

# APPRENTICESHIP SUBCONTRACTING POLICY

This policy sets out the supply chain and fee management policy adopted by the First Intuition group of companies.

## Purpose of Subcontracting

First Intuition subcontracts in the following circumstances:

- Where specialist provision is required to provide specialist courses to employers
- At the request of employers to allow flexibility and access to First Intuition centres across the group where this offers a more convenient study centre or study route for the apprentice
- In a small number of cases where an employer provides training in house as part of an apprenticeship provision to its own employees

First Intuition will not subcontract with the following providers:

- Any provider not listed on the Register of Apprenticeship Training Providers
- Any supporting providers (who are not on the Register of Apprenticeship Training Providers but will deliver less than £100,000 of training)
- Any provider who is considered a higher-risk organisation as per the ESFA financial assurance guidelines

The due diligence process will enable us to make decisions based on the above.

## Programme setup

First Intuition will clearly state the following for each employer that we work with:

- The apprenticeship training and/or on-programme assessment that we will directly deliver
- The amount of funding that we will retain for our direct delivery
- The apprenticeship training and/or on-programme assessment that each delivery subcontractor will contribute to the employer's apprenticeship programme
- The amount of funding we will pay each delivery subcontractor for their contribution
- The amount of funding we will retain to manage and monitor each delivery subcontractor
- The support we will provide each delivery subcontractor in exchange for the amount of funding we will retain
- The monitoring we will undertake to ensure the quality of the apprentice training and/or on-programme assessment we have contracted our delivery subcontractors to carry out
- Any actual or perceived conflict of interest between us and any delivery subcontractors

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### Improving teaching and learning

First Intuition has robust arrangements in place to share knowledge and develop best practice in the delivery of teaching and learning. Through the network, feedback is collected from both employers and apprentices and shared across the group. Data and outcomes are monitored, and steps taken to facilitate the raising of standards across the First Intuition Group of companies.

We also carry out a regular and substantial programme of quality assurance in order to monitor the delivery of the subcontractors we are working with, both for their training and on-programme assessment. This involves observations of teaching, learning and assessment which are all tracked accordingly. We work with our subcontractors in order to ensure continuous improvement is taking place in the classroom and the impact on the learners is positive as well as allowing them to progress successfully on their apprenticeship programmes. A governance structure is in place to ensure consistent and valuable communication.

The benefits offered by First Intuition subcontracting arrangements First Intuition has agreed to subcontract specialist Tax Courses to Lexis Nexis (RELX Limited). This is because many employers in the accountancy sector require employees to complete the apprenticeship standards following either a tax or an accountancy pathway. First Intuition can support apprentices in the development of their skills and behaviours in a finance environment and provide access to specialist tax training delivered by Lexis Nexis. Other specialist providers may be introduced if, after careful consideration, this is believed to be in line with First Intuition values and of benefit to the employers and apprentices working with First Intuition.

First Intuition Centres follow the First Intuition delivery model. Subcontracting within the group allows employers to deal with one provider even if they have several locations. This provides easy administration and consistent apprenticeship delivery across a number of locations. In some cases, subcontracting facilitates greater flexibility of study options and dates for the apprentice and allows employers to meet business needs.

First Intuition has agreed for certain clients to subcontract the skills and behaviours training back to the employer. This is in the case of employers who have Employer Provider status. Such programmes are mapped in detail to the level 4 and level 7 standards and subcontracted on an actual cost basis. This allows the employer the flexibility in creating a scheme providing the apprentices with all the support necessary to thrive in their working lives. The delivery of this programme will be monitored as part of an overall programme that we control.

Subcontracting to the employer allows for the skills and behaviours training to be delivered in context for the learners (the context being their employer's work practices and systems) as well as for Skills and Behaviours training to be delivered by expert "practitioners" e.g. more experienced employer staff who understand the relevant culture, career paths, expectations and client base.

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## Management Fees and support

The support provided will vary on a case by case basis but may include:

- Completing client and apprentice sign up process
- Input of data onto the ILR
- Managing payments to the subcontractor
- Collecting co-investment payment from the employer
- Sampling of subcontractor learners
- Due diligence and quality assurance procedures
- Sharing good practice
- Account management meetings
- Observations and learning
- Support during Ofsted inspections and audit
- Monitoring completion data and KPIs
- Providing on programme support and skills training to the apprentice
- Carrying out progress reviews and monitoring progress of apprentices
- Reporting to employers on progress
- Support in passing through the Gateway and in preparing for the End Point Assessment

The fees charged will be agreed on a case by case basis depending on the extent of services provided. This will include business factors such as:

- The level and type of professional training provided
- The level of on programme support provided to the apprentice and the employer
- The level of support provided to the subcontractor
- The commercial relationship between the parties
- The number of apprentices

The management fee will be between 0 and 15% of the funded costs.

## Payment policy

Payment policy will be agreed on a case by case basis and will be either

- Paid upon invoice by the sub-contractor on completion of the course
- Upon receipt of the funding from the ESFA on the basis agreed by both parties. In this case the payment to subcontractors will be outcome related

## Review and publication

This policy is available on the First Intuition website (<https://www.firstintuition.co.uk/home/apprenticeships/>) and is shared at the 6-monthly conference.

It is due for review annually.