

Subcontracting Contingency Plan

Purpose

This plan outlines the protocols and actions that must be adhered to in the event of issues arising with subcontracted provision, ensuring the continuity of service and the completion of learners' qualifications. This could include the following:-

- Unexpected changes in regulations or funding
- Changes to personnel or absence of key roles
- Funding cuts
- Subcontractor Failure
- Financial instability
- System failure
- Companywide critical event
- A global pandemic like COVID-19

These incidents could require a temporary closure or suspension of activities, this plan outlines the necessary measures to ensure the continuity of our subcontracted provision in such circumstances.

Due Diligence and Monitoring

1. Pre-Contractual Due Diligence:

- All potential subcontractors must undergo a rigorous due diligence process before entering into a contract with Twin.

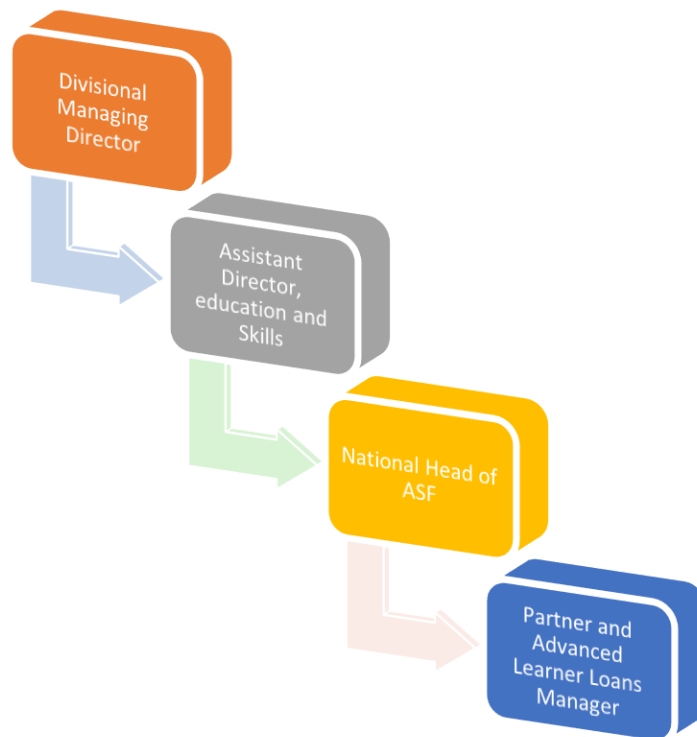
2. Annual Due Diligence Review:

- Existing subcontractors are required to complete an annual due diligence review, which includes an assessment of financial health and other relevant documentation.

3. Ongoing Monitoring:

- Subcontractors must participate in regular and ongoing monitoring processes to mitigate risks.
- The Partners and Advanced Learner Loans Manager will conduct monthly performance monitoring meetings with all partners to ensure contractual compliance and timely identification of potential risks. The minutes are shared with partners and signed by both parties to confirm authenticity. Any potential risks recorded in the minutes, targets and actions to mitigate these risks are set and this is reported to the Assistant Director of Education and Skills who will escalate, when appropriate, to the Divisional Managing Director of Education and Skills. All risks will be added to the Risk Register and monitored by the Executive Leadership Team. Any risks identified by the Partners and Advanced Learner Loans Manager, will be monitored as part of the monthly performance monitoring meeting, or if required risk dependant, on a more frequent basis.

- Succession and supersession planning must be discussed with all subcontractors to ensure continuity of contacts and information sharing. The Partners and Advanced Learner Loans Manager is also part of this supersession planning process with a clear line of replacement or stand in based on leave, sickness, holiday, exit etc. The supersession for the Twin Group Partners and Advanced Learner Loans Manager shown in the flow chart below.



- In the event of the Partner and Advanced Learner Loans Manager being away from the business, as discussed above, as part of the supersession process, the Assistant Director of Education and Skills will have access to all necessary documentation relating to subcontracted partners. These are stored in a secure area within Teams which the Assistant Director of Education and Skills has full access to, therefore all data required for the smooth continuation of contract management will be fully accessible and includes a spreadsheet containing relevant contact information for all subcontractors.

Reporting and Risk Management

For the purpose of this Contingency Plan, risk will be defined as an event which, because of its scale or impact, is beyond the scope of resolution by the normal Twin Group decision-making authority. This would involve serious disruption to the day-to-day functions, which might arise with little or no warning. This may include complete or partial loss of system communications, staffing liquidation, buildings, a major fire, a terrorist incident etc.

4. Risk Reporting:

- Any identified risks that threatens contract delivery must be reported to the Divisional Managing Director and Assistant Director of Education and Skills and the Executive Leadership Team.
- The Divisional Managing Director of Education and Skills will escalate these issues to the Funding Agency as necessary.

Contingency Actions

5. Immediate Response:

- In the event of withdrawal by either party, or if a subcontractor goes into administration or liquidation, Twin will take immediate action to ensure continued delivery of provision and facilitate learners' completion of their qualifications.

