

**BIS** | Department for Business  
Innovation & Skills

**CONSULTATION ON THE FUTURE  
OF THE RIGHT TO REQUEST 'TIME  
TO TRAIN' REGULATIONS**

Government Response

JULY 2011

# Contents

<b>Executive Summary</b> .....	<b>3</b>
<b>Introduction</b> .....	<b>4</b>
Background .....	4
Scope .....	4
Consultation process.....	4
Statistical analysis of responses .....	5
Question 1 .....	6
Question 2.....	7
Question 3.....	8
Question 4.....	8
Question 5.....	10
Government’s response and conclusion .....	12
Next Steps.....	13
Annex A: SUMMARY OF RESPONSES TO PUBLIC CONSULTATION ON THE FUTURE OF THE ‘RIGHT TO REQUEST TIME TO TRAIN’ .....	15
Annex B: List of Respondents.....	21
Annex C: updated Impact Assessment (Final Stage). .....	26

# Executive Summary

1. Ministers of the new United Kingdom coalition Government wished to look at what more could be done to help the economy and to consider the regulatory burden being placed on business. As a first step, in summer 2010 a review of all pipeline regulations was announced to consider all the regulations planned by the previous Government. As part of this review, on 11 August Skills Minister John Hayes launched a consultation on the future of the right to request time to train which had been introduced across Great Britain in April 2010 for employees in organisations with 250 or more employees. Under plans of the previous Government, it was due to extend to cover employees in all other organisations from April 2011.
2. There was a good response to the consultation, from businesses, public sector organisations, professional bodies, individuals, employer representative bodies, trades unions and staff associations, and others. 147 responses were received by the closing date. These responses revealed an extremely polarised position between those supporting retention of the right seeing it as a key way in which individuals could be supported to access training and those wanting to see the right repealed seeing it as an unhelpful and unnecessary burden on business.
3. In taking forward this decision the Government kept two objectives in mind. First, the need to maintain a sharp focus on the importance of workplace training in line with the recently published Skills Strategy and secondly, the need to protect small and medium sized businesses from potential burdens in line with the Coalition Government's principles for reducing regulation and through this create the right conditions for growth as outlined in the Plan for Growth published alongside the Budget.
4. Of the options put forward in the consultation the Government did not feel that it was safe to conclude from the responses received that it could proceed with the planned extension of the right to all employees in April 2011. Equally, given the strong level of support in some quarters, it was not possible to conclude that the consultation had delivered a decisive message in favour of the full repeal of the right. Furthermore, the responses showed there was little support for making changes to the way the right functions so this option is not being considered further.
5. Given this position, the right to request time to train will therefore not be extended to employees of small and mediums sized organisations for the foreseeable future. The right will continue to be available to employees in large organisations with 250 or more employees. This decision will allow time for the evidence base to support the effectiveness of the policy to develop over time. The position will be kept under review. Any future decision on the policy will take account of evidence about levels of employer and employee investment in skills, as set out in [The Plan for Growth](#) (23 March 2011).

# Introduction

## Background

1. The Right to Request Time to Train regulations were introduced in England, Scotland and Wales on 6 April 2010. The regulations commenced for large organisations employing over 250 people in April 2010 and had been scheduled for extension to all organisations in April 2011.
2. The new Coalition Government announced in June 2010 a review of all pipeline regulations to ensure burdens on business are kept to the minimum necessary to protect the public interest. Following on from this, the Government made clear in the Plan for Growth that it wanted to create the right conditions for business to succeed, removing barriers that are preventing them performing to their full potential, holding back growth and hiring by business.
3. The Government launched a consultation on the future of the right to request time to train. The purpose of the consultation was to gather views from interested parties in three key areas: whether the right should be retained; whether it should be repealed; or whether it should be re-shaped.
4. This paper summarises the outcome of the consultation and the Government's response.

