

Encompass

Group

Subcontracting Review and Rationale

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Policy Statement

This policy relates to activity funded through the Education Skills Funding Agency (ESFA) whereby Encompass consultancy enters into a subcontracting agreement with a supplier for Apprenticeship recruitment and delivery.

Scope and Purpose

This policy provides transparency for all sub-contractors, funding bodies and other associated parties or individuals regarding the procurement, due diligence process, support and charging rationale related to sub-contracted provision under Encompass Consultancy with the ESFA.

In January 2020, a government consultation took place with ESFA for making reforms to subcontracting education for learners over 16. The results were produced June 2020 and have started to be implemented from August 2020. If Encompass need to use a delivery subcontractor to meet the need of the employer or learner requirement, we will explore the opportunity on an individual case basis. The terms for subcontracting would require any potential subcontractors to complete formal due diligence in the first instance. We would only look to subcontract opportunities that would enhance the offering and opportunities that would be available for Encompass learners. We would also only be looking to subcontract to fill any gaps in our current niche provision and offering that will give us the ability to offer a better geographical access for learners and employers in our current recruitment area. These factors will only be to shape and enhance the expert and quality provision that Encompass currently offer for Apprenticeship standards.

Rational

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- Recognises the benefits that effective subcontracting can bring to extending the accessibility of provision for learners and thereby contribute to the economic prosperity.
- Use subcontractors to widen participation amongst learner groups that it would otherwise be "hard to reach" and other individuals that face barriers to participation in learning and work.
- Uses subcontractors as appropriate to fill gaps in, and to extend the breadth of its provision: for example, through widening the range of apprenticeship standards offered to employers and learners and broadening the range of sector subject areas or business sectors that can be covered.

Communication

Z:\Policies & Procedures\Policy Documents\Subcontracting Review and Rationale.pdf

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Encompass will communicate and discuss the subcontracting policy with existing and potential delivery subcontractors through regular business review meeting (for existing sub-contractors) and for potential new sub-contractors this will be carried out at on boarding meetings.

Quality Improvement

- Actively works with subcontractors to improve the quality of the teaching and learning they deliver and thereby improve the overall quality of teaching and learning for all learners
- Undertakes observations on all aspects of teaching and learning including information, advice and guidance, progress reviews and assessment.
- Provides timely and meaningful feedback to both subcontractor and delivery staff and observations are incorporated into the Encompass Quality cycle in order that improvement actions impact both internal and subcontractor quality.
- Carries out learner surveys to gather feedback from learners.
- Supports subcontractors to implement effective policies and procedures relating to teaching and learning including assessment and verification policies and procedures.
- Supports subcontractors to develop an effective Self-Assessment Report (SAR) and Quality Improvement Plan (QIP) and will incorporate subcontractors' SARs and QIPs into the overall SAR.

Management Fees and Costs for managing subcontractors

- Encompass will retain a proportionate % of funding for Apprenticeships
- The Management Fee is calculated based on the level of resource required: to effectively manage the individual subcontractor relationship; to ensure funding returns and requirements are met and to ensure that the high quality of delivery to learners is maintained and that any risk to Encompass and the ESFA
- Encompass will provide a detailed breakdown of all quality monitoring activities and other specific costs in all subcontracting contracts. The costs are determined by a percentage of staff costs and relevant overheads. This will be communicated to all subcontractors prior to entering into a contract.

Support Provided

- Business development director & The Operations director will manage the relationship with every subcontractor, including the co-ordination of Due Diligence process and regular Contract Monitoring Meetings with every subcontractor.
- The Quality Manager will ensure that the quality of every subcontractor's teaching, learning and assessment meets Encompass quality standards and to support the continuous improvement of the subcontractor's provision, including any relevant staff training and CPD opportunities.
- Encompass commits to undertake a regular and substantial programme of quality assurance checks on the education and training provided by subcontractors, including visits at short or no notice and face-to-face interviews with staff and students. These checks include whether the learners exist and are eligible, and involve direct observation of initial guidance, assessment, and delivery of learning programme

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- The Head of Compliance will ensure the timely and accurate recording of all information on Encompass's ILR and ensures that all of the subcontractor's delivery meets the ESFA's Funding Rules.

Payment Terms

- Payment terms and method of calculation are made in line with the contract. Payments will be made on a monthly basis, at the end of the month following the delivery period, which has been validated and payment confirmed by the ESFA. Payments will be made based on the funding confirmed and received, less the applicable Management Fee.
- The fees and Charges policy are available on www.encompass.training

Policy review

The fees and charges policy will be routinely reviewed annually, however, may be reviewed in-year in response to any relevant changes in government policy or funding rules.

Due Diligence

To be considered for subcontracting please contact adam@encompass.training

Intervention

- When a subcontractor is not performing according to contract, or there have been other significant issues and/or 'causes for concern' identified which may be of a financial, quality or audit nature, Encompass will refer the matter to the Director of Operations.
- Action taken may include, but not limited to:
 - The production of an Action Plan, with or without identified support.
 - Financial penalty
 - An Improvement Notice issued
 - Termination of contract

Using Subcontractors in the delivery of apprenticeships

- From the outset of each apprenticeship, Encompass and the employer will agree a plan for its delivery. Encompass will and must directly deliver some of the apprenticeship training and/or on programme assessment. The on-programme assessment associated with each employer's apprenticeship programme will have some substance and will not be a token amount.
- Encompass may use delivery subcontractors to complement its own delivery, if requested by an employer and agreed at the start of an apprenticeship. Within an employer's apprenticeship programme, delivery subcontractors will deliver either substantial or part-apprenticeship training for standards. The delivery plan and content of an employer's programme may vary from month to month or from year to year.