



## Monitoring of Sub-contracted Provision & Management Fees

Valid from	September 2021
to	September 2022
Approved by Board and Governors	September 2021

Managing Director Name	K. HALLAM
Managing Director Signature	
Date	01/09/21

## **Monitoring of Subcontracted Provision Policy**

### **1.0 Introduction**

Subcontracting enables Juniper to extend the range and accessibility of our provision and ensure we remain responsive to demands for provision and we believe that this is a niche area of delivery that is attractive to a significant number of young people. Juniper currently has one subcontracting partnership in place. We believe that continuing this contract will enhance the opportunities available to young people as without continued financing this pathway will be withdrawn in the localities that form part of our agreement.

This niche provision is headed up by individuals with significant expertise, knowledge and links in the sporting field – including an ex-Football League referee's assistant and Premier League coach. The provision offers an entry point to these fields, with the entry requirements being accessible to those from disadvantaged groups. The subcontractor that we work with meets the requirements set out in the 'Subcontracting funding rules for ESFA funded post-16 funding (excluding apprenticeships) 21-22'.

As our subcontracting arrangement includes both distance subcontracted delivery and whole programme subcontracted delivery, we have sought approval from the ESFA to continue our arrangement which has been subsequently agreed.

### **2.0 Publication requirements**

In accordance with Education and Skills Funding Agency requirements we publish a *Monitoring of Subcontracted Provision & Management Fees Policy* on our website. We record subcontracted provision in line with the published guidance for the school census and the individualised learner record (ILR) data returns. We will also complete an additional declaration in respect of subcontracting to support our monitoring arrangements in line with the 'Subcontracting funding rules for ESFA funded post-16 funding (excluding apprenticeships) 21-22'.

### **3.0 Main principles of performance management of our Subcontractor**

Subcontracting is underpinned by due diligence checks and a legal agreement which sets out:

- Deadlines for submission of key learner journey and funding paperwork
- Health and Safety and Safeguarding requirements
- Key Performance Indicators
- Meeting requirements

We hold regular meetings (at least weekly) with our subcontracting partner and these take place either at Juniper, their site or remotely via Zoom/Microsoft Teams. These take the form of a calendar of formal contractual and review meetings, remote meetings are also arranged to discuss feedback from site visits to the subcontractor. Subcontracted provision is subject to formal lesson observations carried out by both Juniper staff and recommended nominated staff from the subcontractor, and the outcomes and action plans shared with Juniper. The subcontractor is also expected to carry out regular quality assurance activities such as learning walks and audits. Learning walks will be carried out by Juniper staff whilst attending site visits, and also join Maths and English sessions remotely and provide feedback. Where identified as a need Juniper will provide training and support for the subcontractor's staff.

In addition to planned meetings we will carry out remote checks and short notice visits with our subcontractor which will include face-to-face forums with staff and learners regarding the curriculum design and delivery. We will also sample learner work and monitor the impact that the feedback and assessment is having on learners.

#### **4.0 Meeting Schedule**

##### **4.1 Formal contractual and review meetings**

Monthly meetings will be held with the subcontractor to discuss performance and progress. At each meeting will be the Quality Manager from Juniper and a suitable senior member of staff representing the subcontractor.

A summary of the formal contractual and review meetings is in Appendix B.

##### **4.2 Weekly Catch-up Meetings**

Meetings take place every Friday to discuss smaller agenda items, such as individual learner bursary queries, planning of visits and any other issues that arise between the 'formal contractual review meetings'

##### **4.2 Monitoring and support visits**

Each site will have a minimum of three monitoring and support visits a year with further visits taking place where actions have been identified and an additional visit is deemed necessary. These may be specific to a particular aspect of provision, or may cover several elements of provision. Feedback including areas for improvement will be communicated to the subcontractor following each site visit.

##### **4.3 Formal lesson observation**

Each member of staff teaching with the subcontractor is expected to have at least one formal observation a year, carried out by Juniper, which feeds into staff CPD. The subcontractor will be provided with a copy of the documentation used. During monitoring visits, informal learning walks will be carried out and feedback provided to subcontractor staff.

#### **5.0 Key Contacts**

The subcontractor partner will provide Juniper with a current organisational chart listing each staff member and their role, with any changes communicated in a timely manner to Juniper.

