

Use of the internet by employees of LI Europe is permitted and encouraged where such use supports the goals and objectives of the business. However, LI Europe has a policy for the use of the internet whereby employees must ensure that they:

- Comply with current legislation.
- Use the internet in an acceptable way.
- Do not create unnecessary business risk to the company by their misuse of the internet.

In particular the following is deemed unacceptable use or behaviour by employees:

- Visiting internet sites that contain obscene, hateful, pornographic, or otherwise illegal material.
- Using the computer to perpetrate any form of fraud, or software, film, or music piracy.
- Using the internet to send offensive or harassing material to other users.
- Downloading commercial software or any copyrighted materials belonging to third parties unless this download is covered or permitted under a commercial agreement or other such licence.
- Hacking into unauthorised areas.
- Publishing defamatory and/or knowingly false material about LI Europe, your colleagues and/or our customers on social networking sites, 'blogs' (online journals), 'wikis' and any online publishing format.
- Revealing confidential information about LI Europe in a personal online posting, upload, or transmission - including financial information and information relating to our customers, business plans, policies, staff and/or internal discussions.
- Undertaking deliberate activities that waste staff effort or networked resources.
- Introducing any form of malicious software into the corporate network.
- Company-owned information held on third-party websites.
- If you produce, collect and/or process business-related information in the course of your work, the information remains the property of LI Europe. This includes such information stored on third-party websites such as webmail service providers and social networking sites, such as Facebook and LinkedIn.

1.0 Monitoring

LI Europe accepts that the use of the internet is a valuable business tool. However, misuse of this facility can have a negative impact upon employee productivity and the reputation of the business.

In addition, all of the company's internet-related resources are provided for business purposes. Therefore, the company maintains the right to monitor the volume of internet and network traffic, together with the internet sites visited. The specific content of any transactions will not be monitored unless there is a suspicion of improper use.

1.1 Sanctions

Where it is believed that an employee has failed to comply with this policy, they will face the company's disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary action.

All company employees, contractors or temporary staff who have been granted the right to use the company's internet access are required to sign this agreement confirming their understanding and acceptance of this policy.

2.0 Internet

LI Europe expects every employee to have a fast broadband connection into their homes for use on the weekly video conference.

LI Europe provides a laptop and mobile phone and there are dongles that can be shared throughout the team. Each mobile provided comes with tethering and has a data bundle. Mobile internet on laptops should be accessed via a wifi dongle, mobile phone tethering or a wifi hotspot. Most client sites now offer a guest wifi facility and hotel access to free wifi. You should use these facilities wherever possible.

Employees should ensure that this usage does not bring the company into disrepute by using it for any illegal activity or malicious activity.

3.0 Email

Email sent out from employees' LI Europe account should be written in a professional manner and not bring the company into disrepute.

4.0 Mobile Phones

LI Europe will provide employees with a fully paid mobile phone. This is to be used for work related calls as well as any personal calls when travelling for work. This phone should not be used for any illegal activity or anything that will bring the company into disrepute.

When travelling abroad, due to the large costs associated with data usage, please ensure data usage is turned off unless required for a specific purpose.

Where possible use Skype/Zoom/Microsoft teams (or other video call service) for international calls.

5.0 Security Software

All LI Europe computers and laptops should have an up-to-date version of anti-virus software installed.

Policy No: LIEURAPP2017

Policy Name: Functional Skills Subcontracting Policy

1.0 ESFA Funding Rules

In accordance with the ESFA Funding Rules this Policy outlines the Subcontracting arrangements for our Apprenticeship Provision. LI Europe Ltd will use Subcontracted provision to ensure learners have access to qualified Maths and English tutors to gain their Level 2 qualification in Functional Skills Maths and English.

As defined by the ESFA Funding Rules, the following definitions apply:

- 2.1. Subcontracting means any delivery of an apprentice's programme of learning by a separate legal entity. It does not matter if this is by a third party recruited to deliver on site (travel to teach), online learning or whether the delivery is described as a service.
- 2.2. Subcontractor: A separate legal entity or an individual that has an agreement (called a subcontract) with you to deliver any element of the education and training we fund. A separate legal entity includes companies in your group, other associated companies, and sole traders. An individual could include a person who is a sole trader, self-employed or employed by an agency unless those individuals are working under your direct management and control in the same way as your own employees.

