

Q1-9 are administrative only.

Section 1: Free level 3 qualifications for adults

Q10. What do you think will be the key barriers to adults taking up the free level 3 qualifications?

The main barrier we have identified is that, in warehousing, although there is a need for training and the government's list of eligible qualifications includes one that is relevant to our sector: Highfield L3 Diploma in Warehousing & Storage (RFQ), there are almost no training providers who are delivering this course, so in effect it is not really available.

Other key barriers are:

1. Employers and potential learners being unaware of what is on offer.
2. Training providers and awarding organisations being unclear about exactly what is allowed and thus giving vague, inaccurate or conflicting advice to employers.
3. Course content being misaligned with employers' needs.
4. Employers being confused by a range of training & funding options and lacking the information to discern what is right for their business.
5. Levy-paying employers being incentivised to dedicate their limited management resources to the deployment of their apprenticeship funds instead.
6. Employers being reluctant to invest time and effort in people who may not be loyal to them after the training is completed, or other fears about hidden costs and the risk of not realising a return on investment.
7. Complex stakeholder relationships:
 - a) 3PL warehouse operators' beliefs about the expectations of the customers (manufacturers and retailers) whose goods they are storing and handling.
 - b) Recruitment norms for warehousing, which often include the regular use of labour agencies and temporary labour requirements to meet peaks and troughs in demand.
 - c) Known training providers (already used for mandatory skills like fork-lift truck driving) are not the same as the training providers eligible for government funding.
8. Potential learners being put off by the risk of training (a) being boring, especially if they are expected to repeat things they have already learnt; or (b) not being valuable, especially if employers appear disinterested.

Q11. This is a question for providers:

- a) How do you currently advertise your learner support offer?
- b) To what extent does the current learner support offer enable you to address the financial barriers which could stop adults participating or continuing in learning?
- c) Which financial barriers do you find it hardest to address and what is the reason for this?
Please provide examples and/or evidence for your response.

Training providers have told us that in general, they sometimes use websites such as findcourses.co.uk, coursesonline.co.uk and reed.co.uk, which are aimed at employers. Respectively, those websites have 526, 723 and 1,022 logistics courses advertised. With so many options

available, it must be difficult for employers to pick the most appropriate and even harder for individual learners.

Q12. How easy is it for adults to find out whether they are eligible for the current learner support offer?

a. Really easy b. Easy c. Neutral d. Difficult e. Really difficult

Difficult.

Please provide an explanation for your answer.

Adults who are in employment within the warehousing sector tend to rely upon their employer to show them what learner support is on offer. You will see from our answers below, that employers are ill-equipped to do this. We therefore believe it must be difficult for employees in warehousing to find out about their eligibility. We are not in a position to report on adults working in other sectors, or out of work, but it seems likely that they might face similar difficulties.

Q13. Are there any other ways through which it would be useful to publicise learner support? Please set out what these other ways are and explain why they might be useful.

UKWA advocates learner support being shared with employers via Local Enterprise Partnerships (such as the South East Midlands LEP), professional institutes (such as the Chartered Institute of Logistics & Transport) and trade associations (such as UKWA). These organisations are trusted to quality assure the training providers and share case-studies about how similar employers have benefited from such programmes. Their advantage (compared with providers doing the publicity) is that these organisations are perceived to be less biased and they can advise on a broader range of options.

Q14. How do you think that government can support providers to deliver best practice in communicating and providing the current financial support for adults? Please explain your answer and, where possible, provide evidence for your response.

In warehousing, the culture around training is sometimes negatively influenced by the view that skills and knowledge are best acquired through experience: this is normalised by the absence of any school qualifications (e.g. GCSE, A level or BTec) in supply-chain, logistics or warehousing. Training budgets are usually dedicated to mandatory training: chiefly RTITB accreditation for fork-lift truck driving, but also workplace requirements such as manual handling and first aid qualifications. As well as the Free Level 3 Qualifications and Skills Bootcamps covered by this consultation, employers are faced with a range of options for training they must fund themselves, as well as a confusing array of public funding for other training (Apprenticeships, Traineeships, Kickstart, etc). They report that it is usually difficult to identify the best options for their workforce. Training providers are understandably motivated to promote the training which they themselves offer and in the worst cases, this is described by employers in our sector as “a sales-y bun fight”. In the warehousing sector, this is a problem because there are typically slim profit margins, very flat management structures across shift-based teams and a focus on immediate operational concerns. Employers simply do not have the resources to read all the government guidance, assess the needs of their workforce, evaluate all the different options for training provision and fill in the appropriate forms, especially if they are sceptical about the likely benefits of training.

