

**Subcontractor Management,
Retained Funding Policy**

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Subcontractor Management, Retained Funding Policy

1. Aim

This policy applies to all subcontracted provision funded by the Education and Skills Funding Agency (ESFA) and the Devolved Regions (where applicable).

There will be a standardised approach to the management and recruitment of subcontractors, in accordance with the Education and Skills Funding Agency Subcontracting Standard, programme guidance and the Principles of Best Practice guided by the LSIS publication "Supply Chain Management – A good practice guide for the post-16 skills sector"

2. Objectives

- To ensure a due diligence process that will enable the Shrewsbury Colleges Group (hereafter referred to as the college) as lead provider to satisfy itself that the subcontractor has been selected fairly, has capacity, capability, quality and a good financial business standing.
- To create transparency of supply chain fees and charges.
- To ensure collaborative approaches to improving the quality of teaching and learning.
- To ensure compliance with the ESFA's Subcontracting Standard.

3. Responsibilities

The College's Board of Governors will provide scrutiny of the college's Subcontracted activity, through appropriate committees.

The Principal is responsible for providing approval for delivery under a subcontract agreement, for ensuring Senior Leaders effectively oversee the contracting and delivery process, and for ensuring that the subcontracted provision meets the college's strategic aims and enhances the quality of the college offer.

The Vice Principal – Quality, Apprenticeships and Information supported by the Subcontracting Manager will ensure all subcontractors are subject to the due diligence process and are aware of contractual requirements throughout their delivery.

The Subcontracting Manager – will manage the contract, data, quality, ensure compliance and provide support for the lifetime of the contract.

The Director of Quality Teaching and Learning Enhancement will provide the quality support, SAR processes and observations of assessment, teaching and learning.

4. Introduction

The college recognises the importance of working with partners in line with its strategic objectives and in 2023/2024 intends to subcontract 2.1% of its education funding budget. The college will communicate and discuss this policy with all of its subcontractors annually at the Due Diligence Review and will review the policy in May, of every academic year prior to publication onto the college website.

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The college will continue to subcontract the following funding streams:

- 16-18 Study Programmes for 19+ High Needs Students.
- Adult Education Budget (AEB).
- Levy Funded Apprenticeships.

Due to the implications resulting from the devolution of the Adult Education Budget in the nine Mayoral Combined Authority areas and the Greater London Authority area from the 1st August 2019, the college's proposed subcontracted geographical delivery profile will follow in line with these boundaries.

However, if deemed necessary and should the college have capacity within a devolved area allocation, it may choose to facilitate delivery by a subcontracted partner, ensuring the provision offered is in line with that Authorities specific priorities and shall seek the appropriate approval from the Authority area in advance to use subcontracted delivery partners.

5. Rationale for Subcontracting

The college works with subcontractors to ensure local, regional and national needs are met, while providing our subcontractors with the capability to expand and develop their provision and in turn provide employers nationally with quality and cost-effective delivery.

The college's rationale for subcontracting as a whole, will be reviewed and scrutinised by Governors in line with the academic year planning cycle, to ensure that it remains relevant and clearly linked to the college's strategic aims and objectives.

The college is mindful and takes into full consideration the ESFA's expected direction of travel, for lead providers to be reviewing and reducing where possible the volume of subcontracting activity that it awards.

To support the college's subcontracting approach the college will:

- work with our subcontractors to access markets and Apprenticeship Standards it does not currently have the skills to deliver itself, providing access to expertise and delivery models the college may wish to emulate in the future.
- work towards increasing its offer to widen participation, responding to emerging and market needs, thus enabling it to support Government initiatives, the Education and Skills Funding Agency Strategy, local priority needs as identified by the Marches LEP, the Local Skills Improvement Plan (LSIP), as well as meeting regional and national economic agendas.
- encourage student progression from unemployed programmes into employment supported by Adult Apprenticeships at all levels.
- respond to employer demand for new provision in sectors and/or geographical areas that the college does not currently offer, thereby providing larger national employers with a network of subcontractors that can deliver their programmes.
- work with our subcontractors to enable quality, specialist, niche and in demand delivery, extending student opportunity and providing value for money.

