



The Building Centre, 26 Store Street, London WC1E 7BT  
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Sarah Beale  
Chief Executive Officer  
CITB  
Sand Martin House  
Bittern Way  
Peterborough PE2 8TY

24 March 2020

Dear Sarah Beale,

### **Support Required by the Concrete Structures Industry**

Given the unprecedented impact of the coronavirus pandemic, I am writing to you today to outline the concerns our members have relating to CITB activity, and how you can help us keep the construction industry building during this complex and challenging situation.

CONSTRUCT Concrete Structures Group is the leading representative body for the concrete structures industry, and our members undertake approximately 80% of all concrete frames built nationwide.

### **Card Scheme Concerns**

We have written to each of the relevant card schemes most used by the concrete structures industry (CSCS, CPCS & NPORS). The advice and guidance varies across the schemes and ask CITB to help facilitate a coordinated approach to flexibility measures across the schemes during this uncertain period.

CONSTRUCT would like more detailed guidance for sites and stronger directives to the major contractors about flexibility on temporarily accepting expired cards, unless there is reasonable cause for concern that the operative is not genuine.

This is particularly poignant where operatives have been unable to take their H&SE Test or complete the necessary training or qualifications as a result of Test/Training Centre closures.

In light of Pearson Vue centre closures, we would expect that operatives would not need to provide evidence of this while the centres remain closed.

In the initial stages of this outbreak, we are calling for all cards to have a grace period of 6 months from expiry for being accepted on site, and this period should be reviewed regularly in line with the latest government guidance, and extended if necessary.

CSCS has stated that the deadline for renewal of cards has been extended from 6 months to 12 months. We are calling for all card schemes to mirror this measure and we would again urge that this is regularly reviewed in line with government guidance, and extended if the pandemic continues over a prolonged period.



Chairman: Neil Marney

Secretariat Manager: Dave Campbell

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## **H&SE Testing Requirements**

We note and welcome your guidance on the HS&E Test and flexibility on the renewal of cards, and on finding alternative systems for new entrants into the industry. We recognise the importance of the test to ensure that construction sites continue to operate in a safe manner, however there is a need to find different ways to assess operatives while Test Centres remain closed.

CONSRUCT would like CITB to consider if the H&SE Test could be administered remotely, so that operatives can take the test from their homes or from site/company offices. We understand the lack of invigilation that would arise from this set up, but a shorter window of validity of 12-18 months could be considered, until the operative is able to attend a test centre. We would ask that CITB take the lead in working with the card schemes to find a means to make this workable.

## **Grants, Levy & Funding**

It is imperative that CITB does all it can to make sure grants for training already undertaken are distributed to employers, and ensure that employers can continue to invest in new entrant talent in this difficult time.

We welcome and support CITB's efforts to ensure that grants are paid promptly to aid with employers' cash flow, the lifting of the 20-week processing rule, and bringing forward apprenticeship grant payments to facilitate employers keeping on apprentices.

Cash flow and tight margins are not new to construction, it is inevitable that levy payments will also be a strain on businesses. As construction enters a period where most training will not be able to take place, industry will be hit twice with levy payments based on better business conditions, and unable to undertake training and thus claim grant during 'lockdown' and social distancing measures.

We are calling on CITB to work with Government to provide a temporary levy payment suspension for 3 months, with the option to extend should the pandemic continue over a prolonged period. In line with the governments approach to other taxes, consideration for deferred payments may also be necessary once the peak of the virus has passed.

CONSTRUCT also runs the Concrete Frame Training Forum (CFTF), where we have additional funds to support our members' training and career activity. While the bulk of training has now taken place, the virus outbreak has resulted in some cancelled training and delayed career activity.

Training Groups – including CFTF – with active funding applications in these areas should be given the opportunity to deliver their remaining training and careers activity to an extended deadline.

Employers that have active Skills & Training Fund (S&TF) applications should receive flexibility given that they may not be able to deliver training over the coming weeks. CFTF will submit a collective S&TF application, but will delay submission until May/June to allow members to readjust their training plans in line with updated business plans and skills strategies.



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## Qualification and Apprenticeship Achievements

As it is not clear when this pandemic will subside, it is possible that it will affect the ability of employees and candidates to complete their qualifications.

While CITB no longer operates its own Awarding Organisation (AO), its leading role in construction skills requires it to take a lead in this arena.

We call upon CITB to work with the main AOs for the sector – including NOCN and City & Guilds – to ensure that End-Point Assessments (EPAs) are reviewed for the opportunity of bringing flexibility in the delivery to avoid delay in apprenticeship achievement, and that a grace period of 6 months be introduced to any deadlines for completion. This period should be reviewed regularly in line with the latest government guidance, and extended if necessary.

If the pandemic is short-term there may be little impact on the ability for candidates to complete their NVQs within the 3-year period. However, we would call for AOs to offer a 6-month grace period for completion for those that are nearing the deadline, again with the option to extend further in necessary.

We also welcome CITB's announcement to allow refreshers for SSSTS and SMSTS where they have expired. Temporary Works is significant part of our members operations, and we would therefore expect similar arrangements to be in place for Site Safety Plus (SSP).

As this is an on-going and fast-moving situation, we would like to work closely with you to ensure the issues faced by our sector – and no doubt the other sectors of construction – are robustly dealt with during this difficult time.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "D Campbell", with a long horizontal line extending to the right.

**Dave Campbell**  
**CONSTRUCT Trade Association Manager**

Cc: Nick James, Partnerships Director, CITB  
Cc: Julia Stevens, Partnerships Manager (Training Groups), CITB  
Cc: Sarah Garry, Policy Director, Build UK



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