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Submitted to Feedback on the draft apprenticeship committee guidance
Submitted on 2026-08-28 15:03:21

Questions on the draft apprenticeship committee guidance

1 Do you have any comments on what the guidance says about the composition of the committee?

Composition of the committee:

The Federation of Master Builders (FMB) is the largest trade association in the UK construction industry representing the interests of small and medium-sized building companies across all four nations of the UK. The FMB supports the proposed balance of representation outlined in the guidance, including the requirement to include employers, apprentices, training providers, trade unions, and sector representatives. We welcome the expectation that at least 50% of committee membership should comprise employers or employer representatives.

We believe that the guidance could be strengthened to ensure that the committee provides effective strategic leadership and supports an apprenticeship system that meets Scotland's future workforce requirements.

While the guidance proposes representation from industry bodies and employer representatives, consideration should be given to ensure representation from sectors with substantial apprenticeship investment and participation to ensure strategic decisions are informed by operational expertise.

Construction remains one of Scotland's largest apprenticeship sectors and most successful apprenticeship pathways. Construction frameworks make up more than half of all enrolments at SCQF level 4/5 for Foundation Apprenticeships, while Construction and Related Modern Apprenticeships (MAs) accounted for more than a quarter (27%) of all MA starts during 2025/26 and a third (33%) of all MAs in training. The occupational grouping also had the second largest volume of starts in 2025/26, which increased by 3.4% (+219 starts) compared to the previous year. Achievement rates have increased to above 80%, considerably higher than those seen elsewhere in Great Britain, reinforcing the significant contribution MAs continue to make to Scotland's construction workforce.

The FMB believes that the Construction Industry Training Board (CITB): the Industry Training Board for the construction sector should have representation on the committee. The CITB works closely with employers, training providers, colleges, government, and skills agencies to support workforce development across Scotland. The FMB is one of the Prescribed Organisations (POs) whom the CITB consults with during the Consensus process to gauge industry support for the CITB Levy. The CITB are also a strategic partner of the FMB, and we work closely with the CITB in Scotland to help support micro, small and medium-sized construction companies to recruit and train construction apprentices. This helps to give these companies a voice to shape industry training requirements.

Their needs to be employer leadership within apprenticeship governance. Employers are best placed to identify emerging skills needs, workforce shortages, and future demand arising from economic and policy priorities. The FMB supports the proposal to include employers of different sizes on the committee. However, according to CITB figures, 85% of construction employers in Scotland are small and micro in size, and as such, often do not have capacity to consistently participate in such committees. FMB's members are micro, small and medium sized companies and through engaging with our members, we provide this voice on their behalf. We believe the guidance should include provisions for organisations such as construction trade federations, who can represent sectors with such a significant proportion of micro and SME companies, to communicate their insights and needs.

Furthermore, the guidance should make provisions to ensure that employers, or their representatives, operating in sectors critical to achieving Scotland's economic, social, and environmental ambitions are prioritised for membership of the committee. This would ensure policy coherence with the requirements of the Tertiary Education and Training (Funding and Governance) (Scotland) Act 2026 for investment to have regard to the priorities of Scottish Ministers, and the priority sectors identified for the development of national Skills Needs Assessments by Skills Development Scotland.

As evidenced by its inclusion as a priority sector for a Skills Needs Assessment, construction makes a significant contribution to Scotland's prosperity. The industry generates 6% of Scotland's Gross Value Added (GVA) and is responsible for 10% of all Scottish business turnover. The sector includes almost 13,000 businesses with employees and represents 14% of all employer businesses in Scotland.
The guidance should explicitly encourage representation from employers operating in rural and island communities, where recruitment challenges and apprenticeship delivery models can differ significantly from urban and central areas.

Overall, the FMB is supportive of the proposed guidance and its intention to establish a strong, employer-led committee that provides strategic oversight of apprenticeships and work-based learning within the new SFC structure. We welcome the emphasis on employer representation, labour market responsiveness, and engagement with apprentices and training providers.

2 Do you have any comments on what the guidance says about the appointment of the chair?

Appointment of the chair:

The FMB supports the proposal that the Chair of the committee should be a current or recent employer with experience of representing employer interests. An employer-led Chair will help ensure that apprenticeship investment remains aligned with labour market demand and economic growth objectives.

3 Do you have any comments on what the guidance says about the functions of the committee?

Functions of the committee:

FMB supports the proposed functions of the committee and welcomes its role in:

• Advising on apprenticeship policy and funding priorities;
• Supporting alignment between apprenticeship provision and labour market need;
• Providing oversight of apprenticeship frameworks and quality;
• Promoting a coherent tertiary education and skills system; and
• Monitoring performance and delivery outcomes.

These functions reflect the strategic importance of apprenticeships within Scotland's future skills system. However, we believe further emphasis should be placed on the following areas:
Employer engagement in framework development

FMB supports the proposed role of sub-committees in apprenticeship framework development and approval. However, the guidance should place greater emphasis on ensuring employers remain at the centre of the apprenticeship framework design and review processes. Apprenticeship frameworks are most effective when developed through close collaboration between employers, training providers, and sector specialists.

Strategic workforce planning

The guidance states that the committee should make recommendations on the scale, shape, and prioritisation of apprenticeship provision. FMB recommends that the guidance reference workforce planning, labour market forecasting, and sectoral skills intelligence as key components of decision making. This would help ensure apprenticeship investment supports medium and long-term economic priorities rather than responding exclusively to current demand.

Net zero and infrastructure priorities

The guidance notes the importance of considering labour market intelligence, sustainability, and future skills demands. Due to Scotland's ambitions around net zero, housebuilding, and infrastructure delivery, FMB recommends strengthening references to strategic national priorities and the workforce requirements needed to deliver them. The committee should be expected to consider how apprenticeship provision supports the delivery of Scotland's National Strategy for Economic Transformation; the Housing to 2040 strategy; and the transition to net zero by 2045.

4 Do you have any other comments about the guidance?

Other comments:

The FMB welcomes the Scottish Government's intention to create a robust governance structure for apprenticeships within the reformed SFC. The proposed committee provides an important opportunity to strengthen employer influence and ensure apprenticeship decisions are informed by labour market evidence and learner needs.

As responsibility for apprenticeships transfers to SFC within the new skills system, maintaining strong employer confidence will be critical. The committee should therefore:

1. Maintain a clear focus on employer demand and workforce requirements
2. Investigate provisions for organisations such as construction trade federations, who represent sectors with such a significant proportion of micro and SME companies, to communicate their insights and needs.
3. Use labour market intelligence to inform investment decisions;
4. Ensure meaningful engagement with sectors experiencing significant skills shortages;
5. Support greater alignment between apprenticeships, colleges, universities, and wider work-based learning pathways;

FMB looks forward to continuing to work with the Scottish Government, SFC, and industry partners to ensure Scotland's apprenticeship system supports economic growth, productivity, and the delivery of national policy priorities.

About you

1 What is your name?

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3 Are you responding as an individual or an organisation?

Organisation

4 Please provide the name of the organisation you are representing, if applicable.

Organisation name:
Federation of Master Builders Ltd

5 Are you happy for your organisation's name to be included in the publication of the final guidance?

Yes

6 Are you content for us to contact you about your response?

Yes