



Enterkey Training Supply Chain Policy

2022/23

1. Introduction

Enterkey Training receives funding from the West Midlands Combined Authority (WMCA) for delivery of Adult Education Budget (AEB). This policy sets out how Enterkey Training meets the WMCA's funding rules through its subcontracting arrangements. Enterkey Training is committed to best use resources to secure and deliver adult learning provision.

Enterkey Training is a prime contractor with the WMCA and subcontracts part of its accredited learning provision.

This policy outlines the management charges and fees for Enterkey Training's subcontracting arrangements. Enterkey Training has contracts with each subcontractor which clearly outline the rights and responsibilities of Enterkey Training and each subcontractor for the academic year.

Appendix A provides details of the sub-contractors for 2022 to 2023.

This document is published on Enterkey Training's website.

2. The rationale for our subcontracting position

Enterkey Training seeks to deliver high quality adult learning for adults (aged 19 and over) which:

- Enhance the opportunities available to learners.
- Fill gaps in niche or expert provision or provide better access to training facilities.
- Support better geographical access for learners.
- Offer an engagement and entry point for disadvantaged groups.

Enterkey Training will subcontract services where necessary to:

- Enhance the educational opportunities available to learners in the region.
- Strengthen links with local community organisations for the benefit of adult learners.
- Promote more effective collaboration with other adult learning providers in the region.
- Diversify the capacity to deliver, by providing education and training that Enterkey Training does not have the infrastructure to deliver itself.

Enterkey Training critically consider whether subcontracting arrangements add value to the West Midland's region and represent value for money before deciding to subcontract services. Courses and a curriculum plan are reviewed on annual and regular basis at governance meetings.

Enterkey Training has chosen to subcontract to:

- Offer an entry point to learning for residents with low qualifications.
- Fill gaps in niche or expert provision or provide better access to training facilities.
- Enhance and specialist learning opportunities which equip learners with the skills to progress into work.
- Provide skills for residents to enhance their careers i.e. promotion, increase in wages.

Enterkey Training reviews its supply-chain fees and charges with sub-contractors depending on the type and size of contract. Fees are subject to a risk assessment and due-diligence and are dependent on the agreed learner outcome rates and volume measures.

3. Subcontracting overview

Enterkey Training complies with all relevant procurement legislation when awarding contracts.

All subcontracted provision is required to be delivered in line with the [WMCA Skills Programmes funding rules](#).

Enterkey Training takes legal advice about the impact of [Public Contracts Regulations 2015](#) on the recruitment of supply chain delivery members.

Enterkey Training will not contract any supply chain delivery member where this would require delivery of WMCA funded AEB provision to a second level. All of our supply chain delivery members will be contracted directly by us.

4. Enterkey Training's commitment to improving the quality of adult education

Enterkey Training is committed to continual improvement in teaching and learning in both subcontracted and in-house provision. This is demonstrated by ensuring that any subcontractor is selected through a process that requires demonstrable evidence that they can deliver and sustain high quality education, including high quality teaching, learning and assessment, for all learners in all venues. It is managed through a process of regular performance monitoring and review including independent and paired teaching, learning and assessment observation. This is supported through a comprehensive quality programme of staff development and training.

Subcontractors must have an excellent understanding of the robust evidence we are required to collect for both the WMCA and Ofsted. The tutors, Enterkey Training staff and staff employed by the provider must be experienced, appropriately qualified and have current DBS checks, which are confirmed annually.

Enterkey Training will only consider a supply chain member to deliver training on our behalf where the most recent Ofsted full inspection outcome was at least 'good' or most recent Ofsted monitoring visit outcome is at least 'reasonable progress made'.

5. Management fees

Enterkey Training propose to retain an estimated management fee of up to 20% for the 2022 to 2023 academic year. In summary, the fee has been calculated on the basis of the salary costs of the Enterkey management and staffing which are necessary to ensure proper contract management, quality monitoring and ensure that data is collected and can be provided to the WMCA in a timely fashion.

These costs will vary depending on the type of provision being subcontracted, the risks associated with the provision and a proportion of costs relating to the overheads incurred by Enterkey Training's management of the prime contract. Section 8 provides details of services supplied to the subcontractor.

The time allocation of the Enterkey Training staff (shown as a percentage) has been forecast based on time allocations used in 2021 to 2022 and may vary with subcontractor's needs.

It should also be noted that additional strategic and operational support is offered by the following Enterkey Training staff:

- Operations Director

- MIS & Compliance Coordinator
- Finance staff

Enterkey Training will review the management fee regularly to ensure that it is a reasonable and proportionate fee to the delivery of the sub-contracted provision. Each cost contributes to continuous development of the service and the delivery of high-quality learning to the region. Enterkey Training will ensure a high-quality service is delivered to national standards, benchmarks and regulatory frameworks including Ofsted. This policy is reviewed annually.

WMCA Procured Learning

Enterkey Training will retain up to 20% of the contract value delivered by a subcontractor to cover the staffing and other associated costs of supporting and monitoring the subcontracted provision.

6. The monitoring process

Enterkey Training is committed to ensuring that the teaching delivered to learners is of the best possible quality and demonstrates excellent impact and services provided.

Enterkey Training has a robust contract monitoring process in place, which cover:

- Performance against KPI targets and planned delivery
- Quality of teaching and learning
- Safeguarding
- Equality and Diversity
- British Values / Prevent

7. Services provided by Enterkey Training to support the subcontractor

Activities covered under the management costs to ensure the quality of the service and teaching offer include those listed below. The time allocation of the Enterkey Training staff (shown as a percentage) has been forecast based on time allocations used in 2021 to 2022 and may vary with subcontractor's needs.