The wider communication issue we face is the inequality of careers advice. UKWA is already working with DWP to showcase warehousing jobs and upskill JobCentre staff. We endorse the work of Think

Logistics (administered via the Chartered Institute of Logistics & Transport UK) to help schools meet the Gatsby benchmarks. Nevertheless, recent research by one of our Members found that although 7-8% of the UK workforce is employed in the logistics sector, only about 3% of school leavers want to work in transport or warehousing. For learners, this must be addressed with better communication about careers, coupled with accurate information about all the financial options for relevant training (self-funding, employer-funding AND government-funding).

We recognise this consultation is about “*the approximately 11 million adults aged 24+ **in England** who do not hold a level 3 qualification or higher*”. However, in addition to the challenges above, our Members say they find the variation between the funding arrangements in devolved nations confusing and in particular there is a risk that adults in Northern Ireland are being short-changed. This affects England too, because the confusion is off-putting.

Q15. For the non-financial flexibilities below, please select which you think are valuable:

- Flexible start dates
- Breaks in learning
- Flexible modes of delivery
- Weekend and evening learning
- Recognition of prior learning
- Other which is not listed (please specify)

All the flexibilities mentioned are valuable.

‘Flexible start dates’ allow employers to avoid peak periods of operational activity and help trainers to spread their marking workload.

On ‘flexible modes of delivery’ we believe online delivery can be a useful component of warehouse training but is unlikely to be effective if it is the sole method used at Level 3. For adults who do not already have any Level 3 qualifications, their previous academic experiences may have been poor, so if their learning stalls, they will potentially find it difficult to identify what they are struggling with or feel embarrassed about asking for help. Face-to-face delivery can help to overcome these barriers.

Options for ‘weekend and evening learning’ are especially important for the warehousing sector because many warehouses are operational 24/7 and people work shifts which extend well beyond 9 to 5, Monday to Friday.

On ‘recognition of prior learning’, this is used in two different ways: (a) as a pre-requisite, it can become a barrier to entry; but (b) as an exemption, it can help to avoid learners become disengaged if they are expected to ‘go through the motions’ of learning something they already know. For those who have been out of education for a long time, an introduction to study skills could be valuable at the start, but there are two challenges: adding an introduction to study would make the course even longer; and the funding does not cover it.

Q16. Are there any barriers which might make it difficult to use or deliver the existing non-financial flexibilities? Please set out what these barriers are and, where possible, suggest ways that these barriers may be overcome.

Learning that fits in with shift-work relies on trainers being available to work anti-social hours. The current funding arrangements do not compensate training providers sufficiently to pay their staff a shift-premium. In order to allow a night-worker to undertake any daytime training, it is usually necessary to sacrifice at least two shifts of revenue-generating work per training session. Some

labour workforce agreements, introduced to safeguard wellbeing, render this shift penalty even higher. Disruption to shift-work is a hidden cost of training which ought to be better reflected in public policy.

Q17. This is a question for providers: What could encourage providers to deliver these non-financial flexibilities more often? Please set out which of these non-financial flexibilities your answer refers to (e.g., “all the non-financial flexibilities above” or “flexible start dates only”).

Q18. If you have any further comments or reflections on ‘Accessibility (Section 1: Free level three qualifications for adults)’ you can add them here.

Q19. Different sectors may use the offer in different ways, depending on their skills needs. How do you think different sectors might make use of the offer and why? If you are answering as an employer, you might want to talk about how your specific sector could use the offer.

Q20. How might we adapt the offer to better meet the needs of employers, including those from a range of different sectors, and a range of sizes? Where possible, please set out the proposed adaptation and which types of employers it would suit.

At present, the Level 3 offer is only available for Diplomas, which are a lengthy course (400 hours). However, Level 3 Awards and Level 3 Certificates would both be more accessible as they can be taught within a shorter time frame. Not only is this more flexible, but shorter courses are a less daunting prospect for the employer in a low-margin business hampered by labour shortages and for the learner whose prior educational experiences were uninspiring.

