

WEST MIDLANDS COMBINED AUTHORITY

Adult Skills Fund Programmes Grant Provider Operational Plan

(For the funding year 1 August 2026 to 31 July 2027)

This document sets out the Operational Plan that applies to all WMCA-funded Grant Providers of education and training who receive Adult Skills Fund Programmes funding, including Adult Skills Fund (ASF) and Skills Bootcamps funding for residents residing in the West Midlands Combined Authority (WMCA) area. WMCA-funded providers of education and training who receive Adult Skills Fund Programmes funding, To be read in conjunction with your Grant Funding Agreement.

August 2026

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Operational Plan Key Change and Clarifications

Please see below for the Key Changes and Clarification to 2026/27 Operational Plan as compared to 2025/26:

Area	Type	What's Changed / Added	What This Means
Strategic Alignment	Change	Introduction of the “golden thread” linking strategy, IS outcomes, delivery, performance, and funding decisions	Delivery must clearly align to IS outcomes; performance now directly influences funding and intervention
Delivery Plans	Strengthened	Delivery Plans now clearly underpin claims, monitoring, and reconciliation	Plans become contract-critical; delivery outside the plan risks non-compliance and funding recovery
Performance Management	Expanded	More structured approach: PMRs, monthly monitoring, and clear escalation routes	Increased oversight; Grant-funded Providers must engage proactively and regularly
Spend Thresholds	New	Defined variance triggers (R04–R10) to identify underperformance	Underperformance is formally measured and triggers intervention more quickly
Monthly Forecasting	New	Mandatory monthly forecasting with pipeline, risks, and assumptions	Grant-funded Providers must evidence future delivery and justify performance forecasts
Reconciliation Rules	Updated	Removal of 97% threshold rule	Stronger financial accountability and enhanced focus on 100% funding utilisation
Reconciliation Rules	New	Introduction of 103% over-delivery tolerance subject to conditions set out in an Expression of Interest process	A more robust funding system that aligns delivery with regional priorities and improves outcomes.
High-Risk & Fraud Policies	Expanded	Clearer expectations and consequences for high-risk provider's and fraud	Increased governance requirements and risk reporting expectations
Destination Reporting	Enhanced	Mandatory portal reporting and evidence for outcomes	Destination tracking is now a key performance and funding metric
Ofsted Response	Updated	Clear link between Ofsted outcomes and WMCA actions/interventions	Poor inspection outcomes can directly impact funding and delivery permissions

Purpose

This document applies to all grant-funded providers who receive WMCA-funded Adult Skills funding for the year 2026 to 2027 (1 August 2026 to 31 July 2027).

This document forms part of the Terms and Conditions of Funding. It should be read alongside your Grant Funding Agreement, the [2026/27 Skills Programme Funding Rules](#) and the associated documents referenced within those rules and listed in [Annex A](#). These documents can be found on the [WMCA website](#). Collectively, these documents constitute the [Operational Plan](#) and the Grant Funding Agreement and must be adhered to in full.

You are required to operate in accordance with the terms and conditions set out in the Grant Funding Agreement, including the applicable funding rules, rates, formulas, and the [Individualised Learner Record](#) (ILR) specification. Failure to comply with these requirements will constitute a breach of your Grant Funding Agreement.

All information, including any hyperlinks, is correct at the time of publishing. This document will be kept under review to reflect how WMCA may need to respond to the changing economic context, regional or national priorities.

We reserve the right to make changes to the Operational Plan and associated documents and will publish any updated versions on the [WMCA website](#). It is Your responsibility to ensure that you regularly visit the website and comply with the current version of these funding rules and associated documents.

Understanding the Terminology

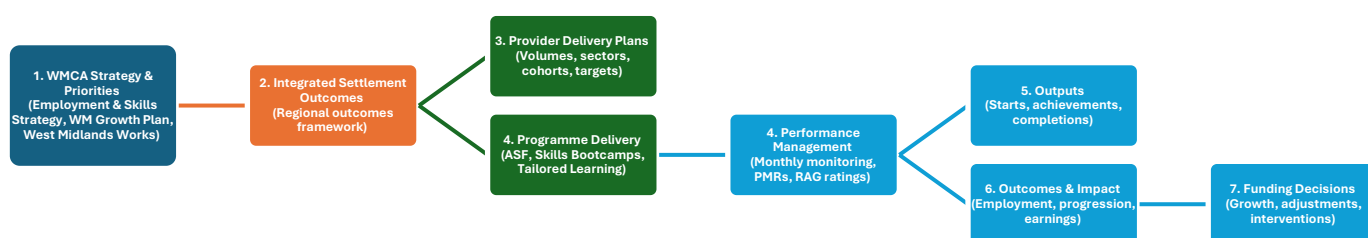
The terms ‘We’, ‘Our’ and ‘Us’ refer to the West Midlands Combined Authority (WMCA).

When we refer to ‘You’, ‘Your’, or ‘Grant Provider’s’, this includes colleges and adult education services part of a local authority in receipt of WMCA-Integrated Settlement (IS) funded Adult Skills Funds (ASF) and/or Skills Bootcamps from Us to deliver education and training to WMCA residents. This may also be referred to as WMCA Integrated Settlement Funding.

We use the terms ‘individual’, ‘resident’ and ‘learner’ to cover those whose provision is funded by Us.

Strategic Alignment

This diagram demonstrates the “golden thread” through the WMCA skills system. Grant Provider Delivery Plans and programme delivery must align to Integrated Settlement outcomes. Performance against these outcomes directly informs performance management and funding decisions, including growth, adjustments, and intervention.



The Delivery Plan forms the baseline for validation of Grant Claims, performance monitoring, and funding reconciliation.

Grant Providers must ensure their delivery does not place WMCA at risk of breaching upstream Integrated Settlement funding conditions, including the Outcomes Framework and Programme Board requirements

Grant Provider Responsibilities at a Glance

[Annex B](#) summarises the core responsibilities of all Grant Providers delivering WMCA Adult Skills Fund (ASF), Skills Bootcamps, and Tailored Learning provision. It should be read alongside the full requirements set out in this Operational Plan and the Grant Funding Agreement.

Funding Focus

Through our [Employment and Skills Strategy](#), which supports the [West Midlands Growth Plan](#) and [West Midlands Works](#) plan, we aim to build on our existing successes by articulating a clear vision for an integrated employment and skills system across the region. This system is designed to stimulate economic growth, improve outcomes for both residents and businesses, and foster healthier, more prosperous communities.

Over the next year, our efforts will continue to focus on four strategic pillars:

- Building strong and inclusive communities.
- Providing a good education up to level 2.
- Moving residents into employment and supporting career progression.
- Meeting future skills needs through upskilling and reskilling.

We place great importance on the development of local delivery networks and the establishment of clear progression pathways for residents. While the WMCA will work with you to oversee performance and compliance, we also expect Grant Providers to collaborate closely with key stakeholders. This collaborative approach is essential to delivering a more strategic, cohesive offer that effectively meets local needs.

Your ongoing track record will continue to inform our assessment of your capacity to deliver education and training to the required standards. These standards encompass Ofsted ratings, quality and compliance metrics, in-year performance, minimum standards, financial health, financial management and control, and delivery against contractual obligations, where such data is available.

At the core of our Grant Provider management approach is the Delivery Plan. Once agreed, this plan will serve as the foundation for monitoring and performance management throughout the year. Performance against the Delivery Plan and other quality benchmarks will guide decisions regarding interventions and potential funding adjustments.

To support this process, each Grant Provider will be assigned a dedicated Relationship Manager and Assistant Delivery Manager/Skills Delivery Officer responsible for day-to-day relationship management and delivery, with clear escalation routes, and with assurance, accountability, and strategic oversight provided by a Delivery Manager and Senior Delivery Manager.

We will maintain a strong focus on the outcomes for our residents, particularly in relation to moving people into employment or help residents achieve in-work progression that leads to improved earnings for those in low-wage roles. As a condition of funding, the accuracy and timeliness of destination data recording will be critical across all Grant Provider types.

The WMCA has established clear data review points for monitoring destinations. Further details can be found in the [Destination and Progression Tracking](#) section below. Additionally, there will be a continued emphasis on sustainable employment outcomes across programmes such as Into Employment programmes and Skills Bootcamps.