## Scope

5. The UK Government has reserved legislative competence for employment to the Westminster Parliament for England, Scotland and Wales. Responsibility for employment law in Northern Ireland has been transferred to the Northern Ireland Assembly.
6. The Devolved Administrations in Scotland and Wales were individually informed of the consultation and invited to provide their views as part of the process. These views have been fully considered by the UK Government in deciding its response. The Northern Ireland Assembly has also been considering introducing a similar right to apply in Northern Ireland. The Assembly has therefore been kept informed of the outcome of this consultation.

## Consultation process

7. The consultation was opened on 11 August 2010 and closed on 15 September 2010. A full twelve week consultation on the introduction and scope of a right to request time to train was conducted in late 2008. Contact had been maintained with a number of interested parties throughout the policy's subsequent development. Because of this, Ministers agreed that a shorter consultation than usual would be acceptable in this instance.

8. The consultation was publicised through the BIS departmental website and bulletins, and a formal press notice was issued. Additionally, UK Government officials made early contact with a wide range of business and professional organisations and other interested parties that it was considered would be likely to wish to provide views. The Devolved Administrations and main employer representative bodies were encouraged to cascade the consultation further within their own contacts.

9. An online survey was made available through a dedicated website and the main BIS website. However, responses were accepted by whatever method participants wished to provide them to ensure that all views were taken into consideration. In the days leading up to the closing date for responses the main business representative groups were invited to submit a response if they had not already done so.

## **Statistical analysis of responses**

10. The consultation asked four questions about retention and coverage of the right. A fifth question provided three options for how the right might be modified. All questions provided opportunity for open comments where respondents wished to provide them, plus an opportunity to provide further open comments of a more general nature. A full summary of responses to all questions is provided at Annex A.

11. As the consultation related to an employment right which addresses skills needs, responses were categorised by groupings with broadly similar interests: employers; individuals (22 respondees); professional bodies (29 respondees); main representative bodies (5 respondees); trade unions (21 respondees); and others (21 respondees);. Employer responses were also grouped by: local authorities (6 respondees); large employers (250+ employees) (25 respondees); medium-sized employers (50-249 employees) (5 respondees); small employers (10-49 employees); and micro employers (up to 9 employees) to identify potential differences of view between these groups. This gave a total of 147 respondents.

12. Not all respondents chose to answer all questions, or to provide enough information that enabled them to be categorised precisely. Additionally, a very small (and statistically insignificant) number of respondents identified themselves in ways that seemed unlikely or an error – such as individuals signalling that they represented an employer or trade union, but their response coming from a private email address, or the tone of language suggesting it may well have not been a formal representative view.

13. Although most responses were submitted from English addresses, it was not always possible to identify accurately which employers or bodies also represented interests outside England. Nine responses could be identified from outside of England: five from Scotland; three from Wales; and one from Northern Ireland.

14. Responses to the individual questions are shown in the following Tables.

## Question 1

Q1. Should the right be retained as it exists now in organisations with 250+ employees, and extend to small and medium organisations in April 2011 as planned?						
Yes		No		Not Sure		Total
74	50%	66	45%	7	5%	147

15. 74 respondents (50 per cent) were in favour of retaining the right as it stood and extending it from April 2011 as previously planned. 66 responses (45 per cent) rejected this approach, and 7 responses (5 per cent) were not sure.

16. This tells us that at least half of all respondents were in favour or undecided about carrying on as planned, and there also is a significant appetite for changing the plans. Most of the respondents were clear in their views and around half provided additional comments to elaborate upon why they held those views. Trade unions, staff associations and a range of professional and other representative bodies in particular were widely in favour of retention and extending to SMEs as planned. They felt that the right was necessary to ensure that employees had access to training and that it was a sensible nudge to require employers to consider these requests. Just under half of respondents felt that the right was unnecessary and that Government should not intervene in this way.

17. Breaking down the figures to show the views expressed by employers, by employer size (see Annex A), shows that smaller enterprises were far less receptive to retention of the right under its existing arrangements. Of the 49 employer responses 59 per cent did not want to see the right extended as planned; rising to 77 per cent when looking at just small employers.