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- where the college chooses to enter into a subcontracted agreement for Levy Funded Apprenticeship provision, the college's involvement will be of a substantive nature and may cover the full or partial delivery of the Apprenticeship, including bespoke provision and support for all other aspects of the programme.

6. Governance:**6.1 In Year Monitoring and Review of Subcontracted activity by Governors**

Governors, through appropriate committees, will be supplied with updates on subcontracting activity to enable them to fully review and monitor this area of provision. This will allow the Governors to understand the impact in terms of financial exposure, performance and quality assurance.

Reporting will include:

- How the executive is exercising oversight of delivery and managing the contract
- Subcontracted funding earned, and funding passed on to subcontractors
- Update on subcontracting declarations
- A range of performance indicators including: student numbers, qualification types, and achievement rates

6.2 Annual Review of Subcontracted activity by Governors

At the end of the academic year the Governors, through appropriate committees, will review the subcontracting activity, using clear, objective and meaningful metrics. This review will then feed into the annual consideration of changes to rationale and existing arrangements.

7. Funding and Payments**7.1 Retained Funding**

The college retains funding at a standard rate of 20%. However, this will be allocated against a risk score for each subcontractor, undertaken at annual due diligence checks and also reviewed throughout the year. This will consider reviews, quality, compliance and data audits. In the unlikely event that a subcontractor has a significantly increased risk rating, the college reserves the right to increase retained funding, up to a maximum of 30%, to reflect the additional support required to assist the subcontractor to reduce the level of risk to an acceptable level. The college reserves the right to notify the subcontractor and to adjust the retained funding accordingly. The college will publish the actual Retained Funding for 2022/2023 when they are available.

**Subcontractor Management,
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The college will produce a separate and bespoke funding breakdown based on each delivery partner's contract value, this will include details of the specific costs associated with managing their contract and why that cost is deemed reasonable and proportionate.

Various factors will be used to establish the specific costs for each contract and these may include (but are not limited to):

- Subcontractor:
 - Risk score / due diligence process
 - Historic performance
 - Known and emerging issues
 - Quality audits and reviews
 - Compliance and data audits
 - Emerging financial risks / concerns
 - Size of contract

Collating and reviewing a wide range of information and metrics will allow the college to better understand how each subcontracted partner operates and to be in a position to help remove or mitigate any perceived or associated risks, through considered management, development and support of the subcontracted partner where necessary.

7.3 Payments

Payments will be made monthly against the Education and Skills Funding Agency funding reports received on a monthly basis. Dates for payment will be notified at the commencement of the contract and are subject to adherence with the college's requirements for enrolling onto the Individualised Learner Record as per contract schedules and guidance documentation.

Payments are dependent upon delivery targets being met and all documentation received being timely and accurate for input onto the Individualised Learner Record. Any payments in excess of the financial schedules in the contract, which have not been agreed in writing by the college, will not be paid. Adjustments may be made where evidence of eligibility, participation or achievement cannot be validated by the college.

Where identified, the clawback of funding in relation to under delivery or for any other reason, will be made in line with the terms of contract.

8. Support and development

The college has the responsibility of supporting all subcontractors to provide high quality delivery. The retained funding enables the college to provide this support which will be

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dependent on the risk assessment process completed throughout the Academic year, any changes to risk scoring or specific requested requirements but could include:

- Programme set up.
- Quality monitoring including:
- Quarterly reviews and monitoring of retention and timely/overall achievement.
- Monitoring of equality and diversity, health and safety, safeguarding and prevent.
- Monitoring and support to ensure maths, English, safeguarding and Prevent are embedded into delivery.
- MIS services to ensure programmes are set up correctly and data is input accurately onto the Individualised Learner Record to generate funding as appropriate.
- Monthly financial reports.
- Contract review meetings.
- Quality assurance support.
- Self-assessment and quality improvement support.
- Assessment, teaching and learning observations.
- Student voice support.
- Funding compliance guidance, monitoring and support.
- Workshops and Training to support delivery and compliance.
- Developing and maintaining a relationship with each employer.
- Delivery/Support of Apprentice Reviews.
- Delivery/Support for Functional Skills.
- Collection, recording and evidence of non-levy employer co-investment.