Q21. How else can we encourage employers to use the free level 3 qualifications for adults to train or upskill their workers? Please set out your suggestion and, where possible, provide a reason and/or evidence for your response.

Ensure training providers actually deliver the Highfield L3 Diploma in Warehousing & Storage (RFQ).

Develop a modular arrangement with streamlined access across different funding schemes (e.g. Bootcamps as module one of Apprenticeships).

Extend the provision to Level 2.

Include essential skills such as fork-lift truck driving and manual handling.

Q22. If you have any further comments or reflections on ‘Employer Involvement (Section 1: Free level 3 qualifications for adults)’ you can add them here.

Q23. This is a question for providers: What prior learning requirements (if any) do you have for someone taking a level 3 course? Please set out the prior learning requirements and how those requirements differ between different courses and sectors (if at all). For example, you may require an adult to have gained the equivalent level 2 qualification before taking a level 3 course. Do the prior learning requirements differ depending on the sector at which the course is aimed?

Providers have told us that prior learning requirements are usually set by the Awarding Organisation. Level 2 in Maths & English are typically required, but providers find that in warehousing, the low bar for entry-level jobs and the culture of promoting from within the workforce, means learners often do not have this. Completing Level 2 Maths & English first will make the overall course take even longer.

Q24. This is a question for employers: Are there any particular requirements for learners looking to achieve a level 3 qualification in an area that supports your sector? Please set out these requirements and, where possible, provide a reason and/or evidence for your response.

Within the apprenticeship framework set up by the Trailblazer group for our sector, a warehouse operative apprenticeship is at L2 and Warehouse Supervisor at L3. The levels are nominal anyway and employers might reasonably establish bootcamps for warehouse operatives too, but under the current arrangements these would have to be at L3. It is not clear how this would then lead into an apprenticeship at L2.

Q25. How else can providers best support adults without a level 3 to access the level 3 qualifications available through the Lifetime Skills Guarantee, given that they may lack some prior learning or experience? Please provide evidence and/or examples to illustrate your response.

Funding pro rata for the units would help, so providers could break the qualification down into bite-size learning and assessment. Under the current arrangements, the whole course has to be taught, including content which is not relevant, in order for the provider to unlock any of the funding.

Q26. How else can we achieve the best impact for adults with the most to gain from the free level 3 qualifications for adults, alongside funding the courses? Please provide a reason and/or evidence for your response.

Showcase, with role models and testimonials, how the learner's circumstances will change. Draw a link between 'this qualification' leading to 'this job opportunity'. Use positive language to explain how people who undertake training not only improve their job prospects, but also get satisfaction from implementing what they have learned and feel valued, both of which can help improve wellbeing.

Q27. If you have any further comments or reflections on 'Pathways to free level 3 qualifications for adults (Section 1: Free level 3 qualifications for adults)' you can add them here.

Q28. If you have any further comments or reflections on 'Section 1: Free level 3 qualifications for adults' you can add them here.

Section 2: Skills Bootcamps Expansion of Skills Bootcamps

Q29. Which current aspects of the Skills Bootcamps do you think are most valuable? Select all that apply.

- Short, intensive courses
- Industry-specific training, designed to meet the needs of employers
- Focused on in-demand skills
- Fast-track to an interview
- Line of sight to a job
- Recruitment pipeline for employers
- Flexible delivery model
- Emphasis on improving diversity in technical skills.
- Other – please specify

Please explain the reason for your response.

Q30. If you have any further comments or reflections on 'Expansion of Skills Bootcamps (Section 2: Skills Bootcamps)' you can add them here.

Q31. This is a question for providers: What do you think are the challenges in delivering Skills Bootcamps? Where possible, please provide evidence for your response.

Providers have told us that for warehousing, it is essential to have the facilities for learners to put their skills into practice, but they find it difficult to get employers involved in work experience.

Q32. This is a question for providers: How best do you think we might help providers to overcome the challenges to delivering a Skills Bootcamp? Please refer to the challenge you have set out in answer to the previous question. Where possible, please provide evidence for your response.

Q33. If you have any further comments or reflections on 'Providers (Section 2: Skills Bootcamps)' you can add them here.

