

Greenlight Training Ltd – Sub-Contracting Policy

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Introduction

The document details Greenlight Training’s policy pertaining to the engagement and management of sub-contractors.

Scope

It is a requirement of the ESFA that Independent Training Providers implement a suitable and sufficient policy prior to commencing any sub-contracting activity, which is funded directly or indirectly through the ESFA. This policy was implemented on the 1st August 2022.

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Procedures/Implementation

Greenlight Training will monitor its sub-contractors ensuring this does not have a negative impact on the effectiveness of service delivery to the client. Greenlight Training will ensure:

- Greenlight Training will conduct fair and transparent procurement activities, carrying out robust due diligence checks on all subcontractors, ensuring compliance with the Common Accord in order to achieve/maintain the highest quality of learning delivery is made available. In turn this will demonstrate value for money as well as a positive impact on the lives of learners.
- The funding that is retained by Greenlight Training will relate to the costs of the services provided. These services, and the levels of funding being retained for them, will be clearly documented, and agreed by all parties in a formal contract.
- Any disputes between sub-contractors that cannot be resolved through mutually agreed internal resolution procedures, Greenlight Training will submit to independent outside arbitration or mediation and abide by its findings. Contract documents will require both parties to agree that the achievements of supply chains are attained through adherence to both the letter and spirit of contracts or partnerships.

Reason for subcontracting

The decision to engage with subcontractors to assist in delivering apprenticeships on behalf of Greenlight Training include:

- To meet with the strategic aims and goals of Greenlight Training
- The added value the subcontractor will bring to Greenlight Training
- Increasing participation (attracting learners who would not traditionally attend Greenlight Training)
- Expansion into specialist subject areas
- Employer needs across the region/nation
- Meeting the client requirements due to the breadth of provision
- Sound financial health of subcontractors
- The quality of provision from subcontractors and their ability to achieve outstanding provision
- Past performance of subcontractors and a track record of high success

Quality Assurance

The quality of the provision will be monitored and managed through the existing Greenlight Training Quality Assurance processes and procedures.

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This Policy positions subcontracted provision as a core part of Greenlight Training activity to enable continuous improvements in the quality of teaching and learning for both Greenlight Training and its subcontractor's. This will be achieved through the sharing of effective practice across our sub-contractor provision, for example through the Self-Assessment Report process and Quality improvement plan.

Quality Improvement

Our sub-contractors are included within our quality plan in a very similar method as our employees. We believe that this ensures the continual progression of the quality of teaching and learning they deliver and thereby improves the overall quality of teaching and learning to all Greenlight Training learners.

Greenlight Training undertakes observations on all aspects of teaching and learning including information, advice and guidance, progress reviews and assessment.

Greenlight Training provides timely and meaningful feedback to both subcontractor and delivery staff and observations will be incorporated into Greenlight Training moderation and standardisation process, in order that improvement actions impact both internal and subcontract quality.

Greenlight Training carries out learner voice surveys to gather feedback from learners, combined employer satisfaction surveys.

Greenlight Training supports subcontractors to implement effective policies and procedures relating to teaching and learning including assessment and verification policies and procedures.

Publication of information relating to sub-contracting

Greenlight Training will ensure all actual and potential sub-contractors have sight of this policy as well as any other relevant documents, e.g.; the Fees and Charges Risk Factor Table and are fully aware of:

- The services Greenlight Training will provide when subcontracting to and the associated costs when doing so, including a list of specific costs for managing the subcontractor, specific costs for quality monitoring activities and specific costs
- for any other support activities
- How each cost is reasonable and proportionate to delivery of the subcontracted teaching or learning and how each cost contributes to delivering high quality learning

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- The typical percentage range of fees retained to manage subcontractors, and how this range is calculated.
- The rationale used to determine the level of fee retained through each subcontract is a risk-based approach.
- The contributory risk factors that would result in differences in fees charged for, or support provided to, different subcontractors might include:
 - Previous track record
 - Success levels
 - Type of customers to be engaged
 - Type of provision to be undertaken
 - Contract duration
- The risk bands that will be used to allocate Greenlight Training charges. Risk factors are given a score so that each subcontractor is aware of why they are in a particular band, this process will be used to give sub-contractors an incentive to improve and thus reduce the risk band that they fall in. For example, higher risk sub-contractors will be allocated less funding but receive more monitoring and support.
- Payment terms between Greenlight Training and subcontractors - timing of payments in relation to delivering provision and timescale for paying invoices and claims for funding received.
- The support subcontractors will receive in return for the fees charged.

