

## **Skills England – Skills for Work request for views**

**October 2026**

### **Introduction**

As the collective voice of employer-led sector skills bodies, Skills Federation brings together organisations with deep knowledge of workforce needs across the country and the economy. Our members are 19 employer led sector skills bodies who work across more than 20 sectors of the economy and represent over 150,000 employers, both large and small, across the UK.

Our members work directly with employers to understand how jobs and skills are changing and translate that intelligence into occupational standards, qualifications, apprenticeships, training and workforce development. They understand individual industries, and collectively, they understand the connections between them. They work nationally and understand how sector needs can play out differently across places and communities. They also understand the skills required by people entering the workforce as well as those needed by millions of people already in work.

This means that collectively, Skills Federation can identify the challenges, dependencies and opportunities that cut across industries and bring both employer reality and practical delivery experience into the design and implementation of skills policy.

### **The Skills Federation response**

We welcome the opportunity to respond to this request for feedback. Ensuring that occupational standards accurately reflect current and future labour market needs is critical for employers. When occupational standards are well designed, they provide a strong foundation for the development of apprenticeships, qualifications and other training products that equip individuals with the skills needed to succeed in work. In turn, this helps employers build and sustain the skilled workforce they need to grow, innovate and contribute to economic growth.

We do have some wider concerns about the pace and sequencing of change. We would encourage Skills England to take stock of the cumulative impact of recent and planned reforms, and to set out a clear long-term vision for how occupational standards, qualifications, apprenticeships and assessment will operate together. Greater clarity on the destination would help ensure that any future changes to occupational standards are both evidence-based and enduring, providing a stable foundation for employers, learners and providers alike.

This response has been developed with input from our members. In addition, a number of members will be submitting their own responses, providing detailed sector-specific perspectives and evidence to help inform the review and ensure that the needs of different industries are fully reflected. We have chosen not to answer the multiple-choice questions because we represent sector skills bodies across the economy and there are significant sector variations.

## Responses

### ***16. How well do occupational standards describe the skills, knowledge and behaviours people need for skilled jobs? What changes would you make?***

Occupational standards should provide a clear and consistent description of the knowledge, skills and behaviours required to achieve occupational competence. Government should not develop these standards in isolation. Meaningful co-design with employers is essential to ensure that standards accurately reflect the requirements of the workplace and the realities of occupational practice. With the move away from trailblazer groups developing occupational standards, Skills England needs to ensure that there is significant engagement with employers through the Expert Network Occupational Groups and other routes. The groups need to involve employers of different sizes and from different places to ensure that standards fully reflect the range of employer needs.

Sector skills bodies also have a vital role to play. Their broad understanding of workforce requirements, emerging skills needs and employer demand across their sectors enables them to provide valuable insight into the development and review of standards. Drawing on this expertise will help ensure that occupational standards remain relevant, credible and responsive to the needs of employers and the wider economy.

Where standards are too broad, they may not provide sufficient clarity to demonstrate competence, particularly in high-hazard or regulated sectors where the breadth may undermine confidence that people undertaking apprenticeships are able to work safely. Where they are too narrow, they can describe a specific job rather than an occupation which causes challenges for transferability between employers. A review targeted at those standards where challenges have been highlighted, and informed by employers and sector skills bodies, should identify and address these issues.

Occupational standards must also be accessible and understandable for the range of users who rely on them, including employers, training providers and individuals. In addition, they need to be sufficiently robust and practical to support the development of qualifications, apprenticeships and other training products. The effectiveness of the wider skills system depends not only on the quality of the standard itself, but also on its usability as the foundation for workforce development and training provision.

We would caution against a sole focus on reducing the number of occupational standards. While standards with low uptake should be reviewed, decisions should also consider the size and strategic importance of the occupation. Some niche occupations will require dedicated standards to ensure a sustainable skills pipeline. For example, the Level 2 Leather Craftsperson has relatively low numbers but if this standard were to be retired the pipeline into the saddle making industry would disappear.

Similarly, consolidation may be appropriate where occupations have genuinely converged, but not where greater specificity is needed to maintain competence, quality or safety. The goal should be a set of standards that meet employer needs, rather than simply a smaller number of standards.

