



# **SUBCONTRACTING CHARGES POLICY**



**Issued: February 2016**

## The Subcontracting Charges Policy

### Terminology

The Term ....	Will hereinafter refer to...
<b>Directors</b>	The directors of Consortia Training.
<b>Funded Organisations</b>	Organisations funded by Consortia Training
<b>Personnel</b>	Any staff employed by Consortia Training and/or the Funded organisations and partner organisations that are responsible for delivery or support of Consortia Training Funded Learners.
<b>Partner Organisations</b>	Employers and work placement providers of Consortia Training Funded Learners.

### Purpose

#### **Statement of Intent**

Consortia Training is fully committed to the principle of high quality teaching and learning and the value of fairness, justice and equal access for all through education. The basis of the Subcontracting Charges Policy is to ensure that organisations can access the very best resources for their learners and aim for excellence in all areas of their provision. This will be supported by receiving high levels of funding at the organisational level with sufficient allocated for the quality assurance of the provision and the management of information.

#### **Consortia Training will seek to ensure good use of funding by....**

- Being clear and transparent with funding levels available to organisations and additional charges for optional services.
- Forging positive partnership relationships who share our mission
- Ensuring that services will be equally accessible and relevant to the needs of different learner groups and organisations
- Seeking best value deals for the benefit of all funded organisations and learners
- Sharing good practice and resources where possible
- Offering excellent information, support and guidance to all funded organisations

#### **Consortia Training will fulfil its statutory legal obligations when setting and monitoring funding in line with...**

- Consortia Training Whistle Blowing Policy (Public Interest Disclosure Act 1988)
- Consortia Training Fraud And Misappropriation Policy
- Consortia Training 2010 Equality Act
- SFA – funding guidance

**Persons involved**

Responsibility for the detailed implementation of this policy rests with the directors of Consortia Training. The directors have the responsibility to review the policy and impact assess its effect by consulting with others and recording the outcomes.

**Funded organisations**

All funded organisations of Consortia Training have a responsibility to ensure the very best use of funds and direct towards the benefit of learners signed onto a Consortia Training Programme. All funded organisations will be required to sign an acceptance to this policy (Subcontracting Agreement).

**Personnel Responsible for Consortia Funded Delivery**

The Consortia Training Directors have overall responsibility to ensure that all organisations funded by Consortia Training will be treated in line with this policy.

All applications funding, or subcontract arrangements with Consortia Training funded, will be considered regardless of religious belief, political opinion, disability, skin colour, age, gender, race, nationality, ethnic origin, national origin, marital or partnership status, sexual orientation, background, but purely on their organisational risk assessment and compliance with the Organisational Monitoring Processes which include financial checks .

**Time-scale**

Funding rates will be reviewed in May and published on the Consortia Training Website by July 31<sup>st</sup> of each year.

**Related Documentation**

Consortia Training will ensure they maintain records

**Organisational**

<b>Record</b>	<b>Purpose to record evidence of ...</b>	<b>Frequency</b>
SFA ACTOR (BRAVO)	Skills Funding Agency - financial viability / due diligence online checking for organisations requiring or receiving over £1000, 000 funding.	Annual
Consortia Training Subcontracting Agreement	The partnership working agreement to ensure clarity, transparency and equality within all arrangements.	Annual renewal in July.
Consortia Training Quality Organisational Monitoring	Organisational status in relation to the use of funding and the quality of the organisation delivering teaching and learning to Consortia Training learners.	Annually completed between 1 <sup>st</sup> January and June 31 <sup>st</sup> with moderation and action plan follow ups July 1 <sup>st</sup> – December 31 <sup>st</sup> .

## **Training and Induction to the Policy**

### **Management**

The directors will ensure all funded organisations have a copy of the Subcontracting Agreement and access to this policy through the Consortia Training website. Sub-contracting partners will agree to abide by the terms and conditions laid out in the subcontracting agreement.

### **Personnel Responsible for Consortia Funded Delivery**

All personnel responsible for Consortia Training funded delivery or supporting Consortia Training learners will ensure good use of Consortia Training funding by providing high quality delivery, and in full compliance with all Consortia Training Policies.

### **Learners Funded by Consortia Training**

All learners will be made aware that their training is being funded by Consortia Training who has overall responsibility for the quality of the delivery. They will be provided with Head Office contact details.

