

University Policy for the Management of Subcontracted Apprenticeship Provision

Introduction

Aims and objectives

- 1.1 This policy outlines the University's approach to subcontracting its provision for apprenticeships. This applies to apprenticeships at all levels (Levels 4, 5, 6 and 7) both Higher and Degree Apprenticeships and to the delivery of Functional Skills (maths and English).
- 1.2 It outlines the University's framework for selecting, approving and monitoring subcontractors in accordance with the Education and Skills Funding Agency (ESFA) regulation and guidance¹, the QAA Quality Code for Higher Education² and the Ofsted Education Inspection Framework³.
- 1.3 The Objectives of the policy are to outline a standardised approach to subcontracting apprenticeship provision including:
 - To ensure a standard due diligence process is carried out on all new subcontractors so that the University can satisfy itself that the subcontractor has been selected fairly, within our procurement policies, and has the capability, capacity and quality to deliver the apprenticeship and a good financial standing.
 - To ensure there is transparency in regards to our subcontracted provision, including the selection process and the charges and fees associated with the provision.
 - To meet the diverse needs of the employer.
 - To set out a framework for collaborative approaches to monitoring and enhancing the quality of teaching and learning.
 - To ensure high rates of achievement and to underpin the co-management of client relationships.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732716/Apprenticeship_subcon_guidance.pdf

²<https://www.qaa.ac.uk/quality-code>

³<https://www.gov.uk/government/publications/education-inspection-framework>

Rationale for subcontracting

1.4 The University recognises the value of subcontracting apprenticeship provision, in some circumstances, in order to enhance the scope, reach and quality of our apprenticeship offer and to provide employers with a high quality apprenticeship programme(s) that is cost-effective, integrated and complements our own delivery.

Specific rationale for subcontracting includes:

- To access markets and Standards that the University does not currently have the capacity and/or capability to deliver itself, but which our contracted employers would like to have access to
- Where a subcontractor can provide specialist staff, expertise or resources that would otherwise not be available
- To respond to employer demand for new provision in sectors or geographical area that the University cannot itself offer, thereby providing a national network of providers
- As a result of a joint bid for higher or degree apprenticeship funding in which the University is the lead provider
- When engaging with a particular subcontractor would bring benefits to the region in terms of knowledge transfer and business innovation

Responsibilities

1.5 The following is an indicative list of responsibilities for subcontracted apprenticeship provision; a full list will be included in the Agreements between the University and the Subcontractor and the University and the Employer

1.6 The University:

- retains responsibility for the academic standards and quality of the provision of any subcontracted apprenticeship at all times
- has responsibility for following its procurement and due diligence processes in the selection and approval of any subcontractor
- retains responsibility for liaising with the employer in regard to all aspects of the provision (with agreed delegated responsibility to the subcontractor where this is outlined in the Agreement)
- is responsible for the ILR returns for the apprentices on the apprenticeship
- is responsible for ensuring there is an Evidence Pack for each cohort and each Learner in place, as might be requested by the ESFA
- will publish a fees and charges policy on its website⁴, detailing what management fee subcontractors are charged and what services are provided for that fee
- will ensure subcontracting procedures are subject to robust independent (external) audit

⁴ <https://www.reading.ac.uk/cqsd/policies-procedures>

1.7 The Subcontractor:

- will provide the University with all necessary documents to carry out initial due diligence processes
- will provide the University with all data and information required to carry out its duty in completing the ILR return for the apprentices and will ensure the University has regular progress updates in a timely manner
- will deliver the programme in accordance with the Agreement
- will cooperate with the University in any on-going monitoring and quality assurance processes including making available student data
- will inform the University of any changes to its provision (curriculum/staff) prior to those changes being made
- will inform the University of any changes to its status (financial, legal, registration etc)
- will follow the University's Supplier Code of Conduct⁵

1.8 The Employer:

- Will inform the University of any preferred subcontractor for the delivery of the apprenticeship, and where possible the University will contract with the preferred subcontractor
- Will collaborate with the subcontractor and the University for the delivery of the apprenticeship programme

1.9 Within the University, subcontracting responsibilities will be as follows:

Activity	Responsible Function/individual
Carrying out initial legal and financial checks	Legal Services and Procurement
Signing off on the legal and financial due diligence checks	Director of Legal Services and Chief Financial Officer
Carrying out T&L and partner due diligence	CQSD
Signing off on the T&L and partner due diligence	University Programme Board (with delegated authority from the University Board for Teaching, Learning and Student Experience)
Undertaking teaching observations and monitoring the quality of teaching and learning	School academics and apprenticeship tutors, reporting regularly to the Apprenticeship Board of Studies and Student Experience (BoSSE), the Apprenticeship Management Group and annually to CQSD
Ensuring data compliance and required regulatory data returns	Henley Compliance and Data Manager, with support from academic, business development and professional services colleagues.