Q34. Skills Bootcamps currently run for up to 16 weeks. Other than the length of the courses, do you think we could adapt Skills Bootcamps in any other way to:

- a) Support adults to access this training more easily?
- b) Support adults who are self-employed to access this training and use what they learn to benefit their business?
- c) Better meet the needs of employers, including those from a range of different sectors, and a range of sizes? Where possible, please detail the proposed adaptation and which types of employers it would suit. Please provide a reason and/or evidence for your responses.

Q35. Skills Bootcamps are designed to give adult learners the skills they need to fast-track them to an interview for a specific job. Do you think Skills Bootcamps courses should continue to be a maximum of 16 weeks long? Please explain and provide evidence for your answer.

Q36. What is the minimum length of time that you think a Skills Bootcamp course should be? Please provide evidence for your response. Providing evidence: If you are an adult learner, you might want to think about how much time you would be willing to commit to training through a Skills Bootcamp, including how many hours per week. If you are an employer or provider, you might want to give an example of a technical skills needed for a specific job and set out how many weeks it would take to learn that skill on a full-time basis.

Shorter models are known to be effective, with the right support. For example, the Assured Skills Academy in Northern Ireland ran for 12 weeks and there was a warehouse skills scheme for Young Offenders at Level 1, which only took 8 weeks. However, the advantage of a 16 week programme is that it gives learners the chance to experience a range of different tasks and activities in the workplace and potentially even across three or four different employers, if such a collaboration can be brokered.

Q37. If you have any further comments or reflections on Accessibility (Section 2: Skills Bootcamps) you can add them here.

Q38. This is a question for employers: We understand that how an employer is required to make this financial contribution could have an impact on them – for example whether employers are required to make an upfront payment before the start of the course. Are there any ways that we could make the mechanism for contributing as easy as possible?

Q39. For all stakeholders, it may be valuable if employers could also make non-financial contributions to training. These non-financial contributions could be made by both those employers who are using a Skills Bootcamps to retrain their current workforce, in addition to the 30% contribution where they are using Skills Bootcamps to train existing employees, and by those who are not. Please select the non-financial contributions below that you think it would be most valuable for employers to make, and add any other contributions not listed that you think would also be valuable.

- Providing space for training.
- Providing technical equipment for learning.
- Helping delivery of the training – e.g., providing some learning materials or teaching part of the course content.
- Giving their workers time to learn.
- Any other additional non-financial contributions not already listed that you think would be valuable. Please specify.

All the contributions listed are valuable.

Another non-financial contribution which might help learners would be for employers to help with transport arrangements for learners to get to and from the workplace. In warehousing this is particularly important because warehouses are not always close to where workers live and because the start and end of working shifts do not always align with public transport availability.

Employers should be encouraged to engage in all the ways listed, not only to facilitate the training, but also to demonstrate to the learners that they are invested in its success.

Q40. This is a question for employers: Would you be willing to make a non-financial contribution to training? Please explain your response.

Q41. How do you think that we can encourage more employers to make non-financial contributions? Where possible, please give examples and explain your answer.

Once convinced of the benefits of training, employers in our sector are unlikely to resist making a non-financial contribution. Testimony about the contributions made by others might be an effective persuasive tactic.

Q42. If you have any further comments or reflections on 'Employer Involvement (Section 2: Skills Bootcamps)' you can add them here.

Q43. What further learning do you think a Skills Bootcamp should enable adults to progress onto?

- No further learning.
- Job-based training in the workplace.
- A higher technical qualification.
- An apprenticeship.
- Other further training and/or learning opportunities not already listed which you think a Skills Bootcamp should enable adults to progress onto. Please specify.

Skills Bootcamps should work as a standalone option. They should also be structured as a modular component of relevant apprenticeships.

Q44. We welcome any further comments on how we can best enable progression from Skills Bootcamps onto further training and/or learning, such as apprenticeships or higher technical education.

Q45. If you have any further comments or reflections on 'Pathways leading on from Skills Bootcamps (Section 2: Skills Bootcamps)' you can add them here.

Q46. If you have any further comments or reflections on 'Section 2: Skills Bootcamps' you can add them here.

Section 3: Meeting Critical Skills Needs

Q47. Are there any current critical skills gaps below degree level and in particular sectors, occupations, or locations that you think the skills system will not meet, either now or in the next five years? For example, some sectors might have specific skills needs which have emerged since exiting the European Union, whereas other sectors might encounter skill needs in the future – for instance, because of new technologies linked to transitioning industries or our ambition to reach net zero by 2050.