18. Several representative bodies commented that in larger organisations there is a greater likelihood of dedicated functionality and resource to deal with personnel and training issues. Smaller organisations without dedicated HR functions could be more challenged to deal easily and consistently with requests submitted using the right.

The time to train regulations should be scrapped for large and small companies alike – in their entirety

**British Chambers of Commerce**

The cost and management of requests may be more difficult to manage in an SME.

**npower**

## Question 2

Q2. Should the right only apply in organisations with 250+ employees, and not be extended to small and medium sized organisations?						
Yes		No		Not Sure		Total
17	12%	114	80%	11	8%	142

19. This question asked whether the right should only apply to large employers and not be extended to small and medium organisations. From the 142 respondents who answered this question, 17 (12 per cent) wanted the right to apply only to large organisations. 114 respondents (80 per cent) were against the right remaining only in large employers, and 11 respondents (8 per cent) were not sure what arrangements should apply.

20. Narrative comments emphasised a difference in interpretations when responding to this question, making the data insufficiently reliable as a consequence of how the question had been presented. The figure for those that said “no” was in fact split between those in favour of extension (whether immediate or delayed) and those who believed the right should not apply anywhere.

21. Several comments were made that where large enterprises already have good training systems in place, the right would be less valuable than in smaller organisations or those less willing to support training and development. The issue of fairness in accessibility to training, with the social and economic advantage it can bring, was forefront in the minds of several respondents – particularly those representing charitable or voluntary sector interests who had a special interest in assisting disadvantaged members of society.

We should both encourage and foster best practice.

**Council of Ethnic Minority Voluntary Sector Organisations**

### Question 3

Q3. Should the extension of the right to small and medium sized enterprises be delayed until the economic conditions improve?						
Yes		No		Not Sure		Total
28	20%	96	70%	13	9%	137

22. This question asked about the appetite for delaying extension of the right until economic conditions improved. 28 respondents (20 per cent) agreed with a delay, while the majority (96 responses (70 per cent)) disagreed, and 13 respondents (9 per cent) were not sure.

23. As with the previous question, comments made by those who disagreed revealed different reasons between those who thought the extension should be pressed ahead urgently, and those who felt the right should never be extended. Those respondents wanting the right to be extended thought that promoting workplace training even in difficult times was extremely important; while those against that felt that the burden of dealing with requests particularly for small firms could present too much of a challenge.

While the economy remains fragile, the need for a flexible, well trained workforce is critical to ensure that both the industry and service sectors in our economy can recover. Without a workforce that can access training whether that training is work orientated or skills for life those individuals will be at a great disadvantage in finding alternative employment which would continue to hamper any economic recovery.

**Alliance for Finance**

### Question 4

Q4. Should the right be removed altogether?						
Yes		No		Not Sure		Total
53	36%	85	58%	9	6%	147

24. This question asked whether the right should be removed altogether. 53 respondents (36 per cent) thought it should, while 85 respondents (58 per cent) thought it should be retained. 9 respondents (6 per cent) were not sure.

25. Looking at employers specifically, 21 respondents (43 per cent of the employer response) did not want to see the right repealed. However, 49 per cent of employer respondents wanted the right repealed (24 out of 49). This rises to 61 per cent when just considering small business respondents. Strong views were expressed from smaller organisations with an existing ethos of regular informal contact between employers and employees, that introducing formal procedures would create a disproportionate burden.

26. However, some respondents strongly arguing for the right to be retained felt that it provided an important safety net particularly for low-skilled employees. Some respondents also thought that alternative solutions could be developed to resolve disputes over refused requests that did not then lead to an Employment Tribunal.

Commitment to training is essentially down to the ethos/culture of an organisation and whether the owners of the business truly appreciate the value of their people. Trying to change current 'thinking' or influence 'action or behaviour' by implementing this kind of statutory process completely misses the point.

