



Apprenticeships

Subcontracting Policy

Effective from 1 August 2022

Status This document is a guide to our procedure and approach to managing the partnership between Go-Ahead London and its subcontractors. It does not form part of the Subcontracting Agreement.

Introduction Go-Ahead London is part of the Go-Ahead Group, one of the UK's leading public transport companies, moving and connecting people to their communities across our bus and rail networks.

We recognise the importance of learning and development, and we invest around £20m in training and professional development every year.

We have received two 'Investors in People' Gold accreditations as recognition for the way we lead, support and manage our colleagues to promote a culture of high performance as well as being voted number 13 of the top apprenticeship employers 2022.

Our aim is to be the employer of choice and maintain a high level of employee retention. We are inclusive and diverse; we focus on learning and development and promote high levels of engagement.

Scope The purpose of this document is to define the basis upon which Go-Ahead London will conduct any subcontracting arrangements. It is a mandatory requirement for employers to have a subcontracting policy in place before engagement in any subcontracting activity. The organisations that Go-Ahead London contracts with will be subject to the requirements and conditions set out in this policy.

The Directors and Finance Department must be satisfied that all subcontracting meets Go-Ahead London's strategic aims, to ensure that learning and development is a positive experience for all, engaging with specialist training delivery partners who add value to our programmes.

Through partnerships, we are able to:

- Realise our vision of delivering a high-quality apprenticeship programme.
 - Support apprentices with their individual development needs.
 - Provide support to our own team, including our vocational tutors.
 - Develop a mutually supportive relationship which all adds value to the learning journey.
-

Contribution to Quality of Teaching and Learning Go-Ahead London's partnership with our subcontractors allows us to access specialist support in areas where we do not have the knowledge or expertise. We have promoted and developed a relationship which provides support to vocational staff and provides apprentices with high quality support for the development of their learning.

Working with our subcontractors improves the overall quality of our offer through:

- Improving the teaching and learning in specialist areas.
- Improving our initial and diagnostic assessment processes.
- An enhanced ability to prepare apprentices for examinations and End Point Assessment; and,
- The inclusion of contextualised safeguarding in relevant specialist delivery.

The performance of our subcontractors is closely managed and, in particular, we monitor, review and discuss individual learner progress. We also set and monitor Key Performance Indicators for subcontractors which are reviewed and monitored by our Board.

The Policy

Go-Ahead London will use its subcontractors to optimise the impact and effectiveness of service delivery to the end user. Go-Ahead London will therefore ensure that:

- Subcontractor activities must comply with the principles of best practice in the skills sector. They will be guided by the principles given in the Education and Skills Funding Agency (ESFA) Funding Rules.
 - Go-Ahead London will always undertake fair and transparent procurement activities, conducting robust due diligence procedures on potential sub-contractors to ensure compliance with the Common Accord at all levels and to ensure the highest quality of learning delivery is made available, demonstrating value for money and a positive impact on learner lives.
 - As part of the due diligence process, potential sub-contractors will be assessed on financial health, health and safety policies, insurance cover, safeguarding arrangements (including Prevent), equality and diversity policies and references will be sought on previous contracts held. Go-Ahead London may ask for additional information and documentation to ensure the robust management of the sub-contracting process and delivery.
 - The funding that is retained by Go-Ahead London will be related to the costs of the services provided. These services, and the levels of funding being retained for them, will be clearly documented, and agreed by all parties. The rates of such retained funding will be commercially viable for both sides and will be negotiated and agreed in a fair and transparent manner. They will be proportionate to the actual services being provided and the levels of intervention and support Go-Ahead London need to offer in the management of the relationship.
 - Where disputes between subcontractors cannot be resolved through mutually agreed internal resolution procedures, Go-Ahead London will submit to independent outside arbitration or mediation and abide by its findings. Contract documents will require both parties to agree that the achievements of subcontractor are attained through adherence to both the letter and spirit of contracts or partnerships.
-

Go-Ahead London will look to subcontract a defined amount of Apprenticeship Provision, in line with the ESFA Funding Rules.

- Any subcontractors will be contracted on a limited basis and only when the best interests of the Go-Ahead London community are served through the use of partners.
- Go-Ahead London will only use subcontractors when it believes it has the appropriate knowledge, skills and experience within the organisation to successfully procure, contract with and manage these subcontractors.
- Go-Ahead London has established procedures relating to the safeguarding of learners, which would include ensuring that subcontracting does not lead to inadvertent funding of extremist organisations.

Rationale for Subcontracting

Go-Ahead London is committed to the high-quality delivery of the apprenticeship learning experience, in line with the funders' priorities. Where appropriate, a small percentage of that experience is delivered through high quality partners with the experience and expertise to meet specific learner needs.

Subcontracted delivery will be used to:

- Support Go-Ahead London strategic objectives to upskill its employees.
- Enhance the overall quality of Go-Ahead London's provision.
- Serve a local demographic need that would otherwise not be met.
- Immediately provide resource to meet a specific identified need whilst reviewing the expansion of direct capacity.
- Provide access to, or engagement with, provision that Go-Ahead London is not qualified to deliver.
- Grow provision mix and provide customers with niche or specialist provision where the cost of developing or capacity to develop are not feasible internally.
- Support a wide geographic requirement.

