

Apprenticeships Subcontracting Policy

1 Introduction and Purpose

UWE Bristol offers a range of Higher and Degree apprenticeship provision across a number of subject areas, to Levy and non-Levy employers. The University has a range of established partnerships with local Further Education and employer partners. Where it is an identified and agreed benefit to an apprentice and/or employer, UWE Bristol will subcontract apprenticeship training and delivery to further enhance the opportunities for learners and businesses across our region.

The purpose of this policy is to provide information to potential and existing subcontracting partners and external agencies on; how the University procures subcontracted provision, the rationale for when subcontracting applies and our approach to applying subcontracting fees.

2 Scope and Context

1. This policy sets out UWE Bristol's approach to apprenticeship subcontracting activities as funded by the Education & Skills Funding Agency (ESFA)
2. This policy is accessible to the ESFA as part of UWE Bristol's annual Subcontracting Assurance
3. It applies to all subcontracted provision funded by the ESFA, and is a mandatory requirement for apprenticeship subcontracting activity
4. The content of this policy has been outlined against the ESFA funding rules for 2021/22 and associated documents

3 General Principles

3.1 Use of subcontractors

The University will at all times undertake a fair and transparent approach to subcontracted procurement activities.

We use different levels of subcontracting depending on the agreement and needs of the employer:

1. Subcontracting to the employer for delivery of part of the standard – where this enhances the apprenticeship through use of the employer's expertise and facilities or other reasons of choice, access or opportunity
2. Subcontracting to a Further Education Partner for delivery of a selected part of the standard - where this enhances the apprenticeship through use of the partner provider's expertise and facilities or other reasons of choice, access or opportunity

3.2 Rationale for sub-contracting

The University engages with and procures sub-contracting to further enhance our offer. These are in line with our strategic aims and objectives for apprenticeship provision and wider University objectives. Our rationale includes:

1. Enhancing opportunities available to apprentices
2. Providing wider choice and range of provision for learners and employers regionally and nationally
3. Providing wider geographical access for learners across the West of England
4. Support the strategic aims of Local Enterprise Partnerships and Industrial Boards
5. Increasing access and participation to Higher Education learning
6. Maximising content through procurement of specialist or niche provision and expertise
7. Offering achievable entry points to disadvantaged learners
8. Employer based demand

4 Contracting & Policy

4.1 Contracting

Subcontractors will be required to sign a legally binding contract that is eligible for the period of contract commencement through to the anticipated end date of the associated apprenticeship training delivered by the subcontracted partner. Details of this will be laid out in a Schedule of activities and payments. A set of Terms & Conditions (in line with the most recent version of the ESFA funding rules) will be included in the contract that require all parties to adhere to. These will be monitored through our ongoing standard Quality Assurance processes for academic partners (see section 4. Quality Assurance) and at Partnership Board meetings chaired by the Director of Apprenticeships. Where subcontracted training is delivered by an employer partner, Programme Boards are in place between UWE Bristol and the employer representative. These are chaired by a senior member of the academic team.

UWE Bristol, the ESFA or Ofsted (where applicable) have full permission to monitor the quality of apprenticeship training being delivered by subcontractors, including the review of data, visits to subcontractor premises (i.e. observations of teaching and learning or assessment) and discussion with apprentices and employers.

4.2 Policy

As part of our Due Diligence processes, subcontractors are required to have robust policies in place. The University will hold records of these each year, and will be made available for external agencies through inspection and audit as required. They should include (but not exhaustive):

1. Safeguarding and Prevent (including DBS/safe recruitment, where appropriate)
2. Health & Safety
3. GDPR
4. Financial accounts
5. Equality & Diversity
6. Quality Assurance

7. All relevant insurance policy certification (i.e. Employers Liability Insurance, Public Liability Insurance)
8. Appropriate teaching and learning policies as required

5 Quality Assurance

UWE Bristol is committed to delivering high quality teaching and learning to apprentices and employers, including where subcontracted delivery applies. The University manages the employer relationship and is responsible for the oversight of any subcontracted delivery. The University has robust processes in place for procuring subcontracted provision, and partnerships are reviewed every 6 months at Partnership Boards with academic partners and at Partner Approval events. Where an employer provides subcontracted training, the partnership is reviewed collaboratively at Programme Boards. All programmes are subject to a rigorous Quality Assurance process, including where the use of approved subcontractors is identified. Subcontracted delivery is assessed at a programmatic level through the Programme Approval process, led by the Deputy Vice Chancellor and Pro Vice Chancellor (Student Experience). This provides strategic oversight as to how subcontracted delivery aligns with the wider University aims and objectives, and assures that subcontractor performance and quality of teaching and learning is scrutinised. The University Quality Assurance process includes standard activity including:

1. Examination Boards and review of associated statistics
2. Module evaluations and feedback surveys
3. Internal and external programme surveys, e.g. the NSS
4. Marking and Moderation processes
5. Annual Monitoring
6. External Expertise
7. Programme Management Committees, and faculty level Academic Standards and Quality Committees
8. Student Rep Staff Forums

A standard Due Diligence process and subcontracting assurance activities are carried out with all partners annually by the Apprenticeship Hub. This assesses the ongoing capacity and quality of provision, including assurance that the subcontractor is on the Register of Apprenticeship Training Providers and meets the requirements set out in the ESFA funding rules. The governance structure overseen by the Director of Apprenticeships at the Partnership Board is in place to review and monitor subcontracted provision with academic partners. The Programme Board is in place to provide governance for subcontracted provision where an employer delivers apprenticeship training.

