Subcontractor Handbook

WEA

**Adult Learning
Within Reach**

Contents

Introduction and aims of the booklet

The WEA have developed a management framework to support and enhance our relationship with our subcontractors. This booklet will provide an insight into our requirements, how the WEA will support your organisation with access to information and how we intend to work together to ensure that we meet the goals and aims of your educational provision agreement.

Key stakeholders within the WEA have developed the content of this booklet. Your appointed delivery manager will share the contents of this booklet with you and continue to provide guidance during your agreement with the WEA.

It is important that your organisation is familiar with the content of the booklet and understands the details, especially in providing data and evidencing quality and information in a timely manner.

This handbook includes:

▶ The WEA's performance management framework for our subcontractors

▶ Clear guidance on WEA processes for subcontractors

Section 1 - The WEA's role in the management of subcontractors

1.1 Subcontractor performance management framework summary

WEA have developed a framework to help manage and support subcontractors. The key aspects of the framework focus on the following areas:

1. Procurement and contracting

2. Onboarding

3. Management and monitoring

4. Exit and end of contract review.

The booklet's purpose is to provide a focus on subcontractor onboarding and starting the delivery of the educational provision outlined in your agreement.

WEA will need to continue its due diligence checks on your organisation throughout the life of your agreement, working with you in managing and monitoring your performance. This includes the critical need to record and provide data to ensure that both organisations are working efficiently and effectively in meeting learner outcomes. It is important that both WEA and your organisation are able to demonstrate that we are meeting the objectives of our funder organisations, both from a quality and financial audit perspective.

1: Procurement and contracting

The WEA's subcontractor management framework includes processes to identify where the need exists to subcontract some or all of the delivery of educational provision. It focuses on the selection of organisations in an open, fair and transparent way following qualitative and financial assessment. You may be an existing subcontractor who has already been through this selection process, or you may be just about to respond to an Invitation to Tender.

In addition, the framework addresses the fundamental steps in the process of subcontracting and the role of commissioning, including the procurement process, reflecting and incorporating the relevant operational activity within the WEA. There may be detailed requirements in funding contracts that control aspects of any subcontracting

of that contract. These requirements will form part of any subcontracting process and subsequent agreement.

This process ensures that all appropriate due diligence has been incorporated, meeting the requirements of Finance, Human Resources, Procurement, Marketing, Education, Membership and Income Growth teams.

A due diligence exercise will be undertaken before contract award and, thereafter, at six-monthly intervals.

2: On boarding

On boarding is a critical part of WEA's relationship with its subcontractors, as this activity will set out how both organisations need to work together to ensure compliance with both our contractual and educational obligations. Understanding these obligations and setting out the processes and required outcomes ensures that all data and information is provided in a timely manner to meeting the Funder requirements..

3: Management and monitoring

WEA has a responsibility to ensure that subcontractors are managed on ongoing basis, and it is important that the relationship can mitigate potential issues for the education provision plan. This requires an appropriate mix of data analysis, monitoring visits and compliance and quality review to ensure that delivery meets the required standard, and that any risk to the expected outcomes is mitigated to limit the impact on all of those involved.

4: Exit and end of contract review

WEA will ensure that all contracts have effective closure processes implemented and exit requirements are shared with the subcontractor as part of its contractual obligations. This may cover the management of the current services, if the contract is not completed, or ensuring all data access is provided for further audit and final payments.

1.2 Headlines

Below are some of the key areas in which WEA and subcontractors will work together to manage and deliver education provision:

▶ WEA will undertake regular reviews of subcontractor performance to ensure high quality delivery that meets learner and employer needs by achieving the planned breadth and depth of provision.

▶ WEA will monitor compliance with funding rules and learner eligibility for funding, as this ensures prompt payment from the funder organisation. This may take place on a monthly, quarterly and annual basis. The assigned contract delivery manager will be involved in this process.

▶ WEA Performance Management Reviews (PMRs) will cover information provided in funding claims. Both ILR and EAS data will be used to measure performance.

▶ The contract delivery manager will rate subcontractor performance on a RAG basis and this will be shared with the subcontractor (see Appendix H). If the RAG rating is outside of the stated tolerance levels, the subcontractor's overall contract value for the year in question may be reduced.

▶ Performance management ratings are important as under-performance may lead to funders reducing our overall contract value.

