



Subcontracting and Partnership Policy

Deputy Chief Executive

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Rationale for Subcontracting and Partnerships

The College enters into subcontracting and partnership arrangements for the following reasons:

- To meet the skills and training needs of Wolverhampton and its region by providing training and education which complements the College's offer
- To support the College in meeting the needs of priority sectors, where specialist provision is required

Our purpose for commissioning subcontracting and partnership arrangements is to deliver the following outcomes for learners:

- To enhance the opportunities available to learners through local and accessible provision
- To fill gaps in niche or expert provision, or provide better access to training facilities which exceed facilities available through the College
- To support better geographical access for learners who have preferences for delivery sites that are more easily accessible to them
- To offer an entry point for disadvantaged groups including delivery for maths and English and other learners who are constrained by work commitments or their socio-economic backgrounds
- To meet the needs of learners who share protected characteristics

The College will not subcontract apprenticeship provision to partners who are also the sole employing organisation for the apprentices concerned unless the College also delivers a substantial element of the overall programme. This may include the College delivering functional skills qualifications and developing knowledge, skills, behaviours and also providing work based assessment and review services.

Subcontracting and Partnership Agreements

Subcontracting and Partnership Agreements comply with current ESFA and WMCA Funding Rules.

All apprenticeship subcontractors must comply with ESFA requirements to be approved as a 'Supporting Provider' or a 'Main Provider' on the Register of Apprenticeship Training Providers (RoATP). Failure to do so will result in termination of contract.

All subcontractors must comply with ESFA/WMCA Funding Rules and be listed on the UKRLP site and have a valid UKPRN and a valid entry on Companies House for accounting purposes.

As per ESFA and WMCA Funding Rules, Second level subcontracting is not permitted under any circumstance.

Authorisation of Subcontracting Agreements

Subcontracting Agreements and any subsequent variations are authorised by the Principal or an individual to whom the Principal gives specific delegated authority.

Subcontracting Management Fees

The range of fees for managing subcontracted and partnership delivery is ordinarily 15% - 20%. A full annual risk-assessment is undertaken to establish the appropriate management fee for each subcontracted partner, which includes:

- Previous track record of delivering Government funded programmes
- Financial stability including review of company reports and director evaluation (including reference to ESFA guidance on High Risk subcontracted provision)
- Overall and timely success rates (where applicable)
- Outcomes of compliance monitoring audits and visits (where applicable)
- Outcomes of Learner and Employer surveys and monitoring (where applicable)
- CVs for delivery staff
- Quality Assurance Arrangements, including teaching and learning
- Qualification Assessment Centre Status
- Timely submission of records (where applicable)
- Insurance cover and all required legal kite marks
- DBS and safeguarding monitoring

In the case of specific compliance concerns arising which necessitate external audit activity, these costs are chargeable as an additional cost to the subcontractor or partner.

In the event of a partner delivering from College sites, fees may rise up to 50%, where a partner benefits from some or all of the following associated additional services:

- Security
- Cleaning
- Reception
- Rates and utilities
- Use of College estate for teaching and training purposes
- Exam registration costs borne by the College
- Initial Advice and Guidance (IAG)
- Student support services (e.g. counselling and Safeguarding)
- Fees advice
- Enrolment services
- Marketing and promotional events
- Joint EQA activity
- Open days/evenings
- College enrichment activities

Subcontractor and Partner Management Activities

The Funding and Compliance Team is responsible for the management of all subcontracted provision. The Team provides the following services:

- Due diligence and risk assessment for existing and potential subcontractors
- Monitoring of quality and compliance, including planned audits together with unannounced visits throughout the year
- Subcontractor reviews through monthly Quality of Education and Funding Board meetings
- Access to a named monitoring officer for all data and ILR processing/queries
- Policy, funding, quality and compliance advice including new funding initiatives (DfE Bootcamps for example)

- Capacity building including the development of teaching, learning and assessment and Observation and grading of subcontractor staff (teaching, learning and assessment)
- Opportunities to bid for joint projects where these meet College priorities
- Assistance with advertising, shortlisting and recruiting apprentices including guidance on using Levy and non-Levy portals
- Administration of internal and external learner and employer surveys
- Awarding body registration and IQA and EQA activities where applicable
- Processing of apprenticeship employer incentive payments
- MIS data entry and enrolment procedures
- Learner eligibility checks in line with funding rules guidance
- Employer registration identification numbers
- Access to ALS specialists
- Access to a Teaching and Learning Advisor for CPD purposes
- Access to Marketing and Employer Engagement specialists
- Development through professional activities, self-assessment reviews and quality improvement plans
- Learner identification badges to enable access to College facilities including VL platforms

