**Springboard Sunderland Trust**

**Subcontractors**

**Recruitment and Management of Subcontractors**



|  |  |
| --- | --- |
| **Recruitment and Management of Subcontractors** | |
| Category: | Subcontractors |
| Responsible Person: | Joyce Young |
| Accountable Person: | Carl Fox |
| Date of First Issue: | November 2015 |
| Next Review Date: | 30/01/2023 |
| Classification: | Sensitive |

# Document Control

## Scope

This procedure describes a standardised approach to the management and recruitment of sub-contractors in accordance with the Education and Skills Funding Agency guidance. As a lead provider, Springboard is solely responsible for the delivery of their contract whether it is delivered wholly by us or with the use of subcontractors. A due diligence process will enable Springboard as lead provider to satisfy itself that the sub-contractor has been selected fairly, has capacity, capability, quality and a good financial business standing. There are references to transparency of supply chain fees and charges and approaches to improving the quality of teaching and learning. Health and safety, equality and diversity and safeguarding is monitored and promoted by the subcontractor.

## Procedure

* 1. Fees and charges
  2. Payments
  3. Support and development
  4. Identifying suitable subcontractors
  5. Due diligence
  6. Monitoring
  7. Review meetings and visits
  8. Data reporting
  9. Learner safety and support
  10. Audit
  11. Unsatisfactory compliance

## Responsibilities

* 1. The CEO and Subcontracts Liaison Officer are responsible for the contracts
  2. The Subcontracts Liaison Officer and deputy is responsible for data monitoring, compliance and quality audits

## Procedure

* 1. **Fees and Charges**

Springboard’s fees and charges range from 15% to 20% depending on their experience, outcomes and risk. Determined through due diligence checks, reviews, audits, quality, compliance and data audits. An increase to their risk rating may identify an increase to the fee to compensate for additional support to be provided to the partner, to help support their development and delivery. Springboard reserves the right to notify the provider and to adjust the management fee accordingly.

* 1. **Payments**

Payments will be made against Springboard’s financial reports received from the funding agencies on a monthly basis and its own data checks.

Payments are dependent upon delivery targets being met and all documentation received timely and accurately for input onto MIS. Adjustments may be made where evidence of eligibility, participation or achievement cannot be validated at the audits completed by Springboard.

* 1. **Support and Development**

Springboard has a responsibility to support all partners to provide high quality delivery. The management fee enables Springboard to provide this support which will be dependent on audit outcomes, changes to risk scoring or personal requirements or requests. Depending on the programme subcontracted this includes, but is not limited to:

* Ongoing development of strategy
* Developing practice in conjunction with funding regulations
* Assuring the delivery of high quality and relevant programmes
* Contract and performance monitoring
* Provision of bespoke Information, Advice and Guidance services
* Mentoring support
* Employer engagement support
* Tutor training / staff development days
* Financial management
* Provider compliance and delivery audit
* Dedicated accounts manager
* All data entry
* MI Reports
* Management and payment of bursary payments to learners
* Self Assessment Report
* Printed materials/advertising
  1. **Identifying Suitable Subcontractors**

Springboard will identify a need for sub-contractors where appropriate and they will be sourced as follows:

* Publish as an open tender
* Contact preferred list of providers
* Contact providers requesting a sub-contract

Prospective providers will be invited to submit applications for the delivery required followed by a review of the applications by the CEO and resulting in an invitation to the successful provider to commence with the due diligence process.

* 1. **Due Diligence**

A due diligence process will be undertaken with all sub-contractors to ensure that the selection process is fair and robust.

The Subcontractor Liaison Officer will initiate the due diligence process.

* An initial meeting held with prospective sub-contractor to identify capacity, quality, and capability. Springboard will be able to identify if the sub-contractor will complement and not compete with our own delivery. Audited financial accounts are obtained to confirm financial position of the sub-contractor If necessary, reference requests will be sent out to a minimum of two training providers that the sub- contractor has worked with
* Confirmation received that the subcontractor is registered on the UK Register of Learning Providers (UKRLP)
* The register of training organisations due diligence assurance gateway process must be completed for all subcontractors
* A contract will be raised that identifies the period of the contract, services to be provided, financial agreements and contractual requirements. The period of the contract should be no longer than one academic year
* Submission of self-declaration of subcontractor form to the Education and Skills Funding Agency
* Meeting to be held by the CEO or appointed deputy and the sub- contractor to discuss Springboard and funding agency compliance requirements
* Any amendments to the subcontractor declarations must be reported to the Education and Skills Funding Agency immediately as well as the contractual requirement to update the Agency as required
* The CEO is responsible for issuing all contracts
  1. **Monitoring**

A monitoring schedule will be established on a yearly basis which will include review meetings, audits, observations learner feedback and contract review.

* 1. **Review Meetings and Visits**

Schedule of review meetings and audits to be completed:

* Reviews will be undertaken more frequently with newer subcontractors and at least annually with longer established subcontractors
* Unannounced visits may be made to the subcontractors by Springboard at any time throughout the term of the contract.

Review meetings will identify:

* Progress of delivery and learner progress
* A selection of learner files to be sampled
* Identification of any issues with safeguarding, equality and diversity and health and safety
* Data checks against individual learners
  1. **Data Reporting**

Data reports will be sent monthly to the partner for checking and amendments if necessary, made on return. Subcontractor data will be monitored to ensure:

* Accurate Individualised Learner Record returns
* Monitoring of targets against profiles
  1. **Learner Safety and Support**

All providers will be expected to implement safeguarding/prevent and equality and diversity with learners; for our smaller subcontractors we will share information relating to equality and diversity and safeguarding/prevent and will be monitored at audit.