▶ Providers will have the opportunity to voluntarily reduce their allocation for the financial year with no impact on the total for future years.

▶ In the scenario where a subcontractor is over-performing and makes a growth request, that subcontractor will be required to evidence the demand from learners and/or employers for further provision. This will include providing evidence of progression into work. Please note that the approval of any growth request is at the WEA's discretion.

Section 2 - Marketing and branding

1. It is important to us that learners know who we are and who has funded their course.

2. This means any marketing of our MCA courses must include both our funders' branding and the WEA branding.

3. Funder logos will be provided to you as a "lock-up", ensuring that all funders are represented in any course-related marketing.

2.1 Using our logo

When working with the WEA, you must include our logo wherever you mention provision that is in partnership with us. This means all digital and printed assets including:

▶ Newsletters

▶ Blog posts

▶ Posters

▶ Flyers

▶ Brochures

▶ Social media posts

▶ Case studies

2.2 Marketing all our courses

It's crucial we ensure that we are meeting the promises of our bid, filling our courses and attracting the audiences we need.

We can support you by including information about your courses on social media, newsletters and our website.

We may also ask you to share marketing about our courses on your social media channels, or in any newsletters you send out. This may include copy and digital assets or links.

If you have any questions please contact your Contract Manager.

Section 3 - HR pre-employment checks, DBS and referencing to support safer recruitment

3.1 The recruitment process

When recruiting new staff members, it is important to ensure the following steps are completed and any related documents are stored securely within the individual's personnel file:

▶ The individual must apply and be interviewed for the role. A copy of the application / CV and interview notes should be placed on the individual's personnel file.

▶ Documentation evidencing the individual's right to work in the UK must be obtained in line with government guidelines. (This can be requested and obtained at the interview stage or during onboarding. However, this must be prior to employment commencing.)

▶ Employment references must be requested for the last three years' employment history (or five years if working with vulnerable adults). Alternatively, the last two employment references may be requested (whichever is covers the longest time period).

▶ All references must be requested from and verified by the companies' HR departments (or manager when a HR department is not available);

▶ If there are any gaps in employment history, this must be discussed and documented as part of the interview / onboarding process.

▶ A DBS check of the level appropriate to the individual's area of work must be carried out (see Section 3.2).

The individual must not start their role without all of the above being in place.

3.2 DBS checks

All staff members must have a basic DBS check as a minimum.

You must carry out an **enhanced DBS check for all staff members in a learner-facing role.** The type of enhanced check carried out should take into consideration:

▶ Who the individual will be working with (e.g. teaching vulnerable adults);

▶ Where the individual will be working (e.g. in a children's centre).

An appropriate assessment of any risk to learners and other staff should be carried out for any cautions or convictions disclosed on a staff member's DBS certificate.

All DBS checks should be **renewed every three years,** before the lapse date of the existing check has been reached. This is to ensure that you remain compliant and up-to-date with any changes.

It is important to remember that, whilst you must record the DBS certificate number and issue date, the certificate belongs to the individual.

Section 4 - General Data Protection Regulations

4.1 Our shared responsibilities

We expect our staff and partners to:

▶ Process data in accordance with the principles of the GDPR and in line with our Privacy Notices;

▶ Follow our data incident reporting procedure if they identify a breach;

▶ Ensure all laptops and mobile phones are password protected and encrypted;

▶ Ensure that any personal data sent via email is password protected and that the password is communicated by another method;

▶ Ensure their work environment is secure; their monitors are locked when unattended, and all personal data is kept in locked drawers or cabinets;

▶ Save all documents on our secure shared drive, not to use USB sticks or home drives;

▶ Ensure that, when sharing personal data with another department or external stakeholder (where a data sharing agreement is in place), it complies with the Data Minimisation Principle and is not excessive.

Fines for GDPR breaches can be up to £20,000,000 or 4% of your global turnover.

Section 5 - Delivering the numbers

5.1 Data collection

WEA must submit a monthly ILR return to the ESFA. The ESFA returns calendar can be found here. Subcontractors must submit their data return to the WEA two weeks before the return to the ESFA is due. Please find the subcontractor submission deadlines for the 2022/23 academic year below.

