

## Subcontracting Policy

Updated 01-12-2021

Next review date: 01-12-2022

### Subcontracting Policy - Introduction

Momentum Training and Consultancy are a regional training provider, operating exclusively in our area of occupational expertise to provide high quality training within the hairdressing and barbering industry. We have over 7 years' experience in delivering high quality traineeship and apprenticeship training programmes and have built lasting relationships with local authorities and local employers. Our partnership approach to training provision values the involvement of apprentices and employers to ensure the successful outcomes of learners and support the local businesses with which we work. ***This policy specifies the Momentum Training and Consultancy rationale for the use of subcontracting partners and our procedures for managing subcontracted provision.***

### Our Delivery Model and Subcontracting Rationale

Momentum Training and Consultancy have academies in our regional delivery areas which enable apprentices to learn and develop in close proximity to their place of employment. Our network of employers has grown considerably over the years, owing to our reputation in the industry sector for high quality training. Many of these employers operate a chain of salons which span across a wider delivery area. To support the learning needs of their apprentices, Momentum Training and Consultancy subcontract elements of our training provision to approved partners who are on the Register of Apprenticeship Training Providers. All decisions regarding subcontracting partnerships are carefully considered to ensure the continuity of our high-quality provision and employers agree to the use of subcontracted provision prior to the commencement of training. The use of subcontracting partners enables us to extend high-quality apprenticeship learning to employers and apprentices who do not have access to a comparable provision within their local area.

### Criteria for Use of Subcontractors

Momentum Training and Consultancy aim to directly provide training to all apprentices where possible. The use of subcontracting partners is solely to enhance our provision to reach apprentices and employers who cannot otherwise access a comparable service to meet their specific learning and business needs. We have identified the following instances as our rationale for the use of a subcontracting partner:

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- Where a lack of adequate industry specific training opportunities are available to learners and employers within reasonable distance to their locality
- Where local training provision limits the learning and development opportunities of learners
- To reduce inequalities caused by socio-economic disadvantage and/or protected characteristics in accordance with the Equality Act 2010 where it is identified that a lack of adequate training opportunities in a geographical area may limit outcomes for individuals

Momentum Training and Consultancy work with a small and carefully selected number of subcontracting partners to maintain a high-quality provision. This allows us to work closely with partners to quality assure delivery and commit to our role in each apprentice's journey.

## **Selection Process and Quality Assurance**

Momentum Training and Consultancy take full responsibility for managing the training provision of all our subcontracting partners. We have a dedicated Quality Assurance team who oversee subcontracted delivery and are committed to ensuring that high-quality training is provided to all learners and employers.

Where the need for subcontracted provision is identified, the opportunity is communicated to all suitable parties within the geographical area that training provision is required. Selection of our subcontracting partners is undertaken as part of a rigorous process which is fair and transparent. All potential partners must participate in thorough due diligence, including but not limited to: RoATP status; financial health checks; inspection of premises for delivery; interviews with principals to assess suitability; evaluation of delivery experience; and qualifications amongst staff. Potential partners who pass due diligence are given further consideration as to the value their training provision would bring to learners and employers before selection. A written agreement must be in place between Momentum Training and Consultancy and the subcontracting partner before the recruitment, teaching and/or assessment of any learners can take place.

Momentum Training and Consultancy work closely with subcontracting partners to maintain high standards of learning and assessment for all learners and employers. Momentum Training and Consultancy attend the premises of subcontracting partners throughout each learner's time on programme as part of our regular performance management process.

