Federation of Master Builders (FMB)

response to:

Post-16 level 3 and below pathways consultation

12 January 2026

Further information:
Jeremy Gray
Head of External Affairs
externalaffairs@fmb.org.uk

About the FMB

The Federation of Master Builders (FMB) is the largest trade association in the UK construction industry. With more than 6,500 member firms, representing around 45,000 employees, the FMB is the recognised voice of micro, small and medium-sized (MSME) construction businesses.

Local builders sit at the heart of supporting the economy, creating new jobs and training the next generation of builders with skills fit for the modern economy. They are also key drivers in helping to deliver government priorities on growing the economy, quality housing delivery, and improving the UK's existing housing stock to be healthier.

Response

Overview

We believe that V levels can improve entry into construction, provided they are developed correctly and are pitched at the right level to provide the correct skills sets. They should be focussed on ensuring young people are career ready but also enable to them to specialise through further qualifications and apprenticeships should they choose to.

We are keen to ensure that it delivers what employers need, as this will help not only from a training perspective in terms of placements, but also employment post training as well. It should also tackle competence, particularly in the built environment, which at the domestic level lacks a stringent set of criteria for a competent workforce. But fundamentally, it must inspire young people to study.

We have also included a response to the *Proposals for new Post-16 Occupational Certificates Construction consultation* in December 2025, as this should also provide useful insight into the wider consultation.

V-levels

1. **We are proposing V levels will be 360 guided learning hours (GLH) to enable students to combine them with other V levels and A levels. Where larger subjects are needed, we propose that these are offered through T levels.**

In taking this approach, are there any risks or issues we need to be aware of?

To have simplified vocational and technical qualifications providing a single new pathway will streamline the offer to young people as there is currently a complex range of courses which can be confusing for employers and students.

We recommend that V levels should be set at Level 2 for construction as it is an introduction. We understand this may not be universally well received. By doing this, it would give a career pathway to move on to a Level 3 specific skill course. If V levels for construction skills are set at level 3 then the content, they learn is unlikely to give them sufficient knowledge to progress straight into a Level 4 qualification. They would need to study another trade specific Level 3

course to gain the knowledge before they could study at Level 4. To many students, this would not be seen to be encouraging a progression pathway but side stepping. For example, when trade skills are learnt alongside other trades, it will be too diluted compared to a two-year apprenticeship in a trade, so V level students would have too little knowledge to progress effectively.

In regard to learning holistically, we feel that it may not be practical to study construction V levels alongside A levels, but it will be dependent on the choice of subjects made by a student.

It should be noted that whilst the T levels have demonstrated their value in other sectors, they have not been so successful in construction. This is largely because of the difficulties in finding work placements for students. In the early discussions with DfE at the development stage of T-levels there was a general view of DfE staff and employers that this was going to be the most challenging aspect of launching T-levels in the construction sector and it has proved to be a valid concern.

Where larger subjects are needed, the proposal is to offer T levels, but this will depend on the student having decided on a single skill set that they wish to study so it would not suit everyone.

2. Are there any particular issues for subjects or students that we need to be aware of as a result of not having medium sized V levels

Medium sized V levels will be essential if students are to be taught a range of skills at an introductory level. From an employer's perspective the content should cover the basic skills that will give the young person a good grounding in construction and enable them to decide on a specialism to study at a higher level. To inspire students to start on a construction career it is essential to be able to sign post students to potential pathways to future advanced skills, but they need to learn the basics first to be of interest for an employer to give them a job.

3. Which subjects do you think are most appropriate for delivery through V levels? Please provide evidence of relevance to employment sectors or further study.

It is stated in the white paper that the V levels will contain a range of vocational subjects based on 'nationally set content which will be linked to occupational standards that are set by Skills England, working with employers.' It is essential that the construction skills being taught at V levels are what employers need otherwise the students will be less likely to be able to find employment upon completion of the course or placements for study.

By involving employers in the setting of the curriculum you will be 'boosting employer engagement' and have 'closer partnerships with employers to better serve their needs,' which are two of the aims of this review.

Please see the Response to Proposals for new Post-16 Occupational Certificates Construction at the end of this consultation for areas of potential study. These answers were given as part of a mini consultation in December, but our understanding is they were not passed on to the wider consultation team.