Quality of Education and Funding Board meetings

All partners are required to attend Quality of Education and Funding Board meetings. The purpose of the meetings is to review progress against agreed contracts, to improve the quality of the provision and to ensure compliance measures are in place. The agenda for each meeting includes:

- Data reconciliation, funding and payments
- Learner achievement, progressions and destinations
- Compliance
- Quality assurance
- Quality improvement (including Self Assessment Reports and Quality Improvement Plans)
- Curriculum development
- Staffing updates (including DBS compliance)
- Safeguarding
- Marketing
- Facilities
- Health and Safety

Timescales for Payment of Invoices

All subcontractor and partner arrangements will be paid based on an agreed proportion of funding, relating to valid funding claims, within 30 days of the invoices being authorised by the College.

Publishing of Data

An annual statement of key data will be published within 30 days of the ILR year-end close. This data will include for each subcontractor:

- The name of the subcontractor
- The UKPRN number
- Their Agreement start and end date
- The type of provision: programme; age range
- The amount of funding received from the ESFA and/or WMCA
- The amount of funding paid to the subcontractor during the academic year
- The amount of funding retained by the College

Contribution to improving Subcontractors' and Partners' quality of teaching and learning

The College offers a full range of teaching, learning and assessment delivery qualifications, which partner providers can access. The College's teaching, learning and assessment criteria is shared with subcontracted partners to be used as a minimum standard. Meetings are brokered between the subcontractors and College curriculum areas with responsibility for delivering in the same sector, in order to facilitate the sharing of best practice.

Communication of the Subcontractor and Partnership Policy

The Subcontractor and Partnership Policy is reviewed on an annual basis and amended to reflect changes to funding guidance and College policy for the next contract year. The Policy is reported to the Board for approval, discussed with partners during review meetings and is published on the College's website under the College Governance page.

Contingency Planning

In compliance with ESFA and WMCA Skills funding rules that apply, if a subcontractor or partner withdraws from the arrangement, or if a subcontractor goes into liquidation or administration, the College undertakes to directly manage and deliver the remainder of the agreed provision already being delivered. This delivery will be either through its existing structure or by retaining tutor expertise and/or specialist equipment, whichever is more cost-effective. Any provision planned not yet started will be cancelled and the project closed unless the College has the means to continue provision either directly or through an alternative partner to an appropriate quality standard.

For apprenticeship delivery, failure by a subcontractor to successfully join the Register of Apprenticeship Training Providers will automatically result in termination of contracts with the College.

If the College needs to withdraw from a subcontracting arrangement, sufficient notice will be provided to allow subcontractors to complete delivery of immediate provision. The College will provide support to enable subcontractors to identify other sources of funding, if possible, take appropriate action to complete the project; or close the project at the earliest opportunity, without prejudice to currently enrolled learners or staff. Contracts will clearly state conditions for termination and recovery of ESFA and/or WMCA funding grants in case of non-delivery.

Where material levels of partnership activity are planned, the College will seek to minimise risks through:

- Regular dialogue with partners, both formally through Quality of Education and Funding Boards and informally as appropriate
- Embedding partners in and alongside the College's direct activities, including through partner occupation of college premises
- Agreeing long term partnership agreements alongside annual funding contracts

- Routine and ongoing due diligence including, but not limited to, review of financial records evidencing ongoing solvency.
- Maintaining records of structure charts for both partners and internal college teams which includes named delegates.

Commitment to Government Policy

ESFA policy seeks to reduce overall levels of subcontracting delivery. This includes, specifically, reducing the volume of subcontracted delivery at geographically distant locations. ESFA policy also requires that the College publishes its rationale and plan for subcontracted delivery and this document forms part of the College's response. The College is committed to reducing distant subcontracting of generic provision and instead growing genuine partnerships that are based upon shared delivery, facilities and technical expertise, particularly where specialist equipment would otherwise be outside of the College's means.