⁵ <https://www.reading.ac.uk/procurement/-/media/project/functions/procurement/documents/supplier-code-of-conduct-rev-2-oct-2022.pdf>

	Reporting to the Apprenticeship Management Group monthly and the BoSSE.
Periodic review of the subcontractor	CQSD and the School

Approval Processes

Tender Process

- 2.1 All subcontracting arrangements for apprenticeship provision will be subject to the University's procurement policies and processes⁶ and in line with the ESFA regulations for subcontracting. Schools will draft their specifications and develop key service levels which will inform the evaluation criteria for choosing a provider.

Potential sub-contractors will be expected to complete the Supplier Questionnaire (templates held by Procurement) which, for this purpose, will include additional queries in regards to T&L due diligence. (Examples of the types of evidence which might be requested for T&L due diligence can be found in Annex 1).

Due Diligence

- 2.2 Potential subcontractors will be subject to relevant and adequate due diligence processes to satisfy the University that they have the capability to deliver the apprenticeship provision to the expected academic standards and T&L quality.
- 2.3 Due diligence process may include, but are not limited to:
- 2.3.1 Completion of the Supplier Questionnaire and any additional due diligence information requests including:
 - Copies of Ofsted report, where available;
 - Copies of Self Assessment Reports (SARs) and Quality Improvement Plans (QIPs);
 - Copies of any other external audit reports (eg: ESFA, QAA, PSRB)
 - 2.3.2 Curriculum mapping and development
 - 2.3.3 Checks on appropriate policies in place
 - 2.3.4 Details on internal QA and QE mechanisms
 - 2.3.5 Observations of learning
 - 2.3.6 A site visit to any planned learning environment
 - 2.3.7 A review of existing student work/portfolios
 - 2.3.8 A list of staff CVs and relevant experience (academic and support staff where necessary)
 - 2.3.9 Meetings with Senior Leaders
 - 2.3.10 Investigations on any other aspect which may affect a provider's ability to deliver.

⁶ <https://www.reading.ac.uk/procurement/information-for-suppliers/proc-policytandc.aspx>

- 2.4 Whenever a new subcontractor is being considered a group will convene to discuss and review the application and proposed providers. This will usually include a member(s) from the relevant School (including the lead academic), a member from Procurement, a member from CQSD, a member from Legal Services and someone who can advise on apprenticeship subcontracting compliance (ESFA regulations).
This group will gather and consider the information submitted, will make requests for further information where required and will put together the case for a preferred provider to the relevant approving bodies.
- 2.5 Approvals for a new subcontractor will be required from the Head of School, UPB (for T&L related issues), the Chief Financial Officer (for procurement and finance related issues) and with final sign-off from the Vice-Chancellor.

On-going Monitoring and Quality Assurance Processes

Monitoring

- 3.1 The University will ensure the subcontracted provision is effectively monitored and reviewed to assure the quality and academic standards of the subcontracted provision and that it meets the Employer's requirements. These requirements will be stated in the formal Agreement with the subcontractor. There will be processes in place to intervene or terminate a subcontract, if necessary, including continuity arrangements to transfer and support current apprentices.

The following will form part of the monitoring and review activities:

- **Review meetings** - a schedule of review meetings will be undertaken in line with the subcontract Agreement and informed by the level of risk. Contract Reviews will normally be undertaken bi-annually by the Contract Manager and Apprenticeship Compliance and Data Manager. Review meetings may include:
 - A review of any external quality assurance reports and of organisational policies and quality improvement plans
 - A review of student progress against targets and profiles, including timely/overall achievement
 - A compliance sample of student files against ESFA rules and data checks against the ILR
 - Discussions and monitoring of issues around safeguarding, equality and diversity, prevent, maths and English
 - At least annually, to review the subcontractor's Self-Assessment Review and Quality Improvement Plan and to feed into the subcontractor's continuous improvement process
- **Observations and moderation** - observations of workshops, teaching and of any tutor/student progress meetings may be undertaken by prior

arrangement or unannounced. Feedback from the observations will be shared with the individuals observed, management at the subcontractor and with the academic lead within the University. Issues will be raised with the subcontractor and any mitigating action put in place if necessary.

