	Policy:	Page 2 of 6
	PC 12.2	Date: 09/05/2018
<b>Title:</b> Sub-Contracting and Partnership Delivery Fees and Charges Policy <b>Owner:</b> Shaheed Ladak		

## 1. Pathway Group & the Role of Partner Providers

Pathway Group aims to offer to employers and individuals, a single point of access to high quality skills development including apprenticeships and vocational qualifications.

Pathway Group achieve this by directly delivering education and training elements ourselves, and where requested by the employer or individual, use partners to provide the relevant sector expertise. To ensure a high-quality programme, we may work with several partners in a single employer, each delivering different aspects of the agreed training.

We have a direct contractual relationship with every employer where we are responsible for the quality assurance and co-ordination of their training. This includes delivering and/or quality assuring substantial elements of every learner's programme.

Pathway Group operates nationally and engages with specialist Partners to ensure we can meet the skills specialisms and geographical spread demanded by employers.

## 2. Agreeing Costs

We will agree a total cost for the programme with the employer or individual learner in advance. As part of our Employer Agreement and Provider Agreement, we clearly indicate how any government funding, levy funding or employer contribution will be distributed between Pathway Group and any partners.


This will clearly state the cost of Pathway Group's Quality Assurance, the cost of the elements directly delivered by Pathway Group, the cost of any delivery by Partners; and where applicable the cost of any Apprenticeship End Point Assessment

The following are the anticipated maximum costs of each element of a programme.

### Apprenticeship Provision (from 1st May 2017)

The funding and where appropriate, employer contributions, will be distributed as follows

Role	% Funding Retained by Pathway
Compliance, Audit & Finance and QA	Typically, 20%
Direct Learning Delivery	Typically, 10%
Delivery of specialist skills	Up to 60%
Costs of End Point Assessment	Up to 20%

	Policy:	Page 3 of 6
	PC 12.2	Date: 09/05/2018
<b>Title:</b> Sub-Contracting and Partnership Delivery Fees and Charges Policy <b>Owner:</b> Shaheed Ladak		

### **Apprenticeship Provision (Starts Prior to 1st May 2017)**

Pathway Group will use funding for the provision of Education & Training to meet the costs of its quality assurance and compliance role for Apprentices who started their programme before 30th April 2017. This includes 16-18 and 19+ learners.

Pathway Group will use up to 30% of the agreed funding to meet these costs. These rates will apply until the completion of their programme.

### **Adult Education Budget Provision (AEB), 19+ Traineeships & 16-18 Traineeships**

We will use up to 30% of the available funding to meet quality assurance and compliance costs for the education and training provided by AEB and Traineeships. Each Partner Provider will be given an annual Maximum Contract Value (MCV) which identifies the funding available to them for their part of the delivery.

#### **3. General Principles of Costs**


All costs incurred by Pathway Group for quality assurance and direct delivery of education and training will be clearly stated in both the Employer Agreements and Partner Agreements. Both the Employer and Partner Providers will agree these costs in advance for each learner.

Pathway Group will make monthly payments to Partners based on the correct submission of data and supporting evidence to confirm they have delivered their agreed part of the programme. All funding claims must comply with the current Education & Skills Funding Agency (ESFA) Funding Rules and the terms of the agreement between Pathway Group, the Partner Provider and the Employer.

Where funding claims cannot be substantiated, Pathway Group will adjust or reclaim any funds from the Partner, and where required make an appropriate repayment to the ESFA, employer or learner.

#### **4. Due Diligence**

All potential Partner Providers will undergo comprehensive Due Diligence. This includes checks of current/past Directors and Persons of Significant Control. Partners are selected on the basis of their track record, specialism and location to ensure Pathway Group is able to effectively respond to employer demand and reflect local skills priorities. The PathwayDirect portal is used to collect and maintain this evidence.

	Policy:	Page 4 of 6
	PC 12.2	Date: 09/05/2018
<b>Title:</b> Sub-Contracting and Partnership Delivery Fees and Charges Policy <b>Owner:</b> Shaheed Ladak		

## 5. Partner Support and Capacity Building

As part of developing our offer to Employers and Individuals, Pathway Group recognises our responsibility to support and grow the quality of our Partner provision. We will use part of the total funding to provide quality assurance and compliance of programmes. This also contributes to the ongoing support and development of our Partners to improve the programmes for learners and employers.