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Momentum Training and Consultancy take responsibility for quality assurance processes which include, but are not limited to:

- Carrying out Health and Safety checks prior to commencement of training at the subcontracting partners delivery premises and periodically thereafter – length of time between checks is dependent on outcomes of prior checks in accordance with our risk-based assessment process.
- Undertaking 12-weekly learner reviews at the subcontracting partners delivery premises.
- Assessing the quality of teaching and learning provided by subcontracting partner staff biannually.
- Collecting and evaluating continuing professional development (CPD) records annually for all involved in programme delivery on behalf of the subcontracting provider.
- Quarterly analysis and reporting of subcontracting partner performance data to Momentum Training and Consultancy directors and subcontracting partner principals.
- Quarterly meetings with subcontracting partner senior managers to discuss performance data and address any issues. Frequency may increase if performance data highlights any concerns.
- Visiting subcontracting partners premises at short notice and/or unannounced to assess quality of training provision. Frequency determined by quarterly performance data analysis.

**Our Contracted Responsibilities**

Written agreements between Momentum Training and Consultancy and each subcontracting partners will include, as a minimum, the following:

- The range and scope of services to be provided by Momentum Training and Consultancy

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- Management fee rates, clear identification of any additional charges and allowable expenses and payment processes
- All requirements and responsibilities of the subcontracting partner

Momentum Training and Consultancy will be accountable for key elements of training provision for all learners allocated to a subcontracting partner, which will include, but is not limited to:

- Managing relationships with all **employers** throughout their learner's time on programme, including responsibility for obtaining signed employer agreements before commencement and maintaining regular contact to ensure that the training provision meets their business needs.
- Supporting and quality assuring **all subcontracted delivery**, including safeguarding, PREVENT duty, equality and diversity, health and safety, quality of teaching and assessment and reviewing and facilitating any additional support needs of learners.
- Ensuring the wellbeing and learning needs of all **learners** are met, reviewing these regularly by communicating directly with all learners throughout their time on programme. Momentum Training and Consultancy will be accountable for establishing each learner's eligibility status prior to commencement of learning and will conduct a thorough induction process to identify any additional support needs and implement the appropriate support. Where subcontracting partners can facilitate additional support to learners, Momentum Training and Consultancy will audit support provision to ensure that the learner's needs are being met to a high standard.

## Support Provision for Subcontracting Partners

Momentum Training and Consultancy will support all subcontracting partners to deliver high-quality training to all learners. The following support activities are provided to all subcontracting partners as a minimum; however, we assess each partner's needs individually and additional support may be provided where identified.

- Each subcontracting partner is allocated a dedicated Momentum Training and Consultancy advisor who will be responsible for overseeing all activities concerning subcontracted training provision. This person will have extensive experience in managing delivery and assessment, as well as administrating

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training provision, and will be on hand to provide advice and guidance to partners, learners, and employers.

- Momentum Training and Consultancy will hold full responsibility for the registration of learners with awarding organisations and manage all aspects of the awarding organisation administration on behalf of subcontracting partners, to include activities such as exam registration, end point assessment processes and certification. Subcontracting partners will have full access to our admin support staff to ensure learners are supported in a timely manner.
- Momentum Training and Consultancy will support subcontracting staff through regular quality assurance reviews to ensure that all provision is compliant with ESFA and awarding organisation regulations. All aspects of programme delivery will be monitored, and feedback given to maintain high standards of training.
- Momentum Training and Consultancy will provide all learning and teaching resources to subcontracting partners to ensure delivery is consistent with our own high-quality provision. Use of resources will be monitored and support is provided to ensure subcontracting partners are using resources to enhance learning outcomes for all learners.
- Momentum Training and Consultancy give all subcontracting partners and subcontracted learners access to quality resources to enhance training provision, including awarding organisation resources such as SmartScreen and Pivot Point, BKSB, online exam systems and online Safeguarding and PREVENT training resources.
- Momentum Training and Consultancy require subcontracting partners to attend all standardisation meetings and programme update briefings alongside our own staff members to maintain quality provision that is compliant with the latest guidance. This includes but is not limited to: Safeguarding procedures; PREVENT duties; RoATP requirements; GDPR compliance; Programme delivery updates; Functional Skills provision; ESFA evidence requirement updates; Health & Safety updates; and all other updates relevant to our occupational area of training provision.
- Momentum Training and Consultancy hold full responsibility for ensuring subcontracting partners are compliant with the legal obligations of

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government-funded training provision. This includes Safeguarding learners; PREVENT Duty procedures; National Minimum Wage requirements for employers; Work Time Directive; Health and Safety risk assessments; Equality and Diversity and British Values.

