

## University of Cumbria Subcontracting policy in relation to Department for Education (DfE) Funded programmes

### Academic Registry (Apprenticeships & Employer Skills)

POLICY SCHEDULE	
Policy title	Apprenticeship Sub-Contracting Policy
Policy owner	Paul Armstrong
Policy lead contact	Peter Train
Approving body	Apprenticeship Steering Group
Date of approval	
Date of implementation	January 2024
Version no.	7.0
Related Guidelines, Procedures, Codes of Practice etc.	Contractual delivery of apprenticeships
Review interval	Annual

***NB. This policy is available on the University of Cumbria website, and it should be noted that any printed copies are uncontrolled and cannot be guaranteed to constitute the current version of the policy.***

## 1. Introduction and purpose

The University of Cumbria offers degree-level apprenticeships to employers covering a range of subject areas.

The purpose of this policy is to provide accurate and comprehensive information to external agencies and potential subcontractors on how the University procures its subcontracted services, the pricing framework used and how quality will be managed and monitored.

## 2. Scope and Context

This policy applies to all subcontracted provision funded by the DfE. The Subcontracting Policy is a mandatory requirement for subcontracting activity. The policy's content has been developed to comply with the DfE Apprenticeship and Performance Management Rules for Main Providers. In line with the funding rules, the policy will be reviewed each year following the publication of revised apprenticeship funding rules by DfE. This version has been revised in January 2024, following the publication of Version 2 of the 2023-24 funding rules for main providers in October 2023.

[https://assets.publishing.service.gov.uk/media/653b726de6c9680014aa9c05/Apprenticeship\\_funding\\_rules\\_2324\\_Version\\_2.pdf](https://assets.publishing.service.gov.uk/media/653b726de6c9680014aa9c05/Apprenticeship_funding_rules_2324_Version_2.pdf)

## 3. Fairness in Procurement

The University will at all times use fair and transparent procurement activities. Selection and procurement of subcontractor will be carried out in accordance with the University's Procurement Policy and the Public Contracts Regulations 2015.

The University will inform the Chief Executive of the DfE in writing, about any circumstances which might lead to an actual or perceived conflict of interest.

## 4. Due diligence

The University will undertake a robust process of due diligence when selecting potential subcontractors to ensure the highest quality of learning delivery is made available which demonstrates value for money and has a positive impact on the experience of both Employers and Learners. Due Diligence checks will be carried out in line with the University's Anti Money Laundering Policy and Procedure, version 3, 2021.

In line with revised DfE Guidance, the University will only procure the service of subcontractors who are registered on the Apprenticeship Provider and Assessment Register (APAR) to deliver services to employers. The University will also only subcontract to organisations where an existing academic collaborative arrangement is already in place.

At least annually, the University of Cumbria will conduct a review of its due diligence checks on each subcontractor to ensure that the subcontracted provider continues to be able to deliver contracted services. The university will also conduct further due diligence checks if there is any material change in the subcontracted provider that has the potential to impact on its ability to deliver subcontracted services. These include but are not limited to:

- Merger with another provider
- Change of ownership
- Change of key personnel (e.g. managers, directors, link person)
- Any issues that may raise concern about the subcontractor's ability to deliver the programme (e.g. infrequent updates, poor student progress, student or employer complaints). These will also trigger an immediate review meeting.

## 5. Rationale for the use of subcontractors

As a general principle, the University will plan not to use subcontractors in its provision of apprenticeships. Where absolutely necessary, subcontracted provision would only be used to meet one of the following criteria:

- To enhance the opportunities available for learners;
- To fill gaps in niche or expert provision, or 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.

In exceptional cases, the university will also subcontract where there is a contractual requirement by the employer to do so.

The university will treat any collaborative or partnership working as a subcontracting arrangement and apply the funding rules appropriately.

The use of subcontracting arrangements on University of Cumbria apprenticeship programmes will be by exception and that in most cases where additional resources or skills are needed, additional staff will be brought into the university as either direct employees, visiting lecturers or secondees.

Subcontracting will only be used for up to 25% of provision on a programme. The University will still retain responsibility for delivering at least 75% of the programme content.

Where used, the university will only subcontract to organisations that are:

- On the Apprenticeship Provider and Assessment Register (APAR) as a main provider
- The apprentice's employer, which must also be on the Apprenticeship Provider and Assessment Register (APAR) as an employer-provider or main provider.