* 1. **Audit**

Audits will be undertaken with the sub-contractor throughout their contract.

* Audit of paperwork held at the sub-contractor’s premises to support eligibility and compliance with the Education and Skills Funding Agency and quality of provision delivered
* A data audit will be completed to ensure accuracy of the ILR
* Quality audit will be completed based on the Education Inspection Framework
* Reports completed and forwarded to the sub-contractor with actions highlighted
  1. **Unsatisfactory Compliance**

An unsatisfactory audit may result in additional procedures being put in place for both the sub-contractor and Springboard, or termination of the contract which could include the following:

* Completion of a development plan for the subcontractor to address issues arising in the quality and compliance
* No further recruitment will be allowed until the subcontractor has taken actions to meet compliance
* Implementation of a programme of support for the sub-contractor to aid with the delivery of the development plan
* Withdrawal of contract and recovery of funding

# Appendix 1: Springboard Sunderland Sub Contractor Appraisal Framework

Name of Organisation:

Appraiser:

**Financial Health**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Are the most recent audited accounts available? |  |  |
| Name of Finance Manager / contact |  |  |
| Description of internal controls system |  |  |

**Health and Safety**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Is there a planned approach to health and safety? |  |  |
| Are policies and procedures in place? |  |  |
| How are placements assessed and monitored? |  |  |
| Workshop health and safety? |  |  |

**Safeguarding of Children and Vulnerable Young People**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Is there a planned approach to safeguarding? |  |  |
| Are policies and procedures in place? |  |  |
| How are arrangements assessed and monitored? |  |  |
| Is there a member of staff who has responsibility for safeguarding issues and staff training? |  |  |
| Do you have a Prevent Strategy in place? |  |  |

**Equality and Diversity**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Does the organisation promote all aspects  of equality and diversity? |  |  |
| What steps are taken to ensure increased access to learning? |  |  |
| Are there effective arrangements to support learners with difficulties? |  |  |
| Are targets set to close any gaps in equality  and or achievement? |  |  |

**Quality Assurance**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Are there systematic quality assurance and continuous improvement processes? |  |  |
| Are there processes for setting and achieving improvement targets? |  |  |
| What data management systems are in place? |  |  |
| Are reports produced regularly and used  to provide management information? |  |  |
| Is information sent to funders accurate  and on time? |  |  |

**Recruitment of Learners / Initial Assessment / Induction**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Is there open access recruitment? |  |  |
| Describe the recruitment process |  |  |
| Induction Content |  |  |
| What elements make up initial assessment? |  |  |
| How are learner’s rights and responsibilities explained? |  |  |

**Staffing and Resources**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Is there a staff development plan? |  |  |
| What plans are there for future staff training? |  |  |
| Are support staff appropriately qualified / is training agreed? |  |  |
| Premises |  |  |
| Are resources / equipment adequate to meet the needs of learners? |  |  |
| Details of staff working on contract qualifications and experience |  |  |

**Performance**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Results of the most recent performance review and or EV reports |  |  |
| Please describe your Quality Assurance (IV) procedures |  |  |
| Current timely and overall achievement rates  for eligible learners |  |  |
| Review processes and target setting |  |  |
| Progression routes / success rates |  |  |
| Arrangements for gathering and using feedback from learners / employers |  |  |

**Teaching and Learning**

|  |  |  |
| --- | --- | --- |
| **Considerations** | **Comments** | **Development Point** |
| Numbers of staff with teaching qualifications |  |  |
| Is there a process in place for observation of teaching and learning? |  |  |
| Staff grades for the last year |  |  |
| Are non-teaching staff observed? |  |  |
| Are reviews observed? |  |  |

|  |  |  |
| --- | --- | --- |
| **Document Check** | **Seen** | **Copy Received** |
| Annual accounts (last 3 years) |  |  |
| Most recent self assessment report and development plan |  |  |
| Most recent Ofsted report |  |  |
| Most recent performance review |  |  |
| Last two EV Reports |  |  |
| Staff development plan |  |  |
| Health and safety policy and procedures |  |  |
| Equality and diversity policy and procedures |  |  |
| Functional Skills/ GCSE strategy |  |  |
| Marking strategy |  |  |
| Teaching learning observations procedure and evidence of observations |  |  |
| Company number |  |  |
| Charity number |  |  |
| UKPRN number |  |  |
| Currently registered on ROTO? |  |  |
| Insurance Details |  |  |
| Any other relevant information | | |
|  | | |

**Names and Addresses of 2 Referees**

**Signed Appraiser Date:**

**Signed Appraisee: Date:**

# Appendix 2: Monitoring Schedule

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Springboard ESFA Subcontractor** | **Compliance and Quality Audit** | **Actual Date** | **Learner Survey** | **Actual Date** | **Observations** | **Actual Date** | **Contract Meeting** | **Actual Date** |
|  | 6 Monthly |  | Yearly |  | 6 Monthly |  | Yearly |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

# Appendix 3: Unsatisfactory Compliance

|  |  |  |
| --- | --- | --- |
| **Criteria** | **Date Undertaken** | **Comments** |
| Development plan issued |  |  |
| Review meeting held to discuss support |  |  |
| Recruitment on hold |  |  |
| Development plan monitored |  |  |
| Withdrawal of contract |  |  |
| Development plan actioned |  |  |
| Recruitment reinstated |  |  |