The WMCA will issue Grant Funding Deals on an annual basis, corresponding to the academic year. The Grant Provider payment profile as set in [Payments to Partners](#) reflects the agreed Delivery Plan and funding allocation. Any in-year adjustments to the value of the Grant will be communicated in writing in advance and will be agreed between the parties. Any adjustments to the value of the Grant submitted by the Grant Provider in writing to the Authority shall be at the Authority's sole discretion only.

Tailored learning

Tailored Learning will be funded exclusively through grant allocations to local authorities and colleges previously recognised by WMCA as 'Community Learning' provider's.

Grant Providers delivering Tailored Learning activity are expected to align delivery with the Building Stronger Communities objectives outlined in the WMCA Employment and Skills Strategy. Delivery should continue to follow the 'non-formula funded' model.

All Individualised Learner Record (ILR) data must be accurately recorded using the WMCA source of funding code 112 and Funding Model 11.

As part of WMCA's requirements to meet Integrated Settlement outputs at a regional level Tailored Learning provision must clearly align to an NVQ level (or equivalent), demonstrating a clear understanding of the expected knowledge, skills, and progression outcomes associated with that level. The only exception to this is delivery under Family Learning. Any provision that does not align to an NVQ level must be agreed in advance with your Assistant Delivery Manager/Skills Delivery Officer as part of Your Delivery Plan.

Each Grant Provider will be required to complete a Delivery Plan on an annual basis. WMCA will monitor these documents as part of its performance management process. The Delivery Plan must clearly reflect the intended outcomes and strategic aims of Tailored Learning, as set out in the Employment and Skills Strategy.

Purpose vs Outcome Guidance:

The seven purposes shown in the Table 1 below are related to the learner's initial participation intent and, through the recruitment process, learning organisations are expected to record on the ILR one purpose for each learner. However, it is recognised that once a learner progresses through a programme, their desired outcome may change. The learner's outcome at the end of the course does not need to tie in with their original purpose. For example, their journey begins by seeking to improve confidence, but the learner feels their end outcome is 'improved skills for progressing to further learning'.

Table 1 - Primary learning objective enrolments leading to outcomes:

7 ACL Purposes	Tailored Learning Outcomes/Code
ACL1 - Engaging and/or building confidence	1. Increased confidence
ACL2 - Preparation for further learning	2. Improved skills for progressing to further learning
ACL3 - Preparation for employment	3. Improved skills for work
ACL4 - Improving essential skills including English, ENGLISH LANGUAGE ACQUISITION (ELA), Maths and Digital	4. Improved essential skills
ACL5 - Equipping parents/carers to support children's learning	5. Improved ability to support a child's learning
ACL6 - Health and well-being	6. Improved physical health 7. Improved mental health and well-being
ACL7 - Developing stronger communities	8. Improved skills to participate in community life 9. Increased understanding of democratic values
	10. Improved skills for Independent Living

For more detailed guidance, please see [Annex C \(Tailored Learning Outcomes Framework\)](#)

Level 3 ring-fenced funding (formerly Free Courses for Jobs - FCFJ)

Within Schedule 3 – Payment Schedule and Grant Claim Process and the approved Delivery Plan, Grant providers who have been allocated funding under the Level 3 ring-fenced funding (formerly known as *Free Courses for Jobs – FCFJ*) must use this allocation exclusively to deliver Level 3 approved programmes. From this point forward, this funding will be referred to simply as your Level 3 Allocation.

Grant Providers may continue to use a portion of their Adult Skills Fund (ASF) allocation to support the delivery of Level 3+ programmes, provided this investment aligns with both:

- The approach taken in the previous academic year, and
- [The West Midlands Growth Plan](#).

Where a Learning Aim Reference Application (LARA) code attracts a higher funding value when delivered under the former FCFJ scheme, Grant Providers can use the higher funding value using the FCFJ LARA code in their ILR return. Please refer to the FCFJ section in the coding guidance for further information.

We expect Grant Providers to remain proactive and responsive to labour market needs. Therefore, Grant Providers with a Level 3 allocation are not required to submit a business case for delivering qualifications that are in the FALA provided that:

- The L3 or above qualification is funded under the FCFJ initiative and/or the FALA; and
- The Grant Provider has sufficient headroom within their existing Level 3 allocation or Adult Skills Funding (formula funded) allocation.

Where a Grant Provider has a variation to their Level 3 allocation, the Grant Provider's Delivery Plan must be updated and resubmitted to the WMCA for approval.

Payments to Grant Providers

Grant-funded payment arrangements for 2026/27

This section should be read in conjunction with Clause 3 and Schedule 3 of the Grant Funding Agreement.

Grant Providers operating under grant arrangements will be paid on a flat monthly profile over a 12-month period across all programmes, in line with the terms of the Grant Funding Agreement. The payment schedule for the funding year 1 August 2026 to 31 July 2027 is set out below and includes Adult Skills Funding including Tailored Learning, Level 3 ring-fenced funding, and Skills Bootcamps (where included within your grant allocation)

Period	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Monthly Profile (%)	8.333	8.333	8.333	8.333	8.333	8.333	8.333	8.333	8.333	8.333	8.333	8.333
Cumulative Profile (%)	8.33	16.67	25.00	33.33	41.67	50.00	58.33	66.67	75.00	83.33	91.67	100.0

Payment schedule:

The WMCA will process BACS payments on the 15th working day of each month. Grant Providers are expected to manage their cash flow accordingly to accommodate these payment terms.

Grant Providers will receive a payment aligned with the profile and terms of their Grant Funding Agreement. This profile will reflect the agreed Delivery Plan and funding allocation. Any in-year adjustments to the value of the Grant will be communicated in writing in advance.

WMCA reserves the right to suspend or cease payments in the event of a breach of the terms of the Grant Funding Agreement.

The standard monthly payment timeline is as follows:

Day of month	Action
Workday 4	Grant Provider submits ILR to DfE
Workday 5	DfE runs validation checks
Workday 6	WMCA receives occupancy report
Workday 7 – 12	WMCA checks the accuracy of returns

Workday 15	WMCA Bacs run to Grant providers
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Conditions relating to the payment of the Grant

Alongside monthly reviews of delivery following the monthly funding returns submitted by the Grant Provider in accordance with clause 7 **Error! Reference source not found.** (Monitoring, Reporting and Evaluation) of the Grant Agreement, WMCA will conduct two formal funding reviews (“Funding Review Points”) during the Term in accordance with clause 6 (Grant Review) of the Grant Agreement. At these Funding Review Points, payments will be reviewed against submitted Grant Claims and the overall funding allocation. Grant Providers will be required to submit actual delivery data to date, including a realistic forecast for the remainder of the Funding Period. The dates for these review points are set out below:

Funding Review Point	Submission Date
Mid-Year Claim	February 2027
Year-End Claim	June 2027

These reviews may result in adjustments to the Grant allocation, based on performance and delivery against the agreed Delivery Plan as set out in clause 6 of the Grant Funding Agreement.

103% Over-Delivery Tolerance – Expression of Interest Process

To support the effective utilisation of available Adult Skills Fund (ASF) resources, WMCA will operate a formal Expression of Interest (EOI) process through which Grant Providers may request approval to deliver above their contracted allocation.

Access to the 103% over-delivery tolerance is not automatic and should not be assumed. WMCA will issue an Invitation to Tender (ITT)/Expression of Interest opportunity to eligible Grant Providers at the appropriate point in the funding year, subject to available budget and delivery forecasts.

Approval to deliver above 100% of allocation will be discretionary and subject to WMCA's assessment of available funding, provider performance, forecast delivery, value for money considerations, and any other criteria specified within the EOI process.

No separate formal growth requests or growth applications will be accepted outside of this process. Providers seeking to access funding above their contracted allocation must do so through the EOI process when invited by WMCA.

Only over-delivery approved through this process will be considered for funding, up to a maximum of 103% of the approved ASF allocation.

End-of-year reconciliation

Once the Funding Period has come to an end and in accordance with the timescales as set out in Schedule 5 (Monitoring and Reporting) and Clause 7.4 of the Grant Funding Agreement, the Grant Provider will be issued a Final Funding return.

Where a Grant Provider delivers less than 100% of their Adult Skills Fund (including Level 3 ring-fenced provision) allocation, WMCA will reconcile the full value of the funding shortfall.