2.0 LI Europe Commitment

LI Europe Ltd is committed to delivering high quality Apprenticeships and supporting employers to ensure they have the skills and knowledge needed within their business. From start to finish, our apprenticeship programmes are designed around real-world needs.

LI Europe Ltd will only use Subcontracting organisations that meets the requirements to ensure learners successfully achieve Level 2 in English and Maths, Functional Skills at Level 2 in these subjects.

LI Europe Ltd will only consider Subcontracting provision that is an enhancement to our current programmes, specialist provision or otherwise outside of our scope or capacity.

LI Europe Ltd recognises its responsibility to conduct transparent and robust due diligence procedures on potential subcontractors to ensure compliance with the applicable funding rules and policy intent.

LI Europe Ltd will monitor and evaluate not only the quality of subcontracted provision, safety and wellbeing of learners undertaking Subcontracted Provision, but also currency of the subcontracted provision and value for money. This will be carefully monitored to ensure continuous improvement and the best use of available funds.

All funding claimed and retained by LI Europe Ltd will be clearly documented and agreed by all parties (currently £471 per learner, per subject over 6 months).

The ESFA's rules governing subcontracted delivery are designed to increase the quality of provision and to ensure that employers have a direct relationship with their main provider. As the main training provider, LI Europe Ltd will:

- Agree the use of subcontractors with employers at the start of an apprenticeship.
- Carry out due diligence checks on potential delivery subcontractors.
- Enter into a written agreement with subcontractors.
- Ensure that second-level subcontracting does not take place.
- Obtain an annual report from an external auditor if the total apprenticeship contract value exceeds £100,000 in any one financial year.
- Directly deliver part of the apprenticeship programme that is of substance.
- Maintain the relationship with the employer.
- Take full responsibility for the quality of all aspects of delivery and carry out regular quality assurance checks of their subcontractor's provision.
- Provide delivery sub-contractor declarations in line with ESFA dates and manage updates if arrangements or circumstances change during the year.

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3.0 LI Europe Ltd responsibilities:

- The Centre Manager is responsible for the contractual arrangements with the Subcontractor and compliance with ESFA Funding Rules.
- The Programmes Director will oversee and hold overall responsibility for the selection and verification of subcontractor suitability.
- The individual Programme Lead will identify opportunities for subcontracting within their programme and contribute to the research and selection of appropriate subcontractors fit for purpose.

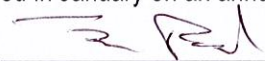
4.0 Learners' responsibilities:

- Learners must treat subcontractors with courtesy and respect.
- Learners are expected to attend all courses where subcontracting provision is delivered to successfully pass the course, and/or gain the relevant qualification from the subcontracted organisation.

5.0 Related Policies

- LIEURAPP22001 – Apprenticeship Continuity Plan
- LIEURAPP22002 – Equality and Diversity Policy
- LIEURAPP22003 – Safeguarding Adults Policy
- LIEURAPP22004 – Prevent Duty Policy
- LIEURAPP22005 – Health & Safety Policy
- LIEURAPP22006 – Concerns, Complaints and Compliments Policy
- LIEURAPP22007 – Recognition of Prior Learning Policy
- LIEURAPP22008 – Quality and High Standards in Apprenticeship Training Policy
- LIEURAPP22009 – Employee Professional Development Policy
- LIEURAPP22011 – GDPR Policy
- LIEURAPP20014 – Safer Recruiter Policy
- LIEURAPP22017 – Functional Skills Subcontracting Policy
- LIEURAPP22018 – Intervention Policy
- LIEURAPP22019 – Plagiarism and Malpractice Policy
- LIEURAPP22020 – External Speaker Policy
- LIEURAPP22021 – Bullying and Harassment Policy
- LIEURAPP22022 – Additional Learning Support Policy
- LIEURAPP22023 – Whistleblowing Policy
- LIEURAPP22024 – Malpractice in Certification and Assessment Policy
- LIEURAPP22025 – Recruitment of Ex-Offenders Policy
- LIEURAPP22026 – Academic Appeals Policy
- LIEURAPP22027 – Apprenticeship Code of Conduct
- LIEURAPP22028 – Conflict of Interest Policy

Policies are reviewed in January on an annual basis.

Company Director  Date 22/11/23

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