

Prime Minister  
Chancellor of the Exchequer  
Secretary of State for Education  
Secretary of State for Work & Pensions

By email

12th January 2026

## **CONCERNS OVER POLICY CHANGES FOR CONSTRUCTION APPRENTICESHIPS AND SKILLS**

Dear Prime Minister, Chancellor and Secretaries of State,

We are writing to express our Association's concerns regarding the proposed changes to construction and built environment apprenticeships in England, and the implications for qualifications in the recently published White Paper.

Unless action is taken, these reforms risk weakening the skills pipeline, undermining workforce competency, and slowing delivery across critical national priorities - including building safety, infrastructure, housing, and the transition to clean energy. We believe the changes, as currently drafted, could reduce employer confidence in training routes, constrain SME participation, and jeopardise pathways to skilled employment. The ramifications could be seen across productivity, regional growth, and public safety. We also have reservations on potential equality concerns for some learners who come from disadvantaged backgrounds.

The British Association of Construction Heads (BACH) has been in existence for over 40 years. It is a membership organisation, primarily for FE Colleges' Construction and Building Service Engineering Departments. Its membership also includes some independent training providers, major construction awarding organisations and a member of the CSCS Carding Alliance, as well as educational recruiters and facilities providers. It is not part of the Association of Colleges.

Construction employers work closely with BACH members on an ongoing basis and also contribute to the Association's bi-annual conferences.

It is appreciated that the views and concerns of the construction and built environment sector may be very different to those of other sectors.

We set out our detailed concerns under the following headings:

- Lack of Understanding of Construction;
- Apprenticeship Proposals; and
- White Paper Proposals.

### **Lack of Understanding of Construction**

The construction industry consists of a number of distinct verticals, each with a wide range of very different occupations, and therefore skills requirements:

- Building (including house building);
- Civil Engineering & Infrastructure (including energy, water and transportation);
- Building Services Engineering (BSE - including plumbing, electronic and electrical); and
- Products, Supplies and Logistics (including mining, extraction, sustainable sources and modular off-site manufacturing).

Trying to compare the wide range of occupations and skills needed against, for example, the much smaller number of GCSE and A Levels academic subjects is not appropriate.

Clean energy and green skills, with their different occupations, are part of all these verticals. However, we note that this aspect is not identified in the White Paper proposals and is not listed in the proposed V Levels or L2 pathways set out in the consultation document. We think clean energy and green skills – given their different occupational standards and reliance on infrastructure - are a significant omission from the Department for Education’s policy thinking for England.

The Department for Education’s various proposals for England over several years give the impression that it considers construction is predominantly house building. We see this in the occupations it has included in Foundation Apprenticeships and Occupational Certificates proposals. The Department does not demonstrate it understands that the largest operational and professional occupations in the construction workforce are in the Civil Engineering and Infrastructure vertical, followed by electrical in the Building Services Engineering vertical. They instead focus on what are known as the ‘biblical’ trades for building; apparently not putting forward coherent policies for skills development in civil engineering and infrastructure. Even within house building, the Department does not seem to understand that there are other essential occupations, such as electricians, plant operatives, roofers and scaffolders.

In addition, the Department does not demonstrate that it fully understands the health and safety risks in the construction verticals or the implications of the Building Safety Act 2022 (arising from the Grenfell Tower tragedy) and hence the need to have competency qualifications and behaviours beyond the proposed classroom courses. It also seems to fail to understand the full relevance of the industry’s Construction Skills Certification Scheme (CSCS), with its over two million card holders. The Department does not appear to comprehend that CSCS underpins not only health and safety, but the control of fraud, illegal immigration and modern slavery, through collaboration by the CITB fraud team and the awarding organisations with which it works.

The Department constantly refers to classroom courses, whereas the industry needs practical competency underpinned by the Skills, Knowledge, Experience and Behaviours (SKEBs) standards it (the industry) has developed.

Through the future development of a CSCS related digital skills passport, the industry will have the means of compliance with the Building Safety Act and the management of ongoing CPD and skills improvements for productivity, green skills and AI/new technologies. Again, we do not see evidence that the Department understands this.

Bearing in mind that members of BACH have decades of experience in the various parts of construction, this inability to fully engage and understand the sector undermines their confidence in what the Department is proposing.