- **Student feedback** - may be collated by the Subcontractor or by the University and will be used as part of monitoring and enhancement processes for the apprenticeship, through the Review meetings and through the relevant BoSSE. Student feedback will also usually be collected during observations.
- **Employer feedback** - to be collected both formally and informally during regular meetings with the Employer and to feed into enhancement activities and into the formal School Teaching Enhancement Action Plan process.
- **Student safety and support** - All subcontractors will be expected to maintain policies in regard to Prevent, Safeguarding and DBS, Equality and Diversity and any other statutory policies as defined by the ESFA or Ofsted. These are reviewed as part of the initial due diligence approval process and the University expects all subcontractors to share their commitment to these areas.
The University will ensure that all students have access to its policies on these matters.
- **Financial monitoring** - all subcontractors' financial position will be monitored via the Procurement Department tools. The system will alert the University to any changes in a subcontractor's financial position and where appropriate will be reviewed by the Finance Business Partner.
- **Reporting changes to the T&L arrangements (curriculum/staffing)** - The subcontractor must inform the University of any changes to the programme delivery including changes to the curriculum or staff delivering the teaching and learning. The University will carry out relevant due diligence checks, in line with the approval process and consummate to the risk involved with the proposed change. Changes must be agreed with the University in advance of their implementation.
- **Data Monitoring** - Subcontractors will be subject to the same data monitoring procedures as the University's direct delivery, for example, checks on all data submitted for the ILR, reviewing progression rates and achievement. This will be undertaken by the Apprenticeship Compliance and Data Manager at the University.

3.2 The monitoring activities highlighted above will be used for the continuous monitoring and enhancement of the apprenticeship delivery. Any urgent action highlighted through a monitoring activity will be instigated promptly by the Contract Manager and Programme Director.

3.3 On-going monitoring will be formally reported to the Apprenticeship Management Group, which meets monthly. Monitoring activities and outcomes

will also be reported to the BoSSE on a termly basis and to the University through an annual apprenticeship review process. The Programme Director will be expected to complete an Apprenticeship Subcontractor Annual Monitoring Form (Annex 2) as part of this process.

Reviews/Audits

3.4 In addition to the Contract Reviews, the University will review the subcontracted apprenticeship delivery at key intervals.

- Due diligence reviews
The data and information collated and reviewed above (3.1) will be reported to the University annually as part of the University Annual apprenticeship review processes.
Schools should complete the Apprenticeship Subcontractor Annual Review Form and submit this to CQSD along with any School SARs and QIPs.
- Contract management and renewal
Contract review meetings will include consideration of whether there is a requirement beyond the term of the contract. If there is a further requirement, the Procurement Department will work with all stakeholders to ensure the correct process is followed for re-contracting. Leading up to the contract expiry, a review process will be undertaken to gather examples of good practice, lessons learned and areas for enhancement in regard to the specific arrangements as well as the University subcontracting processes more generally. The review will also be used to help determine whether the Contract should be renewed, where there continues to be a commercial need.
This review process will include input from member(s) from the relevant School, including the lead academic, a member from Procurement, a member from CQSD, a member from Legal Services and someone who can advise on apprenticeship subcontracting compliance (ESFA regulations). This mirrors the process undertaken for approvals.
- Quality and Continuous Improvement
As mentioned in 3.1 above, at least annually the University will review the subcontractor's Self-Assessment Review and will feed into their ongoing Quality Improvement Plans.
The Subcontractor's SAR and QIP will feed into the University's own processes for developing a Self-Assessment Report and Quality Improvement Plan, which are submitted annually to Ofsted.

Unsatisfactory compliance or quality

3.5 The University will ensure that there are processes in place to intervene or terminate a subcontract as necessary, including continuity arrangements to transfer or support current apprentices.
Unsatisfactory outcomes in reviews, observations, or from student and employer feedback will initially result in an Action Plan.

- 3.6 Unsatisfactory reviews will be reported to the Apprenticeship Management Group, who will support the subcontractor to put in place an Action Plan to address the necessary improvements and who will monitor progress made against the Action Plan.
- 3.7 The Apprenticeship Management Group will report all compliance and quality issues, including progress against Action Plans, to the Apprenticeship Board (currently convened within the Henley Business School). Where timely progress is not being made, the Apprenticeship Board will work with Legal Services and CQSD to manage and intervene in subcontractor provision, including terminating a contract where necessary. At all stages the students' rights will be protected in accordance with the University's Student Protection Plan. Any such changes in subcontracted provision will be reported to the University's Programme Board.

