer, operator or Asset Owner)

3. In which nations/areas does your organisation carry out its activities in Great Britain? (please tick all that apply)

England ✓

Scotland ✓

Wales ✓

Offshore (UK Continental Shelf) ✓

4. What is the size of your organisation in Great Britain?

Micro (9 or fewer employees)

Small (10-49 employees)

Medium (50-249 employees)

Large (250–999 employees)

Very large (1,000+ employees) ✓

5. What industries is your organisation associated with?

Construction

Engineering Construction

Both ✓

Neither

6. Which subsector(s) are the activities of your organisation primarily engaged in? (please tick all that apply)

Homebuilding ✓

Civils ✓

Commercial ✓

Infrastructure ✓

Energy ✓

Process industries ✓

Repair and Maintenance ✓

Plant (hire and operators) ✓
Scaffolding ✓
Offsite Construction Manufacture ✓
Oil and gas ✓
Power generation ✓
Nuclear ✓
Renewables ✓
Chemicals ✓
Pharmaceuticals ✓
Food and drink processing ✓
Water treatment ✓

7. If you are a construction or engineering construction employer, are you registered with the CITB or the ECITB?

CITB

ECITB

Both

Neither

N/A

8. If you are registered with an ITB, what type of levy assessment do you receive? (please tick all that apply)

Exempt from levy payments

Reduced rate levy payment (CITB only)

Full levy rates

Don't know

N/A

Consultation questions

Approach to ITB reform

1. Do you agree with the proposal to create a single, unified ITB by bringing together the CITB and ECITB?

Yes

No ✓

Don't know

2. Please explain the key reasons for your answer to question 1. *(Please answer in up to 500 words.)*

Whilst the CITB and ECITB have a shared core purpose, i.e. addressing market failure in industrial training through intervention, this is in their respective spheres of expertise. Building, construction and civil engineering (CITB), and Engineering Construction (ECITB) are two very different areas of industry, the latter having evolved from the EITB, with both ITB's very distinctive scope of activities covered under their respective UK Statutory Instruments.

In Unite's opinion the two distinct ITBs' should remain so and not be conflated.

The CITB oversees a very fragmented, diverse array of in-scope activities, employers and workers, from micro and small builders, to large commercial and civil engineering construction, encompassing new build, repair, maintenance and retrofit, across domestic, commercial and infrastructure, with approximately 47,378 in-scope employers (approximately £228m in levy per year), employing or engaging a substantial number of the estimated 2.6m construction workforce in England, Scotland and Wales.

Conversely, the ECITB census 2024 identifies 94,680 workers (source: ECITB), across 297 in-scope companies paying approximately £35m in levy per year (source: DWP/ECITB June 2026).

Moreover, established Engineering Construction sites and projects are predominantly large capital project client dominated, representing a significantly different customer base to general building, construction and civil engineering. Whether new build, long term repair and maintenance, or turnarounds and events throughout England, Scotland and Wales, onshore/offshore oil and gas, and onshore/offshore energies across the UK Continental Shelf and GB Territorial Waters, the scope of work covered, specialised occupations and skills required are in the main inherently different.

Engineering construction supplies a critical service to UK energy, process and key infrastructure, without it, put simply "the lights would go out". There are substantial differences between what constitutes Construction (which incorporates the building

industry through to civil engineering) and Engineering Construction, therefore we reiterate that the two should not be conflated or confused.

Engineering Construction sites and installations (both onshore and offshore) are safety critical, representing major accident and environmental hazards should something go wrong. The industry's remit includes, but is not limited to, oil and gas, power generation, UK steel (inclusive of the transition to clean steel), nuclear new build, nuclear decommissioning, nuclear waste processing and storage, renewables, chemicals, pharmaceuticals, food and drink processing and water treatment, including COMAH (Control of Major Accident Hazards) regulated sites, process, procedure, competence, health and safety and controlled methods of working are culturally embedded within many parts of the Engineering Construction industry.

In the interests of our engineering construction members and the companies who employ them, Unite are seriously concerned that if a merger were to go ahead, despite reassurances in the consultation document around mitigations regarding the interests of all sectors represented in a new single entity, that engineering construction would be absorbed and consumed by the larger CITB. This would be to the detriment of the UK engineering construction industry, its clients, workforce, employers, and ultimately the critical infrastructure of the UK.

3. What do you see as the most significant potential benefits of a single, unified ITB and how might these be maximised? *(Please answer in up to 500 words.)*

Please refer to the question 1 answer, where Unite argue for maintaining two separate and distinct ITBs.

4. What do you see as the most significant potential costs and risks of a single, unified ITB and how might these be mitigated? *(Please answer in up to 500 words.)*

A significant financial issue is the setting of the relevant Levy, please refer to the answer to question 9 for more information.

Unite the Union represents craft, technical, professional and support workers and staff across the total construction and built environment, and engineering construction industrial processes. Our own internal structures recognise the distinct differences between the two, coming from very different areas of industry and traditions. Furthermore, the union represents staff members at both ITBs, whom have significant expertise in their respective areas. Feedback canvassed from colleagues has raised consistent concerns about the creation of a unified ITB. These include:

- Loss of sector-specific focus.
- Reduced confidence in how levy funds are used.
- Risk of training becoming diluted.