## 6. Contracting arrangements

All Subcontracting arrangements will follow the guidance published in the DFE Subcontracting Standard (July 2021) which can be found here:

<https://www.gov.uk/government/publications/esfa-subcontracting-standard>

Successful partners will be issued with a legally binding contract eligible for the period from when the contract commences until the planned completion date of an apprenticeship. The quality assurance requirements of this policy form part of that contractual agreement. It will be signed and witnessed by the subcontractor and the University. Terms and conditions will be agreed and included in the contract. The University, Ofsted and the DFE are granted full permission and rights to monitor the quality of training being provided and visit the subcontractor at their premises, training sites or employer's premises from which they operate.

All Subcontracting will reflect completely and accurately the latest version of the DFE Apprenticeship Funding and Performance Management Rules, and all guidance published by DFE related to subcontracting in apprenticeships.

## 7. Quality Assurance (QA) of delivery

The University is committed to delivering high quality teaching and learning for the Apprentice and Employer across its provision and will work with subcontractor to review progress and manage the quality of external provision.

The use of subcontractors will always be agreed with employers before the University enters into any subcontracting arrangement.

All new subcontractors will be subject to an initial visit to confirm approval of appointment as a subcontractor.

The following processes will be used to monitor the quality of subcontracted provision and actively improve quality on an on-going basis:

- Regular contract review meetings between the University and its subcontractors, the frequency of which to be agreed in the formal contract.
- Regular planned and unplanned observation visits to check on the quality of teaching, learning, assessment and progress.

The University will take a risk management approach to subcontractor management to ensure that appropriate levels of contact monitoring and Quality Assurance are maintained. This approach will be based on the number of apprentices placed with a subcontractor as follows:

**University/Sub-contractor Contract review meeting Schedule:**

Number of apprentices placed with sub-contractor	Number of contract review meetings in academic year
	APAR registered sub-contractor
Up to 10	1
More than 10	2

In order to enable contract review meetings to be conducted effectively and efficiently, the subcontracted provider will be asked to provide the university the following information at least 3 weeks prior to the review meeting:

- Copies of learner progress records
- An RAG rating assessment of learner’s progress to identify those at risk of not completing on time
- A copy of the provider’s latest self-assessment report
- Records of delivery staff safeguarding and prevent training

Contract review meetings will be conducted using the review-meeting template in APPENDIX 1 as an agenda and record of the meeting. These will be signed by representatives from both organisations and a copy provided to the subcontractor for their records.

Where appropriate, the University may offer the subcontractor’s delivery staff working on a UoC programme the opportunity to participate in University of Cumbria CPD events including Safeguarding and Prevent training.

**Quality Assurance Check Schedule:**

Number of apprentices placed with sub-contractor	Number of QA Visits in academic year	
	APAR registered sub-contractor	
	Scheduled	Unannounced/ Short notice
Up to 20	1	0
20 +	2	1

In order to make more effective use of Quality Assurance visits, the subcontractor will be asked to provide the following information as a minimum prior to any visit:

- Lesson plans for the lessons to be observed
- Materials
- Examples of learner’s work
- Marking criteria
- Progress notes

Where a subcontractor permanently changes delivery staff on a programme, they should inform the university of this change immediately and send a copy of the new trainer’s CV to the university.

The QA Visit Report Template at APPENDIX 1 will be used as an agenda and record of the QA visit. The QA visit may cover all or a selection of the areas on the template. The focus of the visit will be based on an assessment of the information provided by the subcontractor prior to the visit taking place. A copy of this will be signed by a representative from both organisations and a copy will be provided to the subcontractor for their records.

Where contract reviews or QA visits highlight areas of concern, an action plan will be drawn up by the subcontractor and agreed by the University, to address the areas of concern. Additional meetings and QA visits will be scheduled as required by the University until the issues have been resolved. If the issues cannot be resolved within 8 weeks of the issue being identified The University reserves the right to reallocate apprentices to a new provider to ensure timely achievement of the appropriate elements of the apprenticeship.

All subcontractors must agree to this schedule of meetings and QA visits prior to being awarded contracts.

The University will also take into account feedback, both solicited and unsolicited, from apprentices in its quality assurance of a sub-contractor.