Support and Development

- 3.8 The University will support all subcontractors to ensure the provision of a high-quality delivery. Support and development will be determined through discussions with the subcontractor and by identifying any developmental needs with them. In addition to the quality monitoring highlighted above, this might include support for:
- Programme set-up and curriculum design
 - Development of course materials
 - Embedding Mathematics, English, Safeguarding and Prevent into delivery
 - Self-assessment and quality improvement
 - Student voice - feedback and implementation
 - Funding compliance guidance, monitoring and support
 - Workshops and staff training to support delivery and compliance

Funding and Payments/Fees and Charges

- 4.1 The University's statement on subcontractor fees and charging can be found on the University's webpages here: <https://www.reading.ac.uk/cqsd/policies-procedures>

Data reporting and audit compliance

- 5.1 The Apprenticeship Compliance and Data Manager will undertake regular data monitoring activities to ensure compliance with the ESFA funding rules and any other regulatory and contractual reporting requirements in regards to subcontracted provision. In addition to activities already cited this may include:
- maintenance of the ESFA evidence pack

- regular reports on learner performance to employers
- collation of associated data and reports for the ILR return
- compliance documentation for leavers and learners on a break
- collation and overview of quality assurance reports as detailed above
- monitoring and notification of the sub-contracting declaration to the Apprenticeship Management Group (AMG)
- review and feedback on student and employer evaluations
- oversight and monitoring of any formal complaints

All data and reports will be held securely and will be available for audit by the associated regulatory body.

This policy for the Management of Subcontracted Apprenticeship Provision will be reviewed on an annual basis by CQSD and the Apprenticeship Management Group, currently convened within Henley Business School.

Version Control:

Version	Date Approved	Approved by	Effective from	Next Review	Keeper (responsible for Policy maintenance and review)
1.	10/12/2019	DELT	Date of approval	January 2021	CQSD
2.	08/06/2021	DELT/UBTLSE	Date of approval	Summer 2022	
3.	Policy reviewed January 2023 – no changes required			Summer 2023	

ANNEX 1: Examples of T&L Due Diligence

An indicative list of the sorts of data and information that may be requested during the procurement and due diligence process for approving a new subcontractor.

Initial information request for tender process (normally part of the Selection Questionnaire - (Additional Questions):

Confirmation of existing polices for:	
○ Health and Safety	
○ Prevent	
○ Welfare	
○ Equality and diversity	
○ Anti-bribery	
○ Modern slavery	
○ Disabled students and accessibility	
○ Data protection policy	
○ Major incident/business continuity policy or plan	
○ Safeguarding, including DBS procedures for staff	
Please confirm you do not use any subcontractors (including adjunct faculty) for the delivery of this apprenticeship.	
External Reports	
Provide a link to your most recent Ofsted Report. Please indicate if this was in relation to apprenticeship training. Include your Improvement Plan for any issues raised in the report and details of progress made.	
Provide a copy of your SAR and QIP	
Internal Quality Assurance	
Evidence of previous delivery and results, i.e.: completion statistics for previous apprenticeship cohorts.	
Please provide details of the academic staff that will be involved in teaching on the apprenticeship/programme. Including short form CVs, qualification and experience.	

Further information requested prior to awarding subcontract:

General Information	
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Size of provision	
ESFA contract and status (UKPRN)	
Details of existing collaborations with universities or other organisations for the delivery of apprenticeship provision (including, ideally, named contact details).	
Internal Quality Assurance	
Details of your governance and academic management structures	
Details of your approach to evaluating quality of provision and outcomes. Please give an example of where your processes have been used to identify improvements, what action you took and what was the outcome.	
Curriculum, T&L	
Please provide details of what you include in your induction	
Details of learning resources that you will make available to the apprentices. Please provide examples of handouts and materials (Do you have the IP rights to use these materials for this contract?).	
Details of any use of technology enhanced learning (eg: VLE) where appropriate.	
Details of additional study support/information, advice and guidance available to apprentices	
Will University of Reading students be taught independently of other apprenticeship cohorts, or will there be shared classes, workshops etc. with non-UoR apprentices?	
Student experience	
Details of policies relating to: <ul style="list-style-type: none"> • Student complaints • Student representation • Student feedback/evaluation • Careers advice/service • Supporting students with disabilities • Pastoral care • Student discipline 	
How do you measure learner satisfaction? And, how do you respond to feedback?	
Staffing	
Details of staff recruitment and development policies. Including details of academic staff training opportunities	
Facilities	
Where teaching will take place at the subcontractor's premises, please provide an overview of facilities available	
Assessment - For any subcontractor which will be delivering summative assessments as part of the programme:	

Details of assessment arrangements including policies relating to: <ul style="list-style-type: none">○ Assessment setting○ Marking and feedback to students○ Moderation○ Exceptional circumstances○ Academic Misconduct○ Appeals of results	
Details of your external examiner policy and processes	
Policies on the awarding of qualifications	