Final delivery will be assessed based on the Individualised Learner Record (ILR) data submitted at the final funding return (R14). The reconciliation process will begin in November 2027, and formal reconciliation letters will be issued upon completion for provider review and approval.

Any funds which are payable to the WMCA as part of this R14 reconciliation process shall be paid by the Grant Recipient within 30 days of the date of issue of the formal reconciliation letter in accordance with clause 7.4 and clause 3 of the Grant Funding Agreement. Non-repayment within this period will constitute as a material breach of Funding Agreement, unless otherwise agreed and approved by WMCA.

WMCA will not authorise payments exceeding 100% of the grant allocation.

WMCA will implement a formal Expression of Interest (EOI) process. Access to funding above 100% of allocation will not be assumed or guaranteed and will be subject to successful application through the EOI process and compliance with the specified criteria and conditions.

Performance Management Framework

Performance Management and Funding Arrangements Overview

This section should be read in conjunction with Clause 6 and Schedule 4 of the Grant Funding Agreement

WMCA will conduct Performance Management Review (PMR) meetings twice per year. Any significant under-delivery identified during these reviews, or at any other point in the academic year, may result in the redeployment of funds and the re-profiling of payments.

Where underperformance is identified, WMCA will make every effort to work collaboratively with Grant Providers to address the issues, which may include increasing the frequency of meetings as covered in the RAG Criteria and Interventions section.

A cut-off date of May (R09) has been established for Grant Provider requests in-year reductions to Adult Skills Programme funding allocation where these adjustments may impact the final year-end outturn.

Grant Providers are not required to wait for scheduled performance management meetings to initiate discussions around re-profiling. If underperformance is identified, early engagement is encouraged.

Over-delivery without formal approval through a funding growth process and/or delivery of non-approved qualifications will not be funded by the WMCA.

Spend Performance and Trigger Thresholds

To support effective performance and maximise impact, WMCA will monitor the Grant Provider spend and delivery against profile at key points in the academic year.

Variance thresholds will be used to assess delivery against the agreed funding profile and trajectory. Where performance falls below these thresholds, WMCA may initiate a joint review with the Grant Provider to assess the risk of a shortfall against the grant allocation.

- **R04:** Variance of more than **15%** below the expected position at R05
- **R06:** Variance of more than **12.5%** below expected delivery at R07
- **R08:** Variance of more than **10%** below expected delivery at R09
- **R10:** Variance of more than **5%** below expected delivery at R11

Where these thresholds are missed, WMCA will:

- Increase support and monitoring
- Consider funding adjustments at formal Funding Review Points, in collaboration with the Grant Provider. These will include the Mid-Year Claim (February) and Year-End Claim (June), in accordance with Clause 6 (Grant Review) of the Grant Funding Agreement.

Grant Providers are expected to proactively manage delivery and notify WMCA at the earliest opportunity where they anticipate falling outside of these thresholds.

Formal Performance Management Reviews (PMR)

Throughout the academic year, and during formal Performance Management Reviews (PMRs), the WMCA will assess Grant Provider performance against a range of criteria. These assessments are designed to determine whether Grant Providers are meeting their obligations, particularly in relation to quality assurance, delivery standards, and continuous improvement.

For the 2026/27 academic year, the WMCA will conduct two formal PMRs. However, where a Grant Provider is identified as high risk, WMCA reserves the right to amend the frequency or structure of performance management arrangements accordingly.

Performance reviews will be led by the Relationship Manager (RM) and ADM/SDO. These reviews may cover a broad range of areas, including, but not limited to, delivery performance against the Grant Funding Agreement (including the agreed Delivery Plan), performance against Integrated Settlement outputs, quality of provision, financial management, compliance with funding rules, and overall progress against the agreed delivery plan and intended outcomes.

The indicative schedule for PMRs in the 2026/27 academic year is as follows:

PMR	Indicative Date	Focus
PMR 1	December 2026/ January 2027	Strategic direction, future planning and performance against Integrated Settlement outputs
PMR 2	May 2027	Forecasted Year-end outturn and quality review

It is important that You make timely and accurate data returns at the review point, as this will help Us to ensure your funding allocation is set at the correct level.

From the 2026/27 academic year, Grant Providers are expected to submit full and accurate data returns from R02. This will enable WMCA to monitor regional performance against Integrated Settlement outputs and outcomes and identify gaps in provision.

This insight will inform the focus of the Expression of Interest process delivered through the 103% over-delivery tolerance.

In addition to formal PMRs an additional formal meeting will take place in the second term to review progression towards Integrated Settlement outputs, alongside strategic planning, place-based co-design and collaboration. This will be a strategic meeting will focus on the local skills and employment landscape, strategies to address priorities and gaps, and the collective commitment of all parties for future years.

Monthly Monitoring

In addition to formal performance management reviews, the Assistant Delivery Manager or Skills Delivery Officer will meet with the Grant Provider to conduct regular monthly performance monitoring.

These meetings are designed to provide ongoing performance oversight, enabling proactive risk management and early identification of issues. They offer a structured forum to review progress against the Delivery Plan and Integrated Settlement outputs, assess performance, outcomes and milestones, and monitor financial performance, including spend and forecast. This approach supports a shared understanding of delivery, allowing for timely discussion of risks, consideration of flexibilities or additional support, and informed decisions on any required contract adjustments to ensure alignment with priority areas and expectations.

The meetings also create space for open dialogue on emerging risks, quality and compliance matters, supporting timely mitigation, continuous improvement, and targeted support where needed.

- The monthly performance management and monitoring meeting will consist of:
 - A review of the previous meeting action notes.
 - A review of Grant Provider performance against the Delivery Plan, including Integrated Settlement Outputs.
 - Performance against Outcomes and impact of the provision.
 - A review of financial performance to date and forecast spend and outturn.

- Risk
- Any quality and compliance issues

Monthly Forecast Process

The monthly forecasting process is a core component of performance management and monitoring. It ensures an accurate view of the delivery pipeline and supports proactive oversight of programme performance.

This process enables a shared approach to monitoring delivery, identifying risks, and determining whether flexibilities, additional support, or contract adjustments are required. It also helps ensure that funding remains aligned with priority areas and delivery expectations.

WMCA forecast data will be processed alongside the ILR each month and shared internally with your ADM/SDO.

At the monthly performance management and monitoring meeting, Grant Providers will be required to supply qualitative information on future delivery to ensure the forecast is as accurate as possible. This will include Grant Providers submitting revised pipeline information to reflect any changes in delivery expectations and underpin forecast assumptions.

WMCA's forecast information will be processed alongside the ILR each month.

Grant Providers will be expected to clearly outline the following:

- Where forecast information highlights under- or over-performance, the actions that will be taken to manage this
- Planned cohorts, including confirmed and pipeline start dates
- Programme details, including sector, qualification level, and delivery model
- Delivery pipeline assumptions underpinning forecasts
- Any risks, constraints, or dependencies that may impact delivery
- Areas where additional support or flexibilities or contract adjustments may be required

To align with the ILR submission cycle and WMCA's forecast process and planning, the monthly performance management and monitoring meeting will be held between the 19th and 24th of the month. Your ADM/SDO will arrange the monthly performance calls.

Management Information

This section should be read in conjunction with Clause 7 and Schedule 5 of the Grant Funding Agreement

Learner Data Submission and Reporting Requirements

Grant Providers must submit learner-level data to the Department for Education (DfE) in accordance with the timelines set out in the Data Collection Timetable, as detailed in the Appendices, Validation Rules and Schema, and the Provider Support Manual. These documents, which are regularly updated, are available on the DfE's website under the [Individualised Learner Record \(ILR\) technical documents, guidance and requirements](#)

Changes to the ILR, including learner withdrawals and breaks-in-learning, must be recorded promptly and accurately so that ILR data reflects the learner population at any point in time. Grant Providers are required to report new learner starts within two months of commencement of their course and must report all withdrawals and achievements within three months of the learner's completion. All changes must be submitted by the final collection point of the funding year (R14). Failure to report by this deadline will result in the recovery of funding. Grant Providers must ensure that all learners have seen the [WMCA's privacy notice](#) as part of their enrolment process.

