

Education Subcontracting Policy

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1. What this policy is about and why we need it.

- 1.1 This policy relates to any subcontracted provision delivered on any of our externally funded contracts delivered by CLIP or Riverside. Whilst we deliver most of our provision in-house, opportunities arise to be involved in activity that enables us to develop and expand CLIP's provision, and to share practice with partners on a larger single project or contract.
- 1.2 Currently, this applies to:
 - 1.2.1 ESFA funded 16-19 study programme
- 1.3 We need this policy to ensure subcontractors are selected that can deliver high quality provision that meet our requirements. Additionally, many of our core funders have strict subcontracting rules, and this policy ensures we deliver to this.

2. Who does this policy apply to?

- 2.1 This policy applies to all Subcontractors working on behalf of CLIP or Riverside in delivering services across our education, wellbeing or employability provision.

3. Our policy is...

- 3.1 To engage with subcontractors to better meet local needs. The reasons are varied and include:
 1. Extending the accessibility of provision for learners and thereby contributing to the economic prosperity of our local communities. Lincolnshire is geographically isolated, with poor transport links, and subcontracting supports better geographical access for learners.
 2. Delivering niche provision and widening participation of 'hard to reach' and other individuals that face barriers to participation in learning and work, by building on a subcontractor's extensive and focused experience in specialist areas. This policy offers an entry point for disadvantaged groups as well as enhancing the opportunities available in Lincolnshire.
 3. Capacity building by helping us to respond flexibly to changing market demands and emerging opportunities. Providing accessibility to provision for learners where there are gaps in provision.
 4. Engaging with new markets and provide access to, or engagement with, a new range of customers
 5. Ensuring greater cost efficiency by running certain programmes where it would not be viable for us to build up in-house resources and expertise

6. Providing good development opportunities for us and our subcontractors, to share good practice and new ways of working.

7. To support like-minded (smaller) training providers who would like to benefit from our contract management experience.

3.2 We aim to work with partners who:

- Can add to or complement our current offer to employers and learners or participants
- Share similar views on delivering quality programmes and customer service
- Can demonstrate a commitment to improving the quality of teaching and learning or service provision through collaborative working
- Have a credible track record of delivery and contract compliance
- Can prove to us that they have the capacity and financial viability to sustain high quality training programmes.

3.3 That we will appoint subcontractors according to a pre-defined rationale e.g. geographical location, offering the general or specialist skills that positively contribute to the contract, evidence of quality delivery (e.g. Ofsted), capacity to deliver in terms of deliverables and ESFA or other funder requirements.

3.4 The details of each subcontracting arrangement will be detailed in a specific SLA with the provider. This details the management and oversight we will undertake for each subcontractor, including annual due diligence, ongoing assurance and monitoring, and quality and compliance checks.

3.5 Any subcontracting undertaken by CLIP or Riverside will be delivered in accordance with the Acis Group Procurement and Contract Management Procedure (high value contracts), and ESFA guidance (see section 6).

3.6 We will retain an overall 'Management Fee' of up to 20% of funding, dependent on funding stream, and the level of support required:

1. The Management Fee is calculated based on the level of resource required; to manage effectively the individual subcontractor relations; to ensure funding returns and requirements are met and to ensure that the high quality of delivery is maintained and any risk to us and the funder is mitigated.

2. The Management Fee represents the total cost that we incur in effectively identifying, selecting and managing all sub-contracted provision.

3. Information on the Management Fee is clearly outlined in the commissioning information.

- 3.7 To offer extensive support through our delivery teams to all subcontractors, ranging from quality, training, and compliance. Additionally, all subcontractors can be supported to capacity build through services and expertise from across the group, including finance, health and safety, assets and HR.
- 3.8 Payments to subcontractors will be in arrears following receipt of funding from the funder to us. Payment terms will be agreed annually and will be agreed per subcontractor.
- 3.9 To ensure participants are safeguarded at all times and work in line with our Equality Diversity and Inclusion Policies. All subcontractors will agree to our safeguarding standards and processes, including use of our safeguarding system My Concern.
- 3.10 Our customer voice is heard through all activities – and all subcontractors will work with us to ensure their voice and needs are captured throughout the contract period to ensure these are met long-term.

4. How we will monitor this policy

4.1 We will monitor this policy by annual check, and three year formal review, unless it is needed sooner.

5. Procedures and other documents that link into this policy

5.1 Procedures that link into this policy are:

- Acis Procurement and Contract Management Procedure 2023

5.2 Other documents that link into this policy are:

- SLA Flare 2024/25

6. Links to other policies, legislation and/or regulations

6.1 Policies, legislation and/or regulation that links to this Policy are listed below:

- Acis Group EDI Policy
- Public Contracts Regulations 2015
- ESFA Subcontracting Standard 2022

- ESFA Subcontracting funding rules for post-16 education and training 24/25
- ESFA Subcontracting standard: Subcontracting assurance arrangements for all post-16 providers 2021

7. When this policy will be reviewed

7.1 This policy will be reviewed by August 2025, or sooner should the need arise.

8. Jargon buster

Reference	Definition
CLIP	Community Learning in Partnership
ESFA	Education and Skills Funding Agency
SLA	Service Level Agreement

9. Appendices

None.