This list is not exhaustive as subcontractor needs may vary. Variations between subcontractors may take into account previous experience, delivery history, timely and overall achievement rates, risk assessments and additional support requirements.

9. Processes

This section outlines the due diligence and monitoring processes the college has put in place to ensure good practice in supply chain management. It will provide the support subcontractors may require to develop and attain their goals.

**Subcontractor Management,
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The college identifies its' needs for subcontracting at the commencement of the academic year through the provision planning process. Any additional requirement may be identified throughout the year by employer requests for provision not delivered by the college or its' existing subcontractors, or requests by new subcontractor to work with the college. The college's Corporation delegate management of the day to day operations to the Principal and the Vice Principal – Quality, Apprenticeships and Information.

- Prospective subcontractors will be invited to complete the initial tender (PQQ) for their delivery. Successful completion, results in confirmation as an approved contractor.
- Existing subcontractors, complete annual due diligence (see Section 14), to retain their approved contractor status.
- A tender specification is then issued for tender required delivery to approved contractors (ITT).
- Review of the tenders will be undertaken and scored by the Subcontracting Manager and authorised by the Vice Principal – Quality, Apprenticeships and Information within two weeks of the final deadline.
- If successful, a contract will be issued to the subcontractor.

9.2 Due Diligence/PQQ Process

A due diligence process/PQQ will be undertaken with all prospective subcontractors to ensure that the selection process is fair and robust.

- An initial meeting will be held at the college premises with the prospective subcontractor, the Vice Principal – Quality, Apprenticeships and Information to identify capacity, quality and capability. The college will be able to identify if the subcontractor will complement and not compete with our delivery.
- A financial report request will be submitted to confirm financial position of the subcontractor.
- Company house records will be accessed to clarify the position of the company and directors.
- Review the ESFA's latest list for declared subcontractors.
- Review Initial tender document against the circumstances and criteria stated in the Funding Higher Risk organisations and subcontractors policy.
- Reference requests to be sent out to a minimum of two training subcontractors that the subcontractor is, or has, worked with.
- The UK Register of Learning Providers (UKRLP) and the Register of Apprenticeship Training Providers will be checked to ensure the subcontractor is registered.

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- At the review stage:
- subcontractor policies will be reviewed by the college to ensure the quality of their delivery and their commitment to student health & safety, equality and diversity, prevent and safeguarding.
- certificates and CV's will be checked for the delivery teams.
- All potential subcontractors must provide confirmation of the DBS numbers of all staff working on the college programmes.
- Evidence and certificates will be checked to identify that staff have received training on equality & diversity, prevent and safeguarding.
- The college's commitment to safeguarding, prevent and equality and diversity must be issued to all of our students at their induction to the programmes delivered by our subcontractors.
- A Quality assurance meeting/review will be held by the Subcontracting Manager with the subcontractor at their premises to discuss the college and Education and Skills Funding Agency compliance requirements prior to commencement of delivery.
- This will include:
- the identification of the ESF poster, insurance documentation and Matrix Accreditation.
- the Subcontractor Policy, college guidance documentation and paperwork will be communicated and discussed with the subcontractor prior to the issue of a contract.
- On completion of all due diligence checks, the Approval Checklist will be completed to identify if the subcontractor was successful and recommended for sign off by the Subcontracting Manager.
- The Approval Checklist will be reviewed by the Vice Principal – Quality, Apprenticeships and Information before final sign off.
- On approval from the Vice Principal – Quality, Apprenticeships and Information, a contract will be raised that identifies the period of the contract, which will be no longer than one Academic Year, services to be provided, financial agreements and contractual requirements.
- The contract will be signed by the college's Chief Accounting Officer – The Principal.
- Any amendments required to the Subcontractor Self-declaration form will be reported to the Education and Skills Funding Agency accordingly in line with the contractual requirement to update them at their request.
- All potential subcontractors must provide evidence that they are working towards the Matrix standard if they have no evidence of achieving it.