4. How could current information, advice and guidance be improved or what new guidelines or measures should be developed to ensure that students are informed about V level subject selection and combinations?

Clear guidance to students as to the pathways that are open to them if they choose a selection of construction skills to study is critical for the construction sector. Often construction is seen as the sector of last resort when there is nothing else that a student can do, which is especially true for the trade skills e.g. bricklaying, carpentry.

Even though a young person is not deciding on a specific qualification at this stage, the careers advice needs to give them direction so that they make good choices. Also understanding what employers will require from them in terms of skills, knowledge, and behaviours (SKBs) so that they have a purpose during the V level studies to aim to get employment at the end of their studies and create a career pathway in construction.

New T Levels

5. What factors should we consider when creating T levels where there are currently no level 3 occupation standards?

For any expansion of the T levels and the introduction of new subjects, consideration needs to be given to the following within the construction sector:

- Where do they fit in with existing career pathways so that students can see progression?
- Does the content meet the needs of employers (the aim being to get the students into a job with an employer)?
- The practicalities of offering a good work experience placement?
- Are we developing innovative and new skills that will be needed for the construction industry of the future?

Level 2 pathways

6. We recognise that students do change their minds, and some students may wish to transfer between the Further Study pathway and the Occupational pathway. Others may have the opportunity to progress to level 3 or take up an apprenticeship opportunity mid-way through their Occupational Certificate.

How can the two pathways, and the two qualifications, be designed to make these transitions as easy as possible?

Transitioning between the two pathways can create difficulties which is why good career advice at the outset is critical. However, there will be students who start on a course and realise that they have not made the best choice. A review of progress and suitability early on the course would enable students to make a transition before too much learning has taken place. Colleges are probably best placed to advise on how these transitions can be made as seamlessly as possible.

We do need to recognise that a student moving from a Level 2 course to an apprenticeship mid-way through a course is a success, and not to penalise the student or the College. It should be recorded as a successful completion as it has achieved the aim to get the young person into a job with an employer and on to apprenticeship training.

Foundation Certificates

7. We're proposing that all Foundation Certificates are the same size – 240 guided learning hours (GLH) – to ensure they are a consistent size and can fit within a one-year study programme allowing for English, maths and non-qualification activity such as employability, enrichment and pastoral support, and exposure to level 3 study. In taking this approach, are there any risks or issues we need to be aware of?

The proposal for a one-year study programme for a Foundation Certificate appears to be replacing the current T level foundation year programme. It is important that young people learn English and Maths to the highest level that they can attain, but it is an issue in construction that the lack of achievement in these subjects holds back some young people from progressing into higher levels of learning although they have are very capable with trade skills and would make a valuable contribution to the construction sector.

One of the stated aims is 'not to leave learners behind.' The nearly one million 16–24-year-olds who are Not in Education, Employment, or Training (NEET) are not necessarily at the stage of focusing on higher technical levels 4 and 5. They should be encouraged to progress into employment as the first focus. The proposed Sector Based Work Academy Programmes offer training and a guaranteed job interview, but this does not guarantee employment.

To get a job, employers want skilled tradespeople to work on a building site to help to meet the government's target of 1.5 million new homes and to retrofit existing housing stock. The employers are not particularly concerned with English and Maths qualifications of a potential employee. But they need to know that there is good communication, an understanding of English for H&S compliance and knowledge of the calculations that are needed for the job they are doing.

So, we suggest creating a contextualised English and Maths course that is specific to construction and would enable student to see the purpose of the learning to an appropriate level and be relevant to their practical studies.

8. Should any additional criteria be considered when selecting the subjects suitable to become a Foundation Certificate?

Yes

If yes, what are they and why?

Consultation with employers to select suitable subjects will ensure that the needs of the construction industry are being met, as per the subject content for V levels.

9. Are there any other potential subjects you think should be considered for Foundation Certificates?

Yes

If yes, what are they and why?

Basic trade skills needed on a construction site. This will ensure that we are training young people to take their first steps on a career in construction but giving them foundational skills.

Occupational Certificates

10. We expect the occupational pathway to last two years, in line with current legislation. However, we recognise that some learners may have legitimate reasons for leaving the pathway early, such as progressing to a work-based training programme or moving on to a level 3 qualification. Are there any other circumstances you believed would justify a learner stepping off the pathway before completing the full two years?