Communication

This policy will be reviewed every year and updated as required. It will be published on Greenlight Training web site during the July prior to the start of the academic year in which it will be applied. Potential subcontractors will be directed to it as the starting point in any relationship.

The fees & Charges Risk Factor Table – 2022-23

Fees retained and variation in fees charged and/or support provided to sub-contractors

- The exact fee is calculated based on the specific costs for managing the individual subcontractor to ensure that the quality of delivery to learners is maintained and that any risk to Greenlight Training and Education & Skills Funding Agency is mitigated.

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- Higher fees are retained where more comprehensive support needs are identified, for example to improve the quality of some or all of a subcontractor's delivery or if Greenlight Training provides substantial delivery resources (material, staff, premises).
- Costs will be assessed annually to ensure they are reasonable and proportionate to delivery of their teaching or learning and how each cost contributes to delivering high quality learning.

All funding is drawn down against the provision to be delivered. This figure represents the total cost that Greenlight Training incurs in effectively identifying, selecting and managing their sub- contracted provision. This includes the minimum amount of QA activity that Greenlight Training would attach to the lowest possible risk sub-contractor.

Further charges to cover additional costs may be added to the base fee to cover the cost to Greenlight Training of any additional support that Greenlight Training deems necessary to ensure the quality of teaching and learning and the success rates of any subcontracted provision. Additional cost is determined using a weighted table of risk factors. The table is available to all actual and potential subcontractors. It is designed to ensure that the

cost of any additional support provided to a subcontractor is covered through the funding retained. Additional costs will be recalculated and negotiated each year at contract renewal, giving subcontractors the opportunity to reduce their fees through continuous improvement. This approach will allow Greenlight Training to focus support where and when it is needed.

Additional Support for Sub-contractors

The precise additional support given to each sub-contractor will be negotiated with that sub- contractor, but will be based on a 'risk band' approach and may include:

- Additional site visits
- Additional lesson observation
- Additional tutor support
- More rigorous verification

Additional charges per learner

Greenlight Training may also retain funding to cover the cost of any funded activity that it might undertake on behalf of the sub-contractor such as:

- Awarding Organisation fees and charges
- Hiring of facilities/equipment within/from Greenlight Training

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- Internal Verification

Support provided to subcontractors

- Greenlight Training provides a Strategic Manager to manage the relationship with the subcontractor.
- Greenlight Training provide as Quality Manager to ensure that the quality of subcontractor's delivery meets its expectations and to support the continuous improvement of the sub-contractor's provision.
- Greenlight Training provides administration support to ensure the timely recording of learner information on Greenlight Training's ILR.
- Greenlight Training undertakes a regular and substantial programme of quality assurance checks on the education and training provided by sub-contractors, including visits at short or no notice and face-to-face interviews with staff and learners. These checks include whether the learners exist and are eligible, and involve direct observation of initial guidance, assessment, and delivery of learning programmes.
- Greenlight Training ensures that all subcontractor's delivery meets the Education & Skills Funding Agency's Funding Rules.
- Greenlight Training ensures that any Apprenticeship provision delivered by sub-contractors meets the required standards and specific ESFA funding rules.

Payment terms

- Subcontractors will be paid monthly in arrears.
- Payment will be based on actual delivery evidenced through Greenlight Training's ILR.
- Payment by BACS will be made within 30 days of the sub-contractor submitting a validated invoice to Greenlight Training.

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Policy Updates / Reviews

<p>Originated by: Greenlight Training Ltd on 01/07/2022 Next Annual Review: Greenlight Training Ltd on 01/07/2023 Authorised by: Dan Symons</p> <p>Signature: Dan Symons</p> <p>Date: 07/07/2022</p>			
Amendment Number	Date Amended	Details of Amendment	Pages Affected