The due diligence process will be reviewed on an annual basis with subcontractors and will be undertaken prior to commencing delivery on any new contract.

**Subcontractor Management,
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A schedule of reviews and audits will be developed for the length of the contract, which will also encompass student feedback via telephone. This will ensure the student is receiving quality delivery and support from the subcontractor.

9.3.1 Review Meetings

A schedule of review meetings will be completed in accordance with the subcontractors' risk assessment.

- Contract reviews will be undertaken on a quarterly basis with subcontractors who have a medium risk rating. High risk subcontractors could have monthly review meetings and low risk could have six monthly. These will be agreed at the commencement of the contract.
- Un-announced visits or observations may be made to the subcontractors by the college throughout the term of the contract.
- Review meetings may include:
 - progress of delivery and student progress and targets against profiles.
 - a review of Organisational Policies and External Quality Assurance reports.
 - a selection of student files may be sampled for compliance with the Education and Skills Funding Agency rules.
 - discussions and monitoring of issues with safeguarding, equality and diversity, prevent and health and safety.
 - the monitoring of embedding of safeguarding, equality and diversity, prevent Maths and English.
 - monitoring of quality processes.
 - data checks against students on the Individualised Learner Record.
 - financial transaction checks.

9.3.2 Data Monitoring and Audit compliance will ensure:

- accurate Individualised Learner Record returns
- monitoring of targets against profiles
- monitoring of achievement rates
- compliance with the Education and Skills Funding Agency rules
- the requirements for evidencing financial payments in line with the changes to the Apprenticeship Funding Rules for non-levy employers is undertaken and entered onto the Individualised Learner Record as requested.

**Subcontractor Management,
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- notifications of high risk credit ratings on financial positions are monitored throughout the Academic year as these may lead to suspension of recruitment and an increased risk rating
- financial systems are in place to ensure that co-investment financial transaction is visible and evidence is available for Apprenticeship starts from May 2017. Payments may be withheld if the employer co-investment is not collected.

10. Student safety and support

All subcontractors will be expected to share the college's commitment to prevent, safeguarding, equality & diversity. The documents below will be provided to disseminate to students at their induction. This will include.

- College Equality and Diversity Statement
- College Safeguarding team poster
- College prevent Poster
- Reference to the college website for safeguarding information
- Access to the 'myday' app.

11. Quality Assurance Processes

- Unannounced telephone calls made up to 20% of students to ensure eligibility, existence and quality delivery.
- Observations of initial guidance, induction, assessment, reviews and teaching and learning, inclusive of face to face student interviews.
- Quality audit will be completed at the subcontractor's premises.
- Sharing of good practice.

12. Audit

Audits will be undertaken with the subcontractor, throughout the life of the contract. These will be completed both at the subcontractor's premises and at the college premises. Risk ratings on their paperwork completion will determine the quantity of the student files audited, for example; low risk – 20%-40%, medium risk - 40%-75% and high risk – 75%-100%.

- An audit of paperwork will be completed at a percentage rate decided by the risk rating of the subcontractor at their premises and at the college premises. This will support compliance with the Education and Skills Funding Agency and the quality of delivery to our learners.

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- An audit of paperwork held by the college at a percentage rate decided by the risk rating of the subcontractor to support compliance with the Education and Skills Funding Agency and quality of provision delivered.
- A data audit will be completed to ensure accuracy of the Individualised Learner Record.
- A financial record audit will be completed for Apprenticeship students starting after May 2017 to ensure compliance with the Education and Skills Funding Agency Funding Rules.

Action plans with allocated risk bandings will be completed to report findings to the subcontractor. There is an expectation that these are actioned within one month unless otherwise agreed.

13. Unsatisfactory Compliance or Quality

An unsatisfactory audit in either quality or Compliance may result in additional procedures being put in place for both the subcontractor and the college, or termination of the contract. Non-compliant subcontractors will undergo intensive monitoring until satisfactory progress is made.