## 8. Internal policies

Subcontractors are required to have robust internal policies to ensure compliance with legislative undertakings and general good practice and make certain that policies are regularly updated and effectively implemented, the requirements of which are identified in the contract. As a minimum any subcontractor will be expected to have a policy or policies covering the following topics approved at an appropriate level in the organisation, copies of which will be held by the University of Cumbria for audit and inspection purposes and made available to DFE and Ofsted as part of their inspection and audit regime:

- Employment law & appeals
- Data Protection (DGRP compliant)
- Health & Safety
- Equal Opportunity/Equality & Diversity
- Assessment & Internal Validation
- Safeguarding & Prevent
- Quality policies for deliverers' procedures?
- Insurance:
  - Employers' (compulsory) Liability Insurance = £10,000,000 for any one occurrence/number of occurrences.
  - Public Liability Insurance Cover = £5,000,000 for any one occurrence/number of occurrences.

## 9. Fees and charges

Payments for subcontracted provision will only be made for the delivery of items deemed to be "eligible costs" in the current version of DFE funding rules.

The University makes a maximum charge of 10% of the full contracted value as a management fee for its standard subcontracted provision. The costs cover the provision of:

- Administration
- quality assurance and Oversight
- MIS function relating to the submission of funding claims to the DFE
- provision of review meetings
- provision of a dedicated account manager

Where needed, the subcontractor will be responsible for meeting the costs associated with the registration of candidates with awarding bodies and examination and re-examination fees out of the funds agreed with the University.

Non-standard charges may be applied to other subcontracting agreements in the future where costs savings can be mutually identified and agreed between the subcontractor and the University.

## 10. Payment

Payment to subcontractors will be made within 30 days of the invoice being received, subject to all necessary paperwork and records having been submitted within the required time scale. A checklist of key dates and deadlines for the paperwork to be received for inclusion in the return to the Education Skills Funding Agency will be provided. Payment details are also included in the contract schedules issued to subcontractors at the start of the new contract year.

## 11. Policy review and communication

The University will review this policy annually. Any changes to the policy will be communicated to existing subcontractors at the contract management meetings. The policy will be discussed with new subcontractors prior to their engagement. An up-to-date copy of this policy will be posted on the University's website and paper copies will be made available upon request

## **12. Declaration of Use of Sub-contractors**

In line with DFE funding rules, the University will submit a subcontractor use declaration of DFE at least twice each year summarising the value of any sub-contracted provision paid for in the previous period. The University will also publish a summary of payments made to sub-contractors in the previous year on its website each year.

## **13. Duties within the University of Cumbria**

Nominated members of staff with strategic lead responsibility for subcontracting:

- Deputy Director of Finance

Nominated members of staff with responsibility for procurement of subcontractors:

- Finance Manager Operations
- Apprenticeship Development Manager

Nominated member of staff with responsibility for performance management of subcontractors:

- Apprenticeship Development Manager/Contracts and Compliance Officer – Contract reviews (to be discussed with Paul Armstrong)
- Managed by Academic Team – QA monitoring visits

Policy Approval:

- Student Success and Quality Committee (SSQAC) via Apprenticeship Steering Group

## **12. Contingency Planning**

The subcontracted provider is required to notify the University of Cumbria immediately if there are and changes that may cause a risk to the contracted delivery. These include but are not limited to:

- The possibility of the provider ceasing to trade
- Poor Ofsted Inspection
- Poor DFE audit
- Other significant changes that affect the ability of the subcontractor to deliver required programmes.

In these circumstances, the University will conduct an immediate contract review and reserves the right to seek alternative provision of services to ensure continuity for learners. The university may also conduct an immediate contract review and/or move learners to another provider if it is made aware of potential issues from other sources of circumstances that may affect timely delivery of the contracted provision.

#### **14. Policy sign-off and Oversight**

This policy is owned and approved on behalf of the University of Cumbria's Senior Management Team by the Student Success and Quality Committee.

Oversight of application of the policy will be achieved by:

- An annual schedule of planned QA and contract review visits will be produced each year and reported to the University's Apprenticeship Steering Group (ASG). The Apprenticeship Development Manager will provide an update report to each ASG on the following:
  - Planned QA visits Contract reviews conducted against the schedule
  - Unplanned QA visits Contract reviews conducted against the schedule arising from any issues
  - Any risks or issues identified and mitigating action taking place
  - Updates on any previously reported issues
  - Any changes to the planned reviews for the rest of the year.