Where the quality of subcontracted provision does not meet the required levels of compliance, quality assurance and/or learner/employer satisfaction, an Improvement Plan is initiated and, should that not be achieved, the University will secure alternative arrangements for delivery.

Where required, the subcontractor may be asked to provide the following information as part of our Quality Assurance activities for apprenticeship delivery. These will be reviewed by the Apprenticeship Subcontracting Manager. Where required, improvements plans will be put into place and monitored on a regular agreed schedule to review performance and report findings to the Degree Apprenticeship Board and Partnership Board as required.

1. Progress updates for apprentices
2. Safeguarding/Prevent concerns

3. Updates on progress for maths and English
4. Examples of learners' work
5. Attendance and engagement data

5.1 Roles and Responsibilities for Quality Assurance at UWE Bristol

1. Director of Apprenticeships
 - Responsible for overseeing the strategic needs and performance of the subcontracted provision
 - Ensures adherence to this policy by all UWE Bristol employees and subcontracted partners
2. Head of Apprenticeships
 - Responsible for the effective implementation of this policy
 - Ensures performance of the subcontractor is met, including the Due Diligence and contracting process
3. Apprenticeship Hub
 - Supporting the administrative oversight where subcontracting takes place (i.e. Commitments Statements, Training Services Agreements)
4. Partnership Manager (Apprenticeship Hub)
 - Responsible for managing the relationship with employers where subcontracted activity exists
5. Subcontracting Manager (Apprenticeship Hub)
 - Responsible for operational liaison and performance management of the subcontracted provision
6. Faculty Liaison (i.e. Programme Lead, Link Tutor)
 - Ensure parity of experience and quality of teaching and learning between subcontracted and UWE Bristol led delivery
7. Training Coordinator
 - Supports the development of apprentices who are supported by subcontractors
8. Employer
 - Responsible for ensuring that apprentices receive the required support throughout their apprenticeship, whether training is being delivered by the University or subcontractor (i.e. Off-the-Job learning)
9. Quality Enhancement Team
 - Ensures that the subcontractor meets the Quality Assurance requirements as set out by the University, and that UWE Bristol are providing the appropriate support and guidance where required
10. UK Partners Operations Co-Ordinator
 - Provide operational support to the subcontracted partnership (i.e. invoicing activities)

5.2 Governance of subcontracted delivery

| Governance measure | Frequency | Stakeholders |
|-----------------------------|-----------|---|
| Partnership Boards | 6 monthly | Director of Apprenticeships/Partnership Lead (Chair) Head of Apprenticeships Quality Manager Faculty Lead for Apprenticeships Programme Leader (as required) Apprenticeship Subcontracting Manager Subcontractor senior lead for apprenticeships Subcontractor Quality representative(s) Subcontractor programme team representative(s) |
| Partner Operational Meeting | Monthly | Director of Apprenticeships/Partnership Lead or Head of Apprenticeships (Chair) Apprenticeship Subcontracting Manager Apprenticeship Partnership Manager Programme Leader (as required) Subcontractor Quality representative(s) Subcontractor programme team representative(s) |
| Programme Board Meeting | 6 monthly | Faculty Head of Department Faculty Director of Workforce Transformation & Educational Partnerships Partnership Manager (Apprenticeship Hub) Associate Head of Department Subcontractor representative(s) |

6 Fees & Charges

6.1 Fees for subcontracting activity

The University will pay subcontractors for their delivery and/or assessment activities. The University may retain funding for subcontractor management and quality assurance (as outlined in Section 5. Quality Assurance); details of which are captured in the subcontract and academic or collaborative agreement (where relevant). The University may, where appropriate, also retain further funding to cover any additional charges that fall out of scope of the Quality Assurance fees and will be outlined in the associated Contract.

6.2 Payments

Payment to subcontractors will normally be made within 30 days, subject to any submissions required. Details of payments to subcontractors will be captured in the subcontract.

7 2020/21 Partner Charges

The University will publish the actual year end subcontracting fees each year. Potential and existing subcontractors and external agencies will be able to access the information and this policy via the UWE Bristol website.

| Name of Partner | UKPRN | Start Date | End Date | Value |
|--|----------|------------|------------|-------------|
| Bridgwater & Taunton College | 10000878 | 01/08/2020 | 31/07/2021 | £23,126.00 |
| The Chief Constable of Avon & Somerset | 10063365 | 01/08/2020 | 31/07/2021 | £89,700.00 |
| Weston College of Further & Higher Education | 10007459 | 01/08/2020 | 31/07/2021 | £106,049.00 |

8 Ownership and Oversight

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| Document name: | Apprenticeship Subcontracting Policy |
| Version number: | DRAFT v0.1 |
| Version created by: | Simon Flenley - Head of Apprenticeships |
| This version approved by: | Jo Midgley – Registrar & Pro VC Student Experience |
| Effective from: | September 2021 covering 2021-22 academic year |
| Next review date: | August 2022 |
| Senior Policy Owner: | David Barrett -Director of Apprenticeships |
| Policy Author: | Simon Flenley working with Quality Team |
| Overseeing committee: | DA Board |
| Compliance measures: | Annual summer compliance review of apprenticeship partnerships undertaken by external auditors and reporting to the ESFA |
| Related policies, procedures and codes of practice: | Partnerships Policy |
| Related legislative and/or regulatory requirements | ESFA Funding Rules |

9 Version history

| Version | Date | Summary of changes | Author |
|---------|------------|--------------------|---|
| V0.1 | 07/09/2021 | DRAFT | Simon Flenley |
| V0.2 | 10/12/2021 | FINAL | Simon Flenley – checked by Quality Team and Director of Apprenticeships |
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