6. Contingency Plan Implementation:

- In the event of subcontracted delivery being terminated, the Partners and Advanced Learner Loans Manager will liaise with the subcontractor to implement the Contingency Plan, ensuring a smooth transition for all affected learners. Actions will be undertaken in accordance with the table below which covers a generic worst-case scenario where action has to be undertaken solely by Twin, without any input by the current Subcontractor. Actions may be adjusted depending on individual circumstances.

Steps	Item to action	Details of action Plan	Lead
1	Communication (customers affected)	Twin to provide timely updates to: a. Students b. Employers if relevant c. Other relevant stakeholders affected by the programme delivery	National Head of ASF Partner and Advanced Learner Loans Manager
2	Communication (management information)	To report regularly to: a. Assistant Director of Education & Skills - New reporting document on the transition to be developed as required b. Divisional Managing Director – regarding the transition progress and for risk register reporting b. Board level – Both regarding the transition progress and as part of the risk register reporting c. Funding bodies (e.g. ESFA in general terms and to share specific reporting documentation outlined in a. and b. above)	Partner and Advanced Learner Loans Manager Assistant Director of Education & Skills Divisional Managing Director

3	Communication (customer relations)	<p>Twin Group has appointed a Partner and Advanced Learner Loans Manager, whose responsibility will be:</p> <ul style="list-style-type: none"> a. to ensure frequent and effective communication with students affected b. to minimise disruption of their learning experience c. respond to any queries or complaints arising d. and provide assurance that students will not be adversely affected by the transition and will be able to complete their studies with Twin Group or another suitable alternative Subcontracted provider. 	<p>National Head of ASF</p> <p>Partner and Advanced Learner Loans Manager</p>
4	Delivery (alternative provider identified)	<ul style="list-style-type: none"> • Twin Group staff would Conduct a thorough review of learner progress and assessments. • Twin Group identifies a suitable alternative provider to take over the delivery, which would be either Twin Group or an alternative Subcontractor. • In the unlikely event of students not being able to complete their programme of study through Twin Group provision, (direct or subcontracted), during any teach out period, Twin Group would employ measures to facilitate student transfer to other providers in order to complete their studies. 	<p>National Head of ASF</p> <p>Partner and Advanced Learner Loans Manager</p>
5	Resources (delivery)	<p>Twin Group either:</p> <ul style="list-style-type: none"> a. Redeploys existing staff or recruits new staff and issues contracts of employment (if the delivery is to be taken over by Twin Group) b. Twin Group to support the new Subcontractor with the process of transferring learners onto their online platform. For other types of Subcontracted provision, relevant alternative arrangements will apply to ensure that learners have prompt access to new learning materials. 	<p>National Head of ASF</p> <p>H.R Department</p> <p>Partner and Advanced Learner Loans Manager</p>
6	Certification	Twin Group either:	

		a. Twin Group to transfer learner registrations with the awarding body under the Twin Group centre number (for delivery by Twin) Or b. Twin Group to support the new Subcontractor with the process of transferring learner certification registrations onto the Subcontractor's centre number.	National Head of ASF Head of Assessment and Support Services
7	Data Protection	Twin Group to ensure that any student personal data held by the outgoing Subcontractor will be transferred, archived to Twin Group Data and/or destroyed as relevant in accordance with current GDPR legislation.	National Head of ASF MIS
8	Monitoring and control	To introduce an extra level of scrutiny, both for the transition phase and to oversee the new delivery once started. This could include, for example: a. Regular and frequent review meeting with the delivery manager and team b. The appointment of dedicated intervention manager to swiftly resolve any issues emerging.	National Head of ASF Partner and Advanced Learner Loans Manager

Planning and Execution

7. Post-Withdrawal Planning Meeting:

- Following the withdrawal from a contract, senior management and the Partners and Advanced Learner Loans Manager will convene a planning meeting to determine the best course of action.
- A handover pack and access to subcontractor information will be prepared.
- The subcontractor may be invited to participate in this meeting.

Action Timeframes:

- Set clear timelines for the implementation of identified actions.
- Role and Responsibility Allocation:
- Assign key roles and responsibilities to Twin staff for implementing, monitoring, and reviewing the contingency plan.

Compliance

All Twin staff and subcontractors must adhere to this policy to ensure the integrity and continuity of subcontracted provisions.

Annex 1

GLA ASF Jobs and Skills for Londoners Subcontractors

Subcontractor Name	UKPRN	Contract Start Date	Contract End Date
All Dimensions	10032555	04/09/2023	31/07/2024
East Essex Vocational Training	10028038	01/08/2024	31/07/2025

National ASF Subcontractors

Subcontractor Name	UKPRN	Contract Start Date	Contract End Date
Runway Apprenticeships Training Ltd.	10049149	01/08/2024	31/07/2025
Total Training Provision Ltd (TTP)	10047356	01/08/2024	31/07/2025

Apprenticeship Subcontractors

Subcontractor Name	UKPRN	Contract Start Date	Contract End Date
Professional Vocational Training Ltd.	10009268	01/08/2024	31/07/2025