Deadlines for Subcontractor Data Returns 2022/23		
ILR Return	ILR Return Date	Subcontractor Return to WEA
R01	06/09/2022	23/08/2022
R02	06/10/2022	22/09/2022
R03	04/11/2022	21/10/2022
R04	06/12/2022	22/11/2022
R05	06/01/2023	23/12/2022
R06	06/02/2023	23/01/2023
R07	06/03/2023	20/02/2023
R08	06/04/2023	23/03/2023
R09	05/05/2023	21/04/2023
R10	06/06/2023	23/05/2023
R11	06/07/2023	22/06/2023
R12	04/08/2023	21/07/2023
R13	14/09/2023	31/08/2023
R14	19/10/2023	05/10/2023

5.2 Data integrity

▶ Data must be accurate and error-free when submitted to the WEA. Where possible, you should check the quality and compliance of your data against the rule violations extracted from the Funding Information System (FIS) reports and the Provider Data Self-Assessment Toolkit (PDSAT) reports.

▶ The enrolment form should directly correlate to the data required for the ILR return. Therefore, it is essential all fields are completed fully and accurately to ensure we can claim the funding to which we are entitled.

▶ Learner eligibility must be checked prior to enrolment.

▶ You must collect a National Insurance number for all learners on adult skills courses (Funding Model 35).

▶ Where a learner has indicated they have a learning difficulty, disability or health issue, they must state which health issue they have on the enrolment form. Where there is more than one health issue, the primary issue must be indicated. This applies to all funding models.

▶ You must only claim funding for learners who have passed the postcode validation check and have been confirmed as eligible residents of the relevant MCA area.

▶ Where a learner indicates that they are not in paid employment and are looking for work and available to start work, the length of time they have not been in work must be given. Employment status and benefit status must be consistent with one another.

▶ Attendance and achievement data must be recorded in an accurate and timely manner. Attendance data should be recorded at or immediately after the relevant session, with achievement data submitted within one month of the course end date.

5.3 Financials

Claims and payment process

1. SUB-CONTRACTOR SUBMITS DATA TO THE WEA

▶ You give us information about learners and their learning as agreed in the Data Schedule in the contract and via WEA specified method.

2. WEA CHECK

▶ The WEA checks your data returns for completeness and correctness

▶ If checks are passed, then the WEA Returns the data to the ESFA in the ILR

▶ If checks fail, then WEA will query any issues with the subcontractor

▶ Information can be resubmitted to the WEA again, once it is correct and complete

3. FUNDING RECEIVED

▶ MCA receives ILR data via ESFA

▶ MCA approves the ILR returns and releases payment to the WEA

▶ WEA makes payment to the subcontractor in line with the contractual agreement.

4. MONITORING

▶ The WEA will monitor sub-contractors achievement of allocated targets on a monthly basis.

▶ Payments to sub-contractors will be reconciled to cash earned on a monthly basis

5.4 Learner processes and paperwork

▶ Enrolment forms and other learner paperwork must align to the Combined Authority's funding rules to ensure the correct data is collected from learners.

▶ Please use the forms provided to you by your WEA Contract Manager. These include:

  ▶ Enrolment form

  ▶ Learner eligibility form

  ▶ Low wage declaration and consent

  ▶ Learning record form

▶ Please note that the above list is not exhaustive. Please speak to your Contract Manager for further information.

▶ If you already have appropriate paperwork in place, please speak to your WEA Contract Manager to discuss this.

▶ Attendance details must be captured for every learner via the course register. Learning outcomes achieved must be recorded following the final course session.

▶ Details of learner destination and progression must be reported to the WEA on a termly basis, along with two case studies per term highlighting the learner journey and the impact of learning.

▶ Delivery staff should ensure that the following measures are considered to support learners:

  ▶ Learner support funding

  ▶ Learning support funding

  ▶ Information, Advice and Guidance (pre-course, on-course and post-course)

▶ In addition, all learners should be made awar of your safeguarding and prevent and complaint procedures.

5.5 Audit and compliance

▶ The WEA will be audited by funders. These audits will include checks on our arrangements to ensure compliance by subcontractors.

▶ The WEA will therefore undertake audit and compliance checks of subcontractors' course and learner documentation on a termly basis.

▶ You must keep all relevant documentation and the WEA will collect it at an appropriate point.