Dedicated Enterkey Training contact

Enterkey Training's Operations Director is the first point of contact who will respond promptly to any queries and monitor the performance against the contract throughout the year.

The time allocation of the Enterkey Training staff is shown as a percentage:

Strategic planning, procurement process and due diligence (20%)

- Identifying needs and priorities for the service.
- Programme planning based on local and WMCA priorities.
- Performance reporting to Enterkey Training's Governance Board.
- Tender and/or procurement authorisation process.
- Developing, implementing and managing the due diligence process in accordance with WMCA funding rules.
- Tender and/or procurement evaluation and award of contracts.
- Pre-contract meeting.
- Contract development and agreement.
- Setting up of facility for contract payments.

- Managing proposed changes to contract in-year.

Management of subcontracted provision (25%)

- Regular contact, dialogue, and professional support with key subcontractor contacts through contract monitoring meetings and governance meetings.
- Regular contract meetings to monitor provider performance against contract requirements and the quality of delivery against WMCA quality benchmarks.
- Monitoring of the sub-contractor to ensure compliance with their obligations in respect of processing personal data under the sub-contract and complying with associated legislation.
- Preparing papers and co-ordinating subcontract performance review meetings.

Funding body compliance (20%)

- Providing information, advice, guidance, and support to ensure delivery is compliant with the WMCA's funding rules.
- Maintaining Enterkey Training's relationship with the WMCA.
- Uploading claims and financial regulatory documents to the WMCA.
- Developing documentation and paperwork in accordance with the requirements of the WMCA, for example the suite of learner journey paperwork.
- Purchasing and maintenance of a specialist Management Information System (PICS).
- Managing the monthly ILR return process and submitting accurate funding returns to the WMCA, including recording, data validation and reporting.
- Managing external audits and internal audits such as learner paperwork checks and quality checks to ensure compliance.
- Managing the WMCA funding allocation.
- Managing contract payments to subcontractors.

Quality Assurance (35%)

- Providing quality assurance and improvement support.
- Reviewing, scrutinising and providing constructive feedback on reports, plans and analysis provided by sub-contractors, including:
 - Self-Assessment Report (SAR) & Quality Improvement Plan (QIP)
 - Safeguarding log
 - Staff database
 - Complaints log
 - KPI and performance reports, including delivery information and observation findings
- Reviewing the annual Self-Assessment Review (SAR). This document will involve all staff within the provider, learners and appropriate partners, employers and stakeholders. The SAR will review performance in line with the Education Inspection Framework and include reference to national benchmarks, trends and minimum standards. The SAR will be updated throughout the year, as and when necessary, for example, in response to outcomes.
- Reviewing the Quality Improvement Plan (QIP) that is developed alongside the SAR and details key improvements to be made within year, the people, the improvements involved and the deadline for the improvement. The QIP will be reviewed and formally updated at least quarterly.
- Undertaking direct observations of initial guidance, assessment, and delivery of learning programmes as appropriate, as well as face-to-face interviews with staff and learners.
- Spot checking venues being used to deliver Enterkey Training funded learning opportunities to ensure compliance with requirements including verification that learners exist and are eligible for funding.
- Scrutinising subcontractor ILR data. This would include undertaking compliance checks on information included in the ILR in relation to the WMCA Funding Rules, such as:
 - Undertaking learner eligibility checks and learner file audits

- Undertaking audits and consultation activity with learners, non-learners and key stakeholders / partners to inform provision and practice.
- Commissioning external representatives to undertake impartial quality assurance checks of Enterkey Training and subcontractor practice.
- In addition, Enterkey Training provides additional strategic and operational support through its senior management team.

Core support functions include

- Strategic planning & procurement process, due diligence
- Management of subcontracted provision
- Funding body compliance
- Quality assurance
- External audit
- Media and publicity
- Each subcontractor costs are deemed reasonable and proportionate to the delivery cost and are annually reviewed by the Governance Board.

8. How and when the policy is communicated to and discussed with current and potential sub-contractors

The policy is communicated through governance/contract meetings with the subcontractors and at the contract award meeting with subcontractors.

9. Payment arrangements

Subcontractor learning payments will be based on the outcomes from the ILR.

The subcontractors are paid at regular intervals throughout the year and in line with funding contract and related agreements. The subcontractors are required to submit monthly ILR Data to Enterkey Training at least five working days before the WMCA deadlines.

Once the monthly ILR Data has been processed, Enterkey Training creates a self-billing invoice amount for that month. The subcontractors are paid one month in arrears i.e. delivery for the month of July is paid by the last working day of August.

10. Policy review

This policy is reviewed annually and updated accordingly. The next planned review date is July 2023.

This policy may be reviewed if significant changes in the WMCA funding rules occur. Any changes to this policy that occur mid-contract will be discussed with the subcontractors.

In addition, Enterkey Training, as part of the subcontracting agreements, will undertake a performance and delivery review to enable re-profiling of payments, if delivery volumes or quality of service has fallen below agreed levels.

11. Appendix A: Subcontractor summary information

Name of Contract	UKPRN	Provider	Contract start date	Contract end date
WMCA Adult Education Budget (AEB)	10048418	Great Healthcare for the Community Limited	01 August 2019	31 July 2022

12. Review date and Officer responsible

This policy will be reviewed annually, and in-year as required by funding guidelines and rules.

Reviewed: 1 July 2022

Next review date: 1 July 2023

Officer Responsible: Mumtaz Ahmed, Managing Director

Signed 

Date 1 July 2022

Officer Responsible: Amjad Ali, Accounting Officer

Signed 

Date 1 July 2022

Presented to Board: 19 July 2022