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24th September 2026

Mr Toby Perkins MP
Chair, All-Party Parliamentary Group on Apprenticeships
House of Commons
London
SW1A 0AA
By email: toby.perkins.mp@parliament.uk

Dear Mr Toby Perkins,

Apprenticeships: Delivering Growth, Opportunity and Competence Across the United Kingdom

We are writing on behalf of employers, members and strategic partners from across England, Scotland, Wales and Northern Ireland to reaffirm our strong support for apprenticeships and to thank the All-Party Parliamentary Group on Apprenticeships for its leadership in considering how the apprenticeship system can better support the UK's economic and social ambitions.

Following the Energy & Utility Skills Partnership (EUSP) CEO Council's submission to the APPG's call for evidence, we welcome the opportunity to continue the discussions.

The recommendations within the APPG submission reflect the collective views of the EUSP which is a UK-wide partnership that represents employers responsible for delivering and maintaining critical national infrastructure, supporting economic growth, and providing high-quality employment opportunities in communities across the England, Northern Ireland, Scotland and Wales. Collectively, we believe apprenticeships are among the most effective investments available to develop workforce capability, improve productivity and create pathways into skilled employment.

Through the Energy & Utility's Skills Strategy EUSP members identified the need to optimise funding, policy and legislation to develop workforce capacity and critical skills. As part of the second year of delivery of the Skills Strategy, The CEO Council has prioritised this activity

under the UK Government and Engagement pillar. The EUSP CEO Council has subsequently translated this strategic priority into a series of employer-led workforce recommendations. Working through the Energy & Utility Skills Group, strategic partners, Skills Strategy endorsees and member organisations, employers from across the four nations have provided evidence of the challenges and opportunities within apprenticeship delivery today.

This collective evidence has informed the three priorities set out below which is consistent with the APPG submission. These are growth and opportunity focused and if taken forward, could represent real impact for employers, communities and households in every postcode:

1. Address Inequality in Apprenticeship Funding Across the UK to Deliver "Opportunity in Every Postcode"

The Energy & Utility Skills Partnership welcomes the Government's continued commitment to apprenticeships and the flexibility that recent reforms seek to introduce into the skills system. Across the four nations, governments are rightly focused on widening participation, creating routes into good jobs and ensuring that skills investment supports economic and social mobility.

However, employers operating across the United Kingdom continue to experience significant differences in how apprenticeship funding is generated, allocated and accessed. As infrastructure, labour markets and supply chains increasingly operate across national boundaries, there is an opportunity to create a more transparent and equitable approach to apprenticeship investment.

We encourage the APPG to consider recommendations that would:

- Establish a transparent mechanism for allocating apprenticeship investment across the UK, separate from the current Barnett Formula methodology.
- Develop a clear methodology for identifying apprenticeship levy contributions attributable to employers and workforces in each nation.
- Ring fence apprenticeship funding and ensure that its allocation appropriately reflects where levy liabilities arise.
- Retain unused levy funding within the skills system to support apprenticeship and workforce development, rather than allowing it to return to HM Treasury.

- Utilise unused levy spend in third sector organisations to widen access to apprenticeships.
- Empower and expect apprenticeship leaders in Northern Ireland, Wales, Scotland and England to allocate this funding in response to the needs of employers, industries and citizens.
- Introduce clear arrangements for employers operating across national borders.

These measures would help ensure apprenticeship investment creates opportunity in every postcode and that employers, learners and communities benefit from the full value of apprenticeship investment.

2. Evolve and Sharpen the Focus of Skills England in an Increasingly Devolved England to Enable "Growth in Every Postcode"

Energy & Utility Skills Partnership welcomes the ambition to create a more coherent, employer-informed and evidence-led skills system.

As the skills landscape continues to evolve, there is an opportunity to ensure national leadership is complemented by effective local and regional delivery, while also strengthening collaboration between the skills systems operating across the four nations of the United Kingdom.

We encourage the APPG to consider recommendations that would:

- Ensure employers are at the centre of apprenticeship standard development, review, reform and ‘retirement’. Apprenticeships must be led by the industries in which they will be deployed.
- Position Skills England as the lead body for engagement with nationally significant and large employers, including those who operate across multiple regions and nations.
- Mayoral Strategic Authorities (MSA) and the Greater London Authority should lead engagement with micro, small and medium employers. Mitigations must be planned for areas without an MSA.
- Create formal arrangements for collaboration and accountable delivery between Skills England, Skills Development Scotland, Medr and the Department for the Economy in Northern Ireland.

Taken together, these actions would help create a more connected, employer-led skills system that enables growth in every postcode while reducing complexity for employers operating in different postcodes across the UK.

3. Develop Apprenticeships for Future Competence to Inspire "Confidence in Every Household"

If used and applied appropriately the Government's commitment to modernising apprenticeships and introducing greater flexibility through reforms such as Apprenticeship Units is welcome. Employers recognise the need for the apprenticeship system to evolve alongside technological innovation, changing workforce requirements and new routes into employment.

For sectors such as energy, water and utilities, however, apprenticeships must continue to provide the competence required to operate safely, professionally and effectively in occupations that are critical to everyday life and national infrastructure.

We encourage the APPG to consider recommendations that would:

- Protect independent assurance where it is necessary to maintain occupational competence, quality, and worker and public safety.
- Use apprenticeship units to develop and recognise task based competence.
- Use complete apprenticeship standards to develop and recognise occupational competence.
- Ensure units and standards reflect technological change, modern working methods and evolving occupational requirements.

These measures would help maintain public confidence in apprenticeships, support productivity and equip the future workforce with the skills required to deliver the UK's long-term ambitions.

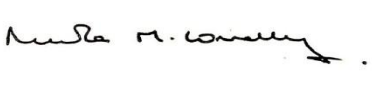
A Shared Commitment Across the Four Nations

The organisations supporting this letter represent employers, strategic partners, professional bodies and stakeholders from England, Scotland, Wales and Northern Ireland. Together, we recognise apprenticeships as a critical component of the wider skills system. We share a

common commitment to ensuring apprenticeship policy supports individuals, employers and communities while providing the workforce capacity required to deliver the UK's future ambitions.

We therefore encourage the APPG to reflect these priorities within its final recommendations and would welcome continued collaboration as this important work progresses.

Yours sincerely,



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Paul Cox

Group Chief Executive
Energy & Utility Skills Group

ENERGY & UTILITY SKILLS

Energy & Utility Skills Partnership CEO Council Members



Memorandum of Understanding Partners, and Energy & Utility Skills Partnership 2025-30 Skills Strategy Endorsees

Energy & Utility Skills Partnership 2025-30 Skills Strategy Endorsees

Members of the Energy & Utility Skills Partnership and additional organisation(s) who are specific supporter(s) of this Apprenticeship APPG letter