▶ Audit and compliance checks will include but will not be limited to:

  ▶ Learning aims and adherence to guided l earning hours;

  ▶ Enrolment and attendance data, including unique learner numbers;

  ▶ Residency eligibility, National Insurance number, low wage, prior learning records and other eligibility criteria;

  ▶ Initial and ongoing assessments and course placement;

  ▶ Progression and learning outcomes;

  ▶ Job outcomes (if applicable);

  ▶ Achievement;

  ▶ All required supporting evidence (Please refer to the Combined Authority's Funding Rules for further information.)

▶ Please refer to the Combined Authority's Funding and Performance Management Rules for further information on evidence you may need to collect.

5.6 Quality requirements

This section outlines WEA expectations and guidance for on-course quality. For teaching and learning, you must:

- Plan to deliver at least 80% of the guided learning hours recommended by the awarding body face-to-face. This can be in the classroom or virtually but it must be delivered by a tutor.

- Provide a course syllabus. This should be provided by the awarding body for accredited courses or created by the subcontractor for non-accredited courses.

- Set learning outcomes and follow a RARPA process for all non-accredited courses.

- Create a scheme of learning which clearly shows the intent of the course and the sequencing of learning in each session.

- Carry out initial assessments before the course has started for all accredited courses. Please note these are not funded as a course session.

- Carry out initial assessment and goal-setting processes on non-accredited courses following the RARPA framework.

- Carry out ongoing assessment followed by group and individual feedback on the progress of courses.

- Ensure timely registration with awarding bodies.

- Appoint internal quality assessors (IQA) for each accredited course before the course starts.

- Have a standardisation and moderation policy and process (IQA, EQA etc), along with records of having carried out appropriate process for each course delivered.

- Carry out annual self-assessment of performance on this contract with the Quality Improvement Plan.

- Maintain timely achievement records (within one month of the course completion date).

WEA expect to see in place and will review subcontractor quality processes including:

- Formal observation of teaching learning and assessment (OTLA) procedures;

- Process, regularity and reporting;

- Subcontractor and joint observations;

- Percentage of provision each term/ quarter randomly selected;

- Data reports, course offer, enrolments and course status;

- Attendance, withdrawals, retention and pass rate;

- Safeguarding Central Record in the subcontractor annual self-assessment with agreed links for the WEA self-assessment process which is required to review subcontractor provision;

- Quality Improvement Plan arising from the self- assessment.

- Evidence of Continuing Professional Development (CPD) for operational and delivery staff and tutors.

5.7 Learning records for learners

You must keep and maintain accurate records of each learner's journey with your organisation.

Your learner records should include evidence of the learner's participation in learning episodes, initial assessment, the learning they undertook, their attendance, retention and achievement. You should also record details of learner progression and report these to the WEA on a termly basis.

A learner file must be maintained for each learning programme and must contain the evidence required by the Combined Authority for funding purposes.

For non-accredited learning, each tutor and student must also complete a record of learning which identifies the course the learner attended, the learning aim, the learning outcomes, the learner's starting point at the beginning of the course, their progress at the approximate mid-point of the course and their achievement against the course learning outcomes at the conclusion of the course.

The tutor should confirm their judgement of the achievement of the learner and should sign the record of learning. The learner should also sign the record of learning. A copy of this document should be kept on the learner file.

A full copy of the learner file should be sent to the WEA at the end of the course or programme. Please refer to the section on learner data below and the Combined Authority's Funding and Performance Management Rules for further details of what the learner file should include.

5.8 Staff and venue requirements

Staff

All staff delivering learning under your agreement with the WEA must be suitably qualified. In addition to the requirements outlined in Section 3 of this handbook, all tutors / trainers will ideally have Qualified Teacher Learning and Skills (QTLS) status. However, individual cases will be considered on their own merits.

We expect all subcontractors to provide their staff with ongoing training and support, as appropriate. This includes supporting them to ensure they have relevant knowledge and understanding of the Combined Authority funding rules and how these apply to their work.

Venues and Facilities

All venues and facilities used to deliver education provision must undergo the checks outlined below. Please note that these also apply to any venues at which learners undertake a placement as part of their learning with you.

▶ Health and safety assessment

▶ Venue Accommodation Form

▶ Placement checks

Section 6 - Social research and evaluation

▶ To help us to demonstrate the value of our adult learning, we will be carrying out surveys with all learners.