ILR data and Earnings Adjustment Statements (EAS) must be submitted in a timely manner via the DfE's secure web portal, [Submit learner data](#). Grant Providers must comply with the portal's conditions of use and the requirements set out in the ILR Specification and Provider Support Manual. Once submitted, the data is validated against national rules. The DfE will confirm successful submissions through Funding Reports available on the portal. Grant Providers are responsible for correcting or removing any data that fails validation, as only the most recent ILR file submitted will be loaded into the national database. Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

In addition to national ILR requirements and validation, WMCA applies its own funding codes and guidance, which are detailed in the [2026/27 Skills Programme Coding Guidance](#). All ILR files will be validated upon submission against WMCA-specific rules. Records that fail validation will be rejected and will not generate funding.

WMCA may conduct additional checks to ensure data submissions align with the Grant Provider's funding allocation and Delivery Plan. Grant Providers will be notified of any discrepancies and required to correct inaccurate data in the subsequent funding return. Related payments may be withheld until corrections are made.

You must ensure that secure and reliable backups of all data are performed regularly and stored in accordance with your Business Continuity Plan. These backups must be maintained in a manner that ensures data integrity, availability and must be accessible to the WMCA upon request in a format specified by us. In the event of data loss, corruption, or other incidents requiring recovery, you may be required, at your own expense, to restore or arrange the restoration of the data using the most recent backup.

Where applicable and agreed with WMCA, Grant Providers must use the EAS to claim funding that cannot be recorded through the ILR. All EAS submissions must be supported by evidence and submitted in accordance with the guidance available on GOV.UK.

Grant Providers must verify the accuracy of their EAS submissions via the Submit Learner Data service and correct any errors immediately. The EAS may also be used to repay any funding claimed in error. WMCA approval is required in advance for EAS claims related to:

- Excess Learning Support
- King's Trust
- Wraparound Funding

EAS claims must be submitted monthly and will be reconciled against ILR data, occupancy reports, and the Grant Provider's agreed delivery plan. The submission of monthly EAS claims is integral to ensuring that forecasting and outturn are as accurate as possible.

Assurance Activities

As part of its assurance responsibilities, the WMCA will actively monitor the data submitted by Grant Providers. This is essential to ensure the integrity and accuracy of funding claims and delivery performance.

To support this, WMCA will conduct regular audits, compliance and thematic reviews. These reviews will apply to all Grant Providers and may include, but are not limited to, the following areas:

- Review of systems and processes
- Verification of data submissions, including ILR, EAS and any other data systems relevant to funding claimed
- Sample checks of learner files
- Evaluation of supply chain (subcontracting) arrangements
- Financial health and assurance checks (performed by DfE guidance)
- Compliance with obligations set out in the Grant Funding Agreement
- Data error reports, such as PDSAT and FRM reports

In addition, WMCA will carry out routine desktop reviews to assess how the funding is being applied. These reviews help identify potential anomalies or errors in funding claims made for WMCA residents, which may require further investigation. WMCA may, at its discretion, require the Grant Provider to undertake and fund any work it considers necessary to improve the quality and validity of data submitted.

Where data submitted does not meet WMCA's funding requirements, Grant Providers will be contacted and required to make the necessary corrections. Related payments may be withheld until the data is corrected, or WMCA may seek to reconcile any overpayments made to the Grant Provider.

To further strengthen assurance, WMCA may engage external audit partners to conduct field-based activities as part of its assurance programme. This may include funding compliance audits and targeted thematic reviews.

Grant Providers are expected to regularly review their internal systems and processes to ensure the ongoing accuracy and reliability of data submissions.

Grant Providers must comply with all audits, assurance, and information requests from WMCA, including providing access to records, systems, and personnel, within 5 working days of request, unless otherwise agreed in writing.

Where WMCA conducts reviews, investigations, or audits of evidence submitted by the Grant Provider to support payments under the Grant Funding Agreement (or any preceding agreement), where material errors are identified, WMCA reserves the right, at its sole discretion, to require the Grant Provider to carry out, at its own cost, a full audit (100%) of all or part of the Funded Activities, within a timescale specified by WMCA. Alternatively, WMCA

may carry out the audit itself or appoint a third party to do so, with the cost recharged to the Grant Provider.

Where errors are found, WMCA will seek to recover funds, which may be recovered based on the error rate and the total value of the Grant Funding Agreement. Recovery may be made through data adjustments, invoicing, or deductions from future payments, with timescales specified by WMCA. Failure to repay any amounts due will be treated as a material breach of the Grant Funding Agreement, and WMCA's decision on the amount to be recovered will be final.

WMCA may conduct ongoing reviews of the Grant Provider's internal controls and processes to ensure that similar errors do not recur. If further assurance work is required, this will also be at the Grant Provider's expense (or procured and recharged by WMCA). If a funding audit results in an "unsatisfactory" rating, this will be considered a material breach of the Grant Funding Agreement.

In conjunction with our ongoing audit and compliance initiatives, we ask all Grant Providers to submit annual assurance statements in line with WMCA requirements and Clause 8 (Auditing and Assurance) of the Grant Funding Agreement. These statements will serve as formal confirmation of governance, financial, and compliance activities and controls, and must be prepared following the specific instructions outlined in the accompanying guidance documents. Timely submission of these statements is vital to maintain continued eligibility for funding and to uphold the principles of transparency and accountability within our operations.

Failure to comply with these requirements will be treated as non-compliance and would constitute a material breach of the Grant Funding Agreement.

Integrated settlement and Outcome reporting

All outputs and outcomes set out in this Operational Plan must align with Schedule 4 (Performance Measures, Outputs and Outcomes) of the Grant Funding Agreement. These contribute directly to the WMCA Integrated Settlement Outcomes Framework, which forms the basis for performance monitoring, funding review, and intervention decisions.

Outputs and Outcomes

This section should be read in conjunction with Schedule 2 and 4 of the Grant Funding Agreement

Through the delivery of Funded Activities, as defined in Schedule 2 (Funded Activities) of the Grant Funding Agreement, Grant Providers are required to achieve the minimum outputs and outcomes specified in their Grant Funding Agreement and Schedule 4 (Performance Measures, Outputs and Outcomes), thereby contributing to the 2026/27 WMCA Integrated Settlement Outcomes Framework. Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

The Grant Provider must ensure that data is submitted accurately and on time through the ILR and must comply with all monitoring, reporting, and operational processes established by the WMCA in relation to the Integrated Settlement, including (but not limited to) the provision of reports to any accountable body, in accordance with Clause 7 (Monitoring, Reporting and

Evaluation) of the Grant Funding Agreement. Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

All Grant Providers will have submitted and agreed a Delivery Plan for the 2026/27 funding year. This Delivery Plan outlines projected volumes and expenditure across the full range of provision. The total value of the Delivery Plan must correspond to the Grant Provider's full grant allocation, including any allocations for the Discretionary Learner Support Fund (DLSF) and/or Additional Learning Support (ALS).

Grant funding may only be used to support new starts in Adult Skills (including Level 3 ring-fenced funding), Non-Formula Funded provision, Tailored Learning (where applicable), Learner Support and Skills Bootcamps as set out in the Delivery Plan. The Delivery Plan will serve as the foundation for ongoing performance management discussions. Delivery outside of the agreed Delivery Plan and outside of eligible expenditure as set out in Clause 4 (Eligible and Ineligible Expenditure) of the Grant Funding Agreement will constitute a material breach under Clause 25.

Destination and Progression Reporting Requirements

As outlined in the [Skills Programme Funding Rules 2026/27](#), the collection and reporting of destination and progression data is a mandatory requirement for all WMCA-funded learners, including those enrolled in Tailored Learning.

Grant Providers must accurately record information in the WMCA Destination Portal, using the defined fields. Guidance on the completion of the Destination Portal can be found in the [2026/27 Skills Programme Funding rules](#) along with the [Outcomes Framework Coding 2026/27](#).

Grant Providers must:

- Update destination and progression data monthly via the portal;
- Ensure all learners have a Day One outcome recorded that reflects their current status;
- Continue tracking learners' post-completion for 6 months, though no further updates are required once a job outcome has been achieved;
- Retain auditable evidence to support all reported outcomes as set out in the Grant Funding Agreement.

An 8-week rule remains in place, allowing Grant Providers time to collect and evidence destination data. Any job or education outcomes recorded within this period will be included in performance assessments to ensure Grant Providers are not penalised.