### **Apprenticeship Proposals**

We support the proposition that modifications to apprenticeship assessments and the bureaucracy around them would help to streamline the regime and increase SME uptake. However, we agree with the letter written to the Prime Minister in November by the British Woodworking Federation on behalf of the consortia of employers and trade unions. We too are

concerned about the extensive use of sampling, reduction in quality assurance and a potential race to the bottom. The reduced quality of apprenticeships, which we believe would be the result of these issues, will mean we have a regime which is second rate in Europe and other parts of the world. This will demean the skills of the UK workforce and construction employers in a competitive global marketplace.

It is understood that, for England, the Department is also developing apprenticeship units based on Skills England standards, through the use of AI tools. The proposal is that the delivery costs of these units will be set against the employers' accounts in a new Growth & Skills Levy from April 2026. We further understand that construction occupations are unlikely to be included in the first wave of development for these units.

In principle we support the policy concept of modularisation and hence apprenticeship units. In our experience, short courses can efficiently and effectively upskill and reskill the existing workforce. However, the proposal, we understand, is currently that the apprenticeship units will not be fully and rigorously assessed and accredited. This is not acceptable for construction as all short courses, apprenticeship units and CPD will need to be accredited to comply with health and safety requirements, as well as the Building Safety Act 2022. Content must achieve competency and needs to be agreed by the employers, not solely written using AI tools.

### **White Paper Proposals (England)**

We have submitted our detailed comments as part of the formal consultation process for England. Here we summarise the main points.

The occupational structure of the Construction and Built Environment sector has two main parts, which in general are not interchangeable.

One is the professional, technical and managerial occupations (Levels 4 to 7), served by A and T Levels. If the Government is considering that one of the Level 2 pathways (Foundation Certificate) is to take students to Level 3, then it needs to design the content as progression to professional, technical and managerial occupations or an electrical apprenticeship.

The other is the operational and trade occupations (Levels 2 and 3 – blue and gold cards) which for house building and civil engineering/infrastructure are predominantly at Level 2. The best pathway for these occupations is a Level 2 competency CSCS-recognised accreditation. Learners generally need to reach Level 1, including functional English, Maths and basic digital skills, as well as 'employability skills', to prepare them for a programme which gets them to CSCS competency either by:

- Level 2 Apprenticeship which achieves competency: or
- Employer-approved Bootcamp style courses followed by an NVQ which also achieves competency. NVQ is the main qualification type recognised under the Construction Leadership Council's policy for issuing a competency card.

For Building Services Engineering (BSE), the best route is to a Level 3 apprenticeship which achieves competency for electricians.

Our overall concern regarding the White Paper for England is that the Department's proposals make the qualification landscape in construction more confusing than it is at present. In saying this we point out the industry does not find the existing NVQs confusing. The present landscape

has developed in response to diverse and evolving skills requirements requested by employers over many years. We observe that the Departmental officials themselves find it confusing. This might be due, understandably, to their lack of detailed knowledge of the industry and all its various verticals.

FE Colleges are currently turning students away due to inadequate capacity; including the lack of sufficient tutors. The tutor capacity problem has grown over the last five years and is predominantly caused by inadequate funding and pay, which successive Governments have failed to tackle. This capacity constraint will only be aggravated by the addition of a V Level and L2 pathway into delivery. It will make logistics much more complex and frankly make the offer to students and employers more confusing, at a time we understand the Government is trying to make the offer easier to understand. We are also concerned that employers will not provide the necessary work placements in the current economic climate.

Turning more specifically to the various detailed proposals in the White Paper for England, our concerns for the Construction and Built Environment sector are:

- **V Levels:** We are concerned that the mistakes made with the On-site Construction T Level will be repeated in the V Level and is therefore not the best use of tax-payers money. Accordingly, we do not see the V Level qualification as viable in the Construction and Built Environment sector, nor do we see substantial support from employers which is needed for at least the work placement component. BACH would not want to see students undertake a course where there is no clear purpose or viable occupational progression or destination. That said, we appreciate that certain T Levels have successfully supported learners into HEI for progression on to professional, technical and management roles.
- **New T Levels:** We do not see the need in the Construction and Built Environment for any more T Levels beyond the existing two. In fact, we are concerned about the future viability of the BSE T Level.
- **Foundation Certificate:** This depends on the purpose and occupational destination of the Level 3 study the learners are aiming for. If they are intended to help a learner to get to a V Level for Construction and the Built Environment, then our concerns over the need and viability of such a V Level stand. In our experience, many learners need Level 1 progressing to Level 2 programmes or apprenticeships.
- **Level 2 pathway into an occupation (Occupational Certificate):** The proposals only support some parts of house building (e.g. not plant operatives, roofers and scaffolders) and do not support all the other construction verticals. In addition, these pathways are lengthy and are classroom-based, which means they won't deliver the practical competency needed for a CSCS blue card, and therefore employment. Their duration also makes them unlikely to be sustainable.