### ***17. How effective are current skills products at helping young people move into skilled employment?***

No response to this question.

**18. Please explain your answer. What works well and what could be improved?**

There is significant change taking place across the qualifications landscape. The introduction of V Levels and Level 2 pathways, the new Level 1 maths and English qualifications, and the planned vocational GCSEs collectively represent a substantial programme of reform. It is therefore essential that implementation timescales are realistic and allow sufficient time for development and delivery. We have previously highlighted concerns that the proposed timescales for V Levels and Level 2 pathways are particularly challenging and risk compromising successful implementation.

The content of new qualifications must be based on occupational standards that are national and be developed in close partnership with sector skills bodies and employers to ensure that it reflects current and future labour market needs, equips learners with relevant occupational skills, and supports progression into employment whether directly or after further study.

Further education colleges, independent training providers and schools will also require appropriate support to prepare for the introduction of new qualifications. The Technical and Vocational Professional Development (TVPD) programme provides a positive model, and government should consider extending this approach across all significant qualification reforms. This should include opportunities for teachers and trainers to maintain up-to-date industry knowledge, engage directly with employers, and understand changing skills requirements and workplace practices.

Devolution presents important opportunities to improve the alignment of skills provision with employment support and other local services, including transport and housing. We welcome the ambition to create more tailored pathways for young people aged 14 to 19. However, this flexibility must be balanced with safeguards to prevent greater fragmentation across the skills system. For devolution to operate effectively, there must be a clear framework setting out responsibilities at national, sector and local levels. Qualifications and occupational standards should retain national consistency and recognition, ensuring that they have currency across England and support learner mobility, rather than becoming specific to particular regions or localities.

Apprenticeships are an important route into employment, but they are jobs and depend on employers creating opportunities and providing the support needed for apprentices to succeed. They should therefore be seen as part of a wider package of education, training and employment pathways rather than the sole solution to reducing the number of young people who are not in education, employment or training (NEET).

Occupational standards should be aligned with progression pathways so that individuals can see both how they can advance within an occupation and how their transferable skills and knowledge could enable movement into other careers.

**19. How well do current occupational standards reflect what employers and the economy needs for growth? Please explain your answer.**

Skills are a key driver of economic growth, with Skills England research suggesting that around one-third of average annual UK productivity growth can be attributed to the expansion of skills within the workforce. However, occupational standards are not themselves a direct driver of growth. Their primary purpose is to define the knowledge, skills and behaviours required for occupational competence.

That does not diminish their importance, however. High-quality occupational standards provide the foundation for skills products and training provision, ensuring they accurately reflect the needs of employers and the realities of the workplace. If standards fail to do this, the resulting products will be less effective in developing the skilled workforce that employers need for economic growth.

Occupational standards should provide a strong foundation for apprenticeships, qualifications and other skills products, and ensure that growth-critical occupations and sectors are adequately covered. To achieve this, standards must be developed and maintained through genuine employer co-design and co-development. Employers are best placed to define the knowledge, skills and behaviours required for occupational competence, ensuring that standards reflect current workplace practice, emerging technologies and evolving business needs.

***20. How well does the current mix of apprenticeships, technical qualifications and apprenticeship units meet the needs of employers and the economy?***

No response to this question.

***21. Please explain your answer, what works and what doesn't work.***

The current mix of apprenticeships, technical qualifications and apprenticeship units meets some but not all needs. For example, smaller employers across all sectors struggle to navigate what is a complex landscape and collaborative approaches including shared apprenticeships should be explored to derisk the process and encourage greater engagement.

The focus on the priority sectors in the Industrial Strategy makes sense but shouldn't be at the total expense of all other foundational and supporting sectors. [Skills England](#) analysis estimates that the IS8+2 sectors make up 23% of total employment in 2025. Decisions about the mix of provision, the levers for engagement, and the levels of funding need to take this into account.

Whilst apprenticeships are valued by employers, they are not the right solution for every skills need. The principle of a more flexible Growth and Skills Levy is therefore welcome. Employers consistently tell us that, alongside full apprenticeships, they need access to shorter, targeted training programmes to upskill existing staff, address emerging skills gaps and respond quickly to changing business needs.