Destination data is critical for WMCA to assess the impact of funded programmes and ensure alignment with regional priorities. Failure to collect and report this data may affect future change requests and could result in a review or reallocation of funding. Grant Providers will be RAG-rated on destination performance against the outcomes/ outputs as set out in the Grant Funding Agreement.

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Variations

Growth Considerations

Considerations for growth will be led by WMCA who will invite Grant Providers to apply at WMCA's request. During the academic year there will be quarterly review points where WMCA will review Grant Provider's performance and spend to date against their agreed Delivery Plan and payment profile.

WMCA will consider growth based on:

- Availability of funds
- Identified need
- The impact on Integrated Settlement outcomes
- Alignment with WMCA strategic priorities
- Grant Provider's delivery performance

Any opportunities for growth will then be communicated to Grant Providers through their Assistant Delivery Manager/Skills Delivery Officer, and an application via a business case will be invited.

WMCA reserves the right to not award additional funding/growth to a provider who has been issued with a funding agreement within the last 4 months, where limited evidence of performance is available.

Grant Providers will not be able to apply for growth if:

- WMCA does not hold a signed copy of the Grant Funding Agreement or any subsequent deeds of variations.
- The Grant Provider is underperforming on ANY areas of this programme or other contracts/agreements they hold with Us within the last year
- The Grant Provider has committed a breach of the Grant Funding Agreement within the last year.
- OFSTED risks have been reported
- The Grant Provider is under investigation under the Grant Funding Agreement or any other agreements/contracts they hold with WMCA, DWP or other combined authorities, or any other Authorities.

Applications for growth will be considered by WMCA through their internal governance process. An invitation to apply for growth does not guarantee approval.

Any adjustments to the value of the Grant submitted by the Grant Provider in writing to the WMCA shall be at the WMCA's sole discretion only.

Delivery Plan Flexibility Requests

Grant Providers may submit flexibility requests within their existing funding allocation at any point during the year by completing and submitting a business case, provided there

is sufficient time to deliver the flexibility within the remainder of the term of the Grant Funding Agreement. All requests will be reviewed by the Grant Provider Flexibility Panel.

WMCA will consider flexibilities based on:

- Identified need (by sector or specific resident groups)
- The impact on Integrated Settlement outcomes
- Alignment with WMCA strategic priorities
- Grant Provider's delivery performance
- Intended progression, impact and benefits

You may be asked to provide additional information to support your request. A business case application for flexibilities does not guarantee approval.

Ofsted Inspections

As part of its commitment to continuous improvement, the Grant Provider must ensure that the quality of funded provision meets the highest standards and delivers positive outcomes for all learners.

To support this, WMCA may request evidence from Ofsted or other relevant sources to verify the effectiveness of the Grant Provider's quality systems. The Grant Provider must take all reasonable steps to ensure high standards across all aspects of delivery, including:

- Reducing barriers to participation and achievement
- Minimising withdrawal rates and improving retention
- Achieving strong progression and destination outcomes
- Promoting equality, diversity, and inclusion
- Closing achievement gaps for disadvantaged learners
- Providing effective leadership and governance
- Delivering value for money and meeting skills needs

Where delivery involves subcontractors or supply chain partners, the Grant Provider must ensure these standards are consistently applied throughout the supply chain.

Inspection Requirements

During the term of the Grant Funding Agreement, Ofsted may inspect the Grant Provider at any time. Upon receiving notification of an inspection, the Grant Provider must:

- Immediately inform WMCA via email to skills.programmes@wmca.org.uk
- Provide, upon request, relevant documentation (e.g. self-assessment, quality improvement plans) within the timescales set by the Inspectorate.
- Notify WMCA of the date of the feedback meeting and allow a WMCA representative to attend.
- If attendance is not possible, confirm the inspection outcome in writing within 5 working days of receiving feedback.

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Ofsted Grading System

Grant Provider's will be assessed across multiple inspection areas to include Leadership and governance, Inclusion, Meeting Skills Needs, Curriculum and Teaching, Participation and development and Achievement. Each area will be graded using the following scale:

- Exceptional – Exemplary provision significantly exceeding expectations
- Strong Standard – Consistently above expected standards
- Expected Standard – Meets the required level of quality
- Needs attention – Improvement required in specific areas
- Urgent Improvement – Serious weaknesses requiring immediate action
- Safeguarding will be judged separately as Met or Not Met.

Please note: The Grading refers to the Ofsted assessments/gradings in place at the time this document was published. In the event that Ofsted assessments/gradings change, WMCA reserves the right to modify this section accordingly.

WMCA Response to Ofsted Outcomes

WMCA will review published inspection report cards and may take proportionate action in response to the grades awarded. This is intended to uphold high quality standards across the provision and to ensure delivery makes a strong contribution to meeting local skills needs:

Quality – Leadership and governance, Inclusion and Safeguarding

Urgent Improvement – Where leadership and governance or inclusion is judged as 'urgent improvement' or safeguarding is not met:

- We will impose immediate improvement conditions
- We may suspend recruitment
- We may adjust funding allocations
- We may reduce, suspend, or recover payment

Quality – Provision-level evaluation areas

Urgent Improvement – Where provision-level evaluation areas are graded as 'urgent improvement', this would normally lead to targeted support or action, which may include:

- imposing additional funding conditions, such as mandating targeted support or increased oversight through an improvement plan
- action under a specific contract (for example Level 3 ring-fenced funding)
- reducing eligibility for certain funding streams pausing or stopping learners' growth/starts
- This list is not exhaustive

Quality - Contribution to skills needs

Urgent Improvement - Where the Grant Provider's contribution to meeting skills needs is judged as 'urgent improvement' WMCA may:

- Impose immediate improvement conditions
- Impose additional funding conditions
- Suspend or cap learner recruitment
- Adjust future funding allocations
- Reduce, suspend, or recover payments

Failure to comply with any imposed conditions or recruitment restrictions within a reasonable timeframe may result in further action, including termination of the Grant Funding Agreement. If the provider disputes the Ofsted outcome, WMCA will continue to assess its position but will review any decisions once the complaint outcome is known. If an Ofsted rating is based on incorrect or fraudulent data, this will be treated as a material breach of the Grant Funding Agreement and may result in immediate termination.

Ofsted Monitoring Reviews

If two consecutive inspections/monitoring reviews identify the Grant Provider or provision-level evaluation areas as ‘needs attention’ WMCA may:

- Impose additional funding conditions
- Suspend or cap learner recruitment
- Adjust future funding allocations
- Reduce, suspend, or recover payments

Financial Monitoring

Financial Due Diligence

The [College Financial Handbook 2025](#), published by the Department for Education (DfE), sets out the financial management and governance expectations for further education colleges in England. The handbook provides a clear framework for financial accountability, risk management, and oversight. It is intended for use by college governors, accounting officers, and chief financial officers to ensure that public funds are managed responsibly and in accordance with HM Treasury’s *Managing Public Money* principles.

The handbook forms a key part of the DfE’s assurance and oversight regime. It outlines mandatory requirements for financial planning, internal controls, audit processes, and governance standards. Colleges are expected to comply with these requirements as a condition of their funding. The document is updated periodically to reflect changes in policy and sector expectations, and colleges must implement any new provisions promptly to maintain compliance and financial resilience.

The WMCA will align with the DfE’s findings and assessments as part of its engagement with colleges. Rather than conducting separate financial assurance processes, WMCA will rely on the outcomes of the DfE’s due diligence and oversight activities, including those informed by the College Financial Handbook 2026. This approach ensures consistency with national standards and supports a streamlined, coordinated framework for financial accountability.

In addition, local authority due diligence will also be undertaken by the DfE, and WMCA will align with these findings. By drawing on both DfE and local authority assessments, WMCA ensures that its funding decisions and strategic partnerships are informed by robust, nationally recognised financial oversight. This alignment promotes transparency, reduces duplication, and supports the delivery of high-quality, financially sustainable further education provision across the region.

College Oversight: Support and Intervention

The Department for Education (DfE) released guidance in November 2025 outlining its approach to oversight, improvement and intervention of (FE) colleges, sixth form colleges, and designated institutions. It emphasises a proactive, risk-based model that encourages self-improvement and early engagement through strategic conversations, dashboards, and support from the FE Commissioner (FEC). The aim is to reduce the need for formal intervention by promoting strong governance and financial resilience.

