



WESTMINSTER ADULT EDUCATION SERVICE

Supply Chain Fees and Charges (Subcontracting) Policy

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Overview

Westminster Adult Education Service (WAES) is a direct delivery service within Westminster City Council providing adult and community learning for adults living and working within and beyond Westminster.

WAES' vision is to transform our learners' lives through inclusive inspirational lifelong learning.

WAES is committed to developing a sustainable and reliable supply chain to enable proactive planning, learning and training.

Scope

To outline the fees and charges paid to subcontracted delivery from Westminster Adult Education Service (WAES) grant funding.

Purpose of Policy

The purpose of the policy is to ensure the effective management of sub-contractors to reduce and mitigate potential risks to WAES and main contractor funding bodies. It also sets out a framework for improving the quality of Teaching and Learning for both WAES and the sub-contractor.

Reason for Subcontracting

WAES operates as a Lead Provider where the majority of provision is delivered in-house, and an agreed proportion of the funding is delivered via sub-contracted organisations.

Sub-contractors will enhance the WAES provision in the following examples:

- Meeting WAES Strategic aims of Community, Careers and Culture
- Providing range of expertise to meet the skills and learning needs of adults and employers in Westminster.
- Delivering niche provision, ensures high quality of teaching and learning, complimented by sub-contractors' extensive and focused experience in the specialist areas.
- Building the capacity and sustainability of the voluntary and community sectors.
- Widening Participation to attract learners by extending the learning offer

Sub-contractor Approval and Due Diligence

WAES will maintain an Approved Supplier list and will always undertake fair and transparent procurement activities, in compliance with Westminster City Council (WCC) procurement procedures. All sub-contractors will undergo comprehensive Due Diligence checks and vetting.

Selection and approval of a sub-contractor will be based on range of checks, including financial viability, track record, type of provision being delivered, quality assurance and safe and secure location to ensure WAES can effectively respond to employer and learner demand whilst reflecting local skills priorities.

Subcontractors will need to have in place key policies as set out by the funders.

Sub-Contractor Management and Monitoring

Each sub-contractor will have a main point of contact for administration and management which is specific to the contract being delivered. This person will be the project co-ordinator and expected to attend monthly Performance Management meetings.

An agreed reporting structure for each contract will be developed and based on contract requirements and sub-contractor risk assessment. As a minimum, each sub-contractor will be subject to annual formal reviews, announced and unannounced spot checks and audits during the life of the contract.

WAES will manage and monitor sub-contractors to ensure that the following standards are met:

- Value for money.
- Compliance with contract requirements.
- Delivering quality programme.
- Minimum standards of performance.
- Further commissioning of supply services will not be permissible without prior approval from WAES who will give due consideration to any specific contract requirements.

Quality and Teaching and Learning

The Sub-contractor will at all times comply with the WAES quality standards for teaching and learning. WAES will closely monitor the performance of the sub-contractor throughout the duration of the contract and will address emerging quality issues immediately.

Sub-contractors are required to have their own course centre approvals and liaise with the awarding bodies. WAES will regularly review External Moderator reports submitted by sub-contractors and monitor any follow-up required.

WAES will review sub-contractors' own quality monitoring processes. This will include conducting lesson observations, interviews and feedback from learners, and reviewing student satisfaction surveys and any other funding requirements such as the London learner Survey.

Fees and Charges

WAES will retain a management fee, calculated as a percentage of the total funding as agreed in the contract. The monthly payment will be based on the funding received through the Individual learner records (ILR) reports. Payments will only be approved once the ILR report is reviewed and validated by the sub-contractor.

Sub-contractors are required to be set up as a supplier on Westminster City Councils payment system to facilitate payment via BACS. WCC operates a no 'PO No Pay policy' so a valid purchase order will need to be given to enable payment of invoices to be processed. Invoices will be paid 30 days from receipt.

Failure to comply with any of the requirements of the contract could lead to withholding the payment to a Sub-contractor.

The standard fixed management fee that will apply to sub-contracted activity will typically range between 10-20%. The management fee is subject to negotiation and will take account of previous track record, contract size, use of service resources.

Risk Management

The Sub-contractor organisation will be risk assessed by WAES that will take into account the result of the due diligence checks and give consideration to the specific contract being offered. Each subcontractor will have to maintain a risk register which is to be updated termly. This will form part of the payment procedure and invoices will only be paid after the risk register has been updated.

A Contingency plan will come into effect where any contract is unable to meet the high standard expected, to minimise any disruption to the learner and ensure they can complete their qualification.

Sub-contractor Support and Capacity Building

WAES has a responsibility to support all sub-contractors to develop and deliver high quality provision that meets the needs of learners. The management fee deducted from allocated funds is used directly to provide a comprehensive programme and support and compliance measures to ensure that public funds are protected and used effectively and that sub-contractors are supported to develop their provision and extend their businesses in a sustainable manner.

The exact mix of support will vary dependent on the needs to individual sub-contractors, but all organisations can expect to benefit from the following:

- One to one management meetings to improve performance
- Safeguarding and Prevent Training
- E-safety training
- Health & safety training
- Support for learner recruitment
- Support for learner and employer voice strategies
- Preparation for external inspection including IV meetings, EV Reports, SAR and QIP training.
- Quality support including briefings, inspections and sharing of good practice
- Employer and learner feedback surveys
- Self-Assessment & Quality Improvement Support
- Teaching & Learning Observations (including Paired Observations)

Policy Review & Publication

The policy will be reviewed annually in July of each year, and any changes notified to sub-contractors as part of either a regular contract review or via separate correspondence. The policy will be published on WAES website <https://www.waes.ac.uk/waes-key-policies>.