# University of Cumbria

## Appendix 1. - Sub-Contractor QA Visit Report Template (Sept 2022)

Sub-contractor Name		Providers UKPRN		Date of Visit	
Address				Name of UoC Representative	
Programme/element being delivered					
This visit is (Tick appropriate box) ONE BOX ONLY	Initial Assessment Visit to confirm acceptance as a subcontractor				
	Scheduled QA Visit				
	Unannounced QA Visit				
	Follow up visit following an unsatisfactory QA visit to check progress				

### Activities Undertaken

Classroom Observation		Interview with Staff		Interview with Students	
Examination of Student records		Other (Specify)			

### Notes

#### Classroom Observation (Must be at least 15 minutes)

Classroom environment was conducive to learning (e.g. temperature, well lit, tidy, clean, organised, suitable furniture and lay out)	Yes/No
The lesson was planned with structured activities	Yes/No
Students appeared engaged and interested in the subject	Yes/No
The teacher responded appropriately to class comments and questions	Yes/No
If the answer to any of the questions above is NO, Please provide a description of the issues found here	

#### Interview with staff

Teachers hold qualifications appropriate to the subject being taught (Record qualifications)	Yes/No
Teachers hold or are working towards a formal teaching qualification (record qualifications)	Yes/No
Teachers are given opportunities to develop and are encouraged to develop	Yes/No
Teachers are regularly observed by the organisation and provided with feedback	Yes/No
Staff feel supported by the organisation	Yes/No
If the answer to any of the questions above is NO, Please provide a description of the issues found here	
Record any relevant comments from staff	

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**Interviews with Students**

Students are happy with the way the subject is taught	Yes/No
Students feel they get the support and help they need from their tutors	Yes/No
Students feel they are making progress	Yes/No
Students know when they are expected to take their exam	Yes/No
Students have been taught by the same teacher for the duration of their course	Yes/No
If the answer to any of the questions above is NO, Please provide a description of the issues found here	
Record any relevant comment from students	

**Safeguarding and Prevent**

Have staff or students identified any Safeguarding or Prevent issues (NOTE!) this question MUST be asked in every visit	Yes/No
If the answer is yes, record the issues below and immediately notify the University’s Apprenticeship Development Manager and Head of Student Support. This will result in an immediate review meeting.	

**Examination of Student Records**

The organisation keeps records of :	
Initial English and Maths assessments	Yes/No
student progress	Yes/No
Student attendance	Yes/No
Attainment	Yes/No
If the answer to any of the questions above is NO, Please provide a description of the issues found here	

Record any concerns regarding student progression, for example, any students likely to not complete on time

**Student Progression and Attainment**

Number/Percentage of first time passes/ Failures in last 6 months	Passes		Failures	
Number/Percentage of retake passes/Failures in last 6 months	Passes		Failures	

**Other**

Please note any other observations that affect or indicate the quality of provision below  
 NOTE! – If this QA visit is a follow up to assess progress after an unsatisfactory visit, reference must be made to the Action Plan drawn up with the subcontractor to address any quality issues

**Findings**

As a result of the QA visit, the Subcontractor’s provision is judged to be:  (Tick one box only. If unsatisfactory an action plan must be agreed with the subcontractor to address any issues identified)	Satisfactory (No Action required)	
	Needing Development (Advisory Only)	
	Unsatisfactory (Remedial Action Required)	

**Subcontractor comments and Signature**

I have received this feedback at the time of the visit and agree/disagree with the findings			
Name		Signature	
Role		Date	
Comments			

# APPENDIX 2 – University of Cumbria

## Sub-Contractor Performance Management Review Template

### Introduction

1. This form sets out and captures the requirements governing the ongoing performance management of University of Cumbria’s sub-contracted delivery as part of our apprenticeship programme for employers.
2. We have full responsibility for the quality of all aspects of every apprenticeship delivered for the employer and we are required to carry out formal assessments of our subcontractor’s provision as detailed in our contract with you and in accordance with the DFE’s funding rules.

### Accountabilities and Principles

3. The University is responsible for carrying out the review of your delivery. Reviews will be held in line with the timescales set out in the University’s Subcontracting Policy.
4. This responsibility includes an annual review of policies and processes concerning subcontracting and the action taken regarding instances of exceptional or poor performance or breach of funding rules. The policy and any occurrences of exceptional achievements or breaches must be reviewed annually as part of our *Student Success and Quality Committee* remit, with any recommendations for action implemented immediately in response.
5. Your nominated quality lead *[insert name]* and/or *[insert accountable role title]* will be in attendance.

