MAYOR OF LONDON

Managing Provider Performance

GLA Adult Skills Fund (ASF) grant-funded provision monitoring and intervention policy 2024-25 for colleges and other grant funded providers.

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What's New?

The table summarises key changes from 2023-24 and which take effect from 01 August 2024.

Table of changes

Section	Change
All	From the start of 2024-25 academic year the GLA will implement a new adult education funding model. This will be broadly aligned with the national modal following the funding reform. What is currently known as the Adult Education Budget will from August 2024 be known as the Adult Skills Fund To reflect this change all references to AEB have been changed to ASF.
Future changes	Update to national policy changes that impact upon the GLA Managing Provider Performance Policy
Monitoring delivery	All reference to the monitoring of the Multiply programme is removed after 31 st March, as the programme comes to an end.
Matrix standard	Inclusion of the requirement to achieve the revised matrix Standard by 2026
Subcontracting Arrangements	Introduced additional requirements regarding internal control frameworks
Intervention Process	The addition of a paragraph introducing the Intervention process

Monitoring and intervention policy for ASF grant funded providers

Introduction and purpose of the document

- 1. The purpose of this document is to set out the Greater London Authority's (GLA) approach to monitoring provider performance for quality and financial concerns. This document also sets out where the GLA will intervene when performance or the financial resilience of a provider is below expected levels. The document supplements the information contained in the ASF Grant Funding and Performance Management Rules and providers should refer to the funding rules, this document and their funding agreement.
- 2. We periodically update this document to ensure it aligns with the requirements of GLA performance and measurements, alongside national policy requirements. All revisions will be summarised in version updates.
- 3. This publication is primarily intended for providers in receipt of a conditions of funding (grant) agreement (the funding agreement) with the GLA, including:
 - General further education (FE) colleges including Institutes of Adult Learning
 - Local authorities
 - Sixth form colleges and
 - Universities and higher education institutes
- 4. This document may also be of interest to
 - Learners who wish to see how providers are monitored for performance
 - Department for Education (DfE)
 - The Education and Skills Funding Agency (ESFA)
 - Office for Standards in Education, Children's Services and Skills (Ofsted)
 - Further Education (FE) Commissioner
 - Mayoral Combined Authority (MCA)
 - Office for Students and
 - Other education and training providers

- 5. If you are a learner who wishes to provide feedback on your education/ training, please refer to the information available online at https://www.london.gov.uk/programmes-strategies/jobs-and-skills/training-providers-teaching-skills/adult-education-budget for information on how to share your views with the GLA.
- 6. For independent training providers (ITPs) please see the GLA Managing Provider Performance Policy document for ITPs.

Future changes

- 7. The Skills and Post-16 Education Act 2022 and the reforms set out in the Skills for Jobs White Paper have provided updated national arrangements for intervention and support in the skills sector. To ensure this guidance continues to support the delivery of the Skills for Londoners Roadmap, we are committed to considering these changes when developing future approaches to managing provider performance to support a positive impact on outcomes for Londoners. Details of these changes will be included in future versions of this document.
- 8. In November 2022, the Office of National Statistics (ONS) reclassified statutory FE providers into the central government sector with immediate effect. This has led to a requirement for colleges to comply with the principles and practice set out in HM Treasury guidance document Managing Public Money (MPM).
- 9. Nationally, DfE will only consider intervention due to no-compliance with MPM where non-compliance is significant or recurring and have made active support available for colleges through tailored support. The DfE changes also include the DfE retaining the right to put colleges into supervised college status, including appointing a DfE observer to the governing body.
- 10. We will consider any additional DfE guidance regarding the impacts on ONS reclassification on colleges and will review this in future version of this document as appropriate.
- 11. The GLA will continue to consider changes made by the DfE national intervention arrangements and consider these for inclusion in GLA policy where appropriate.

Approach to performance management

Role of the provider manager

- 12. Each provider will have a named GLA provider manager who will work with a portfolio of grant-funded providers as a first point of contact when managing the funding agreement between the GLA and the provider. The provider manager will monitor providers through the lifetime of the funding agreement and will meet providers at least once a term to discuss performance. Providers operating as part of a group will be subject to the same monitoring process and clauses within this policy. For a complete picture of the GLA's performance management approach, read this document alongside the GLA ASF Grant Funding and Performance Management Rules and the funding agreement.
- 13. Where a provider is also in receipt of other GLA skills funding such as Multiply, GLA delivery teams will share intelligence about provider performance, risks and issues. The GLA ASF provider manager will lead on areas relating to intervention and issues associated with delivery where it affects both funded programmes.
- 14. The GLA respects the dignity of all employees and values the contribution they make. We apply zero tolerance to all forms of bullying, harassment, discrimination and victimisation and are committed to providing a working environment that is open and inclusive and where everyone is treated with respect. We expect organisations we fund to always treat staff with respect.
- 15. Provider managers will always conduct themselves in accordance with the GLA's Code of Ethics.