The updated guidance:

- Explain the role of the new Regional Improvement Teams
- Introduce a tiered offer of support
- Introduce new mandated support where needed
- Strengthen the existing risk management approach to identifying where improvement is needed: and
- Update existing intervention triggers and introduce a new trigger (contribution to skills needs) in line with recent Ofsted changes

Intervention measures are clearly defined and triggered by non-compliance with legal or regulatory requirements and with the following intervention triggers:

- Trigger 1: Financial health
- Trigger 2: Financial management and other controls
- Trigger 3: Quality
- Trigger 4: Contribution to skills needs
- Trigger 5: Failure to make progress on resolving an issue/s of concern

The guidance introduces a streamlined process involving Notices to Improve, FEC assessments, and Single Improvement Plans. The Secretary of State retains enhanced statutory powers to intervene where necessary to protect learners and public funds.

The guidance also details the process for exiting intervention, including post intervention monitoring and support (PIMS). Colleges are encouraged to engage in structural reviews and consider mergers or other changes where appropriate. The guidance provides a framework for Independent Business Reviews (IBRs) and Structure and Prospects Appraisals (SPAs) to support informed decision-making.

In addition, the guidance addresses financial distress and insolvency, outlining the availability of emergency funding and the operation of the FE insolvency regime. It reinforces the importance of early risk identification and the role of education administrators in managing insolvency procedures, with the overarching goal of safeguarding learners and ensuring institutional sustainability.

Fraud and Irregularity

The Grant Provider must immediately notify the WMCA if it becomes aware of any suspected fraud or financial irregularity in the delivery of Funded Activities in line with the WMCA's [Anti-Fraud and Corruption Policy and Procedures](#). This includes, but is not limited to, collusion with staff from the WMCA or regulatory bodies, computer fraud, submission of false or misleading funding claims, and fraud involving awarding organisations or subcontractors.

If the WMCA has reasonable grounds to suspect fraud or irregularity, it reserves the right to access the Grant Provider's premises, or those of any subcontractors, at any reasonable time, with or without notice. This access includes the right to examine, copy, or remove relevant documents and electronic records, and to interview staff or agents involved in service delivery.

In such cases, the WMCA may also require the Grant Provider to commission an independent investigation by a qualified professional at the provider's expense. Alternatively, the WMCA may appoint its own investigator and recharge the Grant Provider for the cost. Where fraud or irregularity is suspected, the WMCA may suspend payments and/or require the Grant Provider to pause learner recruitment under the Grant Funding Agreement or any other agreement/contract between the parties.

Failure to report such incidents promptly, or where a Grant Provider is found to have engaged in fraudulent or irregular activity, this will be treated as a material breach of the Grant Funding Agreement and may result in suspension, recovery of funds, or termination in line with Clause 25 (Events of Default).

If the Grant Provider is a registered or exempt charity, it must inform the funder of any official warnings, schemes, or orders issued by the Charity Commission. Failure to do so will be treated as a material breach of the agreement.

High-Risk Provider and Subcontractor Policy

As the accountable body, the WMCA is required to exercise appropriate oversight and control over the public funding it administers. This responsibility includes ensuring that:

- Public funds are used appropriately and in accordance with relevant regulations.
- Funded Activities are delivered in line with the terms and conditions of funding agreements.
- Value for money is achieved for the taxpayer, and
- Funding is directed towards delivering the policies and priorities approved by the WMCA and its delegated authorities.

The allocation of funding is contingent upon the WMCA being satisfied that Grant Providers do not present a high level of financial or operational risk, as defined in [the High-Risk Provider Policy](#) and the terms of the relevant grant funding agreements.

This policy applies to both public and private sector providers, including supply chain partners, where services are procured or grant funding is issued under WMCA's role as the lead or accountable body. In cases where WMCA does not have a direct contractual relationship with a provider, such as supply chain partners, but determines that the supply chain partner poses a high risk, WMCA may require the lead provider to take immediate and appropriate action. This may include the removal of the supply chain partner from all WMCA-funded delivery.

WMCA will assess and manage provider risk in line with its Funding – High Risk Providers and Subcontractor Policy, which sets out the requirements, expectations, and additional monitoring arrangements applicable where a provider or subcontractor is identified as high risk.

In accordance with Clause 7 (Monitoring, Reporting and Evaluation) of the Grant Funding Agreement, Grant Providers are required to actively monitor and report risks relating to delivery, performance, and compliance, including those that may result in a high-risk classification.

Failure to:

- Disclose material risks
- Comply with the requirements of the High-Risk Provider and Subcontractor Policy
- Provide information, reports, or evidence requested by WMCA

will be treated as a failure to comply with monitoring and reporting obligations and, where appropriate, may constitute a material breach of the Grant Funding Agreement in line with Clause 25 (Events of Default).

Where risks are not effectively managed or mitigated, WMCA reserves the right to apply intervention, funding adjustment, suspension of delivery, or termination action in accordance with Clause 6 (Grant Review) and Clause 25 (Events of Default) of the Grant Funding Agreement.

Policies

Due Diligence

WMCA requires Grant Providers to apply due diligence across all aspects of Adult Skills Funding and to comply with Procurement Regulations (as defined and set out in the Grant Funding Agreement) and the Public Sector Equality Duty (as set out in clause 33 of the Grant Funding Agreement), ensuring that you comply with legislation to ensure individuals' safety and well-being, equal treatment and access to provision and correct handling of data and information.

Grant Providers must ensure they have in place evidence in the form of policies, which may from time to time be required for WMCA audit & compliance purposes. Failure to comply with these

requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Policies that will be required are listed, but not limited to:

- Safeguarding,
- Prevent,
- Health & Safety,
- Equality & Diversity,
- GDPR,
- Freedom of Information and Whistleblowing,
- Indemnity Insurance
- Subsidy Control
- Modern Slavery
- Complaints

Data Protection and Information Governance

The requirements regarding intellectual property, confidentiality, data protection and freedom of information are detailed in the Grant Funding Agreement.

Grant Providers must comply with all applicable Data Protection Legislation, including the UK GDPR and Data Protection Act 2018, in accordance with the Grant Funding Agreement.

For the purposes of delivery under the Grant Funding Agreement:

- Grant Providers act as independent data controllers and are responsible for ensuring that all personal data is processed lawfully, securely, and in line with relevant legislation.
- Grant Providers must implement appropriate technical and organisational measures to ensure the security and integrity of personal data.
- Grant Providers must notify WMCA promptly of any actual or suspected personal data breach relating to delivery of Funded Activities.
 - Notifications must be made without undue delay, and in line with internal reporting requirements where specified.
- Grant Providers must cooperate fully with WMCA in relation to Freedom of Information (FOI) and Environmental Information Regulations (EIR) requests, including:
 - Providing requested information within required timescales
 - Supporting WMCA to meet its statutory obligations

Failure to:

- Comply with Data Protection Legislation
- Report data breaches in a timely manner
- Provide information required to support FOI or regulatory requests

On the expiry or termination of the Grant Funding Agreement, the Grant Provider must also ensure that all documents and digital records related to the Funded Activities are made available to WMCA upon request. This includes any such records held by subcontractors or supply chain partners involved in the delivery of the Funded Activities. All information must be complete, accurate, and accessible to support a smooth transition or audit process.

Failure may constitute a material breach of the Grant Funding Agreement, in accordance with Clause 15 (Data Protection and Public Procurement) and Clause 25 (Events of Default).

Complaints and Whistleblowing

Grant Providers are responsible for receiving, investigating, and resolving complaints related to the delivery of the Funded Activities. You must have a clear and effective complaints framework in place. This framework should enable You to gather feedback and respond to complaints from learners, their representatives, employers, and the wider community. A log of all complaints must be maintained and made available to the WMCA upon request.

You must ensure that learners are fully informed of your complaints procedure. This procedure should be clear, accessible, and communicated during the enrolment process. It must also be published on your organisation's website so that learners and other stakeholders can easily access it. In addition, you are required to follow and publicise the WMCA's Complaints Procedure, which outlines how complaints should be handled and escalated where necessary. The [WMCA's complaints policy](#).