### Guidance

1. This form should be completed in accordance with the university of Cumbria’s subcontracting policy.
2. Signature(s) confirm the record as being true and accurate.
3. This record will be held by *the University’s apprenticeship team and circulated to attendees by email*

<b>To be completed by the University</b>			
<b>Subcontractor</b>		<b>UKPRN of provider</b>	
<b>In Attendance</b>			
<b>Programme(s)</b>			
<b>Period of Review</b>	<i>[date/trimester/module(s)]</i>		
		<b>Maths</b>	<b>English</b>
<b>Number of Apprentices currently placed with subcontractor</b>			
<b>Number of current Apprentices anticipated to complete on time</b>			
<b>Number of current apprentices anticipated to miss target completion date</b>			
<b>Agreed actions to support those students who may miss target completion date. Use specific names and actions</b>	<b>Student Name</b>	<b>Planned remedial action</b>	

<b>Changes in Key subcontractor staff since last review</b>	Name of new person	Role	Date of change
<b>Record any actions required by either the subcontractor or university resulting from staff changes</b>			
<b>New starts since last review</b>			
<b>Completers since last review</b>			
<b>Other Issues (if none record none)</b>		<b>Actions taken/planned, By who With target date. If none record none</b>	
<b>Record any Prevent or Safeguarding Issues</b>			
<b>Record any relevant subcontractor internal QA audit findings</b>			
<b>Record any complaints or appeals from learners</b>			
<b>Findings from University of Cumbria observation visits</b>		<b>Actions to be taken</b>	
<b>1</b>			
<b>2</b>			
<b>3</b>			
<b>4</b>			
<b>5</b>			
<b>Finance</b>			
<b>Invoices (record any issues with invoices and actions to be taken)</b>			

<b>Payments</b> (record any issues with payments and actions to be taken)	
<b>Milestones / KPIs for next period</b>	<i>[details] [performance] [Dashboard]</i> e.g. - Assessment - Achievement - Progression to KSBs

<b>SUBCONTRACTOR STAFF ATTENDANCE AT RELEVANT CPD EVENTS (e.g Prevent and Safeguarding training, Teacher training).</b>			
<b>Name</b>	<b>Details</b>	<b>Activity</b>	
<b>ACTION</b>	<b>Positive/No Action</b>		<i>[Reasons]</i>
	<b>Remedial Action</b>		<i>[Details]</i>
	<b>Intervention</b>		<i>[Details]</i>
<b>Authorised Signature</b>		<b>Date</b>	
<b>Name</b>			
<b>Discussion [other] [achievements] [issues]</b> e.g. Ofesd, DFE Audit			
<b>1.</b>			
<b>2.</b>			
<b>3.</b>			
<b>4.</b>			
<b>Action Agreed</b>			
<b>Subcontractor DECLARATION</b>	<b>I can confirm that the information given during this performance management review is accurate and true.</b>	<b>Date</b>	
	<b>University Representative</b>	<b>Subcontractor Representative</b>	

<b>Signed</b>		
<b>Name</b>		
<b>Role</b>		
<b>Date and period of next review</b>		

## Version Control

<b>Version Number</b>	<b>Description</b>	<b>date</b>
<b>1</b>	Version approved by Student Success and Quality Committee	October 2018
<b>2</b>	<p>Version 2, Updated following Ofsted Inspection, Audit feedback and UVAC webinar on best practice in April 2019.</p> <p>Summary of Changes:</p> <ul style="list-style-type: none"> <li>• Initial Due Diligence check on all subcontractors will be repeated at least an annually. Such a review will also triggered by significant changes to the organisation to include:               <ol style="list-style-type: none"> <li>1. Merger with another provider</li> <li>2. Change of ownership</li> <li>3. Change of key personnel (e.g. managers, directors, link person)</li> <li>4. Any issues that may raise concern about the subcontractor’s ability to deliver the programme (e.g. infrequent updates, poor student progress, student or employer complaints). These will also trigger an immediate review meeting.</li> </ol> </li> <li>• Contingency plans to account for major disruption in subcontracted provider are now included. This will address issues that include:               <ol style="list-style-type: none"> <li>5. Ceasing to trade</li> <li>6. Poor Ofsted Inspection</li> <li>7. Other significant changes that affect the ability of the subcontractor to deliver required programmes.</li> </ol> </li> <li>• Subcontractors are required to notify the university immediately of any issues that may affect delivery of contracted services to learners.</li> <li>• The policy incorporates process for gathering information from subcontractor prior to any monitoring visit to allow identification of issues to be explored during the visit. Specifically for lessons, an observation pack to include:               <ol style="list-style-type: none"> <li>8. Lesson plan</li> <li>9. Materials</li> <li>10. Examples of work</li> <li>11. Marking criteria</li> <li>12. Progress notes</li> </ol> <p>For contract review meetings include:</p> <ol style="list-style-type: none"> <li>1. Progress records</li> <li>2. RAG rating for learners</li> <li>3. Self-assessment report</li> <li>4. Staff safeguarding and prevent training record</li> </ol> </li> </ul>	April 2019