A change in personal circumstances would justify a leaner leaving the course. It is hoped that support could be put in place for the learner to resume the course at a later date if that was practical for them.

11. We are proposing that DfE set the introductory core content for Occupational Certificates and that this core content is shared across related qualifications. Do you agree with this approach?

No

12. Please give reasons for your answer

It should be recognised that Construction has different requirements for the core content to other sectors so the inclusion topics such as health and safety and understanding competency requirements under the Building Safety Act would need to be included. We would ask that DfE set the core content in consultation with construction employers to ensure that it meets the needs of the construction sector.

13. We believe the sizes of each Occupations Certificate should be variable and driven by Skills England national occupations standard(s) it is linked to, as opposed to having a fixed size for all Occupational Certificates. Do you foresee any challenges with this approach?

Yes

14. If so, what are they and how might they be overcome?

Although we agree with not having a fixed size for all Occupation Certificates as sectors have differing needs, the challenge will be to create a system of Certificates that can be clearly understood by employers and young people. It will need to correctly reflect the young person's achievements within a certain industry.

15. We are proposing the size of the broad introductory core content should be proportionate and should be less that 50% of the overall guided leaning hours (GLH). Do you foresee any challenges with this approach?

Yes

16. If so, what are they and how might they be overcome?

The core content for construction will need to include additional aspects due to the nature of the sector. We would still expect this to be less than 50% of the overall guided leaning hours.

Non-qualification activity

17. What non-qualification activities do you think are successful at supporting vocational students to engage best in their course content in order to achieve in their course and progress to their stated destination?

Other activities could include visits to different sites to observe a working site, to include both main contractors and SMEs. Talks from outside specialist speakers adding to the current curriculum topics.

A pilot project run in coordination between CITB, FMB and Shooters Hill College in East London has developed Master Classes for its students. The students are those that would not traditionally align to specific college courses and are taking a broad look at various construction skills before moving forward with their studies. The master classes are run by builders and other built environment professionals to teach a variety of skills, that include business acumen, trade skills and career planning.

Transition and branding

18. We plan to roll out V levels, Foundations Certificates, and Occupational Certificates together by route, to ensure coherence across levels and clear progression

Do you think this is the best approach?

Yes. However, consideration does need to be given to the phasing out of the current courses e.g. BTEC etc. so that there is continuity of the courses offered.

We would suggest that full consultation with the employers in the construction sector is undertaken before the roll out proceeds. Employers are the experts in the sector, and the aim is to get more skilled people employed in the industry to meet the skills gap that will only increase if we do not train young people to replace the increasing number of skilled workers who are due to retire in the next 10 years. Employers will be the key as they take on the young people who have completed their training, so it is critical that the new courses meet their needs.

Are there alternative rollout strategies we should consider, or any unintended consequences we might be overlooking?

We would like to understand how the new qualifications will be assessed. Will there be a practical end point assessment (EPA) or will progress be recorded during the course? This needs to be firmly in place before any rollout so as not to cause any delays in students completing their courses and obtaining the qualification.

19. **What steps should we take to ensure the outline content for V levels, Foundations Certificates, and Occupational Certificates is high-quality across subjects and awarding organisations?**

Consultation with employers, colleges and awarding organisations are needed so that everyone is working together to achieve this aim.

20. **We're proposing that there is no awarding organisation branding for content for V levels, Foundations Certificates, and Occupational Certificates titles to make the qualifications easier to understand**

Do you foresee any problems with this?

We don't foresee any obvious issues.

How could we mitigate these?

n/a

Equalities impact

21. **Could any of the proposals have an impact – positive of negative – on people with any of the following protected characteristics?**

The development of this work should carefully consider improvements that could be made to attracting more women and those from ethnic minority groups into construction. With only 2% of women on the tools and 5% from ethnic minorities in construction in total. As these courses will be the entry point to the sector, it should do all it can be as inclusive as possible. Although we acknowledge more can be done to improve the perception of the industry in these demographics

Supplementary information:
Response to Proposals for new Post-16 Occupational Certificates Construction

The below consultation was run over a short period in December 2025. We understand these responses have not been shared with the main consultation team, although we believe this will be valuable input towards the wider work on V levels.