## 6.0 Fees

To ensure that sub-contracted provision meets Juniper’s high standards for quality of education, teaching, learning and assessment and funding rule compliance, a management fee will be deducted from any funding drawn down from the Education & Skills Funding Agency (ESFA) before any payment is made to the subcontractor. Juniper will make contractual payments to subcontractors based upon the National Funding Rate amount of funding paid to Juniper from ESFA for each eligible learner. Payments will only be made upon receipt of acceptable and timely submission of evidence of learning for each individual learner. All funding claims must comply with current funding rules and the terms of the agreement between Juniper and the subcontractor. Where funding claims cannot be substantiated, Juniper will adjust or reclaim any funds already paid or are due to be paid to the subcontractor and where required, make an appropriate repayment to the ESFA. Payments to subcontractors will be paid based on the terms agreed in the Contract following receipt of the funding payment from the funding body.

The management fees deducted under each agreement with the subcontractor will be between 10% and 20% and will be influenced by the scale and complexity of the delivery model, funding stream and the level of support required. In determining the appropriate fee, regard will be given to the following:

- Funding stream under delivery;
- Level, frequency and type of assurance visit required to be provided by Juniper;
- Geographical distance;
- Further additional support included in the Contract between the Juniper and the subcontractor.

Exact fees to be deducted will be individually agreed with the subcontractor through negotiations, taking into account the factors above. Please see below a non-exhaustive list of the funded activities and management oversight applied to our subcontracting arrangement.

ITEM
<b>Quality Monitoring Activities</b>
Monitoring of Registers – evidence of attendance
Sampling and observations of Progress Reviews & target setting
Work experience and placement monitoring
Sampling and feedback of learner work
Administering and reviewing learner surveys and forums
Learning Walks/informal learning walks
Observations of learning and teaching and follow up actions
Full Provision Review
Safeguarding and Prevent Training for staff
Safeguarding monitoring meetings with each site
Additional support and guidance for staff supporting learners with SEND
Review of EDIMs data and recommendations
Site visits to monitor health and safety, safeguarding and quality of TLA
Quality and performance reviews
Informal catch-up meetings to monitor progress and completion of remedial actions agreed during monthly quality and performance reviews

Site visits from Juniper Governance Board members
<b>Management &amp; Administrative Costs</b>
Administration (inc – ILR input, Bursary Management, etc)
Travel (mileage)
Contractual – policy and procedure development
Management Board – quality, performance and financial assurance
Quality Coordinator part time (0.5)
External Auditor
Processing financial payments
Delivery of training to subcontractor staff on training days

## Appendix A – curriculum checklist to support delivery of sub-contracted provision

ITEM	Frequency (one off unless stated)
<b>Pre course start</b>	
Promotional materials	
Course approval with awarding body	
Enrolment form	
Additional Juniper Enrolment form	
Awarding body registrations	
Timetables for each site	
Evidence of prior attainment for each applicant	
Initial assessment results for each applicant	
Diagnostic assessment results for each applicant	
Single Central Register for staff	
Organisational Chart	
Schemes of work	
Health and Safety & Covid Risk Assessment for each site	
TLA Observation Planner	
Safeguarding arrangements	
Self-Assessment Report	
Quality Improvement Plan	
<b>On programme</b>	
Registers – evidence of attendance	Weekly
Progress Reviews & Target setting	Quarterly
Work experience and placement monitoring	Quarterly
IQA feedback	Quarterly
Learner surveys and forums	Quarterly
Learning Walks/informal learning walks	Monthly
Observations of learning and teaching and follow up actions	Monthly
EQA/EV visits and actions	
Exam schedule ( if appropriate)	
Homework records	Quarterly
CPD records for all staff teaching on the programme	
Safeguarding monitoring	Monthly
Arrangements for Learning Support	Monthly
Arrangements for Learner Bursary	Monthly

<b>After programme completion</b>	
Achievement data across all qualifications	
Learner destinations	
Monitoring of participation and achievement gaps	

## **Appendix B – Standard agenda for formal contractual and review meetings**

1. Review of agreed actions from previous meeting
2. Quality Review
3. Safeguarding, Health and Safety & Equality and Diversity
4. Staffing and Recruitment Needs
5. ILR Review of At Risk Learners
6. AOB