### **Employers**

All employers will be made aware that their learners' programmes are being funded by Consortia Training who has overall responsibility for the quality of the delivery. They will be provided with Head Office contact details.

## **Procedure**

### **Marketing Information**

Publicity and information materials will be developed to reflect an awareness of all subcontracting charges and this will be published on the Consortia Training Website.

### **Monitoring**

All potential funded organisations will be initially checked before an agreement is formed to ensure there is an ability to deliver high quality in all areas of the organisation additionally a keen desire to continuously improve driven by directors with a vested interest. Financial viability will be examined as each organisation will be required to provide a set of accounts which will be submitted to Consortia Training's accountant for feedback on viability. A Funding Agreement will be subject to the outcome of this process.

Where there is a requirement or possibility of funding over £100,000 pounds per year organisations will be required to become a Registered Training Provider by completing the process of due diligence for the SFA (ACTOR). A Funding Agreement will be subject to the outcome of this process. Good practice will be seen where organisations complete the ACTOR process regardless of the funding amount.

## Requests for Information

Requests for information will be responded to within two working weeks. Directors/Management will approve the release of information to ensure it does not contravene data protection legislation or could be used in any way that contradicts the Freedom of information Act.

## Confidentiality and Data Protection

Consortia Training is registered for data protection and will comply with all requirements for confidentiality of personal data in line with the legislation requirements.

## Funding

The funding paid for the delivery of services will be based on the total number of learners successfully enrolled onto a Consortia Training programme and within scope on each monthly basis, free of any errors when submitted to the SFA for payment. Errors may delay the payment in that month. **(See appendix 1 for Contract value & Profiled starts)**

The total amount earned each month, for all elements of funding, will be subject to the following fees:

### Consortia Training Management/Administration Fee

#### **The Consortia Training Management / Administration rate is currently 15%.**

This rate funds ....

- All general administrative / management of information duties in relation to the learner or funded organisational duties.
- An annual observation of teaching and learning
- An annual observation of a learner review
- An annual quality monitoring visit
- File audits
- Online / phone information advice and guidance
- Collation of learner feedback and dissemination of data from outcomes
- Analysis of learner success and dissemination and feedback on outcomes
- Analysis of performance against profile
- Production and monitoring of Consortia Training policies, procedures and documentation.
- Directors and Quality Improvement team monthly meetings to continuously develop and improve the provision for the benefit of organisations.
- Organisational meeting preparation and presentation (3 times per year)

### Consortia Training Optional Support Services Provision

The services listed below are offered through Consortia Training and can be accessed to support quality processes & training delivery. The services will be agreed and charged for accordingly and where appropriate the total % or amount will be deducted from the monthly earned amounts by Consortia Training and then paid to the providing organisation.