Q1. Referring to the occupational standards published on the occupational maps, are there any standards that are missing from the above list that you think should be included for 16-19 classroom-based provision? Please explain why you think they are suitable

In consultation with members the following have been identified:

- Roofing - this does not require working from height. Roof trusses can be created on the ground and then roof tiles installed all within reach of student without the need for elevation.

- Heritage – it has been noted that there is a lack of those working in heritage trades. We are aware of ongoing work in CITB to address this, but that shouldn't lead to exclusion here.

- Airtightness – which will be vital for the Future Homes Standard.

Q2. Are any of these occupational standards unsuitable for 16–19 classroom-based provision?

Group 1: on site construction

- Architectural Joiner
  - Architectural joinery requires advanced precision and experience, making it more appropriate for Level 3 or an apprenticeship route. Including it risks setting unrealistic expectations for learners and employers.

- Carpentry and Joinery - Architectural Joiner
  - needs to be removed as this is about designing and making custom fitting timber products and is a specialised craft.

- Carpentry and Joinery - Site Carpenter
  - Carpentry is the entry level for working with timber where items such as architraves and skirting are installed on a site. Joinery is at a more advanced level where items are crafted in a workshop. At this level of training, you cannot expect a student to be studying joinery which is a Level 3 qualification. Remove Joinery from the title

- Plasterer - Fibrous plasterer

    - Fibrous plaster is not appropriate for entry level students. There may not be tutors to deliver such a niche area and not one that should be kept, unless there is clear industry need.
- Bricklaying
    - **Appropriate,** but needs to include block work to make it suitable.

- Plasterer - Solid plasterer
    - **Appropriate,** but it should include the skill to mix and apply different renders on to bricks, blocks and concrete walls

Group 2: Construction Finishing Trades

- Roles involving gas, heating and electrical engineers
    - These roles require advanced levels of training.

- Roles with power tools
    - Requires one to one supervision and therefore difficult in a classroom environment.

- Painter and Decorator
    - Industry discussions would suggest that this should be removed or just focus on painting. However, we would recommend consulting with the appropriate trade body - Painting and Decorating Association.

- Floorlayer
    - It is unclear what this role would involve. Would this cover carpet, vinyl, laminate, wood and tiles? We would suggest the focus is on laminate and wood. Potential to remove carpet and vinyl if applicable.

- Groundworkers – insufficient room to train effectively.

- Wall and floor tiler
    - **Appropriate,** but will only be able to cut tiles with hand tools

- Domestic Plumber
    - **Partly appropriate** - can only include basic plumbing for kitchens, bathrooms, showers, fitting washing machines and small-scale issues including leaky taps, burst pipes and blocked toilet drains. Plumbing is otherwise an advanced skill set.

Q3. Are the proposed subject groupings appropriate to develop shared core content?

The best content from the core introductory content should be drawn from common Knowledge, Skills, and Behaviours (KSBs) in occupational standards. But this should be reviewed before finalising this process. The FMB strongly recommends embedding soft skills and employability behaviours within the core content. Employers consistently value punctuality, reliability, communication, and teamwork alongside technical ability.

There should also be additional knowledge, such as realistic expectations of site work (e.g., bricklaying outdoors), health and safety awareness, basic multi-skills exposure, understanding

organisational structures (from sole traders to SMEs), and professional behaviours such as time management and customer interaction.

Q4. If you think that a different grouping of standards would lend itself better to developing shared core content, how would you change the groups?

The following could be added to help better prepare students:

- Health and safety & site awareness
- The concept of Retrofit - insulation, ventilation and air tightness
- Sustainability
- Waste management & the importance of recycling
- An understanding of building regulations and their importance
- An awareness of different build types and their requirements

Other areas, potentially nuanced, have also been suggested. We recommend discussions with the FMB and other organisations to ensure all groupings that industry are looking can be captured.

Q5. What additional knowledge and understanding, over and above that included in standards, would you like students to have when they enter employment in your sector?

As noted throughout, employers want students to enter the workplace with a clear understanding of site realities and professional behaviours. English and Maths is important, but these should remain relevant to vocations skills, such as financial literacy for business management, this is vital given the number of builders that set up as sole traders or run businesses.

