**Subcontracting Standards Business Case 22/23**

The college recognises that it needs to reduce the volume of delivery that it subcontracts and is committed to reducing this in line with ESFA and FEC expectations, continuing to decrease the number of contracts it offers outside of the Coast to Capital and South East LEP areas in 2022/23.

This will be achieved via an agreed and managed process of reduction, in line with the tendering processes with only a small number of existing partners who meet our strategic objectives to design and deliver high quality, inspiring career pathways to ensure that ESCG students are equipped with the knowledge, skills and behaviours to achieve personal, economic and civil success.

Of our remaining partners, GFTS (noted as the largest remaining niche delivery partner) have proven themselves to mirror our operational strategies with long- and well-established relationships with the college and we are proposing to continue this relationship with new starts in 22/23. For all other partners, the college will ensure that we are working to manage their exit from our supply chain in a careful and considerate way.

Our proposal and business case identifies GFTS as being the largest of our remaining subcontracts and this is where there continues to be a direct need by employers for growth within the niche fenestration sector. With the colleges continued support they are now one of the UK’s largest and most active Glass Industry training providers, with strengths identified as:

* Delivery by tutors with extensive industry experience to the learners and provide enhanced opportunities to employers and learners alike.
* Leaders in their field and were the first and only ITP in England to successfully support learners through EPA for the new Glass Industry Apprenticeship Standards.
* Continued growth and expertise is allowing them to engage with an increasing number of employers which is procuring the apprentices and underpinning our sustainability for the future.
* Working nationally with both small and large employers, they develop talent at all levels, and fill gaps in niche, industry specific provision.
* Through recent industry changes and employer analysis, GFTS identified the need to explore and update sector expertise levels in all areas of the Glass Industry, by building ‘Practical Skills Centres’ in Southwest and Northwest of England.
* Whilst delivery is across all counties, their centres also provide an excellent skills-based facility, in two areas where most need was identified, encouraging learners from all walks of life to participate in a safe and accurate simulated environment. This approach has opened up opportunities to many learners from disadvantaged groups and filled gaps for students who would previously be unable to learn in a real-life, hands-on situation.
* There is a structured delivery team and apprenticeship offer to ensure they have the ability to deliver apprenticeships of a consistent quality to employers of all sizes, including those micro employers, and those larger companies with multiple sites, and to provide the best learner journey possible to all of our apprentices which supports the ethos of ESC.

Our aim is to continue to work with GFTS to allow them to develop new and existing apprentices of all ages, across a wide range of occupations and job roles to meet the skills needs of the future in this niche sector.

ESCG will also continue to work with our community partner Brighton Dome Festival who support the college with local niche delivery of Music education provision. In doing so, the college is responding and fulfilling the objectives of the National Plan for Music Education by supporting Study Programme learners. The partnership is supported mainly on the grounds of Lewes Campus under the management of the Lewes Curriculum and Assistant Principal with compliance management supported by the WBL partnerships due diligence requirements.

As part of the annual business planning cycle of the college the March Finance Committee agree the annual volume of subcontracting available via funding stream. Existing partners are invited via our Dynamic Purchasing System to submit a bid through a series of mini tenders and ESCG will use its supply chain to optimise the impact and effectiveness of service delivery to students and/or employers.

ESCG will ensure that supply chain management activities comply with the principles of best practice in the skills sector and will require clarification during the procurement and Due Diligence process that they declare against the Grounds for mandatory exclusion against Regulations 57(1) and (2) that they have not been found guilty of Terrorist offences or offences linked to terrorist activities including money laundering or terrorist financing.

The Due Diligence process will include a review of the following evidence:

* Statutory accounts and company credit checks via Companies House
* EQA/Inspection Reports and historic quality information including prior achievement rates
* Sub-contractor profile – based on completed GRID lite profile (our revenue tracking software)
* An overview of the other subcontract values and prime contractors each partner contracts or is planning to contract with, by funding stream
* Sub-contractor duty (and KPIs)
* Evidence of Awarding Body status, including sanctions
* CVs for delivery staff (including DBS numbers)
* Declarations of business standing of the Directors and any conflicts of interest with ESCG staff or Corporation members

Any subcontracted activity is a fundamental part of ESCG provision. The quality of the provision will be monitored and managed through the existing College QA processes and procedures, as amended in order to fully encompass all sub contracted activity.

Subcontractors will be required to demonstrate that they have robust quality audit arrangements in place which are, consistent with the requirements related to the audit activities undertaken by ESCG.

Subcontractor performance will be monitored on an on-going basis and will also include attendance at Principal Performance Review meetings (PPR) that will be scheduled at quarterly intervals throughout the year. Should Subcontractors fail to deliver the data consistently, ESCG reserves the right to withhold funding until sufficient evidence is provided.

**Monitoring will include:**

* having weekly check in call and monthly conference calls and/or visits
* examining MIS and claims
* T&L observations (including review, FS & IAG)
* scheduled support and unannounced visits.
* Desktop auditing of e-portfolio systems
  + At point of sign up a Companies House check/Google map search on all employers takin on any Apprenticeship standards with a value of £10K+ to reduce risk of fraud against funding.