

LCBT Policy – Business Case / Rationale for Subcontracting Document 2023/2024

Subcontractor Name:	THAT NAIL PLACE – Trading as TNB Skills Training
Proposed Delivery:	16-18 Traineeships and 19-24 Traineeships (Rollover from 2022/23 to 2023/24 – completions and progressions only)

Policy Statement

The London College of Beauty Therapy Ltd (LCBT) is committed to enhancing and diversifying the range of curriculum programmes that complement and widen our own curriculum offer and diversify the range of opportunities to re-engage young people and adults in learning and training. Working with high quality organisations and nurturing quality with smaller training providers allows the College to achieve this goal and ensures that quality provision can be delivered to a wider geographical area, especially reaching learners where access to the curriculum is limited.

Subcontracting Review and Rationale
<p>LCBT is pleased to continue with the existing subcontracting arrangements with TNB Skills Training in relation to 16-18 Traineeships and to complete the remain few 19-23 traineeships from the 2022/23 academic year that have rollover over in to the 2023/24 academic year in order to complete their traineeships and record their progression. This has been agreed by the senior stakeholders of LCBT including the CEO/Principal, COO and Finance Director who are members of the college's executive board. Knowledge management is embedded with key data captured, reviewed and lessons learned and communicated amongst the contract management team.</p> <p>Consideration of the research that was required for whole and distance subcontracting approval by the ESFA in relation to the need for the subcontracting provision within the South-East Kent area was reviewed and subsequently approved to continue with subcontracted provision barring ESFA approval.</p> <p>Review of TNB Skills Training Performance, have performed adequately within a period and sector still effected by increasing level of identified mental health (substantially continuing from the COVID pandemic) within an area of high deprivation. Additionally, traineeship delivery, previously a significant Government priority, is a significant stepping stone provision that has be identified to continually be of high need in the area of delivery with the South-East Kent area and therefore the LCBT Executive Board feel the continuation/extension of the subcontract with TNB Skill training for 16-18 Traineeship provision is justified, appropriate and needed and provides the best value for money.</p> <p>Review of TNB Skills Training regulatory and funding compliance from the previous academic years have shown no significant issues and that TNB Skills Training are proactive at keeping up to date and complying with updated funding rules and contractual obligations each academic year.</p> <p>TNB Contract Manager has significant experience and knowledge of the contract manager role over a period of 9+ years and has significant seniority and understanding of the responsibilities of staff within TNB Skills Training to satisfy the conditions of continuing traineeship subcontracted provision.</p> <p>Knowledge and experience from previous subcontracts with TNB Skills Training demonstrate the skills and ability to deliver quality subcontracted Traineeship provision as well as robust and support contract management from those with contract management responsibility within LCBT.</p> <p>The subcontract has been agreed to be extended as the 16-18 traineeship delivery aligns with the objectives aligned with LCBT's curriculum and its mantra of "Courses for Careers", aiding and supporting opportunities for</p>



young people and adults to gain the skills and qualifications to embark in lifetime careers in beauty, make-up, hairdressing and fitness / wellbeing industries. The contract keeps in line with the ESFA expectation to minimise subcontracted provision, as the subcontract only represents approximately 10% of LCBT's total funding allocation, this is significantly under the 25% threshold currently stated by the ESFA for subcontracted provision and has been reduced over the last 2 years.

LCBT has been a subcontracting partner with TNB Skills Training for over 9 years, supporting, developing and nurturing their development and provision in order to provide high quality learning provision to learners in particularly disadvantaged areas of the South-East where the learners engaged may not have had the access to such opportunities otherwise to the type of learning provision, providing an entry point for the most disadvantaged learners in the area. TNB Skills Training provides better access to training for learners in residing in areas of high deprivation within the geographical areas of Sittingbourne and Folkestone. Specialising in referrals from local schools, Job Centre Plus (JCP), Community Youth Projects, Connexions and the Local Authority, learners are generally in the high priority Not in Education, Employment or Training (NEET) category as well as those who are unemployed and low income seeking pathways to employment. LCBT are pleased with TNB Skills Training's past performance and are happy to continue to support the learners they are engaging in the supported areas as well as to continue to support the development of their training provision which in turn supports the learning provision in the area where it is not readily available by other training providers. These reasons align with both the ESFA guidance for subcontract rationale and LCBT's own strategic aims and enhances the quality of learning for learners in the disadvantaged areas of the South-East of England.

This means that the education rationale meets the following aims:

- Enhances the opportunities available for learners
- Fills gaps in niche or expert provision and provides better access to training facilities.
- Supports better geographical access for learners
- Offers an entry point for disadvantaged groups.

The subcontract will meet the agreed educational needs in relation to the delivery of Traineeship provision and it is deemed affordable and achievable upon review. Possible alternatives have been considered but not suitable and if the continuation of the Traineeship provision with TNB Skills Training was not able to take place, subcontracted provision would immediately cease at LCBT and formally reviewed for subsequent academic years. Contingency plans for subcontracts can be found within LCBT's Business Continuity Plan/Policy and LCBT's Subcontracting Policy.

No additional subcontracting services will be required in addition to those specified and contained within the Subcontracting Business Case and Rationale document for the 2023/24 academic year.

Confirmation of Funding

In the allocation of learning provision funding percentages to TNB Skill Training, LCBT has taken in consideration the effects that would be applied to possible future funding allocations to LCBT based on the lower area uplift for provision and some lower programme uplifts for TNB Skills Training's proposed provision as well as any withdrawal funding reductions in to account.

- 80% Learning Provision Funding from ESFA Funding all 16-18 Traineeships
- 80% Learning Provision Funding from ESFA Funding rollover from 22/23 academic year completions and progressions ONLY for 19-24 Traineeships into the 23/24 academic year.



European Union

European
Social Fund



**Education & Skills
Funding Agency**

LCBT.
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Specific Cost of Subcontractor Management		
Service Provided	Specific Cost	Detail of Service
Managing the subcontract	Contract Management 2% Process Administration 8%	Contract management includes but not limited to: Due Diligence, Contract creation and awarding and Performance Management. Process Administration includes but not limited to form and enrolment checking, data processing, filling, information cross referencing and collection of physical forms.
Quality monitoring activities	Quality Assurance 6% Compliance 4%	Quality Assurance includes but not limited to Quarterly Curriculum Quality Reviews, training days, assessment of IQA/EQA reports, observations of teaching & learning & IAG. Compliance includes but not limited to: Monitoring contractual and funding rule compliance, auditing of enrolments, remote and onsite visits, existence and delivery checking, learner, employer and staff interviews.
Reason why cost is reasonable and proportionate to delivery of the subcontracted teaching or learning and how each cost contributes to delivering high quality learning.		
<p>The cost reflects the proportion of resources that the College must use to provide a quality service for the subcontractor as well as ensure our compliance with ESFA funding rules associated with the funding allocation and subcontracted delivery. The cost is proportion accordingly to the level of resource and costs that are required in the terms of administration, management of the process, contractual management, audit compliance monitoring and the quality assurance of the teaching and learning. These activities all support the high-quality delivery of the College partner. Additionally, it can be confirmed that the cost of the contract management activities is proportionate to the contract size and risk.</p>		

Policy Review: The Subcontracting Rationale Policy is reviewed annually in the month of July. Next scheduled review is for July 2024

Name: **Aparna Sambasivan**

Position: **Finance Director**

Signed:

Date: 17th July 2023