

# SUBCONTRACTING STRATEGY & PROCUREMENT

## 1) Introduction and purpose strategy

This document sets out the strategy Engineering Trust Training Ltd (ETT) uses to approve all new subcontractors it will use in the delivery of apprenticeship services. It also sets out the procurement checks ETT will use to approve both new ongoing subcontractors.

## 2) Strategic Fit

ETT use subcontractors to deliver L2 Diploma in Engineering Operations, L3 Diploma in AME or L4 HNC in Engineering. These are qualifications delivered as part of L2, L3 and L4 apprenticeships, normally via day release over the course of two academic years.

Subcontracted provision of this nature is used when an employer wishes to use ETT as their training provider however they are geographically located too far away from the ETT training venue to allow the apprentice to attend via day release. ETT does not actively market to, or develop business with, employers who are not geographically in reach of its training venue in Bicester, Oxfordshire (apart from those employers based in North Devon, see below).

Employers who are not geographically in reach of its training venue approach ETT with a request for delivery and ETT assesses each request to decide if it is able to work with the employer or not. ETT meets with the employer to identify what Apprenticeship Standard fits with the role they are looking to employ an apprentice within and where they (or the apprentice) will be located during their programme. As part of the pre-apprenticeship work that ETT conducts with each employer, it will assess if a suitable subcontractor is located close to the apprentice and make inquiries as to whether a subcontracting arrangement could be entered into to deliver a specific qualification as part of an apprenticeship. On most occasions, an area will only have one, possibly two providers who deliver engineering and who will consider entering into a subcontracting arrangement for very low numbers of apprentices.

Our work in North Devon subcontracts the qualification delivered via day release (as set out above) to the local college as all apprentices in that area are unable to attend the ETT training venue located in Bicester, Oxfordshire. This subcontract arrangement has been in place for multiple years and utilises the only Engineering training in the area. ETT does develop business in this area of the country and has dedicated staff in the region to facilitate the wider apprenticeship programme.

Strategically, subcontracting allows ETT to work with employers who have requested to do so. Subcontracting is not used as a form of growth or to allow ETT to expand into other areas of the country. Subcontracting is used to deliver a specific qualification within a wider apprenticeship programme that is delivered by ETT staff.

## 3) Procurement

Due diligence is the process by which inquiries are conducted for the purpose of timely, sufficient and accurate disclosure of all information and documents needed to inform the decision making of ETT.

ETT will meet with a potential subcontractor to discuss requirements and to discover if the course offered by the subcontractor fits with the proposed apprenticeship(s). The due diligence process then gathers further information to assess if the subcontracting arrangement will be possible, that the subcontractor is of good standing and that their delivery methods will ensure a high-quality educational experience for apprentices. Ultimately ETT are looking for any significant factors that will impact on the student experience or its ability to manage the subcontracting relationship.

Due diligence includes;

- Contract meeting with the subcontractor to discuss requirements, their delivery and cost.
- An Information Questionnaire is completed and ETT review relevant information such as policy and procedure, Ofsted report, financial health, people with significant control etc.
- A Procurement Checklist is completed to assess the suitability of a subcontractor. As in most cases, there are not multiple options of subcontractor, this is a procurement process rather than a tender process. The checklist is a set of key questions with 'yes' or 'no' answers which will determine if the subcontractor is suitable or not. Any 'no' answers must be mitigated to allow for the overall decision to subcontract to that organisation to be a 'yes'.
- Annual ongoing due diligence is also undertaken to ensure subcontractors remain suitable for ETT apprentices.

#### **4. Ongoing Management of Subcontracted Provision**

To ensure continuous alignment with ETT's quality standards and learner progress expectations, ongoing management of subcontracted provision will include:

**Quarterly Reviews:** ETT will conduct quarterly reviews of learner progress with a designated representative from each partner organisation. These reviews will include evaluations of learner achievement, feedback from employers, and any issues related to the delivery of the programme. This approach is designed to maintain accountability and foster ongoing communication to support learner success.

**Documentation and Reporting:** Records of these quarterly meetings, including actions taken and follow-up measures, will be maintained to ensure a transparent and consistent review process that supports learner progress and programme integrity.

#### **5. Actions for Underperformance in Learner Progress**

ETT has established procedures for addressing underperformance in learner progress:

**Identification and Initial Review:** When a learner is identified as not making adequate progress, an immediate review will be conducted to assess any contributing factors. This review may involve consultation with the learner, their employer, and the subcontractor.