- Support is provided for the development of subcontracting partner staff and Momentum Training and Consultancy audit evidence of CPD, assessor qualifications, learning plans and schemes of work regularly where subcontracted learners are on programme. Our excellent links with industry experts are extended to subcontracting partners, supporting their staff in enhancing their skills and knowledge by providing access to workshops, seminars, and industry events to ensure that training provision is guided by up-to-date techniques and trends.
- Momentum Training and Consultancy take full responsibility for the evidence provided by subcontracting partners in Ofsted and awarding organisation audits. We will carry out short notice audits to ensure all learning and assessment is evidenced to meet the high standards of awarding organisations and Ofsted. Subcontracting partners are supported in using the required evidence documents throughout all learner's time on programme.
- Momentum Training and Consultancy manage all aspects of the ESFA contract and data management for subcontracting partners. The use of PICS software for learner data returns ensures accurate reporting both externally and internally.

## Management Fee Structure

Where a subcontracting partner delivers elements of training on behalf of Momentum Training and Consultancy, an average of 80% of funding is paid to the subcontracting partner for their delivery to subcontracted learners, in accordance with ESFA funding rules. Momentum Training and Consultancy retain a percentage of ESFA funding to cover all management and support activities as detailed in previous sections of this policy. We believe our funding structure fairly represents the level of high-quality support we provide to all subcontracting partners, while respecting the hard work and quality provision of the subcontracting partner.

Factors influencing the variation in our retained percentage are dependent on the subcontracting partners success rates and support needs beyond those detailed in this policy. Where it is identified that a subcontracting partner requires support due to

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lack of experience and/or resources, the retained percentage of funding may increase to fairly reflect the additional services that Momentum Training and Consultancy will provide to support learners and employers. Management fees will never be increased by Momentum Training and Consultancy without justification of additional services and support requirements. All fees and expenses are clearly set out in individual subcontracting agreements to ensure transparency and clarity.

Expenses relating to awarding organisations, such as learner registration and End Point Assessment fees, are built into management fees in agreement with subcontracting partners. Any services outside of those included in the management fee may be charged for and are clearly detailed in subcontracting agreements prior to signing.

Momentum Training and Consultancy are committed to high-quality training for all learners, both in-house and subcontracted. Subcontracting agreements may be revised if performance reviews highlight a need for increased support, to ensure high standards of training provision are met. In the event of any contract revisions, all changes are agreed with subcontracting partners and a new agreement will replace the existing one.

**Paying our Subcontracting Partners**

Momentum Training and Consultancy adhere to ESFA rules throughout all subcontracting arrangements, including those concerning timely payment to subcontracting partners for training provision.

Our Finance team make monthly submissions to the Data Service via PICS for all learners on programme. Information specific to a subcontracting partner is forwarded to them in a report which details the gross value received in ESFA funding. Information is cross checked by senior managers prior to sending to ensure GDPR regulations are adhered to. The report will detail the net payment due to the subcontracting partner and will be sent to allow time for a subcontracting partner to reconcile with their own live learner data. All deductions made by Momentum Training and Consultancy will be in accordance with individual subcontracting agreements.

Subcontracting partners must agree the monthly net value in writing in a formal request for payment, sent to our Finance team directly via email. Once this has been

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received, payment is usually made immediately via BACS transfer, however, can take 3-5 working days dependent on the bank used by the subcontracting partner.

## **List of Current Subcontracting Providers**

- Mike Taylor T/A Mike Taylor Education
- Halls of Ivy Beauty Academy Limited
- Changes Promotions Limited
- Inspire Hair and Beauty Academy Limited
- Achievement Training and Skills Limited

*All information is correct at time of writing. Any significant updates will require a policy update ahead of the proposed review date.*

Billy Moore

Momentum Training and Consultancy limited