**Gifford**

It would be better to remove this right and seek new methods of incentivisation.

**People 1st**

## Question 5

27. The last question asked whether the right should be retained but made to work better. Three different approaches for how the right could potentially be amended and still function as a valid employment right were put forward.

Q5. Should the right be retained, but made to function better, for example by:						
a. Exempting employees who can already access training from being able to use the right or introducing exemptions for other employees?						
Yes		No		Not Sure		Total
34	26%	82	63%	14	11%	130
b. Adding new reasons for refusal where good training review systems already exist?						
Yes		No		Not Sure		Total
34	26%	81	63%	14	11%	129
c. Introducing different procedures for dealing with requests? (If yes, please specify what these should be and how they would operate.)						
Yes		No		Not Sure		Total
22	17%	81	63%	25	20%	128

28. Option A explored the appetite for introducing exemptions for particular groups of employees, such as those already able to access training. Of 130 responses, 34 respondents (26 per cent) agreed with this approach. However, the majority disagreed (82 respondents (63 per cent)) or were not sure (14 respondents (11 per cent)).

29. Option B explored the appetite for adding new reasons for refusal which could be used by employers when considering applications. Of 129 responses, 34 (26 per cent) respondents agreed with this approach. However, the majority again disagreed (81 respondents (63 per cent)) or were not sure (14 respondents (11 per cent)).

30. A key theme made by those in favour of change was that the legislation should take account of employers with effective training procedures and provide exemption from the requirements of the legislation. However, those not in favour of change argued that the legislation is already weighted in favour of employers. Employers already have a number of reasons which they could use to decline requests and further reasons were not needed.

The regulations do not need amending as they have enough checks and balances to ensure that unfair burden is not placed on employers.

**USDAW**

31. Option C explored the appetite for introducing different procedures for dealing with requests, and asked for suggestions of what these might be. Of 128 responses, 22 respondents (17 per cent) thought that different procedures should be introduced. However, 81 respondents (63 per cent) thought no further procedures were necessary while 25 respondents (20 per cent) were not sure.

32. Overall, responses to these three questions showed that there was not strong support for the alternatives that had been identified prior to the consultation as possible ways to develop the policy while retaining its aims. There was a willingness from some respondents to try different approaches, but others felt that to do so might simply add complexity. The Employment Lawyers Association in particular argued that different procedures would not make the right function better and carried a strong risk of creating legal uncertainty around who could and who could not make requests.

Government should focus on promoting training rather than regulating on it. Businesses need to be socially aware of the benefits that training can bring to a business' competitiveness. The additional costs [of compliance] would be overly burdensome for a small business and might lead them to reconsider employing staff at a time when Government is looking for the private sector to lead the recovery.

**Federation of Small Businesses**

Where companies have robust processes then this should exempt them from the policy. Small companies may be liP accredited for example.

**Corus**

Example procedures should be provided as guidance to assist those who may not be familiar with training and development processes and procedures.

**Shropshire Fire and Rescue Service**

## Government's response and conclusion

The consultation sought views on four options for the future of the right:

- Continue with the extension of the right as planned;
- Retain the right only for large firms;
- Delay the extension of the right to SMEs until the economic conditions improve;
- Repeal the right in full.

It also sought views on whether, if the right was retained, it could be amended so that it functioned better.

34. There was a good response to the consultation, with the arguments for and against the right to request time to train clearly articulated by the respondents. The arguments reflect key positions of: employers, who in the main see the legislation as an unnecessary burden especially for small businesses; and employees and their representative bodies, who value the backing to request training provided by these powers. It was also clear that there is no strong support from any group for amending the right as this was unlikely to improve how it functions.

35. Half of all respondents were in favour of retention of the legislation for large organisations and the majority thought it should be extended to small and medium enterprises in April 2011 as planned. However, as already observed, this was not the majority view of employers and these arguments grew stronger when looking just at the responses about small organisations.