Working with other agencies

- 16. The Skills and Employment unit will work with partner agencies under a Memorandum of Understanding following delegation of the Adult Education Budget to the Mayor of London to ensure that there is oversight of adult the Adult Skills Fund programme and other skills programmes for London residents.
- 17. Most providers will receive funding from the GLA, DfE or ESFA in delivering their courses. The GLA may share data and intelligence, where concerns are raised regarding provider performance or financial resilience, with the DfE/ ESFA's territorial and case management team to ensure that any measures implemented to correct underperformance does not have unintended consequences for the DfE/ ESFA and vice versa. These organisations will also share this with the FE Commissioner. Providers should inform the GLA if/ when they enter active support or intervention with either organisation.
- 18. Providers in scope for DfE/ ESFA and the FE Commissioner's Annual Strategic Conversations are encouraged to invite their provider manager to attend the meeting

- where these discussions encompass adult education funded by the Mayor of London. Following the meeting the provider manager will discuss any actions associated with provision of London's adult skills.
- 19. Where a provider is in scope to return an accountability statement to the DfE/ ESFA they are encouraged to share a copy of the statement with the GLA to inform discussions and support the mayor's priorities. Providers are invited to share any updates to the statement with the GLA when periodic revisions are made.
- 20. When the DfE/ ESFA share intelligence regarding provider performance and risks and they are funded by both organisations, the GLA will not instinctively impose measures to address underperformance associated with DfE/ ESFA funding agreement. Provider managers will only consider intervention measures when evidence indicates a risk to the viability of the GLA funding agreement or provision funded by the mayor.
- 21. For providers with funding through the Multiply programme, which is funded by the DfE we expect providers to cooperate fully and in a timely manner to any information requests from the GLA. This includes any data returns, financial submissions and evidence required for programme assurance.
- 22. Providers may also receive devolved funding from a Mayoral Combined Authority (MCA). Where a provider enters intervention measures with an MCA, they are asked to notify the GLA.
- 23. GLA ASF funded provision is subject to Ofsted inspections. When Ofsted give notice of an inspection providers must inform their provider manager and invite them to the feedback meeting.
 - Following an inspection visit, the provider manager will review the inspection report
 and discuss any actions required to improve performance. Providers will share a
 completed copy of the single improvement plan where a grading of inadequate or
 lower is awarded. The plan should be shared with their provider manager. Where
 appropriate the GLA may work with the DfE, ESF and FE Commissioner to protect
 both public funds and the interests of London learners following the outcome of the
 inspection.
 - FE colleges, sixth form colleges and institutes of adult learning (IAL) are subject to Ofsted Enhanced Inspections. Providers must invite their provider manager to a stakeholder interview under the enhanced inspection process.
 - Subcontractors delivering provision funded by the GLA on behalf of a prime may be visited by Ofsted. The GLA may act following an Ofsted inspection of subcontracted provision as outlined in the funding agreement entered into with the prime.

- Multiply funded provision is not subject to an Ofsted inspection however, Ofsted will
 conduct a thematic review of the quality of education funded by Multiply across
 England. Ofsted are selecting a small sample of local areas and a selection of
 providers located within them. Ofsted will visit each of these providers to review
 provision relating to four of the ten interventions offered by the overall programme.
- We expect providers chosen as part of the thematic review to fully co-operate with the process. These are no inspection visits, and the subsequent report will not name any local areas or their providers. Furthermore, there will be no inspection judgements made of any individual provider or local area and will have no impact on either local area or provider Ofsted gradings.
- 24. The FE Commissioner may review provision funded by the GLA and make recommendations to improve the quality or financial resilience of a provider. The GLA may share information to assist the FE Commissioner and their team to complete any investigations that will be coordinated by the DfE/ ESFA. If the FE Commissioner visits a provider, the provider should notify their provider manager and offer to invite them to attend key meetings.

Terminology

- 25. Funding agreement refers to the conditions of funding, the attached appendices to the conditions of funding and any documents or parts thereof, policies or guidance specified in the agreement and any variation to the agreement accepted by the GLA in OPS (as the same my be amended, added to , supplemented, substituted or varied in accordance with the terms of the agreement).
- 26.OPS, the GLA Open Project System, is an on-line management information system (MIS), or any successor system and/ or any other system that performs any of the same functions and which the GLA notifies to the Body from time to time.
- 27. A delivery year refers to the period from 01 August to 31 July.

Monitoring delivery

28. Provider managers will collaborate with providers and support them to deliver the provision set out in their funding agreement and delivery plan. They will monitor performance to identify risks with performance and support them to identify actions to improve performance and prevent further escalation of issues.

