

# SUBCONTRACTOR

## Guidance 2024 – 2025



Make UK has sourced subcontractors in complementing its commitment to the apprenticeship programme across many years. We have found this to be beneficial in working with high quality specialist training organisations, which in turn has introduced new industrial sectors to apprenticeships, generating a fresh, highly productive workforce.

Using subcontractors allows us to increase our offer across a varied range of apprenticeships providing employers with the ability to use just one provider for their training needs. It widens our offer in supporting applicants of all academic abilities within our local community due to the diverse entry criteria involved, thus offering a wide variety of training opportunities, contributing to social inclusion, and supporting social mobility.

We currently subcontract with high-quality, well-established organisations who deliver specialist training that meets the needs of an high-end employer.

We look for subcontractor who offer alternative resources and expertise in addition to those offered by our organisation supporting cost effective training. We continually investigate alternative appropriate training provision to ensure the apprentice has the greatest chance of success along with a positive learning experience.

### **Due Diligence**

Make UK will undertake a robust process of due diligence when selecting potential subcontractors to ensure the highest quality of learning is made available which demonstrates value for money and has a positive impact on the experience of both Employers and Learners.

At least annually, Make UK will conduct a review of its due diligence checks on each subcontractor to ensure that the subcontracted provider continues to be able to deliver contracted services. We will also conduct further due diligence checks if there is any material change in the subcontracted provider that has the potential to impact on its ability to deliver subcontracted services. These include but are not limited to:

- Merger with another provider
- Change of ownership
- Change of key personnel (e.g. managers, directors, link person)

Any issues that may raise concern about the subcontractor's ability to deliver the programme (e.g. infrequent updates, poor student progress, student or employer complaints). These will also trigger an immediate review meeting.

### **Agreement**

An agreement to use any of our subcontractors will be made with the employer prior to the starting of an apprentice. All costings relating to a learner's programme of learning are discussed with the employer and broken down within the signed commitment statement ensuring complete transparency.

Make UK will take reasonable measures to ensure that all subcontractors meet the standards of quality and care expected by funders and inspectorate by only subcontracting with high quality, low risk colleges or training organisations. These training organisations must be 'live'

on the Register of Apprenticeship Training Providers (RoATP) or Apprenticeship Provider and Assessment Register (APAR) as a main or supporting providers or

Measures are in place, as not to inadvertently fund any extremist organisation and all arrangements will only commence when Make UK has been fully satisfied that no conflicts of interest are forthcoming. The use of any subcontractor must have the written authority of the board of Trustees.

Make UK will seek to work with existing partners in developing apprenticeship provision that does not compromise the contract of Make UK and keep within the Education and Skills Funding Agency funding rules.

Engaging subcontractors improves the scope of provision within the community and in turn enables us all to raise standards by the sharing of good practice.

All policies and procedures relating to the delivery of the Education and Skills Funding Agency contract will be used to monitor the performance of the sub-contractor.

Make UK and subcontractors will work together in partnership to achieve a common goal to support every apprentice in achieving their planned outcome within the timescales set. This will be carried out through carefully planned stages and responsibilities of all involved will be agreed by legally binding contracts.

**Listed below are examples of services provided by Make UK and associated Subcontractors (please note this is not meant to be an exhaustive list, other documents should be consulted)**

- Full recruitment, assessment/selection of relevant, eligible candidates
- Comprehensive employer engagement/sign up process
- Learner Induction/preparation including IAG
- Comprehensive administration management of the whole apprenticeship
- Complete finance and invoice management of the whole process
- Learner review/progress monitoring
- Learner welfare, IAG, Health and Safety and personal development training
- Learner 'expected behaviours' and employment skills training
- Functional Skills training and examinations
- Learner and employer training relevant to their industry
- Wellbeing training for all (safeguarding, mental health etc.)
- Contract compliance service of subcontractors
- Quality monitoring of subcontractors – E.g. Observation of teaching & Learning
- Interviews of all subcontracted learners

**Provided Services – Subcontractors (all listed may not be applicable):**

- Qualification registrations
- Delivery of technical training
- Delivery of practical training
- Delivery of Functional Skills

- IQA services
- EPA arrangements

#### **Subcontractor responsibilities:**

- To carry out the OTJ technical training in accordance with the prescribed, approved apprenticeship standard relevant to the apprentice's job role
- To ensure that any equipment used for training is up to current industry standard.
- To register the apprentice with the relevant awarding organisation and have all the necessary systems in place to satisfy the awarding organisation, Ofsted and the current ESFA funding rules to enable successful completion of the apprenticeship standard
- To pass any due diligence undertakings prior to, and during, the using of subcontracting services
- Contribute regularly to our reassessment of risks associated with subcontracting activities during the life of the agreement
- EPA arrangements (preparation and booking assessments)