36. Similarly there was little support for delaying extension of the right until economic conditions improve. Some respondents were concerned that this could send the wrong message, citing the importance of training in difficult times.

37. A majority of respondents also thought the right should be retained although a significant minority thought the legislation should be repealed. The responses varied from those citing that the right was an unnecessary burden to those arguing strongly that the right should be retained as an important route for employees to access training where this was a problem in the workplace.

38. Lastly, the majority of respondents expressed little appetite to make any further changes to the legislation. A key concern expressed was the position of those employers who already train their staff. It was felt that these employers could be exempted from the legislation or have access to additional reasons to refuse requests. While there was some support for this, the majority of respondents did not agree that this was required and that employers who have good arrangements in place will receive very few, if any, formal requests under this legislation. We also received a compelling response from the Employment Lawyers Association, whose professional view was that different procedures would not make the right function any better and may be problematic to operate in practice.

39. The Government has also taken account of the following issues in determining the way forward with the Right to Request Time to Train regulations:

- The need to maintain a sharp focus on the importance of workplace training set out in the recently published skills strategy Skills for Sustainable Growth;
- The importance of encouraging employers who don't train to invest in their workforces to do so to develop their businesses and increase the overall stock of skills in the economy; and
- The need to balance these priorities against protecting small businesses in particular from potential disproportionate burdens in line with the Coalition Government's principles for introducing new regulation and the need to create the right conditions for business as set out in the Plan for Growth.

40. On balance, the Government has therefore decided to retain the right for employees in large organisations employing 250 or more people. The right will not be extended for the foreseeable future. As announced in Skills for Sustainable Growth, the Investors in People standard will be made more accessible for small and medium sized organisations to increase access and relevance to the specific needs of these businesses.

41. The Government recognises that views expressed through the consultation do not provide conclusive support or a clear direction for retention of the right. There is also little hard evidence to support views expressed that the right is adding burdens to employers who train or that it is increasing the volume of training by employers who currently under-invest.

42. In view of this any further decisions on the way forward for this regulation will be based on evaluation of the impact of this policy. The Government's decision will allow the evidence base to support the effectiveness of the policy over time. In reaching a decision on the way forward the Government will take into account the progress made by all employers in engaging with their employees to address their training needs and the level of employer investment in skills.

## Next Steps

43. An updated final stage Impact Assessment to reflect the government's preferred option will be published on the BIS website in due course.

44. The right to request time to train will continue to be available to employees in large organisations with 250+ employees. Online guidance materials and an employer toolkit will not require change to reflect this.

45. We will discuss with the BCC and FSB what guidance and information on skills training and development available through the Business Link website would be helpful to SMEs in making appropriate skills investment decisions. We will also work with the BCC and FSB in communicating the benefits of training to their members.

46. Formal evaluation of the right to request time to train will be undertaken, so that the merits of this policy can be reviewed by April 2015. A post implementation review stage IA will be completed. This will enable an evidence based decision to be made on whether the right should then be extended to employees in small and medium organisations in April 2015, remain as now or be repealed.

## Annex A: SUMMARY OF RESPONSES TO PUBLIC CONSULTATION ON THE FUTURE OF THE 'RIGHT TO REQUEST TIME TO TRAIN'

Q1. Should the right be retained as it exists now in organisations with 250+ employees, and extend to small and medium organisations in April 2011 as planned?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	17	35%	29	59%	3	6%	49	33%
Individuals	11	50%	10	45%	1	5%	22	15%
Professional bodies	11	38%	17	59%	1	3%	29	20%
Main representative bodies	0	0%	5	100%	0	0%	5	3%
Trade unions	21	100%	0	0%	0	0%	21	14%
Others	14	67%	5	24%	2	10%	21	14%
<b>Total</b>	<b>74</b>	<b>50%</b>	<b>66</b>	<b>45%</b>	<b>7</b>	<b>5%</b>	<b>147</b>	