**Targeted Support Plan:** Where issues are identified, a targeted support plan will be developed. This plan will include specific actions to help the learner return to the expected progress trajectory.

**Follow-up and Monitoring:** The progress of learners on targeted support plans will be closely monitored, through follow-up meetings to ensure that interventions are effective and progress is sustained.

## 6. Monitoring and Dashboard Review

ETT utilises a Dashboard document to monitor learner progress and subcontractor performance. The Dashboard includes key metrics reviewed on both a quarterly and annual basis, ensuring:

**Continuous Oversight:** The Dashboard tracks essential indicators such as attendance, assessment outcomes, and learner satisfaction, enabling ETT and subcontractors to maintain up-to-date records and respond to emerging issues.

**Enhanced Partner Communication:** This mechanism facilitates the maintenance of effective relationships between ETT and its subcontractors, promoting shared accountability and a clear understanding of learner progress at every stage of the apprenticeship programme.

**Compliance with Performance Benchmarks:** By regularly reviewing data through the Dashboard, ETT and partner organisations can quickly identify and address any areas where performance falls short of established benchmarks, ensuring that learners are on track to meet their apprenticeship goals.

## 7. Quality Assurance and Safeguarding of Provision

To ensure the quality of subcontracted apprenticeship provision, ETT will implement a range of quality assurance measures. These include:

**Documentation and External Reporting Reviews:** ETT will review documentation and reports on an annual basis, including any external reports from quality assurance bodies such as Ofsted and External Quality Assurance (EQA) auditors. Audits and reports will help assess the compliance of subcontractors with ETT's standards for instructional quality and learner experience.

**Audits:** ETT will conduct both scheduled and random audits of subcontractor provision. These audits will include evaluations of instructional materials, assessment processes, and safeguarding mechanisms.

**Safeguarding and Safety:** As part of its duty of care, ETT requires subcontractors to maintain robust safeguarding policies that align with ETT's standards. This includes ensuring that subcontracted sites have appropriate safeguarding leads, policies, and training. ETT will conduct safeguarding reviews to confirm that mechanisms are in place to protect learners' wellbeing and that they receive support to complete their apprenticeship aims in a safe and timely manner.

For more detail of the quality assurance activities, please see the dedicated section below.

## 8. Summary

This policy ensures that ETT's subcontracting strategy aligns with regulatory requirements and best practices, maintains high-quality standards, and upholds ETT's commitment to learner

success and safety across all subcontracted provisions. Regular reviews, comprehensive monitoring via the Dashboard, and targeted support for learners not meeting progress benchmarks will be key mechanisms for safeguarding the quality and integrity of ETT's subcontracted provision.

## 9. Dashboard Quality Assurance Measures

**Quality Assurance Policies:** Review their quality assurance frameworks to ensure they meet the standards set by relevant regulatory bodies, such as Ofsted or the Education and Skills Funding Agency (ESFA).

**Safeguarding Policies:** Ensure they have robust safeguarding policies in place to protect the welfare of apprentices, including child protection procedures and training for staff.

**Equality and Diversity Policies:** Check for policies promoting equality and diversity, ensuring they align with legal requirements and best practices to foster an inclusive environment.

**Financial Stability and Compliance:** Assess their financial health and compliance with funding regulations, including audits and financial controls, to mitigate risk.

**Curriculum and Delivery Models:** Evaluate the college's curriculum, including how they plan to deliver apprenticeship training and whether it aligns with industry standards and requirements.

**Assessment and Monitoring Procedures:** Investigate how they assess and monitor learner progress, including their methods for feedback and improvement.

**Employer Engagement Policies:** Look into how they engage with employers to ensure the apprenticeship programmes meet industry needs and that they have mechanisms for gathering employer feedback.

**Staff Qualifications and Training:** Verify that their teaching staff are appropriately qualified and receive regular professional development to ensure high-quality delivery.

**Data Protection and GDPR Compliance:** Ensure they have policies in place to protect personal data and comply with GDPR regulations.

**Complaints and Appeals Procedures:** Review their procedures for handling complaints and appeals to ensure transparency and accountability.

**Partnership Agreements:** Examine existing partnership agreements or contracts with other organisations to understand their collaborative practices.

**Regulatory Compliance:** Confirm that they comply with all relevant regulatory frameworks, including ESFA guidelines and apprenticeship standards.