The introduction of apprenticeship units has the potential to meet at least part of this need and to provide a mix of products that better meets employer demand. However, they need to be designed with sector skills bodies and employers to ensure they meet employer need and there needs to be sufficient funding for employers to access these opportunities at scale where needed. The funding also needs to be sufficient to ensure that training providers can deliver the units.

Feedback from employers suggests that Foundation Apprenticeships are not currently meeting workforce needs in all the sectors they were originally intended to serve, although there may be greater potential for uptake in sectors such as retail and hospitality. For example, Enginuity, which represents the engineering and manufacturing sector found that demand for Foundation Apprenticeships in the manufacturing sector is minimal. If Foundation Apprenticeships are pitched at level 2 but offer a reduced level of specialism relevant to an occupation, they are unlikely to meet the skills needs of SMEs. The low take-

up of Foundation Apprenticeships supports this. Skills England should review both the shape of Foundation Apprenticeships and the sectors that they are targeting.

Funding is also important. Apprenticeships require a training provider and the funding for Foundation Apprenticeship needs to be sufficient for training providers to deliver them. There are some cases, for example, in the rail sector, where current proposals are unlikely to be attractive for training providers to deliver because the funding is too low.

***22. How could occupational standards be made simpler without reducing quality or confidence in the system?***

We are interpreting the question as being about the simplification of the system of occupational standards, rather than about streamlining the wording of standards. Occupational standards can be simplified where there is clear duplication or significant overlap between standards. However, simplification should not result in standards becoming so broad that they no longer accurately reflect occupational competence or the needs of specific occupations. For example, the Level 2 Lean Manufacturing Operative occupational standard is too broad to fully meet the needs of employers across the sectors it is delivered in.

Greater use of common or core knowledge, skills and behaviours may be appropriate in some areas, helping to reduce duplication and improve consistency across related occupations and transferability across occupations. However, this should never come at the expense of quality, particularly in safety-critical, highly regulated or specialist industries where a greater degree of occupational specificity is essential.

Any decisions on simplification should be informed by employers and sector skills bodies. Sector skills bodies bring a detailed understanding of occupational requirements, workforce needs and industry practice, and are therefore well placed to advise on where standards can be streamlined and where distinct occupational standards remain necessary.

***23. What role should Strategic Authorities and local partners play in reviewing and shaping occupational standards?***

Occupational standards should continue to be set nationally to ensure that qualifications, apprenticeships and other products developed from them are recognised and valued across the country, supporting both employer confidence and workforce mobility. The focus should be on incorporating local insights and intelligence into a national framework, rather than creating different standards for different regions. Occupational standards can then be used locally by Mayoral Strategic Authorities and local partners to inform skills products.

***24. How can occupational standards reflect local and regional skills needs while staying consistent nationally?***

The knowledge, skills and behaviours required to demonstrate competence in an occupation do not vary by place. However, the mix of qualifications, apprenticeships and other training provision needed to meet employer demand in a particular locality may differ across regions. For example, in the automotive sector, regions may have different concentrations of vehicle manufacturing, battery production, motorsport, logistics, or service and repair activity. The skills system therefore needs sufficient flexibility to enable Strategic Authorities and local partners to deliver the qualifications and skills programmes that respond to local labour market needs and economic priorities.

Local priorities can be met through delivery of national products that is tailored to the specific needs of local labour markets. For instance, arboriculture and forestry learners may need an understanding of local species, planning requirements and employer practices, alongside the transferable knowledge and skills that enable them to work effectively across regions.

***25. How might labour market changes, such as AI, new technologies, automation and net zero, affect occupational standards over the next 5 to 10 years? How could they be updated more quickly to remain relevant?***

The needs of the economy are fast moving, particularly in relation to AI and new technologies and it is essential the standards are future-proofed as far as possible and accurately evolve as changes happen. However, it is important to note that introduction of AI and the impact on roles, is happening at different paces in different sectors. For example, in the Financial Services sector generative AI is automating routine tasks and freeing up time for people to focus on more complex, creative and interpersonal work and in the screen industry, analysis shows the impact of AI may affect up to 80% of production roles by 2028. However, in the engineering and manufacturing sector, less impact has been seen with less than 0.2% of all job adverts mentioned AI in any meaningful way. This is why it is essential to take a sector approach and that sector skills bodies are engaged to help provide this insight.