Q2. Should the right only apply in organisations with 250+ employees, and not be extended to small and medium sized organisations?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	5	10%	37	76%	7	14%	49	35%
Individuals	2	10%	17	81%	2	10%	21	15%
Professional bodies	4	15%	21	81%	1	4%	26	18%
Main representative bodies	1	25%	3	75%	0	0%	4	3%
Trade unions	2	10%	19	90%	0	0%	21	15%
Others	3	14%	17	81%	1	5%	21	15%
Total	17	12%	114	80%	11	8%	142	

Q3. Should the extension of the right to small and medium sized enterprises be delayed until the economic conditions improve?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	12	27%	28	62%	5	11%	45	33%
Individuals	3	15%	15	75%	2	10%	20	15%
Professional bodies	8	31%	15	58%	3	12%	26	19%
Main representative bodies	0	0%	4	100%	0	0%	4	3%
Trade unions	1	5%	20	95%	0	0%	21	15%
Others	4	19%	14	67%	3	14%	21	15%
Total	28	20%	96	70%	13	9%	137	

Q4. Should the right be removed altogether?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	24	49%	21	43%	4	8%	49	33%
Individuals	6	27%	14	63%	2	9%	22	15%
Professional bodies	14	48%	14	48%	1	3%	29	20%
Main representative bodies	5	100%	0	0%	0	0%	5	3%
Trade unions	1	5%	20	95%	0	0%	21	14%
Others	3	14%	16	76%	2	10%	21	14%
Total	53	36%	85	58%	9	6%	147	

Q5. Should the right be retained, but made to function better, for example by:

a. Exempting employees who can already access training from being able to use the right or introducing exemptions for other employees?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	16	36%	26	58%	3	7%	45	35%
Individuals	4	20%	14	70%	2	10%	20	15%
Professional bodies	6	26%	10	43%	7	30%	23	18%
Main representative bodies	0	0%	3	100%	0	0%	3	2%
Trade unions	1	5%	19	95%	0	0%	20	15%
Others	7	37%	10	53%	2	11%	19	15%
Total	34	26%	82	63%	14	11%	130	

b. Adding new reasons for refusal where good training review systems already exist?								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	12	27%	28	64%	4	9%	44	34%
Individuals	5	25%	13	65%	2	10%	20	16%
Professional bodies	7	30%	10	43%	6	26%	23	18%
Main representative bodies	0	0%	3	100%	0	0%	3	2%
Trade unions	1	5%	19	95%	0	0%	20	16%
Others	9	47%	8	42%	2	11%	19	15%
Total	34	26%	81	63%	14	11%	129	

c. Introducing different procedures for dealing with requests? (If yes, please specify what these should be and how they would operate.)								
	Yes		No		Not Sure		Total	
	Vol.	%	Vol.	%	Vol.	%	Vol.	%
Employers	7	16%	27	63%	9	21%	43	34%
Individuals	3	15%	14	70%	3	15%	20	16%
Professional bodies	6	25%	12	50%	6	25%	24	19%
Main representative bodies	0	0%	2	67%	1	33%	3	2%
Trade unions	2	10%	18	90%	0	0%	20	16%
Others	4	22%	8	44%	6	33%	18	14%
Total	22	17%	81	63%	25	20%	128	

\*please note – Percentages may not add up to 100 due to rounding

Not all respondents chose to answer every question, so totals may differ.

The high ratios of respondents who answered “no” to questions 2 and 3 does not imply they would welcome extending the right to SMEs without delay; some wished to see the right proceed, while others were opposed to the right in any format.

The following tables recognise that the right was being introduced in a phased approach. Large employees and local authorities may have responded to the consultation on the basis of experience from actual requests they had been required to handle, while SMEs would not have been required to handle requests.