Further additional understanding should include:

- Health and safety
- First aid
- Mental Health training – we see this as vital given the high suicide rate within the industry
- Awareness of sustainability.
- Building regulations.
- Basic financial literacy.
- Communication skills.
- Timekeeping.
- Attitudes (e.g screen time awareness).
- Understanding documents & reading drawings.
    - Recording work through photographic evidence.
- Building a portfolio to show to skills achieved on the course.
- An understanding of other trades to avoid siloed work.
- Different working environments: e.g. domestic, commercial
- Different building types: e.g. new build, refurbishment
- Emerging technologies

Q6. How important is it to employers that the grading of Occupational Certificates allows them to compare candidates' attainment?
Consistency in grading is essential for employer confidence. The FMB recommends a simple, unified grading scale across all Occupational Certificates, supplemented by competency descriptors to clarify practical ability.

Q6(a). Would a grading scale have more value to employers if it was consistent with the equivalent apprenticeship End Point Assessment?
While alignment with apprenticeship EPA grading could provide continuity, many SMEs are unfamiliar with EPA frameworks. Therefore, consistency with EPA grading is less critical than clarity and simplicity.

It is also unclear if it is proposed that an EPA would come at the end of the course or as the student progresses. One EPA at the end will be a cheaper option than assessing as they complete a section of the course. We would welcome clarity on this point.

Q6(b). Or would a single, consistent grading scale across all Occupational Certificates be more helpful?
The FMB recommends a simple pass or fail requirement to ensure robust competency. However, if a grading scale is the overall industry preference, a single, consistent grading scale would allow for greater flexibility and allow transferable skills to enable students to take up job opportunities that may not be in the area they have previously studied in.

We would welcome some thought provided to areas like attendance, punctuality, commitment and attitude to be counted towards grading to support students with the skills employers are looking for.

Additional Observations

Use of 'experts'

The consultation notes the use of experts, but it has been noted by members that 'experts' would not have put the combinations of skills sets together, as some are too advanced and niche. The FMB would like greater transparency over which 'experts' were consulted and will be involved in the roll out of these measures. We have serious concerns that the use of so-called experts, marks a move away from using employers, who should sit at the heart of this rollout.

Type of study

We have questions over whether it is proposed that the training be undertaken at a school or at a college, this is not clear and needs expanding. There are also concerns over the nature of the expectation on students, for example we're uncertain how students can have their own individual study programme as it raises questions over the nature of the work they would be doing in the classroom, would it be individualised? This would be impractical in practice.

Career prospects

Wider issues, over the nature of young people knowing career prospects are also relevant to discuss as part of this consultation. As we see it, the proposed measures assume a 16-year-old

has a good idea of their future career path, but in reality, that's rarely the case. The focus appears to be on preparing students for an intended occupation, but we have concerns that tutors would struggle to manage the differing requirements of students within a single class, we'd welcome greater discussion on this matter.

Length of courses

The FMB agrees with the 2-year study programme, but we are clear that academic study such and Maths and English should be relevant to their future career. However, we do see a route for a 1-year programme. The feedback the FMB has received suggests a one-year programme is easier to deliver and results in better achievement rates, alongside improved retention – the FMB would happily arrange a discussion with those involved with this feedback.

We would appreciate further clarification on work experience, especially in the context of course length. We're unclear if it is planned for students to have work experience. T levels have shown that this was a complex element to deliver. We'd welcome further discussions on this aspect.

Good practice

The FMB has noted that the Australian school-based apprenticeship model[1] as a strong example of integrating classroom learning with real work experience, which could improve engagement and retention. However, examples also exist closer to home.

The CITB funded project Build Academy[2], in collaboration with the FMB and Shooters Hill College is an industry led training initiative. It takes students through continuous training for up to a year. At any point during their training, a student can be employed, with the sign off from the Academy and employer to ensure they are ready. The students are given basic training in multiple trades and soft skills, so that they can understand their likes and dislikes before specialising. This solves a perennial issue in construction of high dropout rates because of dissatisfaction with a particular trade or route into construction.

The project is in a pilot stage, and outcomes have not yet been collated, but preliminary evidence suggests a positive model that encourages employment and embeds basic skills sets and behaviours. We would welcome discussions with the department on this project as part of this consultation.

[1] MEGT - https://www.megt.com.au/apprenticeship-and-traineeship-information-schools

[2] Build Academy – FMB Website - https://www.fmb.org.uk/resource/help-to-train-london-s-next-generation-of-builders-through-build-academy.html