



Apprenticeships Subcontracting Policy

Policy owner:	Emma Ward
Implementation date:	June 2024
Review date:	Annually the policy must be reviewed, signed off, and published on our website by the 31 st of October each year
Related policies:	Apprenticeships Handbook University of Buckingham
Related procedures:	Apprenticeship Subcontracting Procedures Apprenticeships Handbook University of Buckingham

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Version History

Version	Approved by	Revisions made	Date

1. Purpose

- 1.1 The purpose of this policy is to provide accurate and comprehensive information to external agencies on how the University procures its apprenticeship subcontracted services and the pricing framework used.
- 1.2 The University of Buckingham currently works with one subcontractor (see below) as part of the apprenticeship programmes. This is an area of delivery the University is not currently delivering and requires the expertise of others to deliver.

Subcontractor	Contract Value	Delivering
Buckinghamshire Adult Learning	£10,000	Functional Skills in English Level 2 Functional Skills in Math's Level 2

2. Scope

- 2.1 This policy applies to all subcontracted apprenticeship provisions.

3. Legislative context

- 3.1 This mandatory policy applies to all apprenticeship subcontracted provisions supported with the funds supplied by the ESFA. The policy's content has been developed to comply with the [ESFA subcontracting standards](#) and [ESFA funding rules](#).

4. Policy statement

- 4.1 Subcontracting will only be considered to enhance the quality of the learner offer. The decision to subcontract will not be motivated by financial gain.

The educational rationale for subcontracting must be clear and must meet one or more of the following aims:

- To enhance the opportunities available for learners
- To fill gaps in niche or expert provision, or to provide better access to training facilities.
- To support better geographical access for learners
- To offer an entry point for disadvantaged groups, or to give consideration of the impact on individuals with shared protected characteristics.

- 4.2 The full range of fees retained by the provider and charges (which must be eligible costs) that apply, including funding retained for managing quality assurance/oversight and for administrative functions such as data returns. Management fees will not exceed 20% of the value of the funding.

- 4.3 All subcontractors must satisfy one of the following 4 criteria:



- They are on the published Apprenticeship Provider and Assessment Register (APAR) and have applied by the main provider or supporting provider application routes.
- They are the apprentice's employer, or a connected company or charity as defined by HMRC, and are on the published APAR, having applied through the employer-provider application route.
- They have applied to the APAR subcontracting exception process and have been approved to be exempt from the requirement to be on this register and can produce written approval from the department confirming that this exception applies to them, including its duration; or
- They are not on the published APAR but will deliver less than £100,000 of apprenticeship training and on-programme assessment under contract across all main providers and employer providers between 1 August and 31 July each year.

The University will ensure that they have written confirmation from the ESFA that they have fully achieved the subcontracting standard, at the point of subcontracting, if they intend to use a subcontractor who is not on APAR.

- 4.5 As a provider we will determine that each cost claimed by a subcontractor is reasonable and proportionate to the delivery of their teaching or learning and contributes to delivering high-quality learning
- 4.6 A clear rationale for subcontracting, the services they will provide and the associated costs will be published for each subcontracted delivery
- 4.7 When selecting a subcontractor due diligence checks on potential subcontractors are mandatory, a subcontractor checklist can be found here.
- 4.8 The University will provide a fully completed delivery subcontractor declaration by the dates given by the ESFA. This will be submitted on at least two occasions between 1 April to 31 March each year. The University will update the subcontractor declaration if subcontracting arrangements change during the year.

5. **Responsibility**

Nominated member of staff with responsibility for performance management of subcontractors: Head of Apprenticeships.

6. **Rationale**

The University of Buckingham currently subcontracts the teaching and delivery of English and Math's functional skills as this is an area of delivery the University is not currently delivering and requires the expertise of others to deliver. By offering the subcontracting delivery for Functional skills we are ensuring that we are providing learners the maximum opportunity to complete their Apprenticeship where English and/or Math's Level 2 has not been achieved prior to joining the programme. The University works closely with its subcontractor to monitor performance and progression of learners and to ensure adequate support is in place for the attainment of these qualifications.

7. **Relationship with other policies/procedures**



- 7.1 APPRENTICESHIPS PROFESSIONAL DEVELOPMENT POLICY
- 7.2 Apprenticeships Complaints Policy and Procedure Policy
- 7.3 INITIAL ASSESSMENT POLICY
- 7.4 ENGLISH AND MATHS DELIVERY POLICY
- 7.5 CONFLICT OF INTEREST POLICY FOR INTEGRATED APPRENTICESHIP END-POINT ASSESSMENT
- 7.6 FAIR ACCESS POLICY FOR APPRENTICESHIP END-POINT ASSESSMENT

8. Definitions

- 8.1 Where the provider buys in the delivery of apprenticeship training and / or on-programme assessment from a third party (including the apprentice's employer) this is subcontracting