- a) What are these skills gaps? Please set out what these skills gaps are and specify whether they apply to a particular sector, occupation, or location.
- b) What level are these skills gaps at?
- c) Is this a current skill gap, or something that you see emerging in the future? If in the future, please detail when you think this skill need is likely to arise.
- d) Why do you think the skills system does not meet this skills gap?

The rise of ecommerce and the introduction of more automation & robotics in warehousing have both created skills gaps. Since exiting the European Union, there is a knowledge gap in our sector about best practices in operating warehouses for bonded goods and certain foodstuffs affected by new regulatory requirements. In future, further gaps are likely in respect of the customs and excise arrangements affecting warehouses in the new Freeports.

These skills gaps are at Levels 2-5.

Q48. If you have any further comments or reflections on 'Critical Skills (Section 3: Meeting critical skills needs)' you can add them here.

Our sector is happy to support the acquisition of functional skills (English and Maths) as a basic human right, but we do not always demand them as a pre-requisite. Entry level jobs in warehousing at Level 1 (and sometimes Level 2) are usually accessible even for people with poor functional skills. In fact, with the benefit of technology such as 'pick by light', the requirement for functional skills is reducing. The ability to respond to error messages from an automated system is arguably more critical than any traditional functional skills. Even at entry level for the most straightforward jobs, however, warehouse workers must have sufficient grasp of the English language to be able to follow safety instructions; and the ability to count is usually important.

Q49. Are there any particular sectors or occupations which would benefit from improved access to shorter courses? Please set out which sector or occupation and, where possible, provide a reason and/or evidence for your response.

Q50. Could more options for shorter courses or more modular learning opportunities help adults to overcome barriers to learning? Please explain your answer and, where possible, provide evidence for your response.

Both employers and learners may find it daunting to sign up for a long-term commitment, so shorter, modular learning opportunities are more accessible.

Q51. This is a question for providers: Are you currently delivering short courses (under 12 months) or modules outside of full qualifications? If you answered yes, please specify:

- a) What courses/modules you are delivering.
- b) What level these short courses/modules are.
- c) Why you chose to deliver these short courses or modules.
- d) How you designed these short courses or modules. For example, did you work with employers to do so?

Q52. This is a question for employers: Have you funded short courses (under 12 months) or modules outside of full qualifications? If you answered yes, please specify:

- a) What short courses/modules you have funded, and why.
- b) Whether you worked with the provider on the design of any of these courses.

Employers in our sector routinely fund mandatory training: chiefly RTITB accreditation for fork-lift truck driving, but also workplace requirements such as manual handling and first aid qualifications.

Q53. This is a question for employers: Do you have any skills needs that you think might be met by a short course or module outside of a full qualification? If you answered yes, please set out what these are.

Q54. Considering the provision we have already made available through National Skills Fund investment, do you think there are any further gaps below degree level in adult skills provision which would benefit from targeted support? If you answered yes, please:

- a) Specify what these gaps are.
- b) Provide evidence for your answer, including evidence on the impact of this gap.
- c) Suggest ways that these gaps in provision might best be met.

Q55. If you have any further comments or reflections on 'Shorter Courses (Section 3: Meeting critical skills needs)' you can add them here.

Q56. If you have any further comments or reflections on 'Section 3: Meeting critical skills needs' you can add them here.

The well-publicised shortage of HGV drivers, which is affecting the UK economy, might (at least in part) be addressed by "Warehouse to Wheels" programmes. Many of our Members operate both warehousing and commercial lorry fleets. Warehouse employees whose motivation and loyalty are assured and who have prior knowledge of customers and their inventory, can be offered C+E driving licence acquisition along with experience and a guaranteed position, ideally with the support of public funding. UKWA is in favour of such schemes: if well-managed they provide career progression opportunities and meet business needs. However, we want to stress that the sustainability and long-term success of "Warehouse to Wheels" will rely on improvements in the recruitment and retention of warehouse operatives.

The UK Warehousing Association welcomes the opportunity to respond to this consultation and collaborate with stakeholders including the UK Government, to ensure the logistics sector embraces integrated solutions to our labour shortages and skills gaps.