▶ WEA need valid contact details from all learners and the permissions to contact them for monitoring.

▶ We will be asking some survey questions at the start and end of courses to measure social value using the TOMS National Framework for measuring social impact (**https://youtu.be/j7h08vb2Ifg**).

▶ We will create links to the surveys using survey monkey and it will be the responsibility of the subcontractors to ensure their completion as part of their contracts.

▶ The data from these surveys is then entered into the social value calculator to provide us with a monetary value of our outcomes of the devolved contract.

▶ The surveys can be quite detailed and some beneficiaries may need support to complete them.

Section 7 - Learner data requirement

The Learner File:

The learner file must contain evidence to support funding claimed. It must be available for termly compliance checks and a copy must be given to WEA at the end of the learning. If the time spent in learning is short, the level of evidence in the learner file will reflect this.

Please note that:

▶ The learner file must assure us that the learner exists;

▶ You must have evidence that learning took place;

If applicable, the learner file must confirm/ include the following:

▶ That the information provided by the learner was correct when it was collected;

▶ All information reported to us in the ILR and the earnings adjustment statement (EAS), and, if it applies, the supporting evidence for the data you report;

▶ Your assessment and evidence of learner eligibility for funding and a record of what evidence the learner has provided;

▶ All initial, basic skills and diagnostic assessments;

▶ Information on prior learning that affects the learning or the funding of any of the learning aims or programme;

▶ Evidence of Information, Advice and Guidance (IAG) to demonstrate that the learning programme is relevant, in the correct order and leads to a high quality learner journey;

▶ For 'personalised learning programmes' (for example, non-regulated learning aims), full details of all aspects of the learning to be carried out, including supporting evidence of the number of planned hours reported;

▶ A description of how you will deliver the learning and skills and how the learner will achieve;

▶ Supporting evidence for funding claimed for a learner, including details of any learner or employer contribution;

▶ Support needs identified, including how you will meet these needs and the evidence of support provided;

▶ That learning is taking or has taken place (including a work placement if the learner is taking part in a traineeship) and records are available;

▶ The learner's self-declarations as to what state benefit(s) they claim and their status relating to gaining a job;

▶ All records and evidence of achievement of qualifications, learning aims or traineeship programme, including a destination/exit form. This must be available within three months of you reporting it in the ILR;

▶ For Liverpool City Region Combined Authority learners undertaking Sector Based Work Academy programmes (SWAP) or Pre-Employment Training, evidence that they are eligible for and have evidence to support any claim for a job outcome payment;

▶ Where the learner is unemployed, a record of what you have agreed with them, including the relevance of the learning to their employment prospects and the labour market needs.

Please note that this list is not exhaustive.

Appendices

A: Leadership team

B: Stakeholder management team

C: WEA supply chain fees policy

D: Subcontractor quality checklist

E: Subcontractor initial meeting template

F: Compliance checks

G: Subcontractor monthly monitoring template

H: RAG rating

I: Not in Use

J: Subcontractor performance rating

Appendix A

Leadership Team

Chief Executive and General Secretary

Director of Quality and Student Services

Director of Education: Employability and Skills

Director of Education: Community Learning

Director of Finance and IT

Director for Marketing, Membership and Income Growth

Director for Scotland

Head of HR and Organisational Development

Appendix B

Stakeholder Management Team

Head of Financial Business Planning and Analysis

Head of Business Development

Head of Information Technology

Procurement and Social Value Lead

Head of Marketing and Digital

Head of Region

Senior Delivery Manager

Appendix C

WEA Supply Chain Fees Policy

This policy outlines the fees and charges of supply chain activity for Education and Skills.

Funding Agency/MCA funds provided by the Workers' Educational Association (WEA) to its subcontractors.

To access the file click here.

Appendix D

Subcontractor Quality Checklist

This is an example of a document currently used in WEA.

To access the file click here.

Further advice can be provided by the Director for Quality and Student Services, Head of Region and Head of Business Development.