All complaints must be handled in line with your internal procedures and any guidance issued by the WMCA. Once your investigation is complete, including any appeals process, you must inform the complainant of the outcome in writing. If the complaint remains unresolved to the complainant's satisfaction, you must advise them of their right to escalate the matter to the WMCA. You are expected to cooperate fully with any investigation the WMCA undertakes and act on any recommendations provided.

You must also ensure that an effective whistleblowing procedure is in place and followed. This procedure should allow staff and learners to raise concerns about possible malpractice in confidence, without fear of victimisation, discrimination, or disadvantage. The whistleblowing process must be clearly communicated and accessible to all relevant parties. Additionally, you are required to follow and publicise the [WMCA Whistleblowing Policy](#).

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Procurement, Subcontracting and Supply Chain

When engaging supply chain partners (subcontractors), Grant Providers must ensure full compliance with the following:

- [The Skills Programme Funding Rules](#)
- [The Supply Chain Management and Funding Rules](#)
- [The WMCA's Higher Risk Provider Policy](#)

Grant Providers are required to select their supply chain partners fairly, transparently, and without discrimination. Where applicable, Grant Providers must adhere to all relevant procurement legislation, particularly if they are classified as contracting authorities under

procurement law. It is the Grant Provider's responsibility to ensure that any proposed delivery partners possess the necessary financial stability, capacity, and capability to deliver the subcontracted Funded Activities effectively.

Grant Providers must obtain formal written approval from WMCA on an annual basis before entering into any supply chain contract. No subcontracted delivery may commence until this approval has been granted by the WMCA. This requirement applies to all third-party arrangements, including those involving learner recruitment, job placement services, and the delivery of teaching, learning, or assessment.

Subcontracting is permitted only to one level. Grant Providers must ensure that their subcontractors do not further subcontract any part of the Funded Activities. Any in-year changes to supply chain arrangements, including changes to subcontracting values or the addition of new partners, must follow WMCA's business case process. Furthermore, if a Grant Provider intends to procure additional supply chain partners the WMCA must be notified in advance of any procurement activity. Grant Providers are expected to ensure that any procurement follows the Procurement Regulations (as defined in the Grant Funding Agreement). WMCA will assess how the proposed provision enhances the offer to residents and aligns with the [Employment and Skills Strategy 2024–2027](#).

For further guidance, Grant Providers should refer to the Supply Chain Management and Funding Rules, which can be accessed on the [WMCA Website](#).

The Grant Provider retains full accountability for all subcontracted delivery as if delivered directly, in accordance with Clause 5 (Compliance with Upstream Funding) of the Grant Funding Agreement.

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Impact and Evaluation

Information may be collected to support both processes and impact evaluations of Adult Skills Funded Programmes. Grant Providers will be expected to supply relevant data to facilitate evaluation activities conducted by the WMCA and must also provide learner case studies upon request.

Learner Welfare

Safeguarding and Personnel Requirements

This section must be read in conjunction with clause 19 of the Grant Funding Agreement.

The Grant Provider must ensure that all Funded Activities are delivered in a way that safeguards and promotes the welfare of learners, including those in environments outside the Grant Provider's direct control. This includes adopting safer recruitment practices and having regard

to relevant guidance issued by the Secretary of State for Education. Where guidance uses the term "must," it should be interpreted as "should" unless it refers to legal obligations, such as those under the Safeguarding Vulnerable Groups Act 2006. The Grant Provider must ensure that it complies with the Safeguarding Vulnerable Groups Act 2006 at all times.

All Grant Provider personnel or potential personnel who may come into contact with learners or access learner information must be subject to appropriate checks. This includes any convictions and obtaining the most extensive DBS background checks available (from the Disclosure and Barring Service), and, where permitted by law, sharing the results with WMCA upon request. For overseas applicants, the Grant Provider must follow the relevant government guidance on criminal records checks. These checks must be completed before any individual begins work with the Grant Provider.

No one who appears on a Barred List may be employed or engaged in delivering the Funded Activities. The Grant Provider and its supply chain must comply with all DBS reporting requirements. If a referral is made to the DBS, the Grant Provider must inform WMCA that a referral has been submitted. If any personnel are added to a Barred List, they must be immediately removed from delivery of the Funded Activities.

Pending the outcome of background checks, Grant Provider personnel must not be used in the delivery of the Funded Activities. Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement. The Grant Provider must also supply details of its recruitment, training, supervision, and employment policies when requested by WMCA.

The Grant Provider must ensure that there is always a sufficient number of appropriately skilled and experienced staff, including supervisory staff, to deliver the Funded Activities effectively. This includes having adequate staffing levels to cover holidays, sickness, other absences, and both anticipated and actual peaks in demand. All personnel must receive the necessary training and supervision to ensure the proper delivery of the Funded Activities under the Grant Funding Agreement.

Health and Safety

Grant Providers must comply with all relevant health and safety legislation, including regulations set by the Health and Safety Executive (HSE). This involves implementing and maintaining safe systems of work and appropriate safety policies to protect staff, learners, and the public.

When delivering the Funded Activities in environments outside the Grant Provider's direct control, reasonable steps must be taken to ensure the safety of learners. This includes working collaboratively with other organisations, clearly defining responsibilities, and documenting arrangements to ensure mutual understanding and accountability.

The Grant Provider must report all incidents that are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 ("RIDDOR") in accordance with those

regulations and must investigate or assess the circumstances of all learner incidents within the scope of RIDDOR and follow the relevant HSE guidance.

In the event of a learner's death during service delivery, the Grant Provider must notify the WMCA immediately by phone or email. Additionally, if any part of the Funded Activities are subcontracted, the Grant Provider must ensure that all health and safety obligations are fully reflected in the subcontractor agreements.

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

Learning Environment

Grant Providers must ensure that all Funded Activities are delivered in environments that are safe, healthy, and supportive, going beyond basic legal health and safety requirements.

In line with the Counter-Terrorism and Security Act 2015, the Grant Provider must comply with both the Prevent duty and the Channel duty. This involves following statutory guidance to prevent individuals from being drawn into terrorism and cooperating with relevant panels when necessary. Any incidents or referrals related to these duties must be reported to the Funder promptly. Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

You are responsible for monitoring and addressing any harm that may affect learners. This includes incidents resulting in absence from learning, physical or mental injury, disfigurement, bullying, or harassment. Cooperating with the funder and the Department for Work and Pensions regarding Industrial Injuries Disablement Benefit (IIDB) and maintaining robust safeguarding and health and safety records, supported by regular checks.

Where Grant Providers refer safeguarding concerns, such as sexual harm or abuse allegations, to social care services or the police, the WMCA must be notified by email with a high-level summary. Similarly, any incidents undermining British values or Prevent compliance, or referrals of staff under the Counter-Terrorism Act, must also be reported.

The Grant Provider must comply with the Safeguarding Vulnerable Groups Act 2006 and must have in place throughout the Funding Period, policies and procedures to ensure full compliance.

All the above responsibilities must be passed on to any subcontractors involved in delivering the Funded Activities and the Grant Provider must ensure that the above provisions are included in its contract with subcontractors.

Failure to comply with these requirements will be treated as a material breach in accordance with clause 25 of the Grant Funding Agreement.

People and Skills

Adult Skills funded programmes as part of the [WMCA's Employment and Skills Strategy](#) are designed to support individuals who face barriers to employment, lack foundational qualifications, or need to reskill for emerging job opportunities. These programmes are particularly focused on residents who have not yet achieved a Level 2 qualification, those in low-paid or insecure work, and individuals seeking to transition into more sustainable and higher-paying careers. By targeting these groups, the WMCA aims to build strong and inclusive communities where everyone has the opportunity to thrive economically and socially.

The Adult Skills Fund, including Skills Bootcamps, is aligned with the WMCA's strategic pillars to support residents into employment and enable career progression. These initiatives provide flexible, employer-responsive training that meets current and future labour market demands. Skills Bootcamps, in particular, offer intensive, short-term training in high-demand sectors such as digital, construction, and green technologies, helping residents quickly gain the skills needed for in-demand roles. The Adult Skills Fund complements this by offering broader foundational and vocational learning opportunities, ensuring that residents can access a clear progression pathway from basic education to advanced skills and employment.

To ensure the effectiveness of these programmes, the WMCA emphasises collaboration between grant providers, employers, and local stakeholders. Grant Providers are expected to deliver high-quality, compliant education and training, with a strong focus on outcomes such as job placements and in-work progression. Through the use of Delivery Plans and robust data tracking ensures that programmes remain responsive to local needs and deliver measurable impact.

