



**Subcontracting Policy
2020-2021**

Mindflex are committed to delivering high quality learning opportunities and is committed to growing and diversifying a range of programmes to widen participation.

To meet this aspiration Mindflex have taken a strategic view to subcontract part of our provision and develop good partnerships that can demonstrate good quality teaching and learning across a range of Apprenticeship standards that will be delivered.

Through the supply chain management, we will be able to draw on good and best practice across all programmes. Mindflex supports the partnership arrangements and will assist in raising their standards of delivery and quality of teaching and learning through our quality provision.

We operate an inclusive approach to developing robust procedures which we will include our partners in our quality/partner quality cycle.

Scope

This policy covers the area of subcontracting where there is delivery of Apprenticeship standards.

We will ensure that:

- The proposed delivery is in the best interests of learners and employers
- The proposed delivery has a clear strategic fit with our mission, objectives, and values (there will be no duplication of provision and Mindflex will only seek complimentary organisations where true added value can be evidenced)
- There is adequate expertise within Mindflex to quality assure the provision
- The Subcontractor is approved by our due-diligence process
- There is enough funding available within our funding contract
- There is a clear and transparent commitment between Mindflex and the Subcontractor and both undertake to work within the terms of the agreed contract

All learners are informed by the relevant subcontractor that their Apprenticeship programme is being delivered on behalf of Mindflex. All subcontractors, as part of the due diligence process, undergo a financial health assessment for Mindflex to mitigate any risk to the overall provision. Any subcontractor with a contract value of £100,000 or more is required to register on the ESFA Register of Apprenticeship Training Providers. This registration requires them to pass the ESFA Due Diligence procedures.

Mindflex will provide to the Education and Skills Funding Agency details of the amount of subcontracted provision and the individual providers with whom they have a contract.

Quality and Compliance

The quality of the provision will be monitored and managed through our existing quality improvement processes. As part of our quality cycle we would expect all partners to work and comply with us to improve our quality.

As minimum Mindflex will carry out the following Quality measures with all Subcontractors which will inform our commitment to improve the overall quality.

- Teaching, Learning and Assessment graded observations
- Learner telephone interviews

- Employer telephone interviews
- Review of IQA and EQA reports
- Risk Management and Auditing of compliance aspects of contracts
- Management Information Services and data control advice
- Single staff registers
- CPD opportunities and planned training and development
- Support with Funding Rules compliance
- Equality and Diversity support and sharing of best practice
- Safeguarding, Prevent and British values
- Health and Safety compliance
- Policy and Procedures development
- Management of Data and Data Protection compliance

Self-Assessment

All Subcontractors will be required to undertake a self-assessment process in relation to the Education Inspection Framework and produce a SAR which clearly and specifically identifies and evaluates the Apprenticeship standards which they are contracted to deliver. The SAR and resulting quality improvement plan must be submitted as specified in the contract.

Information, Advice and Guidance (IAG)

Subcontractors will be required to demonstrate that they provide information, advice and guidance (IAG) at appropriate stages and through a range of media, including the internet, to a standard consistent with that offered by Mindflex.

IAG should include:

- Initial advice and guidance to inform the learner's choice of programme
- On-programme advice and guidance/tutorial support to help learners:
- Develop ideas for future learning or employment including promotion
- Who have personal issues such as substance misuse, housing problems, pregnancy etc, identify and make contact with relevant organisations
- Make specific choices about future learning or employment.

Partners should hold matrix accreditation or be working towards.

Additional Support for Sub-Contractors

Mindflex recognises that from time to time our partners need additional support, and this will be based on a 'risk band' approach and may include:

- Additional site visits
- Additional lesson observation
- Additional tutor support
- More rigorous verification and audits

Sub-Contractor Fees

Mindflex determine the fees for each subcontractor based on their individual service requirements. Through the due diligence process and contractual negotiations Mindflex will determine the range of services the subcontractor provides themselves and those provided by Mindflex.

The fees will vary for each subcontractor and the type of provision, the costs include but are not limited to the following areas:

- Administrative support and claims submissions
- Quality Assurance
- Contract Management
- Management Information/Case Management systems
- Account management

Policy Communication

This Policy will be discussed with all Subcontractors during contract negotiation meetings and reviewed at least annually in August of each year. Any changes will be notified to Subcontractors as part of a regular performance review or via separate correspondence.