Additional breakdown of employer responses to Q1 by employer type –			
Should the right be retained as it exists now in organisations with 250+ employees, and extend to small and medium organisations in April 2011 as planned?			
	Yes	No	Not sure
Local Authority	4	2	0
Large (250+)	8	14	3
Medium (50-249)	2	3	0
Small (10-49)	1	6	0
Micro (up to 9)	2	4	0
SME sub-total	5	13	0
SME percentage	28%	72%	0%
Total	17	29	3
Percentage	35%	59%	6%

Additional breakdown of employer responses to Q4 by employer type – Should the right be removed altogether?			
	Yes	No	Not sure
Local Authority	1	4	1
Large (250+)	12	11	2
Medium (50-249)	3	2	0
Small (10-49)	5	2	0
Micro (up to 9)	3	2	1
SME sub-total	11	6	1
SME percentage	61%	33%	6%
Total	24	21	4
Percentage	49%	43%	8%

## **Annex B: List of Respondents**

### **Devolved Administrations**

Scotland

Wales

### **Employers**

AMEC plc

Bentley Motors Ltd

Celtic Lines

City College Norwich

City of Bradford Metropolitan District Council

Corus

Curtis Consulting Ltd

DHL GB

Eurosource Solutions Limited

flybe ltd

Foster Wheeler Energy Ltd

Future-Wize Limited

Gifford

Gravesham Borough Council

IFDS

Iggesund Paperboard

Indestructible Paint Ltd

Jaguar Land Rover

John L Robertson Ltd

Key Training

Learning for Business Ltd

Mineral Products Qualifications Council

Motorola Ltd

Nationwide Building Society

npower

Oberthur Technologies

Oxfam GB

Pipeline Induction Heat Ltd

S & D Training Ltd

Shaw Energy and Chemicals Ltd

Shropshire Fire and Rescue Service

Skills Strategy Research Ltd

Sodexo

Solution7 Ltd

Sony Europe Limited

Southend-on-sea Borough Council

Stockport Council

T3UK

Thackray Museum

The Glayram Group

Toyota Motor Manufacturing UK Ltd

Whitbread Group plc

Woodford Homecare & Support Services

Zodiac Training

Zurich Financial Services

Other company names not provided

**Main employer representatives**

British Chambers of Commerce

CBI

FSB

EEF

IOD

**Professional bodies**

ACCA

AOC

Association of Convenience Stores

British Coatings Federation

British Furniture Manufacturers Ltd

British Holiday and Home Parks Association Ltd

British Retail Consortium

Chartered Quality Institute

CIPD

Construction Skills

Council of Ethnic Minority Voluntary Sector  
Organisations

Employment Lawyers Association

Engineering and Machinery Alliance

Federation of Ophthalmic and Dispensing Opticians

Forum of Private Business

Greater Manchester Chamber of Commerce

Heating & Ventilating Contractors Association

Institute of Leadership & Management

Institute of Payroll Professionals

ISM

Leighs Paints

Lincolnshire and Rutland Employment and Skills Board

Local government Employers

NATECLA

NHS Litigation Authority

People 1st

Skills for Logistics

The Packaging and Films Association

**Trade unions or staff associations**

Alliance for Finance

BECTU

British Association of Construction Heads

Community Lives Consortium

CWU

GMB Staff Union

NASUWT

PCS

RMT

Scottish TUC

TUC

UCATT

UNISON

Unite, the Union

University and College Union

USDAW

Other local representatives and/or branches

**Other bodies**

Asset Skills

Barnes Associates

Catch22

Children England

CISI

City and Guilds

ConstructionSkills

Council for Administration

Imperial College London

NIACE

Perranporth Pre-School

RAISE

Retail Motor Industry Training Limited (Remit)

SEMTA

SFA

Sheffield Hallam University

Sheffield Occupational Health Advisory Service

Skill : National Bureau for Students with Disabilities

Skills for Care and Development

Skills-Third Sector

Somerset Skills and Learning

Summitskills

The Age and Employment Network

The British Racing School

The Family and Parenting Institute

There were also responses from 22 individuals.

### **Annex C: updated Impact Assessment (Final Stage).**

This will be published in due course and made available online at [www.bis.gov.uk](http://www.bis.gov.uk)

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