



# Sub-contractor Fees and Charges Policy

## Policy Statement

Coventry & Warwickshire Chamber Training is committed to growing and diversifying the range of courses it delivers to widen participation, deliver to niche markets, engage in new and emerging markets and meet the regional and local economic development agenda. In order to achieve this, Coventry & Warwickshire Chamber Training has subcontract part of its provision to partner organisation(s) who can demonstrate high quality delivery.

## Scope

This policy applies to all supply chain activity supported by funds supplied by the Education and Skills Funding Agency. This strategy covers two key areas of Subcontracting:

1. Provision subcontracting where there is the delivery of full programmes or frameworks/standards by the Subcontractor.
2. Service subcontracting where the delivery of a service as part of the delivery of a programme such as procuring the delivery of part of an Apprenticeship framework or outreach support.

Within both of these cases, Coventry & Warwickshire Chamber Training retains full accountability for contract delivery and for direct delivery of some of the apprenticeship training and/or on-programme assessment associated with each employer's apprenticeship programme.

Coventry & Warwickshire Chamber Training will only use delivery subcontractors that satisfy one of the following three criteria:

1. They are on the published Register of Apprenticeship Training Providers and have applied by the main or supporting application routes;
2. They are either the apprentice's employer, a connected company or charity as defined by HMRC and are on the published Register of Apprenticeship Training Providers, having applied through the employer-provider application route; or
3. They are not on the published Register of Apprenticeship Training Providers but will deliver less than £100,000 of apprenticeship training and on-programme assessment under contract across all main providers and employer-providers between 1 April and 31 March each year.

## **Subcontracting Rationale**

Upon commencement of the subcontracting process, Coventry & Warwickshire Chamber Training will consider the case on a business based rationale to ensure that the subcontracting will be in the best interests of all parties.

Coventry & Warwickshire Chamber Training will ensure that:

1. The proposed delivery is in the best interests of learners and employers.
2. The proposed delivery has a clear strategic fit with our mission, objectives and values.
3. There is sufficient expertise within it's to quality assure the provision.
4. There is sufficient staff resource in support areas to administer the processes.
5. The Subcontractor is approved by our due-diligence process.
6. There is sufficient funding available within our funding contract.
7. The Subcontractor agrees to work within the terms of our contract.

## **Improving the Quality of Teaching and Learning**

Subcontracted partners will be expected to meet Coventry & Warwickshire Chamber Training's quality assurance standards with Coventry & Warwickshire Chamber Training being committed to supporting, developing and sharing good practice and professional development of staff through quality reviews, operational meetings, observations of teaching and learning and learner and employer feedback. The quality of provision will be monitored and managed through our existing quality improvement process with Coventry & Warwickshire Chamber Training's Self-Assessment Report / Quality Improvement Plan process ensuring continuous improvement in all parts of the learner journey.

## **Training Service Fees**

Coventry & Warwickshire Chamber Training retains a training services fee from subcontracted partner organisations, with this ranging from 10% to 17.5%. The fees charged reflect the cost of the procurement process, the delivery of training services including data returns to the ESFA, learner progress reviews and training delivery.

Subcontractors will receive a high level of support and guidance and access to Coventry & Warwickshire Chamber Training's systems, including:

- Quality management systems.
- Certification and registration with awarding bodies if required.
- Management Information Services and data control advice.
- Audit of management systems and delivery and observation of teaching, learning and assessment.
- Safeguarding of Young People and Vulnerable Adults procedures.
- Health and Safety compliance.
- Teaching, Learning and Assessment observations and coaching.
- CPD Opportunities and planned training and development.
- Policy development.
- Support with Funding Rules compliance.
- Regular national updates regarding funding and policy guidance.
- Network Meetings.
- Equality and diversity support.
- Administration of grant processes.

Not all Subcontractors are charged the same training services fee with the differences being dependent upon the level of support and input required, the experience of the Subcontractor, their target learners; their track record, success rates and the level of risk as determined by the due diligence process.

### **Payment Arrangements**

- Payments are made on a monthly basis by the end of the following month in which the activity is successfully processed and uploaded to the ESFA by Coventry & Warwickshire Chamber Training
- Following validation of the evidence in the ILR return, Coventry & Warwickshire Chamber Training will make the appropriate payment to the Subcontractor based on the level of income calculated by the validation process in that month less the agreed management fee.
- Payments are made by BACS within 30 days of invoice
- Coventry & Warwickshire Chamber Training expects that the Subcontractor will fully engage in the assessment of accuracy of payments and they therefore have the responsibility to review their monthly remittance advices to identify any inaccuracies.

### **Policy Communication**

The Policy will be discussed with current and future Subcontractors during contract review meetings and reviewed at least annually in July of each year. Any changes will be notified to subcontractors as part of their regular performance review or via separate correspondence. This policy is published on Coventry & Warwickshire Chamber Training's website (policy section).

## Appendix 1:

### Current Subcontractor(s):

Warwickshire Garage and Transport Group Training Association

**UKPRN:**

10007349

**Contract Start Date:**

1st August 2019

**Contract End Date:**

31st July 2020

**Type of Provision:**

Apprenticeships

In 2018/19, the following earnings and payments were completed:

Total Earnings: £199,191.19 Payments made: £175,288.25 Retained income: £23,902.94

In 2017/18, the following earnings and payments were completed:

Total Earnings: £276,087 Payments made: £262,282 Retained income: £13,804

In 2016/17, the following earnings and payments were completed:

Total Earnings: £296,378 Payments made: £281,560 Retained income: £14,818

Midland Group Training Services

**UKPRN:**

10004355

**Contract Start Date:**

1<sup>st</sup> August 2019

**Contract End Date:**

31st July 2020

**Type of Provision:**

Apprenticeships

In 2018/19, the following earnings and payments were completed:

Total Earnings: £64,443.67 Payments made: £53,166.03 Retained income: £11,277.64