	<ul style="list-style-type: none"> <li>Subcontractor will be required to provide details and CVs of named individuals that will deliver the programme and notify the university if this changes.</li> <li>Subcontractor may be offered the opportunity to access CPD offered to the university's own apprenticeship delivery team. (for example, Safeguarding and Prevent training)</li> <li>A template has been added for Contract review meeting records</li> <li>The number of contract review meetings for higher numbers of learners is increased from 3 to 4</li> <li>Safeguarding and Prevent has been added as a mandatory area to cover in all visits.</li> <li>The addition of the requirement for the subcontractor to be subject to Ofsted requirements and inspection in addition to DFE audit.</li> </ul>	
2.1	Addition of Oversight and reporting responsibilities in section 13 following SSAQC meeting on 2/5/19.	2/5/19
3.0	<p><b>Revisions for version 3 – Updated 15<sup>th</sup> August 2019 to reflect new requirement in DFE funding rules that all subcontractors should be on the Register of Apprentice Training Providers (RoATP), including those that provide English and Maths.</b></p> <p><b>Section 2</b>, Updated reference to current funding rules from DFE.  <b>Section 4</b>, Amended, the university will now ONLY contract with providers on the DFE Register of Apprentice Training Providers (RoATP) as required in the 2019-20 funding rules.  <b>Section 5</b>, New funding rules referenced  <b>Section 6</b>, Reference to non-RoATP registered providers removed from text and tables. Number of visits revised  <b>Appendix 1</b>, QA visit report template has RoATP UK Provider reference number added to table to demonstrate provider in on RoATP  <b>Appendix 2</b>, Contract review template has RoATP UK Provider reference number added to table to demonstrate provider in on RoATP</p>	15 <sup>th</sup> August 2019
4.0	<p><b>Revised to account for 2021-22 DFE Funding rules in September 2021</b></p> <p><b>General:</b></p> <ul style="list-style-type: none"> <li>The original policy focussed on the subcontracting of English and Maths Functional Skills. This has now been brought in house so specific reference to these subjects has been removed.</li> <li>The University anticipates that some future programmes may involve sub contracting specialist provision so the rules have been updated to reflect the more general use of subcontractors.</li> </ul> <p><b>Section 2</b> – Version of funding rules updated  <b>Section 5</b> – Rational for use of subcontractors updated to reflect 2021-22 funding rules changes  Section 6 – reference to specific DFE documents has been replaced with reference to all relevant DFE funding and performance management rules.  <b>Section 9</b> – Contract management fees reduced to 10%</p>	Sept 2021

	<b>Contractor performance review template</b> – Specific reference to English and Maths Functional Skills removed	
<b>4.1</b>	<ul style="list-style-type: none"> <li>• Following review of RoATP application guidance, Policy updated with: <ul style="list-style-type: none"> <li>○ Addition of reference to UoC ‘anti money laundering policy and process version 3 2021 to cover due diligence checks (Page 1)</li> <li>○ Addition of statement of only working organisations where existing academic working arrangements are in place to strengthen due diligence. (Page 1)</li> </ul> </li> </ul>	Dec 2021
<b>5.0</b>	<ul style="list-style-type: none"> <li>• Reference to funding rules updated for 22-23 funding year.</li> <li>• Reference to DFE Subcontracting Standards (July 2021) added to section 6. Contracting arrangements</li> </ul>	Sep 2022
<b>6.0</b>	<p>Annual review of policy in Jan 2024</p> <ul style="list-style-type: none"> <li>• Reference to Apprenticeship Provider and Assessment Register (APAR) to replace RoATP.</li> <li>• Updated links to DFE web site</li> <li>• Addition of reference to “eligible costs”</li> <li>• Maximum percentage of a programme to be subcontracted added.</li> </ul>	January 2024