The support provided varies dependant on the needs of the individual organisation, but as a general guideline will encompass the following areas;

### Quality Improvement & Learning Delivery

- Advising delivery staff to improve the Quality of Teaching, Learning and Assessment
- Using OTLA to improve the quality of learning and its impact on the learner
- To work with IQA's and delivery staff (including Partner staff) to continually improve the quality and effectiveness of programmes through CPD and one-one support
- To develop the English & Maths skills of delivery staff to improve support given to learners
- To provide standardised English & Maths Initial Assessment for all learners
- To coach all relevant Managers and Delivery Staff (including Partner Staff) to recognise and act upon issues that may affect the safeguarding of learners
- To intervene where needed to improve delivery by Partners ensuring learners successfully complete their programme.
- To provide online learning materials (PathwayDirect), tailored to their individual programme, to help develop their transferable workplace skills
- To provide information and support to all Pathway Group learners to ensure they know how to safeguard their welfare and how to protect themselves online.
- To provide information and support to all Pathway Group learners to ensure they understand the Prevent Duty and wider British Values
- Preparation for Ofsted Inspection including Nominee Training.
- Guidance with annual Self-Assessment and developing Quality Improvement Plans

### Data & Management Information

- Ensuring that all ILR information and supporting evidence is accurate, authentic and as a minimum meets current ESFA Funding Rules.
- Work with Partners to resolve any inaccuracies in ILR data quickly
- Ensure that all delivery (including elements delivered by Partners) meet all legal requirements, such as H&S Codes of Practice, availability of DBS Checks, checks to ensure individuals Right To Work in the UK, Data Protection
- Provide Partners with regular MIS data and performance management information to ensure they effectively co-ordinate their elements of the programme to ensure learners progress and achieve on time (PICs Data Dashboard).
- Data reporting and validating information submitted to the ESFA including using DSAT, BI Tools and the Apprenticeship Service.

	Policy:	Page 5 of 6
	PC 12.2	Date: 09/05/2018
<b>Title:</b> Sub-Contracting and Partnership Delivery Fees and Charges Policy <b>Owner:</b> Shaheed Ladak		

### Risk Rating & Additional Support for Partners

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


- Additional site visits
- Additional session of observations of teaching learning & assessment
- Additional tutor support
- More rigorous verification
- Training – all subcontractors are invited to training sessions to support their development and delivery of their subcontracted provision e.g. documentation, funding methodology, new initiatives within apprenticeship frameworks, safeguarding and prevent training.

Risk Band	% Funding Retained by Partner	% Funding Retained by Pathway
Red (High)	Up to 60% *	Up to 40%
Amber	Up to 70% *	Up to 30%
Green	Up to 75% *	Up to 25%
Gold (Low)	Up to 80% *	Up to 20%

### Contract Management

- To provide ongoing quality checks and evidence audits to ensure that all Partner delivery complies with current ESFA Funding Rules
- The analysis of Progression and Destination results to identify areas for improvement
- Setting and monitoring progress towards Equality & Diversity Impact Measures (EDIMs)
- Ensuring minimum levels of learner and employer progress and timely achievement including establishing Stretch Targets to progressively drive up achievement.
- Measuring and investigating Learner satisfaction through FE Choices
- Using Learner & Employer Voice to collect and act upon user feedback to improve the effectiveness of programmes.
- To work with employers to arrange the End Point Assessment of Apprentices.
- Ensuring that delivery by Partners comply with the ESFA Funding Rules
- The collection of Employer contributions towards the cost of Apprenticeships
- Undertaking regular Due Diligence of Partners including checks on Directors and Persons of Significant Control
- Undertaking annual Financial Health Assessments of Partner Providers

\* Excludes cost for EPA for Apprenticeships

	Policy:	Page 6 of 6
	PC 12.2	Date: 09/05/2018
<b>Title:</b> Sub-Contracting and Partnership Delivery Fees and Charges Policy <b>Owner:</b> Shaheed Ladak		

#### Other Partner Support on a case by case basis

- Employer Engagement & Brokerage
- DBS Applications
- Learner Recruitment via The Apprenticeship Works
- IAG Officer Training Qualifications
- Management Development Qualifications
- TAQA Qualifications

#### 6. Payment Terms

Pathway Group will make payment to Partners on the nearest last working day of each calendar month. Payment is subject to the correct evidence and data being submitted to Pathway Group by the agreed monthly deadline (20th). Any claims submitted after the deadline may/will not be processed and deferred to the following month.

Adjustments may be made to specific payments where evidence of eligibility, continued participation or achievement cannot be validated. Any amendments will be based on guidance provided by the current version of the ESFA Funding Rules.

#### 7. Publication of Fees Charged

Each year, Pathway Group will publish all actual funding we have retained to meet the costs of quality assurance and our Direct Delivery, alongside funds that have been paid to Partners for their contribution to the programme.

#### 8. AELP Sub-Contracting Best Practice Guidance

Pathway Group fully support the principles and practices outlined in the AELP Publication 'Best Practice Guidance for a Relationship between a Prime Provider and a Subcontractor' March 2018. We have revised our own policy to reflect these and will continue to develop our own practices around the emerging good practice of effective partnership collaboration.

#### 9. Policy Review & Publication

The policy will be reviewed in July of each year. The policy will be published at [pathwaygroup.co.uk](http://pathwaygroup.co.uk) and also via PathwayDirect.