

Nuclear Industry Association Response to the Department for Work and Pensions ‘Industry Training Board Reform’ Consultation

The Nuclear Industry Association welcomes the opportunity to respond to the Department for Work and Pensions’ ‘Industry Training Board reform’ consultation.

The NIA is the trade association and representative body for the civil nuclear industry in the UK. We represent more than 340 companies operating across all aspects of the nuclear fuel cycle, including the current and prospective operators of nuclear power stations, international designers, and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.

Executive summary

The Nuclear Industry Association strongly opposes the merger of ECITB and CITB, due to concerns over the potential loss of focus on specialist workforce requirements for high-hazard industries in the proposed unified ITB. Efficient workforce development and mobilisation for maintaining the existing nuclear fleet and delivering new-build projects is vital for realising the Government’s decarbonisation, energy security, and economic growth ambitions. Over the past 35 years, the ECITB has built programmes with specialist expertise in high-hazard industrial training, qualifications and competence standards, which are needed now more than ever for safety-critical sectors like nuclear. The ECITB has also established sector-specific diversity initiatives which specifically target the barriers to entry faced by underrepresented groups in high-hazard engineering environments. A merger of ECITB and CITB would risk resource allocation away from the specialist focus of the ECITB, money intended for training being allocated to managing the merger, and creating a system where some firms pay significantly more than before. We therefore strongly oppose the merger of ECITB and CITB, and instead encourage major civil engineering scope to be transferred from CITB scope to ECITB scope to align the ECITB to the full lifecycle of major infrastructure delivery. Benefits of the merger identified by the Government could still be realised through a formal, statutory collaboration framework between ECITB and CITB, which could cover joint workforce forecasting, interoperable competence standards, shared careers promotion, and coordinated major project skills planning.

Approach to ITB reform

1. Do you agree with the proposal to create a single, unified ITB by bringing together the CITB and ECITB?
 - a) No.
2. Please explain the key reasons for your answer to question 1.
 - a) Instead of merging the CITB and ECITB, we would strongly encourage Government to transfer major civil engineering from CITB scope to ECITB scope, which would align the ECITB to the full lifecycle of major infrastructure delivery, and allow CITB to focus on volume construction where its size and employer network model are genuine assets.
 - b) While the ECITB raises approximately £35m a year from fewer than 300 levy-paying employers, the CITB raises approximately £228m per year from over

- ii. With the revised scope boundary, the ECITB and the CITB should enter a formal, statutory collaboration framework. This would cover joint workforce forecasting, interoperable competence standards, shared careers promotion and coordinated major project skills planning. This would deliver the strategic benefits the government seeks while preserving the accountability and specialism of two distinct employer-led bodies.

Assessing the impact of a single ITB

1. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative impacts on individuals with protected characteristics.
 - a) The ECITB has taken active steps to address the significant diversity challenges in the engineering construction industry, through its Inclusion, Diversity, Equality Action (IDEA) taskforce, dedicated diversity and inclusion training standards, and strategic partnerships with organisations including the Association of Black and Minority Ethnic Engineers (AFBE-UK) and the Employers Network for Equality and Inclusion.
 - b) A merged ITB risks diluting the sector-specific diversity initiatives the ECITB has developed, which target the distinct barriers to entry faced by underrepresented groups in high-hazard, male-dominated engineering environments. These barriers — including the physical site environment, shift patterns on remote projects, and the perceived inaccessibility of specialist technical careers — differ from those in mainstream construction. The broader agenda of a merged ITB risks deprioritising these targeted interventions in favour of wider workforce entry programmes.
 - c) We would strongly encourage a merger or scope reform to include an explicit commitment to diversity and inclusion programmes within engineering construction, with performance reporting against sector-specific targets for gender and ethnic representation. The ECITB's IDEA framework should be preserved and ideally expanded under any reformed structure.

2. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative environmental impacts.
 - a) Considering the environmental benefits delivered by the nuclear sector through low carbon electricity production, the environmental impact of ITB reform would be indirect but material, potentially disrupting the UK's ability to reach Clean Power 2030 and Net Zero by 2050.
 - b) The risk of a merger is that the urgency of green skills development for engineering construction, where the transition from oil and gas to nuclear and renewables is most acute, is diluted within a unified ITB focused on volume housebuilding and general construction.
 - c) Any structural reform should therefore explicitly protect and strengthen the ECITB's role in green skills development for the energy sector, with dedicated funding streams that are not subject to competition with volume construction training priorities.

Options for further ITB reform

1. Please provide any views on changes that should be made to the employer activities currently in scope of the CITB and ECITB to better reflect the needs of the construction and engineering construction sectors.
 - a) The current ECITB coverage appropriately reflects the engineering construction footprint, however, we would welcome a revision of the overlap between ECITB and CITB coverage regarding civil engineering works associated with major energy infrastructure. We would encourage Government to transfer major civil engineering from CITB scope to ECITB scope, ensuring a coherent skills pathway for project employees moving between civil and mechanical phases.
 - i. Any scope changes beyond this should focus on strengthening links with emerging energy technologies — fusion, hydrogen, ANTs — within the engineering construction framework. ECITB's direct employer engagement model is well-suited to lead in these evolving domains.
2. Please provide any views on whether the maximum levy period for an ITB should be extended beyond three years and, if so, what the new maximum should be.
 - a) We would support extending the maximum levy period beyond three years as longer cycles provide stability and planning certainty for large capital investments and training programmes spanning multiple project phases.
 - i. Accountability could be maintained through mid-term reviews to ensure continued value for money and responsiveness to changing industry needs.

Further Information

The NIA is happy to provide more context, or any clarifications desired on the content of our response and to ask our members where appropriate for additional information that may be useful.

Please contact Elisabeth Roden, Policy Analyst for the Nuclear Industry Association, at elisabeth.rodén@niauk.org to do this.