Regarding the equality aspects of the proposals it is not clear what the impact will be for the Level 1 learners, many of whom come from disadvantaged backgrounds. This is a group that traditionally goes into construction roles, and we would not want to see them become disadvantaged.

## Summary

BACH is fully committed to developing a skills system that supports the UK Government's Missions on House Building and Clean Energy and will work collaboratively to achieve these goals. We also recognise that the White Paper proposals for England may work well in certain sectors, but not construction.

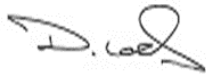
In construction, we must recognise that core skills are shared across the UK and across employers of all sizes. At the same time, we need flexibility to meet the differing needs of regions and employer scale - whether that's MCAs, new Strategic Authorities, or devolved nations such as Northern Ireland, Scotland, and Wales. We welcome the setting up of a Task Force for construction apprenticeship reform, including apprenticeship units. With the same spirit we would ask you to suspend the proposals in the White Paper for construction. The Task Force and the suspension would then allow the industry - through the Construction Leadership Council (CLC), the Construction Skills Mission Board (CSMB), the Sector Skills Councils and the Building Safety Regulator - to develop apprenticeships, training programmes, competency assessment and accreditation regimes that deliver what is needed by the industry and its customers, UK wide.

We stand ready to work with you to implement the changes supported by industry.

Regards



Graham Hasting-Evans  
**BACH President**  
**Chief Executive of**  
**NOCN Group**



David Lord  
**National Chair**



Geoff Coughlan  
**National Vice-Chair**



Nikki Davis  
**BACH Representative on**  
**CSMB**  
**Principal & CEO at Leeds**  
**College of Building**

cc Secretary of State DESNZ

**Annex A: List of Further Education Colleges that are members of BACH.**

Abingdon and Witney College	Milton Keynes College
Activate Learning	Moulton College
Barking and Dagenham College	Nelson & Colne College
Barnet and Southgate College	NESCOT
Bedford College Group	New City College Tower Hamlets
Bishop Auckland College	New College Swindon
Blackburn College	Newcastle College
Blackpool and The Fylde College	Newcastle College Group (NCG)
Bolton College	Newham College
Bournemouth & Poole College Group	North Hertfordshire College
Bradford College Group	North Kent College
Bridgend College	North Lindsey College
Bridgwater & Taunton College	Northampton College
Buckinghamshire College Group (BCG)	Oaklands College
Burnley College	Oldham
Calderdale College	Pembrokeshire College
Cambridge Regional College	Peterborough College
Capital City College Group	Preston College
Cardiff and Vale College/Coleg Glan Hafren	Reaseheath College
Carlisle College	Riverside College
Carsharpton College	Rotherham College
Chelmsford College	Sheffield College
Chichester College Group	South Essex College
City College Norwich	South Gloucestershire & Stroud College - SGS
City College Plymouth	South Thames College
City of Bristol College	South Thames Colleges Group
City of Westminster College	Southport College
Colchester Institute	Southwark College
Coleg Cambria	St Helens College
College of North West London	Stamford College
Craven College	Stockport College
DN Colleges Group	Suffolk New College
Doncaster College	The Chesterfield College Group
Dudley College of Technology	The Guernsey Institute
East Surrey College	The Manchester College Group
Education Training Collective – Stockton Riverside & Redcar	Trafford & Stockport College Group
Farnborough College of Technology	Trafford College
Gloucester College	Tresham College
Grwp Llandrillo Menai	Truro and Penwith College
Hachette Learning (Hodder Education)	Tyne Coast College
Hartlepool College of FE	United college
Highlands College	United Colleges Group
Hopwood Hall	Walsall College
Hull College	Waltham Forest College
Inspire Education Group: IEG	Warrington & Vale Royal College
Kidderminster College	West Herts College Group
Kingston College	West Lancashire College
Kirklees College	West London College
Leeds College of Building	West Nottinghamshire College
Leicester College	West Thames College
Lewisham College	Wigan & Leigh College
Lincoln College	Wiltshire College & University Centre
Merton College	Wirral Metropolitan College
Mid Kent College of Higher & Further Education	Yeovil College
Middlesbrough College	York College