





## Subcontracting Policy

### COVER SHEET

#### Document Control

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<b>Document Owner</b>	Managing Director (Idalina De Jesus)
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#### Version History

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02.01.22	1		Head of Operations (David Porter)	Managing Director (Idalina De Jesus)	02.01.22	

**Location:** School of Marketing Dropbox\Policies\Policies and Procedures\Subcontracting Policy



### **1. Scope**

This policy covers the activity for which School of Marketing is funded by the Education and Skills Funding Agency (ESFA) for the provision of apprenticeship training.

### **2. Context**

This policy is in accordance with the ESFA's apprenticeship funding rules and subcontracting standard, with updates to be applied as required to reflect any amendments or clarifications made by the ESFA.

### **3. Principles**

The majority of apprenticeship training and assessment will be delivered by School of Marketing directly, acting in the capacity of lead training provider. There may be circumstances, however, in which some of the training needs to be subcontracted to another partner organisation. Any such subcontracting arrangements will be agreed with employers in advance and will be clearly articulated in the employer's Training Services Agreement, as well as the tripartite commitment statement.

School of Marketing will lead the relationship with the employer at all times and will retain full oversight and responsibility for the whole apprenticeship, including the actions of our delivery subcontractors. In accordance with ESFA funding rules, as the lead training provider, School of Marketing will always undertake a substantive portion of the delivery of any apprenticeship where a subcontracting arrangement is in place.

The cost of subcontracting management, including quality monitoring and assurance is included within the overall price of delivery and forms part of our standard fees. This will be clearly set out in the Training Services Agreements which we have in place with our employer partners. These agreements will also make clear which aspects of the training will be delivered by School of Marketing and which will be delivered by our subcontractors.

School of Marketing ensures that it enters into a written agreement with its subcontractors and that second-level subcontracting does not take place without School of Marketing's prior written consent. School of Marketing will obtain an annual report from an external auditor if the total apprenticeship subcontract value exceeds £100,000 in any one financial year.

School of Marketing will make biannual declarations to the ESFA via its MyESF account to confirm its subcontracting arrangements and undertakes to update this declaration whenever such arrangements change.



#### **4. Reasons for Subcontracting**

School of Marketing will only subcontract training where it is necessary to enhance the quality of our learning offer. Specifically, School of Marketing will subcontract the delivery of Functional Skills for English and Mathematics where apprentices do not already hold – or are unable to demonstrate that they hold – such qualifications. The rationale for subcontracting this delivery is that it fills gaps in niche or expert provision, which ensures that learners are provided with the optimal support, enhancing the quality of learning offer.

#### **5. Quality assurance and due diligence**

School of Marketing's programmes are subject to a rigorous Quality Assurance process, including collaborative provision with delivery subcontractors. School of Marketing's Senior Management Team are responsible for the development of all programmes and collaborative provision. With their oversight, potential subcontractors will be subject to due diligence processes to satisfy that they have the capacity and capability to deliver the training to the expected academic standards and in adherence to the ESFA's Subcontracting Standard requirements. School of Marketing will only use subcontractors that are on the published Register of Apprenticeship Training Providers with a valid UK Provider Registration Number (UKPRN). We will also consider any relevant reports from organisations such as Ofsted, the Office for Students, and the Quality Assurance Agency.

The due diligence undertaken by School of Marketing are designed to meet the requirements detailed in ESFA's guidance and applies the criteria as set out in the *'funding higher risks organisations and subcontractors'* policy – including checks to ensure extremist organisations are not funded. If deemed to be a high-risk subcontractor, School of Marketing will not consider contracting with them. The financial health of any subcontracting organisation is a key focus of the due diligence checks undertaken at the outset, including a review of the latest audited accounts.

School of Marketing will utilise internal and external expert advice to confirm the suitability of the content of the training to be delivered by subcontractors and will ensure that the curriculum is sufficient for apprentices to achieve the qualifications in question. School of Marketing's Quality Manager is responsible for ensuring that the subcontracted provision is monitored and reviewed to assure the quality and academic standards of the subcontracted provision; and that it continues to meet both our requirements and the Employer's requirements. These requirements will be stated in the School of Marketing's written agreement with the subcontractor.

Clear and regular lines of communication are expected between School of Marketing and all subcontractors that have been engaged. This includes stipulated regular review meetings with the subcontractor to discuss delivery provision and specific learner progress, concerns and considerations. At a minimum, School of Marketing requires to meet subcontractors on a monthly basis, with more regular meetings scheduled if needed to maintain the high-level of delivery expected by learners and Employers. Performance and qualitative targets to be achieved throughout their contract life are monitored monthly by the Quality Manager.



## **6. Contingency Plan**

If for any reason, financial or otherwise, a subcontractor is unable to continue delivery either temporarily or permanently; School of Marketing will work with the subcontractor to ensure the continuity of delivery for learners enrolled on School of Marketing apprenticeship standards, appropriate to the circumstances. Options may include, but are not limited to:

- Delivery using School of Marketing staff
- Transfer of delivery to an alternative subcontractor

## **7. Policy review**

This policy will be reviewed bi-annually, to ensure that it continues to meet the relevant ESFA funding rules and regulations. The policy will be published on School of Marketing's website.