Branding and Publicity

Guidance on publicity is detailed in clause 24 (Publicity and Branding Requirements) of the Grant Funding Agreement.

WMCA publicity and branding requirements must be followed. Detailed guidance can be located in the [Media Assets](#) section of the WMCA website. This covers such areas as photography and images, videos, brand guidelines, logos and other brand assets.

All residents on Adult Skills Funded Programmes must be informed that their training is supported by the WMCA, and evidence of this must be in the resident's evidence pack. All provider documents held in the resident's evidence pack must display the WMCA logo.

Annexe A – Associated Documents

Grant Providers must operate in accordance with this Operational Plan, the Grant Funding Agreement, and all associated documents referenced within these, which collectively form part of the Terms and Conditions of Funding.

Failure to comply with these requirements will constitute a material breach of the Grant Funding Agreement.

All associated documents are published on the WMCA website, and it is the responsibility of the Grant Provider to ensure they access and comply with the most up-to-date versions at all times.

Documents referenced include (but are not limited to):

- WMCA Skills Programme Funding Rules 2026/27
- Skills Programme Coding Guidance 2026/27
- WMCA Destination Portal Guidance and Outcomes Framework Coding
- WMCA Supply Chain Management and Funding Rules (Subcontracting Guidance)

Links to the above guidance can be found [here](#)

- [WMCA High-Risk Provider and Subcontractor Policy](#)
- [WMCA Branding and Publicity Guidance \(Media Assets\)](#)
- [WMCA Anti-Fraud and Corruption Policy](#)
- [Whistleblowing policy and process](#)
- [Complaints policy and process](#)

WMCA Policy Documents can be accessed via the links below:

- [Employment and Skills Strategy](#)
- [West Midlands Growth Plan](#)
- [West Midlands Works](#)

Grant Providers should refer to the DfE website for policies and procedures listed below

- College Financial Handbook (DfE) (*where applicable*)
- Provider Support Manual (DfE)
- Data Collection Timetable (DfE)
- Individualised Learner Record (ILR) Specification and Supporting Guidance (DfE)

Annexe B - Provider Responsibilities

Key provider responsibilities are detailed within this guidance, the associated funding rules, and the funding agreement, including but not limited to:

Area	Key Responsibilities
Strategic Alignment	Ensure all delivery aligns to WMCA strategies and Integrated Settlement (IS) outcomes; clearly demonstrate contribution through Delivery Plan and ongoing performance
Delivery Planning	Develop, submit, and maintain an accurate Delivery Plan aligned to allocation, sectors, cohorts, and outcomes; update following any approved changes
Delivery & Performance	Deliver against agreed profile and thresholds; proactively manage performance and engage early where underperformance is identified
Performance Management	Attend and actively contribute to monthly monitoring, PMRs, and strategic meetings; respond to actions and escalation requirements in a timely manner
Forecasting & Pipeline Management	Provide accurate monthly forecasts, including pipeline activity, planned cohorts, risks, and delivery assumptions; maintain a credible delivery pipeline
Spend & Threshold Management	Monitor spend against profile and ensure delivery remains within defined variance thresholds (R04–R10); take corrective action where required
Outcomes & Impact	Deliver against outputs and outcomes set out in the Grant Agreement; ensure provision leads to employment, progression, or wider impact aligned to IS framework
Destination Tracking	Update learner destinations monthly, track for up to 6 months, and retain evidence to support outcome claims
Data & ILR Compliance	Submit accurate and timely ILR and EAS data; ensure all data meets WMCA and DfE validation requirements and reflects actual delivery
Financial Management	Deliver within allocation; manage cash flow in line with payment profile; participate in funding reviews and reconciliation processes
Quality & Ofsted	Maintain high-quality provision; meet Ofsted standards; notify WMCA of inspections and implement improvement actions where required
Tailored Learning Provision	Ensure Tailored Learning aligns to NVQ levels (or equivalent) and demonstrates measurable progression and outcomes
Compliance & Assurance	Participate fully in audits, reviews, and assurance activities; provide timely access to records, data, and staff when requested
Risk & Governance	Identify, manage, and report delivery, financial, and compliance risks; escalate issues including fraud, irregularity, or high-risk activity
Change Requests & Flexibility	Submit business cases for delivery changes or flexibility requests; ensure sufficient time and alignment to priorities
Growth Opportunities	Engage in WMCA-led growth processes where invited; demonstrate strong performance and alignment to access additional funding
Supply Chain Management	Ensure subcontractors are approved, compliant, and effectively managed; retain full accountability for subcontracted delivery
Safeguarding & Learner Welfare	Maintain robust safeguarding, Prevent, health & safety, and learner welfare arrangements; report incidents in line with requirements
Data Protection & FOI	Comply with GDPR and information governance requirements; report data breaches promptly and support FOI/EIR requests
Branding & Publicity	Ensure WMCA branding is applied to all materials and learner documentation; evidence funding acknowledgement
Collaboration & Partnership Working	Work with WMCA, local authorities, employers, and stakeholders to support place-based delivery and progression pathways

Annex C - Tailored Learning Outcomes Framework

The Tailored Learning Outcomes Framework provides a structured approach for defining, recording, and evidencing learner outcomes within non-formula funded provision. It supports Grant Providers to demonstrate the impact of learning by capturing progression in confidence, skills, wellbeing, and community engagement, aligned to the WMCA Integrated Settlement Outcomes Framework.

All examples are indicative and non-exhaustive. Grant Providers must ensure that outcomes are clearly defined, measurable, and supported by appropriate evidence in line with WMCA requirements.

Outcome Area	Definition	Example Outcomes (non-exhaustive)
1.Increased Confidence	Improved belief, or reduced doubt, in one's abilities.	Increased confidence in a specific skill or area; greater positivity about life or situation; increased willingness to engage in learning; enrolment onto further learning; participation in volunteering; engagement with new services; steps taken towards employment.
2.Improved Skills for Progression to Further Learning	Skills that enable learners to progress to further learning, including generic and technical skills.	Progression into further learning; increased motivation to learn; improved organisation and self-management; improved critical thinking and reflection; improved independent learning; increased resilience; development of technical or sector-specific skills.
3.Improved Skills for Work	Skills enabling learners to gain, sustain, or progress in employment.	Entry into employment, volunteering, or work experience; improved communication, teamwork, and problem solving; improved planning and preparation; improved career planning and job search skills; increased confidence and motivation to seek work; progression in employment or steps towards self-employment; development of technical skills.
4.Improved Essential Skills	Development of English (including ESOL), maths, and digital skills.	Increased capability in English, maths, or digital; achievement of qualifications; progression to higher level learning within essential skills; improved use of these skills in daily life or work.
5.Improved Ability to Support a Child's Learning	Parents/carers better equipped to support a child's learning and development.	Increased ability to support learning at home; improved engagement in children's education; increased aspirations for children; improved understanding of how children learn; improved family relationships; improved child outcomes such as engagement, attendance, confidence, and behaviour.
6.Improved Physical Health	Improved or maintained physical health as a result of participation.	Increased fitness or mobility; improved ability to engage in work or learning; increased physical activity; improved understanding of health, diet, and exercise; reduced reliance on health services; return to work following illness.
7. Improved Mental Health and Well-being	Improved or maintained mental health and emotional wellbeing.	Reduced stress, anxiety, or isolation; improved ability to manage mental health; increased resilience; improved sense

		of wellbeing; increased confidence to engage in learning or work; improved social interaction and relationships.
8. Improved Skills to Participate in Community Life	Skills and confidence to take an active role in the local community.	Increased sense of belonging; participation in community or voluntary activity; improved confidence to engage locally; development of social networks; improved understanding of environmental and community issues; contribution to local cultural or community activity.
9. Increased Understanding of Democratic Values	Improved awareness of democratic values and civic responsibility.	Increased understanding of democracy, rule of law, and individual liberty; improved awareness of equality, diversity and inclusion; increased respect for others; improved understanding of rights and responsibilities; engagement with wider communities.
10. Improved Skills for Independent Living	Skills that support independent living and day-to-day functioning.	Improved ability to manage personal and domestic tasks; improved decision-making and problem solving; increased financial awareness; improved social interaction; increased ability to care for self and others.