- Strong concerns about disruption from a merger exacerbating existing skills shortages.
- The loss of both CITB and ECITB as longstanding and widely recognised trusted bodies within their respective areas and specialisms.
- Reduced local support for new entrants and SMEs.
- The potential for job losses across both organisations and ‘restructuring’ resulting in a loss of expertise and reduced service capacity.
- A recurring theme throughout the feedback is concern that the ECITB, as a significantly smaller and more specialised organisation, would lose its identity, influence and sector focus within a much larger CITB dominated structure.
- Collaboration between the two organisations already exists through joint working arrangements established following the Farmer Review. For instance, the Research teams for each ITB have been collaborating with each other for at least 8 years, and that closer cooperation would continue without any need for a structural merger.
- Concerns have been raised from all quarters regarding governance and representation, questioning how engineering construction interests could be fairly represented within a new body where the CITB represents a substantially larger employer base. There is significant scepticism about assurances that sector representation would be maintained, noting that little detail has been provided regarding governance arrangements, board composition or decision-making processes. There is also concern within engineering construction that the consultation process itself may not adequately reflect ECITB voices due to the comparative scale of CITB participation.
- ECITB is often perceived as more employer-led, technically focused, and closely aligned with the needs of its specialist engineering construction sectors, contributing to its generally stronger reputation among industrial employers.
- The contrast between the two ITBs in terms of reputation is perhaps best demonstrated by the most recent industry consultation regarding proposed levy rates. The ECITB saw an overwhelming majority of its in-scope employers vote in favour of their proposals, giving them their strongest ever mandate, in significant contrast to CITB outcomes around the same process.

Overall, the view was that the differences between CITB and ECITB are significant, and a single ITB would struggle to effectively meet the needs of both sectors and the current and future challenges they both face.

5. If you answered 'No' or 'Don't know' to question 1, please identify any other approaches to ITB reform that should be considered and the reasons why they would be more effective in meeting the employers' construction and engineering construction skills needs. (Please answer in up to 500 words.)

Regarding the consultation document where it states: “The government considered 3 other broad options for ITB reform, in addition to the preferred option of creating a single ITB using the existing primary legislation.”, option 1, which would see the retaining of the CITB and ECITB as separate legal entities and bodies with stronger

collaboration is the most logical way forward, building upon strategic working , for example ongoing strategic collaboration at the Hinkley Point C and Sizewell C projects, and expertise from both industries in areas where overlap exists such as structural steel and scaffolding.

It would also make sense to collaborate in more generic areas including:

- The CITB's New Entrant Support Team (NEST) for apprenticeships, pathways and placements into the array of skilled occupational pathways available for young people and people transitioning in careers to pursue, and likewise the ECITBs scholarships programme.
- Labour Market Intelligence (LMI) and workforce planning and utilisation, not least to support the major infrastructure planned pipeline of projects and work, including large scale nuclear new build (NNB), small modular reactors (SMRs), Carbon Capture and Storage (CCS), clean steel, hydrogen, and developing low carbon energy technologies.
- Aligned to the above, major project transition from the initial large-scale civil engineering phase, through to the engineering construction phases of project programmes.
- Collaborative utilisation of CITB National Construction College (NCC) facilities, classrooms, and resources.
- As above, where overlap in equipment and procedures exist (e.g. steel erecting, scaffolding, moving, lifting and positioning complex engineering loads), increased utilisation of NCC facilities through collaboration between both ITBs.

The above examples do not require a merger, especially one that key players in industry have neither asked for nor shown a desire, but instead a strategic collaboration, that ensures the distinct roles, expertise and identities of both ITBs remain intact.

Assessing the impact of a single ITB

6. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative impacts on individuals with protected characteristics. *(Please answer in up to 500 words.)*

A merger of both ITBs would have a detrimental impact on the targeted, industry specific initiatives and priorities of both ITBs. To reiterate, CITB encompasses general construction, civil engineering and building focused in the built environment. Conversely ECITB is mechanical engineering and capital project engineering focused, from power generation through to chemicals, pharmaceuticals and process.

The CITB Construction Workforce Outlook forecasts that the UK construction industry needs to recruit 239,300 extra workers over the next five years, that being workforce growth required to meet projected industry output over and above normal recruitment levels and industry churn. Whilst the overall proportion of women, minority and underrepresented groups in the sector is slowly increasing, these groups remain stubbornly underrepresented, not least in manual and on-site trades compared to office and professional roles, with for instance only 1%-2% of the onsite workforce being women.

The Supply Chain Sustainability School's Fairness, Inclusion and Respect (FIR) Programme, partly funded by CITB, identifies that cultural obstacles persist regarding recruitment of women and ethnic minority groups:
(<https://www.supplychainschool.co.uk/diversity-survey-report-2023/>).