Occupational standards should therefore be reviewed regularly to ensure they remain relevant and reflect changing employer needs. Sector skills bodies are particularly well placed to identify where updates are required, given their close relationships with employers and understanding of sector-specific trends. Where changes are needed, the process for updating occupational standards and assessment plans should be efficient and responsive, through the Expert Network Occupational Groups. However, while updates should be undertaken at pace where appropriate, this should not come at the expense of quality, employer engagement or the rigour of the standards themselves.

It is important to recognise that changes to technology and AI are also creating more hybrid roles that don't fit neatly into one sector or occupation definition. Cross working across sectors will be essential to recognise where this is happening and to collaborate to create standards that capture the right knowledge, skills and behaviours.

***26. How useful is the Standard Skills Classification (SSC) for the skills system? How could it be improved?***

The Standard Skills Classification presents an opportunity to create a shared and widely understood framework for describing the skills and tasks required within occupations. A common skills language could deliver benefits for individuals, employers, careers professionals and policymakers, supporting skills development, career progression, workforce planning and labour market analysis. It could also help place-based organisations better understand current and future skills need and inform workforce demand forecasting.

However, its success will depend on widespread adoption, comprehensive coverage and ongoing relevance. Government and Skills England should implement a coordinated programme of engagement and communication to promote awareness and encourage consistent use across the employment and skills system. Care should be taken to ensure that coverage is complete. For example, in the land-based sector, some gaps have been identified. In addition, the classification will need to be reviewed and updated regularly to ensure it continues to reflect changes in occupations, technologies and employer demand.

There is also an opportunity to improve alignment across the UK. Differences between the standards used in England and the devolved nations can create complexity for employers operating across national borders. Greater coordination and consistency would help reduce this and support workforce mobility.

## ***27. Which 3 areas should be the highest priorities?***

No response to this question.

## ***28. Is there anything else Skills England should consider?***

Different industries across the UK economy face distinct workforce pressures, skills needs, regulatory environments and patterns of technological change. A one-size-fits-all approach to skills policy will not respond effectively to employer needs. A skills system that works for employers must combine national coherence and regional flexibility with strong sector expertise, ensuring policy reflects the realities of different industries while remaining clear and consistent across the economy.

Skills Federation believes government should establish a more formal network of employer-led sector skills bodies covering the whole economy to provide:

- **A strategic interface between government and industry**, giving government a clear route into employers and sectors a recognised route into policymaking.
- **A collective employer voice**, bringing together businesses of different sizes to identify common workforce challenges and develop solutions.
- **Capacity for collective action**, from increasing apprenticeship participation and employer investment in training to attracting new entrants and responding to challenges such as AI and changing occupational needs.
- **A bridge between national and regional skills systems**, helping to translate sector workforce priorities into regional planning while maintaining appropriate national consistency.
- **A mechanism for co-designing and delivering skills policy**, ensuring programmes reflect genuine workforce demand and can work in practice.
- **Reliable workforce intelligence**, combining labour-market data with direct employer insight to identify current and future skills needs.

A successful model should be built around several core principles.

- **Employer-led and employer-backed** – Sector skills bodies should have the confidence of their industries, be meaningfully representative of employers and have a strong employer-led governance model.
- **Whole-sector representation** - They should be able to engage employers of different sizes and from across the UK, ensuring SMEs as well as large employers can shape workforce priorities.
- **UK-wide and connected to devolution** - Sector skills bodies should support coherence across the UK while working effectively with Mayoral Strategic Authorities and other regional bodies to respond to local labour-market needs.
- **Focused on solutions and delivery** - Their role should go beyond representing employer views. They should convene employers to develop practical solutions to workforce challenges and support implementation.

- **Able to work across sector boundaries** - Many skills challenges cut across industries. Sector skills bodies should therefore collaborate where occupations, technologies or workforce needs overlap.