Go-Ahead London will not subcontract solely to meet short-term funding objectives.

Financial Approvals for Subcontracting

All subcontracting arrangements will be subject to due diligence and signed off by the Finance Director and subcontracting partners in line with the financial regulations (see below).

SUBCONTRACTING

Values

- Up to £100,000 with any one partner
- Over £100,000 with a single partner
- Up to £250,000
- Over £250,001

Required level of sign-off

- Finance Director
 - Finance Director
 - Finance Director
 - Finance Director
-

-
- Contracts may be subject to change during the contract period. If necessary, such changes will be made in consultation with partners in order to improve quality or respond to unexpected events.

Management Fees and Calculation

All subcontractor contracts define both shared objectives and individual roles and responsibilities. The contract conforms to the requirements of the Funding Rules and the expectations of our own contract with the ESFA.

Contracts will determine clear start and end dates, exact or estimated learner numbers, content of delivery and related incomes and costs.

The contract confirms any management fee charged by Go-Ahead London to its subcontractors. This figure represents the total cost that Go-Ahead London incurs in effectively identifying, selecting, managing, and administering all subcontracted provision.

Where a sub-contractor is delivering English and maths all funding is passed to the sub-contractor without the deduction of a management fee. Our focus is on the quality of education, and we believe that programmes need to be appropriately funded if the best results are to be achieved.

Go-Ahead London reserves the right to cover additional costs which may be added to the standard management fee for any additional support that is deemed necessary to ensure the quality of teaching and learning and the success rates of any subcontracted provision. Additional costs are unusual, and partners will be informed in writing prior to them being incurred. All contracting is done on an annual basis and agreements will be recalculated and negotiated annually at contract renewal, giving subcontractors the opportunity to reduce their fees through continuous improvement.

Contracts will be subject to change if, where necessary in the contract period, and in consultation with partners, where such changes improve quality or respond to unexpected events.

The existence of the subcontractor is reported to the ESFA through submission of the Subcontractor Declaration Form in November and July each year.

Support Provided to Subcontractors

To ensure that the subcontractor is best supported to achieve our high expectations, Go-Ahead London have:

- Discussed the wider objectives of the apprenticeship scheme with the subcontractor and agreed our respective roles.
 - Included the subcontractor in the formation of the Individual Learning Plans.
 - Agreed resources which complement the resources being used in vocational delivery.
 - Shared and discussed the documentation to be used to support delivery.
 - Included the subcontractor's staff in staff development opportunities.
 - Planned observations and discussions with subcontractor delivery staff.
-

Quality Improvement All learners who are provided with education and training under a subcontracting arrangement remain the responsibility of Go-Ahead London. All learners supported through subcontracting arrangements are told about the subcontractor's roles and responsibilities in providing the learning.

Subcontracted activity is recognised as a fundamental part of the apprenticeship. The quality of the provision will be monitored and managed by the Apprenticeship Manager ensuring delivery is in line with Quality Assurance processes and procedures, to fully encompass all subcontracted activity.

The Apprenticeship Manager will ensure all subcontractor partners work with our experienced Internal Quality Assurance Team to ensure that delivery in our name meets our robust requirements for experience and achievement.

Go-Ahead London sub-contracted provision is a core part of the apprenticeship and contributes to continuous improvements in the quality of teaching, learning and assessment for both parties. This will be achieved by having regular meetings to share effective practices and discuss feedback received from learners.

Go-Ahead London will robustly manage and monitor all sub-contractors to ensure that high-quality delivery is taking place that meets the specific funding requirements for each programme delivered.

Payment Terms and Timing The extent of delivery and fees due to the sub-contractor will be discussed and reconciled monthly.

Go-Ahead London reserves the right to withhold some monthly payment where errors or further clarification is needed to reconcile the Individual Learner Record. Such amounts may be recovered by deductions from future payments to the partner under their agreement.

On receipt of a valid invoice from the subcontractor, Go-Ahead London will make full payment within 30 days.

All subcontracted provision is subject to a full legal agreement with Go-Ahead London and failure to meet robust quality requirements may result in the withdrawal of all funding.

Additional Charges per Learner Go-Ahead London may also retain funding to cover the cost of any funded activity that it might undertake on behalf of the subcontractor, such as:

- Awarding organisation fees and charges
- Hiring of facilities/equipment within/from Go-Ahead London
- Internal verification

Such payments will be agreed in advance and confirmed in writing.

Audit Requirements Subcontractor arrangements are subject to external audit, including Ofsted and all funding agencies. Co-operation with these processes is explicit within the contracting agreement.

When Go-Ahead London enters subcontracting arrangements for the purpose of delivering provision under its ESFA Financial Memorandum with an aggregate value of £100,000 or more in any one year, it must obtain an annual report from its external auditors which provides assurance on the arrangements that Go-Ahead London has in place to manage and contract its subcontractors.

Policy review

This policy will expire on 31 July 2023 when its effectiveness and validity will be reviewed. It will be revised as necessary and reissued by 1 August 2023.

Signed



John Trayner
Managing Director

Date: 1 August 2022