Appendix E

Subcontractor Initial Meeting Template

Organisation	
Date	

A Delivery	
	Comments
1. Planned delivery against profile	
2. Tutors • CVs • DBS • Safeguarding / Prevent Training	
3. Venues H&S checks	
4. Records required (refer to Subcontractor Compliance checklist)	

B Due Diligence	
	Comments
Any items outstanding from due diligence checks	

C   Quality check

	Comments
Complete quality checklist	

D   Other discussion areas

	Comments

Next meeting date:

Actions agreed		
	Responsible person	**Date for completion**
Signed: WEA		
Subcontractor		

Appendix F

Management and Monitoring

Quality and compliance checks

As part of the contract terms and conditions and in line with funder requirements, the WEA will carry out termly compliance checks to check the following evidence and documents:

- Enrolment forms;
- Eligibility check and records, including residency;
- Prior learning checks;
- Initial and ongoing assessment and monitoring arrangements and records;
- DLS and ALS arrangements and records;
- Claims and supporting evidence of expenditure (if applicable);
- Attendance data/registers;
- Course publicity;
- Progression and learning outcome information;
- Achievement records and IQA and EQA reports;
- Learner feedback records.

Note: this list may not be exhaustive and the WEA reserves the right to review additional items as appropriate, for example in the event of new/ changing funder requirements, process changes, etc.

What the WEA will be seeking to verify includes (but is not limited to)

- That appropriate eligibility checks have been completed and learner eligibility recorded;
- That enrolment forms contain the right information in line with funder requirements and that they have been fully and accurately completed;
- That learner employment and benefit status are consistent with one another;
- That the learning aim and guided learning hours are accurate;
- That funding streams and sources of funding are accurate in relation to learner postcode;
- That learners have been appropriately assessed, prior learning checks completed and recorded and that findings have informed correct placement onto courses;
- That requests for learner and learning support have been appropriately actioned and records have been kept to evidence decisions made and support provided;
- That appropriate ongoing assessment arrangements are in place and evidenced;
- That learner attendance and any withdrawals have been accurately recorded in a timely manner;
- That learning outcomes are in line with learning aims and that achievement is recorded correctly and evidenced appropriately;
- That learner feedback has been sought, recorded and acted upon where applicable;
- That anomalies have been followed up and any changes made to the learner file or data are authorized and an audit trail for the change exists;
- That course publicity and other course documentation correctly displays WEA and funder logos, statements and any other relevant funder required information.

Appendix G

Subcontractor Monthly Monitoring Template

The WEA will monitor performance on a monthly basis and will provide you with the following information each month:

▶ Subcontractor Performance Summary Report

▶ Subcontractor Reforecast Report

▶ Quality Performance – Monthly Monitoring Template

To access an example of the Funding Summary and Forecast files click here.

To access an example of the Subcontractor Reforecast Report click here.

Please see below for an example Quality Performance template.

Further advice can be provided by the **Head of Region.**

Quality Performance – Monthly Monitoring Template	
Current position with reference to latest reports	Comments
1. Health and Safety	
2. Safeguarding	
3. Prevent	
4. Wellbeing	
5. Sustainability	
6. Retention, Pass and Achievement Data	
7. Equality Diversity and Inclusion	
8. Progression & Destination Data	
9. SLRs, Learner Files, Records	
10. OTLAs	
11. Learner Survey Outcomes and Feedback	
12. Complaints	
13. Progression Data and Case Studies	

Actions agreed		
	Responsible person	Date for completion
Signed: WEA		
Subcontractor		

Appendix H

Subcontractor Performance Rating

SUBCONTRACTOR PERFORMANCE RATING			
Assessment criteria	**Green**	**Amber**	**Red**
1. **Current earnings against profile**	**>=97%**	**>=90%**	**<=90%**
2. **Delivery progress**	No significant problems. On track to deliver outputs.	Outputs deliverable but require re-profiling.	Major issues causing delay. Likely to under deliver
3. **Quality and compliance**	Good quality and compliance overall - no concerns.	Some issues but actions in place to improve	Significant quality and/ or compliance concerns.
Overall RAG	Overall RAG will be green if all criteria are rated green.	Overall RAG will be amber if one or more criteria are rated amber.	Overall RAG will be red if one or more criteria are rated red.

Interventions based on performance rating

Green   No intervention required
Amber Informal SMART Action Plan
Red   Formal Performance Improvement Process:- Formal Action Plan

Education & Skills
Funding Agency

INVESTORS
IN PEOPLE

European Union
European
Social Fund

matrix
quality standard for information
advice and guidance services