ANNEX 2:

Annual Monitoring Form for Apprenticeship Subcontractors

1. The apprenticeship subcontractor annual monitoring process is intended to provide Programme Directors, the relevant Board of Studies and Student Experience and CQSD the opportunity to routinely monitor the management and operations of the apprenticeship provision delivered by subcontractors, during the previous year.
2. This articulates with the University policy for the management of Subcontracted Apprenticeship Provision: <https://www.reading.ac.uk/cqsd/policies-procedures>.
3. It is intended that the monitoring form should articulate with the annual apprenticeship review process which principally considers the teaching and learning aspects of the apprenticeship programme, through the monitoring and review of the SAR and QIP. In order to complement this process, this form should focus principally on the relationship with the subcontractor and report on the on-going QA and management processes in place.
4. This monitoring form should be completed by the Programme Director and submitted to the School's Director for Teaching and Learning (SDTL) for inclusion in the School Teaching Enhancement Action Plan process, which will be further considered by the Sub-Committee for the Delivery and Enhancement of Learning and Teaching (DELT).
5. This document is intended to be reflective as well as indicate future plans. Programme Directors should highlight examples of good practice which can be shared with other Schools engaged in delivering Apprenticeship programmes, key issues that have arisen and actions taken in response to these issues. Key changes and future developments should also be included.
6. Schools are asked to complete one form per subcontractor AND per programme. i.e.: if a subcontractor delivers more than one programme multiple forms should be completed. (All cohorts (across different Employers) studying the same programme with the subcontractor should be included on the same Form).

Annual Monitoring Form for Apprenticeship Subcontractors

1. Programme details	
Name of subcontractor	
Programme title	
UoR Programme Director	
Managing School Including which BoSSE the programme reports to.	

1. Data and Compliance	
Please fill in this section in regards to data for the past academic year and indicate assurances around quality management where requested.	
Please list all Employers using this subcontracted provision	
What is the total size of the subcontracted provision for this programme? (i.e.: total student numbers)	
Please confirm that the programme is being run in line with the Subcontractor Agreement and Employer Agreements.	
Please comment on the relationship with the subcontractor.	
Have there been any changes to the curriculum? If yes, were these reviewed and approved by the Programme Director?	
Have there been any changes to staff teaching the programme? If yes, were you notified of the staff changes promptly and did you review the CVs/portfolios of any new staff? And/or undertake any teaching observations?	

<p>How many students completed the programme this year?</p> <p>Is this in line with projected completions?</p>	
<p>Do you have any concerns regarding the progression rates?</p> <p>If so, how are these being addressed?</p>	
<p>Were all ESFA data returns completed successfully (eg: ILRs)?</p> <p>Please identify any issues and how these are being addressed.</p>	

2. Programme Successes and Good Practice

<p>Please use this space to highlight any areas of good practice and successes for the subcontracted provision during the past academic year.</p> <p>Give thought to:</p> <ul style="list-style-type: none"> • Any direct teaching observations that have taken place • Student safety (including safeguarding, equality and diversity, prevent) • Any compliance audits that have taken place • Assessment practices and Learner performance • Learner progress against targets and profiles • Learner support • Application of learning to the workplace • Learning Resources • Discipline, Complaints and Misconduct 	
<p>FEEDBACK:</p> <p>Please use this space to comment on any positive Learner or Employer feedback in the past academic year. (i.e.: From programme and module evaluations/observations/employer review meetings etc)</p>	

3. Areas for Improvement

Please use this space to identify areas for improvements and any elements of the programme that could have gone better in the past 12 months.

Give thought to:

- Any direct teaching observations that have taken place
- Student safety (including safeguarding, equality and diversity, prevent)
- Any compliance audits that have taken place
- Assessment practices and Learner performance
- Learner progress against targets and profiles
- Learner support
- Application of learning to the workplace
- Learning Resources
- Discipline, Complaints and Misconduct

FEEDBACK:

Please use this space to comment on any issues raised in Learner or Employer feedback in the past academic year.

And, what has been done to address those issues.

Please attach any agreed up to date Quality Improvement Plans in place for this subcontractor.

4. Action Plan

Please list any Actions which will be undertaken this year to address any issues or development opportunities identified above (add extra rows if necessary):

1	
2	
3	

5. Programme Director Sign Off

Any further comments	
Signed: (electronic signature acceptable)	
Dated:	

This Form should be submitted to the School Director of Teaching and Learning for consideration and inclusion in the School Teaching Enhancement Action Plan process. It should also be returned to CQSD as requested by the Senior Quality Support Officer.