## Optional Support Services Menu

Menu	Included	Cost	✓
Health and Safety Visits	<ul style="list-style-type: none"> <li>Hourly rate and mileage</li> </ul>	£25.00 per hour 40p per mile travel	
Internal Verification	<ul style="list-style-type: none"> <li>Hourly rate and mileage</li> </ul>	£25.00 per hour 40p per mile travel	
Access to online ForSkills e-initial assessment for English, Maths and Learning Styles. E-learning basic skills support materials to meet needs identified.	<ul style="list-style-type: none"> <li>Cost of online tests and support materials.</li> </ul>	0.5% of contract	
e- Learning support materials for hairdressing (Hairdressing ATT and in house developed resources).	<ul style="list-style-type: none"> <li>ATT License</li> <li>LearnZone License</li> <li>Development of resources</li> <li>Quality management and administration of resources including uploading.</li> </ul>	1% of contract value (the more organisations that utilise this could lead to a reduction).	
E-portfolio / ILP and Tracking	<ul style="list-style-type: none"> <li>E portfolio</li> <li>E ILP</li> <li>E tracking &amp; Review</li> <li>LearnZone Licence</li> </ul>	0.5% of contract (not yet in place to be developed)	
Learner Journey & Staff Policies with procedural documents where applicable.	<p>Documents &amp; reviewed materials e.g.</p> <ul style="list-style-type: none"> <li>ILPs</li> <li>Learner Review &amp; Targets</li> <li>Monitoring &amp; Achievement Records.</li> <li>Staff Induction Materials</li> <li>Appraisal Materials</li> <li>Session Plan Templates etc.</li> </ul>	0.25% of contract	
Licence for continued use of paper-based Hairdressing Learning Resources	<ul style="list-style-type: none"> <li>Task books (which will be reviewed in line with current standards).</li> </ul>	0.25% of contract	
Licence for use of Schemes and lesson plans for Life Skills, (with links to the Every Child Matters Agenda).	<ul style="list-style-type: none"> <li>Scheme of work, lesson plans and resources for delivery of Life skills (with ongoing development).</li> </ul>	0.25% of contract	
City and Guilds Functional Skills - Registration & Certification	<ul style="list-style-type: none"> <li>Cost for registering and certificating with City &amp; Guilds</li> <li>Administration charge.</li> </ul>	Registration & Certification in line with C&G charges per learner	
City and Guilds Key/Functional Skills - testing	<ul style="list-style-type: none"> <li>Cost for testing with City &amp; Guilds</li> <li>Administration charge.</li> </ul>	In line with C&G charges per learner	
City and Guilds Hairdressing Registration & Certification	<ul style="list-style-type: none"> <li>Cost for registering and certificating with City &amp; Guilds</li> <li>Administration charge.</li> </ul>	In line with C&G charges per learner per qualification complex & level.	
Framework Cost	<ul style="list-style-type: none"> <li>Cost for certificating with Awarding Organisation</li> <li>Administration charge.</li> </ul>	£30.00 per learner (subject to any increases from HABIA)	
Licence for continued use of ERR delivery resources	<ul style="list-style-type: none"> <li>Scheme of work, lesson plans and resources for delivery of ERR</li> </ul>	0.25% per contract	
CRB	<ul style="list-style-type: none"> <li>Criminal Records Bureau Checks</li> </ul>	Per staff member £56.00 (approx.)	
Conducting of Learner Reviews	<ul style="list-style-type: none"> <li>Preparation, delivery and administration of Learner reviews.</li> </ul>	6% per contract	

## **Monitoring, Review and Evaluation**

### **Monitoring of Process and Information**

The process of monitoring will build on the process of listen, consult and learn from actions and experiences of all involved and focus on improvement from the information obtained. The Consortia Training Directors and the Quality Team will monitor the Subcontracting Charges Policy implementation.

### **Organisational Monitoring**

All organisations will be continuously monitored for quality, through process such as audit, observations, quality visits, learner success rates and learner and employer feedback. Where there is an indication that organisations are failing to provide the necessary quality Consortia Training will not form a funding agreement in the following year and may terminate mid contract in line with the terms and conditions of the Subcontracting Agreement.

### **Impact Assessment**

This policy will be impact assessed for equality and diversity and records will be maintained.

### **Safeguarding**

This policy will be reviewed to ensure it fully safeguards learners, personnel and other partners in relation to their levels of safety, health, achievement, enjoyment, contribution and wellbeing.

### **Monitoring of Documentation and Policy**

The Directors supported by the Quality Improvement Team will review the policy and documentation annually. Communications will notify Consortia Training funded of all reviews and any outcomes from the reviews. The final updated policy will be approved by all directors (or their agreed representative). The completed policy will then be displayed on the Consortia Training Website.

### **Grievances/Complaints in Relation to Equality & Diversity**

Consortia Training funded organisations have the right to lodge a complaint or grievance about any of the areas covered under the Subcontracting Charges Policy. If discrimination is alleged the incident should be dealt with under the Grievances or Complaints.

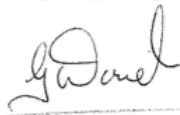
A Consortia Training Organisation who is not satisfied with the action taken by Consortia Training and feels it right to question the matter further, s/he may consider the following possible contact points:


- Skill Funding Agency
- Ofsted
- The Citizens Advice Bureau and/or law centre/firm
- Relevant professional bodies or regulatory organisations

All Consortia Training funded organisations will be required to accept this policy with any necessary approved addendum added to personalise as required.

Approved by the Directors of Consortia Training on 29<sup>th</sup> June 2016

Signed:  S. Bamford

Signed:  G. Daniels

Signed:  G. Iannantuoni

Signed:  S. Lilley