



Subcontracting Policy 2023-2024

Updated: March 2024
Review Due: April 2025

This policy relates to Let Me Play Ltd, Inspire ATA Ltd and LMP Action C.I.C, known as "LMP Group" or "The Company." The policy applies to all three companies and is the standard by which we adhere to.

The purpose of the policy is to define the basis on which LMP Subcontracts provision and to provide accurate, transparent, and comprehensive information on the fee structure.

Let Me Play Ltd, established in 2004, focuses on education and social impact, working together to bring about positive, sustainable change. Let Me Play is a group of companies (*commonly referred to as "LMPGroup," "LMP" or "The company"*). The group consists of three companies:

Let Me Play Limited, incorporating LMP Education
LMP Action, Community Interest Company (C.I.C)
Inspire ATA Limited

The various divisions of LMP Group service schools, businesses and individuals across the UK through Holiday Camps, Alternative Education, Employability Support Programmes, Apprenticeships, Adult Education and Bootcamps.

Business Needs

For 2023-24, we have revised contract needs and are subcontracting a proportion of our Non-Devolved Adult Education Budget (AEB). There are no plans to sub-contract any provision other than the delivery of **AEB**. The decision has been made to support the contract performance and our intent of supporting more people into work/progressing careers.

Scope

This policy covers the area of subcontracting for AEB.

LMP will work with a range of partners that are of high-quality and have a shared value of putting the learner and the employer at the centre of what we do. We operate the following approach:

- A two-stage robust and comprehensive due diligence process prior to contract award. This includes a PQQ, with only certain parties being asked to complete a full due diligence pack. This risk-based approach includes financial standing, quality reports, track-record, and declarations on key measures.
- An evaluation that the proposed delivery is in the best interests of learners and employers. This includes and assessment that the proposed delivery has a clear strategic fit with our contract, mission, objectives, and values.
- There is adequate expertise within LMP Education to quality assure the provision.
- There is enough funding available within our funding contract.
- There is a clear and transparent commitment between LMP Education 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 **AEB** programme is being delivered on behalf of LMP Education.

- All subcontractors, as part of the due diligence process, undergo a financial health assessment for LMP Education to mitigate any risk to the overall provision. Any subcontractor with a contract value of £100,000 or more is required to have audited accounts and hold appropriate Education & Skills Funding Agency (ESFA) approval status.
- LMP Education will provide to the ESFA 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 quality.

As minimum LMP Education 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 central 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 Traineeship provision which they are contracted to deliver. The SAR and resulting Quality Improvement Plan (QIP) must be submitted as specified in the contract.

Careers Education, Information, Advice and Guidance (CEIAG)

Subcontractors will be required to demonstrate that they provide CEIAG at appropriate stages to a standard consistent with that offered by LMP Education.

CEIAG should include:

- Initial advice and guidance to inform the learner's choice of programme.
- On-programme advice and guidance/tutorial support to help learners
- Development of ideas for future learning or employment including promotion

Partners should hold Matrix accreditation or be working towards this.

Additional Support for Subcontractors

LMP Education 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

Subcontractor Fees

LMP proposes to retain an estimated management fee of up to 20.0% of the value of the ESFA rates for each qualification as set out in the ESFA funding rate matrix for each learning aim.

The fee has been calculated based on salary costs and management support necessary to ensure proper contract management, quality monitoring and ensure that the data is collected and can be provided to the ESFA promptly.

Through the due diligence process and contractual negotiations, LMP Education will determine the range of services the subcontractor provides themselves and those provided by LMP Education.

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

- Administrative support, compliance, and claim submissions.
- Quality Assurance
- Contract Management
- Management Information/Case Management systems
- Account management.

All invoices will be paid in accordance with funding received from ESFA and receipted no longer than 30 days after this point.

Policy Communication

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