This could include the following.

- A high risk banding with review meetings held monthly until the college is satisfied that the subcontractor is no longer high risk.
- Completion of a development plan for the subcontractor to address issues arising in their quality and compliance.
- Suspension of recruitment until the subcontractor has taken actions to meet compliance.
- Implementation of a programme of support for the subcontractor to aid with the delivery of the development plan.
- Withdrawal of contract and recovery of funding.

14. Annual Due Diligence Review

An Annual Due Diligence Review will be undertaken with the subcontractor prior to the renewal of a contract to retain approved contractor status. This will be undertaken during the summer term before the commencement of the Academic year.

- Renewal form to be completed by the subcontractor and submitted to the Subcontracting Manager for review.
- Submission of Self-declaration of Subcontractor form to the Education and Skills Funding Agency.
- An updated financial report will be requested to confirm the financial position of the subcontractor.
- Company house records will be accessed to clarify the position of the company and directors.
- Review the ESFA's latest list for declared subcontractors

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- Review Renewal document against the circumstances and criteria stated in the Funding Higher Risk organisations and subcontractors policy.
- The UK Register of Learning Providers (UKRLP), and the Register of Apprenticeship Training Providers will be checked to ensure the subcontractor is still registered.
- At the annual review stage:
- Updated Subcontractor's policies will be reviewed by the college to ensure the quality of their delivery and their commitment to student health & safety, equality and diversity, prevent and safeguarding.
- Updated certificates and CV's will be checked for the delivery teams.
- Updated evidence and certificates will be checked to identify that staff have received training on equality & diversity, prevent and safeguarding and DBS will be checked for any new staff.
- A Quality assurance meeting/review will be held by the Subcontracting Manager with
- the subcontractor at their premises to discuss the college and Education and Skills Funding Agency compliance requirements prior to commencement of delivery. This will include:
 - the identification of the ESF poster, insurance documentation and Matrix Accreditation
 - the Subcontractor Policy, college guidance documentation and paperwork will be communicated and discussed with the subcontractor prior to the issue of a contract.
- On completion of all due diligence checks, the Approval Checklist will be completed
- to identify if the subcontractor was successful and recommended for sign off by the Subcontracting Manager.
- The Approval Checklist will be reviewed by the Vice Principal – Quality, Apprenticeships and Information before final sign off.
- On approval from the Vice Principal – Quality, Apprenticeships and Information, a contract will be raised that identifies the period of the contract, which will be no longer than one Academic Year, services to be provided, financial agreements and contractual requirements.
- The contract will be signed by the college's Chief Accounting Officer – The Principal.
- Any amendments required to the Subcontractor Self-declaration form will be reported to the Education and Skills Funding Agency accordingly in line with the contractual requirement to update them at their request.
- The college's commitment to safeguarding, prevent and equality and diversity must be issued to all of our students at their induction to the programmes delivered.

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15. General Data Protection Regulations (GDPR)

The college and the Subcontractor both acknowledge that they work in accordance with the General Data Protection Regulations 25th May 2018 and the Data Protection Act 2018; and any amendments hereafter.

The college has produced a set of supporting documents available to both the Subcontractor and the Student at any time on the college website; SCG.ac.uk. The Subcontractor must share the college Student Privacy Notice with each student at the point of enrolment.

The college is a Data Controller. The college acknowledges that the Subcontractor may also be considered a Data Controller; therefore, the Subcontractor will want to produce a privacy notice to share with all students.

15.1 Data Breach

A data breach is defined any unauthorised access to, loss of, sharing of, or loss of access to any personal information.

The college takes any data breach very seriously and has a procedure to investigate and notify individuals as necessary.

Any confirmed or potential data breach must be reported to the college within 24 hours of identification.

