Policy No: PAR001

Inspire Education Group

Partnership policy

The Partnership Policy for Subcontracting forms part of the Inspire Education Group's (IEG) Internal Control and Corporate Governance arrangements to ensure compliance with legislative requirements for procurement and effective management of subcontracting arrangements, including IEG-owned subsidiary companies.

Scope

The policy applies to all supply chain activity supported with funds supplied by the Department for Education (DfE), Cambridge and Peterborough Combined Authority (CPCA), Greater Lincolnshire Combined County Authority (GLCCA) the Office for Students (OfS) or any successor organisations.

The Policy Statement

IEG engages with subcontractors to ensure the local skills need is met. Reasons include:

- To enhance the opportunities available for learners
- To fill gaps in niche or expert provision and/or provide better access to training facilities
- To support better geographical access for learners
- To offer an entry point for disadvantaged groups
- To give consideration to the impact on individuals with shared protected characteristics, where there might otherwise be gaps

Responsibilities

The IEG Corporation and the Chief Executive Officer are responsible for:

- Approving the Partnership Policy
- Ensuring all subcontracting partnership arrangements meet the Group's strategic aims and enhance the quality of the Group's curriculum offer to students
- Approving all subcontract partners with which the Group will subcontract in any given year. These partners should be high-quality and low risk
- Approving and signing off on the Group's supply chain fees and charges policy
- Ensuring subcontractors are not 'high risk' as set out in the DfE Funding Higher Risk Organisations and Subcontractor Policy

The Corporation and Chief Executive Officer understand that the Group should not subcontract to meet short-term funding objectives.

The Chief Learning Officer is responsible for ensuring the policy aligns with all current DfE guidance and updating the policy annually.

Related Documentation

- Appendix 1 – Principles and Procedures
- Partner Handbook
- PAR002 - Supply Chain Fees and Charges Policy & Statement
- EDI001 - Equality, Diversity and Inclusion Policy
- SAF001 - Safeguarding for All Policy
- DfE Funding Higher Risk Organisations and Subcontractor Policy

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Overarching Principle

The Group will use its supply chains to meet its strategic goals and to optimise the impact and effectiveness of service delivery to the end user. The Group will therefore ensure that:

- Supply chain management activities comply with the principles of best practice in the skills sector. In particular, they will be guided by the principles given in the Learning and Skills Improvement Service publication *"Supply Chain Management – a good practice guide for the post-16 skills sector"* (Nov 2012 and subsequent iterations)
- The Group will at all times undertake fair and transparent procurement activities, conducting robust due diligence procedures on potential and existing subcontractors to ensure the highest quality of learning delivery is made available, demonstrating value for money and a positive impact on the lives of students
- Where disputes between supply chain partners cannot be resolved through mutually agreed internal resolution procedures, the Group will submit to independent outside arbitration or mediation and abide by its findings. Contract documents will require both parties to agree that the achievements of supply chains are attained through adherence to both the letter and spirit of contracts or partnerships. Signatories therefore commit that all discussions, communications, negotiations, and actions undertaken to build, maintain and develop supply chains will be conducted in good faith in accordance with the overarching principles

IEG has robust due diligence procedures to ensure:

- Financial and reputational risks are minimised
- High standards of Safeguarding and Data Protection are maintained
- Any subcontracting does not lead to the inadvertent funding of extremist organisations

IEG will comply with the current DfE guidance on subcontracting, ensuring adherence to all elements of the guidance, including the DfE Funding Higher Risk Organisations and Subcontractors Policy.

Quality Assurance

Subcontracted activity is a fundamental part of the Group's provision and is formally approved by the Board of Governors. This Policy positions subcontracted provision as a core part of Group activity to enable continuous improvements in the quality of teaching and learning for both the Group and its subcontractors. This will be achieved through the

sharing of effective practice across the supply chain, for example, through the Self-Assessment Report process, joint staff development and joint business planning.

Subcontractors are required to have robust quality control of teaching, learning and assessment and quality improvement processes in place. The Group will monitor and manage the quality of partner provision through the existing Group quality assurance processes and procedures.

Subcontractors must have their own up-to-date Safeguarding and Data Protection policies and procedures.

Fees and Monitoring

The Policy and Fees are approved by IEG Corporation. The actual level of funding paid and retained to each of the subcontractors is available in the Supply Chain Fees Statement, which is published annually on the IEG website.

	Provider Type	**Management Fee**	**Monitoring Visits**
Low Risk,	*Established provider with experience and track record of delivery of DfE Apprenticeships, CPCA/DfE/GLCCA Adult Skills Programmes, 16-19 Study Programmes.	15% - 20%	2
Medium Risk	*Established provider experienced in the delivery of DfE Apprenticeship Programmes, CPCA/DfE/GLCCA Adult Skills Programmes, 16-19 Study Programmes	15% - 20%	4
High Risk	*DfE/CPCA/GLCCA New Provider	15% - 20%	6

*** CPCA & GLCCA management fees will not exceed 15%**

- All of the organisations contracted with have undergone a robust IEG Due Diligence process and have been audited by the Group's Quality Department
- A risk assessment is undertaken on all organisations
- Payment is never authorised without a full DfE, CPCA or GLCCA approved contract in place

- Payments are made to the subcontractor at the end of each month (usually 28th of each month) Partners will be paid in line with their contractual agreement. All payments are made after sufficient audit evidence of learning activity has been provided. This includes one or more site visits by the Partnership Team. As part of the controls, the Group Partnerships Manager, assisted by the Group Director of Estates and Health and Safety, reviews workplace risk assessments of each existing and any new provider.

Renegotiation

Annual renegotiation of contracts will be undertaken with each partner at the Course Performance Review. Contract values will be agreed following confirmation of funding allocations from DfE, CPCA and GLCCA. Approval will be sought from the IEG Corporation. IEG will agree contract values based on previous contract compliance and the ability of each partner to meet agreed Key Performance Indicators.

Contract Monitoring

The following checklist should be adhered to for all subcontracted provision:

- Schedule of planned monitoring visits in place to include 'unannounced' visits
- Audit documentation to be completed and signed by both parties
- Summary of actions produced from audits to be shared with subcontractors to support a quality improvement action plan

Audits will include:

- Face-to-face interviews and/or telephone contact with staff and students
- Student eligibility for funding
- Direct observation of assessment
- Direct observation of programme delivery
- Review of minimum standards for apprenticeship delivery to include duration of apprenticeships and standard requirements
- Review of student work to ensure appropriate planning and feedback is taking place
- Annual review of subcontractor policies
- Review of External Quality Visits by Awarding Bodies

- Qualifications, Disclosure and Barring Service checks and Continuous Professional Development for subcontractor's delivery staff
- Annual review of the Companies House database
- Review of Safeguarding Policy & Prevent Action Plans

Providing independent assurance on subcontracting controls

In line with the DfE subcontracting certification arrangements. IEG achieved the three-year certification, lasting from 2023 to 2026.

During the certification period, subcontracting will be added to the audit strategy where appropriate.

Procurement

A full tender will be advertised and let in line with Public Contract Regulations 2024 and subsequent amendments, with overarching contracts let for periods of three to five years.

Annual values within the subcontracting arrangements will be agreed with partners within the overall three-year values issued during the tender, including any further optional years.

Publication of information relating to subcontracting

In compliance with the DfE and other agency funding rules that apply, the Group will publish its subcontracting fees and charges policy and actual end-of-year subcontracting fees and charges on its website before the start of each academic year (and in the case of actual end-of-year data, as required by DfE). This will only relate to 'provision sub-contracting', i.e. sub-contracted delivery of full programmes or standards. It will not include the delivery of a service as part of the delivery of a programme (for example, buying the delivery of part of the Apprenticeship standards or outreach support).
IEG will complete a subcontractor declaration form as required by the DfE ensuring that nil returns are completed where appropriate and the declaration form is updated in-year where necessary.

Communication

The Group will ensure all actual and potential subcontractors have sight of this policy.

This policy will be reviewed annually and updated as required. It will be published on the Group website prior to the start of the academic year in which it will be applied and will be discussed at 1-1 partner meetings. Potential subcontractors will be directed to it as the starting point in any relationship.

Contingency Plan

Students would be supported by IEG in the event:

- IEG need to withdraw from a subcontracting arrangement
- A subcontractor withdraws from an arrangement
- A subcontractor goes into liquidation or administration
- A subcontractor is removed from the Register of Apprenticeship Providers and Assessment Register (APAR)

A contingency plan would be agreed taking account of the circumstances that caused the subcontractor to no longer be able to deliver services to students.

All students are the responsibility of IEG, and their interests would be the focus of any contingency plan.

Subcontractors must report any issue that puts the contract and delivery to students at risk to the Chief Learning Officer. The Chief Learning Officer would convene a planning meeting with the IEG Executive. Information on the reasons and circumstances that affect the delivery of the subcontract would be gathered prior to this meeting. Information from the subcontractor would be gathered to clarify the severity of the risk and timescales. The subcontractor may be asked to attend the contingency planning meeting.
A plan would cover the following:

- Securing relevant documentation from the subcontractor in relation to the contract and the students
- Defining how students would be supported to enable them to complete their learning
- Communicating the proposed plan to students and employers

- Identifying the timescales for action
- Identifying roles and responsibilities for implementing, monitoring and reviewing the contingency plan

There are different options that may be considered, including the following:

- Short-term delivery by a subcontractor to ensure that on-programme students are supported to achieve
- Engaging with another subcontractor to ensure that on-programme students are supported to achieve
- IEG directly delivers to ensure that on-programme students are supported to achieve