#### **Make UK Rationale for using subcontractors:**

- The use of subcontracting assists us in supporting niche provision and meets the needs of employers and specific industry sectors
- Using subcontractors creates a diverse provision with a wide range of opportunities with different entry criteria which may offer an entry point for certain disadvantaged groups
- Working with subcontractors' enables the sharing of good practice and raises standards in all provision which in itself supports the subcontractor's ability to obtain their own apprenticeship contract

#### **Make UK costs associated with subcontracting:**

##### **Administration**

- Office based team ensure a compliant system is in place to manage funding and to process payments associated with the apprenticeship programme
- Ensuring data is collected, stored and processed in accordance with funding rules
- Full employer engagement service including vetting, compliance, compatibility and account management
- Full recruitment and learner initial assessment process to ensure individual eligibility and suitability to the apprenticeship (this must be carried out in order to satisfy ESFA/DFE and Ofsted)
- Learner induction to prepare the individual in starting their apprenticeship
- Assessment of learner to identify if any learning support is required
- Assessment of learner's literacy and numeracy skills to identify any gaps in learning

##### **Quality**

- Processing data
- Negotiating costs and services with subcontractors and employers

- Due diligence checks and file management covering a wide range of criteria
- Audit checks (remote and physical on-site)
- Observations of delivery
- Programme progress meetings (whole class and individuals)
- Collation of feedback from all parties to ensure continuous improvement

### **Reviews, progression and assessment**

- Create and update individual learner progress tracking and monitoring systems
- Carry out a formal learner review process to regularly interact with tutor, learner and employer to discuss progress of all areas of the apprenticeship
- Action plan learner with specific targets to achieve a successful completion within the planned apprenticeship duration
- Conflict manage and problem solve any employment or training issues that may arise
- Evidence the guidance given to continuously improve the apprenticeship behaviours expected within the apprenticeship standard
- Supply current Information, advice and Guidance on a wide range of areas including staying healthy, mental health and providing a platform to discuss any personal issues privately.
- One point of contact for learner and employer
- Manage the whole safeguarding process in keeping the learner safe from harm (including the PREVENT agenda)
- Reinforcing all safeguarding processes at every learner review
- Equality and Diversity awareness training at every learner review
- Training opportunities such as county lines and mental health to enable learners to operate in a modern Britain
- Literacy and numeracy monitoring, training and facilitating Functional Skills qualifications
- Specific IAG reviews to ensure settling in at the early stage and advice to progress to the next levels available

### **Clear defined SUBCONTRACTORS POLICY 2024-25.**

Make UK provides high quality training to learners, increasing employer engagement by widening the range of provision opportunities through the use of sub-contractors.

Make UK will take reasonable measures to ensure that all subcontractors meet the standards of quality expected by funders and inspectorate by only subcontracting with High Quality, Low Risk colleges or training organisations who are listed on the Register of Apprenticeship Training Providers or Apprenticeship Provider and Assessment Register (APAR). This arrangement will only commence when Make UK has been fully satisfied that no conflicts of interest are forthcoming and provisionally agreed by the board of Trustees.

No management fee will be chargeable and each subcontractor will receive 100% of their costs (subject to reduction for any underperformance).

Through the Education and Skills Funding Agency Apprenticeship Budgets Make UK will seek to work with existing partners in developing Apprenticeship provision which does not compromise the contract of Make UK and improve the scope of provision within the community. This in turn will enable our partners to raise standards in their provision and enable them to successfully increase the chances of obtaining their own Apprenticeship contracts.

All policies and procedures relating to the delivery of the Education and Skills Funding Agency contract will be used to monitor the performance of the sub-contractor.


Prior to awarding contracts Make UK will request the following information.

(Not intended to be an exhaustive list, but an example of)

- Details of teaching/assessment staff
- Details of awarding body accreditation
- Details of qualification verification reports
- Details of policies and procedures
- Details of Employer Liability/Public Liability and Professional Indemnity Insurances
- Details of ownership of the organisation
- Details of organisation UKPRN
- Details of DBS for delivery staff working with sub-contracted learners
- Details of quality standards held in relation to the delivery of provision funded by Training Trust
- Evidence of working towards Due Diligence as required by The Register of Apprenticeship Training Providers (RoATP) or Apprenticeship Provider and Assessment Register (APAR) process
- Accepted on the Register of Apprenticeship Training Providers or Apprenticeship Provider and Assessment Register (APAR)
- Company accounts over the past three years
- Ofsted inspection reports, or evidence of involvement in any Ofsted activity during previous subcontracting arrangements
- Details of staff training in regard to Safeguarding procedures and associated Safeguarding policies and PREVENT
- Success and timely success data over the last three years

Make UK will continue work with sub-contractors to improve the quality of all provision, share good practice, and contribute to social inclusion and social mobility.

Changes to the delivery of provision will be discussed at regular meetings prior to implementation.

Policy Author	Policy Signature	Last Review Date	Policy Date	Policy Review Date
Jayne Griffiths Compliance Manager		August 2024	September 2024	August 2025