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Appendix 1- Approval Checklist

Subcontractor Name:

Please score as appropriate: 1 Unsuitable 2 Suitable 3 Very Suitable

No	Question	Answer	Score
1	Does the delivery compete with or complement college delivery?		
2	What additional support & development does the subcontractor need?		
3	Is the subcontractor financially sound?		
4	Are the company and Directors active on Company House?		
5	Does the subcontractor offer high quality delivery?		
6	Is the subcontractor management structure clear and supportive?		
7	Are the subcontractor's references satisfactory? (if applicable)		
8	Has the Subcontractor delivered SFA fundable training over the last 3 years?		
9	Are the subcontractor's timely/overall achievement rates over the last 3 years satisfactory?		
10	What is the subcontractors risk scoring? (Low, Medium, High)		
11	Are the subcontractors training facilities suitable?		
12	What are the geographical areas for delivery?		
13	What are the types of provision to be undertaken?		
14	Has the subcontractor got Matrix Accreditation?		
15	Does the subcontractor have financial systems in place (if applicable)		

POLICIES AND PROCEDURES

Subcontractor Management, Retained Funding Policy

Expected Score	30	Actual Score	
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Notes

Submitted for approval: (Please tick)	To remain on Approved contractors list:	To be added on to Approved contractors list

Submitted by: Signed:	Approved by: Signed:
Position:	Position:
Date:	Date:

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Appendix 2 - Subcontractor Checklists

Subcontractor Name:

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Initial Tender Process (PQQ) - Application to Approved Contractors List

Description:	Date requested:	Date received:	Comments:
New subcontractor enquiry			
Employer driven request			

Due Diligence Process (PQQ)

Description:	Date requested:	Date received:	Comments
PQQ document reviewed			
Financial report requested			
Review of submitted accounts			
ESFA High Risk policy check			
Companies House check			
References check			
RoATP check			
ESFA declared subcontractors list check			
Valid UKPRN check			
ICO data protection register check			
Review of Policies, CV's, DBS information, combined allocation check and additional supporting documents etc			
Initial Meeting with the Vice Principal Quality, Apprentices and Information and Subcontracting Manager			
Approved by the Vice Principal Quality, Apprenticeships and Information and added to Approved Contractors List			

Signed:

Date:

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Position:

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POLICIES AND PROCEDURES

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Subcontractor Name:

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Due Diligence Annual Review (Existing Subcontractors on Approved Contractor List)

Description:	Date requested:	Date received:	Comments
Due Diligence document reviewed			
Financial report requested			
Review of submitted accounts			
ESFA High Risk policy check			
Companies House check			
RoATP check			
ESFA declared subcontractors list check			
Valid UKPRN check			
ICO data protection register check			
Review of Policies, CV's, DBS information, combined allocation check and additional supporting documents etc			
Approved by the Vice Principal Quality, Apprenticeships and Information to remain on Approved Contractors List.			

Unsatisfactory Compliance Process:

Description:	Date Undertaken:	Comments:
Development plan issued to subcontractor		
Review meeting held to discuss programme of support		
Recruitment disallowed		
Development plan monitored		
Withdrawal of Contract/Funding		
Development plan actioned		
Recruitment re-instated		

Signed:

Date:

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Position:

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POLICIES AND PROCEDURES

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Subcontractor Name:

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Approved Contractor List – Invitation to Tender:

Description:	Date requested:	Date received:	Comments
Tender Specification issued			
Tender Specification returned			
Tender Specification scored within two weeks of final deadline			
Approved by the Vice Principal Quality, Apprenticeships and Information			
Quality and contract clarification meeting			
Contract issued			
ESFA subcontracting declaration submitted			
Amendments to ESFA subcontracting declaration submitted			

Signed:

Date:

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Position:

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POLICIES AND PROCEDURES

Subcontractor Management, Retained Funding Policy

Subcontractor Name:

Monitoring Process Risk Assessment Percentage

Description:	Date scheduled:	Date Undertaken:	Comments
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Contract Clarification Meeting			
1 Review Meeting			
2 Review Meeting			
3 Review Meeting			
4 Review Meeting			
Induction Observation			
Delivery Observation			
Data and Compliance Audit			
Quality Audit			
Additional 1			
Additional 2			
Additional 3			
Additional 4			

Signed:

Date:

Position: