



SUBCONTRACTING CHARGES POLICY



Issued: May 2018

The Subcontracting Charges Policy

Terminology

The Term	Will hereinafter refer to...
Directors	The Directors of Consortia Training.
Funded Organisations	Organisations funded by Consortia Training
Personnel	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.
Partner Organisations	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 from May 2018 only charge 1.5% for basic management of subcontractors and then additional visits and support will have a menu of charges.

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...

- Public Contracts Regulations 2015
- Consortia Training Whistle Blowing Policy (Public Interest Disclosure Act 1988)
- Consortia Training Fraud And Misappropriation Policy
- Consortia Training Equality and Diversity Policy
- Current ESFA – 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 impacts 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 is directed 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 for funding, or subcontract arrangements with Consortia Training, 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 31st of each year.

Related Documentation

Consortia Training will ensure they maintain records for further information rules and requirements for subcontractors refer to all listed documentation below.

Organisational

Record	Purpose to record evidence of ...	Frequency
ESFA (Education Skills Funding Agency, RoATP (Register of Apprenticeship Training Providers)	ESFA - financial viability / due diligence online checking for organisations, mandatory for over £100,000 funding.	Annual or as required by the ESFA
Due Diligence	Check on subcontractors to ensure they are viable and committed to high quality educations and training.	Annual – 1 st July
Consortia Training Subcontracting Agreement	The partnership working agreement to ensure clarity, transparency and equality within all arrangements.	Annual renewal in July.
Funding Profiles Agreement	Agreed financial and learner profiles for the funding year.	Annual renewal in July (unless alterations are made to the funding agreements or adjustments are made by the ESFA)
Supply Chain Services and Charges Agreement	Any additional services to be provided to subcontractors and any agreed charges or % payments are itemised.	Annually in July unless agreed amendments are made within the year e.g. additional services are purchased by the subcontractor.
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 st January and June 31 st with moderation and action plan follow ups July 1 st – December 31 st .
Due Diligence Checks for Subcontractors	A structured procedure, for ensuring new and existing subcontractors are financially viable and low risk in relation delivery and compliance.	At initial application stage (for new subcontractors) and annual monitoring of all subcontractors.
The Apprenticeship Agreement – Terms and Conditions	Form a legal agreement with the Employer and express the terms and conditions including those relating to subcontracting.	Annually on sign up a new learners with each Employer.
Individual Learning Plan	Agreement and commitment statement (section C) – to specify the payment and incentives and the formal arrangements for each learner.	On sign up of each learner.
Subcontractor Declaration	Subcontractors and amounts of funding to the ESFA	Uploaded when requested usually twice a year.

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 and a requirement to ensure financial viability and compliance. 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. A Funding Agreement will be subject to the outcome of a strict checking process which will include...

- Companies House Check - ensuring the company is active and legitimate
- Credit Agency Risk Report – no risk warning
- County Courts Judgments Checks - ensuring no sign of criminal activity by Directors
- No resolution to wind up or liquidate the company
- Agreed funding limit (under 100,00 if not on RoATP)
- The provision of financial accounts which will be submitted to Consortia Training's accountant for feedback on viability.

Subcontracting Charges Policy

Where there is a requirement or possibility of funding over £100,000 pounds per year organisations will be required to become a Registered of Apprenticeship Training Providers by completing the process of due diligence for the ESFA. A Funding Agreement will be subject to the outcome of this process. Good practice will be seen where organisations complete the Registered of Apprenticeship Training Providers process regardless of the funding amount, but outcomes on contracts will not be reliant purely on these outcomes. Subcontractors who have applied through a supporting route on RoATP will not be able to exceed a contract of £500,000.

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.

The Consortia Training Management / Administration Fee is based on:

Pre May 2017 starts the total amount earned each month, for all elements of funding and will be subject to the following fees...

- Organisations with Low Support Requirements, Standard Fee – 16%
- Organisations with Medium Support Requirements, Fee – 21%
- Organisations with High Support Requirements, Fee – 26%

From May 2017 all subcontractors commencing new learners will pay 1.5% management fee. Additional support and intervention will be charged using a menu (supply of services see below).

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"> Hourly rate and mileage 	£25.00 per hour 40p per mile travel Parking costs	
Internal Quality Assurance	<ul style="list-style-type: none"> Hourly rate and mileage 	£25.00 per hour 40p per mile travel Parking costs	
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"> Cost of online tests and support materials. 	Charged at the Forskills rate per learner for each test or set of support materials. Currently £1.20 per test	
e- Learning support materials for hairdressing (Hairdressing ATT and in house developed resources).	<ul style="list-style-type: none"> ATT License LearnZone License Development of resources Quality management and administration of resources including uploading. 	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"> E portfolio E ILP E tracking & Review LearnZone Licence 	0.5% of contract (not yet in place to be developed)	
Learner and Staff procedural documents	Documents & review materials e.g. <ul style="list-style-type: none"> ILPs Learner Review & Targets setting documentation Staff Performance Management Materials 	Mandatory – no charge	
Learner and staff Journey Resources	<ul style="list-style-type: none"> Monitoring & Achievement Records. Staff Induction Materials Session Plan Templates Task books Licence for continued use of paper-based Hairdressing Learning Resources (which will be reviewed in line with current standards). Resources for delivery of Life skills (with ongoing development). Scheme of work, lesson plans and resources for delivery of ERR 	0.5% of contract	
City and Guilds Functional Skills - Registration & Certification	<ul style="list-style-type: none"> Cost for registering and certificating with City & Guilds Administration charge. 	Registration & Certification in line with C&G charges per	

		learner	
City and Guilds Key/Functional Skills - testing	<ul style="list-style-type: none"> • Cost for testing with City & Guilds • Administration charge. 	In line with C&G charges per learner	
City and Guilds Hairdressing Registration & Certification	<ul style="list-style-type: none"> • Cost for registering and certificating with City & Guilds • Administration charge. 	In line with C&G charges per learner per qualification complex & level.	
Framework Cost	<ul style="list-style-type: none"> • Cost for certificating with Awarding Organisation • Administration charge. 	£30.00 per learner (subject to any increases from HABIA)	
DBS	<ul style="list-style-type: none"> • Disclosure barring Service Checks 	Per staff member £62.00 (approx.)	
Conducting of Learner Reviews	<ul style="list-style-type: none"> • Preparation, delivery and administration of Learner reviews. 	6% per contract	
Additional monitoring visits, support or intervention visits	<ul style="list-style-type: none"> • Hourly rate and mileage 	£25.00 per hour 40p per mile travel Parking costs	

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.

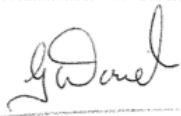
A Consortia Training Organisation who is not satisfied with the action taken by Consortia Training and feels it right to question the matter further, s/he may consider the following possible contact points:

- ❑ Education and Skills 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 May 15th 2018

Signed:  S. Bamford

Signed:  G. Daniels

Signed:  A. Lilley