Furthermore, the ECITB's 2024 Workforce Census (<https://www.ecitb.org.uk/wp-content/uploads/2025/01/ECITB-Workforce-Census-2024-Report.pdf>) identifies key demographics and imbalances in Engineering Construction, including:

Age – The share of workers under 30 and over 60 has increased in the three years to 2024 to 16.8% for those under 30 and 14.7% for those over 60. The share of workers aged 30 to 59 decreased from 73.7% to 68.5% and identifies an “upcoming wave of likely retirements”.

The ECI workforce is identified as more diverse in 2024 than it was in 2021, however 83.7% are identified as being from white backgrounds, with 16.2% from ethnic backgrounds. (The data collected has local, regional, and sectoral disparities, therefore the reader should refer to the above linked report for a deeper analysis).
Gender – The share of women in the ECI increased to 16.9% in 2024. However, at occupational level and particularly in craft engineering roles, both new entrants and the existing workforce remain significantly male dominated. The ECITB identify that: “The most acute skills shortages are in occupations where men make up the vast majority of the workforce.”

The ECITB have an Inclusion, Diversity, Equality Action (IDEA) taskforce as an engineering construction specific initiative, for driving cultural change and integrating

equality, diversity and inclusion into training standards and workforce practices. UK Engineering Construction operates to very different schedules, shifts, technical engineering requirements, with a significant requirement for a mobile workforce, predominantly in what can be very hazardous environments, hence the need for very specifically nuanced and targeted initiatives by experts within the industry. The expansion of talent pools for both Construction and Engineering Construction are vital for addressing existing and emerging skills shortages, improving access for women, ethnic minorities and underrepresented groups etc. into well paid craft and technical trades, occupations and careers with prospects. The scope, environments and jobs being promoted are markedly different, and risk under a merger being consumed into a confusing and generic landscape for attracting those considering career options across UK industry, with engineering construction being sidelined.

7. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative environmental impacts. (Please answer in up to 500 words.)

As identified in answer to question 2, engineering construction sites and installations (both onshore and offshore) are distinct, engineering focused, and safety critical, representing major accident and environmental hazards if something should go wrong. This alone should make people pause and reflect before instigating a merger process. Again, Unite reiterate that separate focused ITBs should be maintained.

Options for further ITB reform

8. Please provide any views on changes that should be made to the employer activities currently in scope of the CITB and ECITB to better reflect the needs of the construction and engineering construction sectors. (Please answer in up to 500 words.)

In 1990, a number of specialist allied sectors came out of scope of the CITB. A significant reason for their leaving was that they felt their specialist skills sets were not being served by the large homogenous CITB dominated by the builders and construction companies. That chapter in ITB history should serve as a warning regarding the current proposals to merge the CITB and ECITB.

If re-extending scope is being considered as this question potentially implies, it should firstly be established that market failure actually exists in an area of industry. It should be remembered that there are also alternative models, such as the Sector Skills Councils under the now abolished UKCES, established by the previous Labour Government. That model could be re-explored as a solution for autonomous self-governance where a sub-sector was not best suited to being absorbed by a larger homogenous CITB, possibly entering and accessing the levy system if systemic ongoing market failure was found to be an issue.

A prime example of UK wide best practice, where a sector which came out of scope of the CITB and has in the main flourished, is the electrical contracting industry. The industry has its own not for profit structures and skills ecosystem, including standards setting, apprenticeship provision and delivery, careers advice, pastoral care and future skills signposting, maintenance of NOS, intrinsically linked to the delivery of end point assessments, research and LMI, with personnel certification in skills, safety and competence along with a clear pathway of personal development, deeply embedded. Unite would argue that electrical contracting is an exemplar in skills and apprenticeships when held up against many other areas of the UK economy, let alone the broader construction industry, with apprentice electricians representing approximately 1 in 4 apprenticeship starts across the total construction and built environment industrial process (recruiting approximately 9,000 apprentices per annum across the four nations; with around 7,500 in England; 1,000 in Scotland, 500 in Wales; and 500 in Northern Ireland into Level 3 Advanced Apprenticeships) yet it is not subject to the CITB levy. To bring such successful models back into scope would be a retrograde step, counterintuitive, and could destabilise what is a highly evolved system in an industry that has a proven track record which exemplifies what can be achieved when stakeholders work collaboratively together, acting responsibly and investing in their industry's long-term skills base and the industry's future needs.

9. Please provide any views on whether the maximum levy period for an ITB should be extended beyond 3 years and, if so, what the new maximum should be. (Please answer in up to 250 words.)

The triennial review period, i.e. 3 years, was the established norm for both ITBs and appears to have worked reasonably well. However, as the consultation document points out, extending the duration could help with longer term thinking and stability. Conversely it could be construed such an extension would lead to less transparency and accountability, Therefore, ultimately, the period should be determined by the in-scope constituents of the respective ITBs.

Furthermore, as per the answer to question 2, with both constituencies being distinct and different in nature and scope, if merger between the two ITBs were to take place, then those two constituencies should be treated as separate, as what may be suitable for one may not be suitable for the other in regard to the structure and level of the respective levies, which are both structured differently.