Table 1 Monitoring delivery cycle

Month	Delivery cycle activity	Performance management meeting
August	New academic year commences R12 ILR return for previous academic year (AY)	Q2 Multiply monitoring meetings begin
September	R01 ILR return R13 ILR return	Q2 Multiply monitoring meetings conclude
	Multiply funding year funding claim	
October	R02 ILR return Final R14 ILR return for previous AY Q2 Multiply funding claim and	Term 1 ASF monitoring visits commence
November	forecast R03 ILR return	Term 1 ASF meetings conclude
	External assurance on subcontracting controls – deadline for primes to return certificates, reports and subcontracting checklists for previous academic year	Q3 Multiply monitoring meetings begin
December	R04 ILR return Issue reconciliation statement for previous academic year Issue indicative allocation letters	Q3 Multiply monitoring meetings conclude
	for next academic year – except multi-year grant providers	
	R05 ILR return	

Month	Delivery cycle activity	Performance management meeting
January	Q3 Multiply Funding Claim and Forecast	
February	R06 ILR return	Term 2 ASF meetings commence
	Mid-year claim and mid-year forecast – excluding multi-year grant providers	Q4 Multiply monitoring meetings begin
March	R07 ILR return	Term 2 ASF meetings conclude
	Allocation letters issued for next academic year	Q4 Multiply monitoring meetings conclude
April	R08 ILR return	
	Q4 Multiply Funding Claim	
	Multiply Financial Year Funding Claim	
May	R09 ILR return	Term 3 ASF meetings commence
June	R10 ILR return	Term 3 ASF meetings close
	Final funding claim submission	
	Subcontracting plan approvals for next academic year via OPS	
July	R11 ASF ILR return	
	End of academic year ASF delivery	
	ASF Financial planning information return	

- 29. The Multiply programme operates across the financial year and the programme comes to an end on the 31 March 2025.
- 30. During the business cycle and where available, the Skills unit will notify providers of opportunities to bid for additional funding.

Table 2 – Monitoring information

Information	Monitoring discussion in respect of ASF
Individualised Learner Record (ILR) data returns	The timeliness and accuracy of ILR data related to London residents studying ASF.
	We send communication to providers in-year to ensure data errors are corrected before the R14 ILR Final data return. This return is a 'hard close', after which ILR data cannot be changed.
Funding claims	Performance against funding agreements for skills delivery. as shown in funding claim returns, and whether the total funding value should be adjusted to better reflect the level of performance.
Ofsted inspections	The outcome of any recent Ofsted inspection or monitoring visit and the quality improvement actions which the provider is implementing to secure better provision.
Delivery Plans	London priorities and the response to London priorities including the Local Skills Improvement Plan, annual strategic conversations and any related actions that are taken.
FE Commissioner assessments	The findings or report of any FE Commissioner investigation or diagnostic assessment, and any action plan developed by the provider in response to the assessment report.
Initiative and other skills funding	The progress with the delivery of any initiative or growth funding allocated in addition to the grant funding allocation and other funding streams such as Free Courses for Jobs or Multiply.
Financial health assessments	Provider managers will discuss the outcome of any review of the financial performance information where there are risks to the delivery of ASF and they have requested an improvement action plan from the provider.

Information	Monitoring discussion in respect of ASF
Audit and fraud investigations	The report of audit processes, where findings are qualified or require management action
	Upheld investigations related to college funding, governance, funding audits and/or significant fraud or fraudulent practice
Subcontracting plan	Progress with the delivery of the ASF subcontracting plan and any issues with performance.
Participant feedback and complaints	Information applicable to investigate a complaint raised by a learner.
London Learner Survey	Baseline survey completion rates and actions taken by the provider to increase completion rates among funded learners.
National Achievement Rates Tables (NARTS)	Achievement rates data on adult (19+) further education (FE) and skills in England, produced at provider level with summary statistics
Other	Any other information applicable to determine the level of risk associated with delivering the contract.

- 31. Provider managers will discuss performance at termly meetings and Table 2 lists different topics for discussion depending on circumstances.
- 32. The provider manager will lead on the interventions process and monitoring performance according to the monitoring information set out in table 2
- 33. Each provider is expected to have the following policies in place and publicly accessible to support programme delivery and safeguard provision for adult learners. Provider managers should confirm the availability of the following list of policy documents:
 - Equality & Diversity Policy
 - Sustainability Policy
 - Health and Safety policy

- Safeguarding Policy
- Data Protection Policy
- Learner Complaints and Whistleblowing Policy
- Internal Grievance and Disciplinary Policy
- Modern Slavery Policy
- Centre Approval Status
- Delivery Subcontracting Funding Retention and Charges Policy (where appropriate)

Matrix Standard

34. A revised matrix Standard was launched in May 2023. We expect providers who currently hold the matrix Standard to transition to the revised standard when their next three-year assessment take place, which should be before the end of 2026. Communicate the status of a matrix accreditation to your provider manager.

Subcontracting arrangements

- 35. Providers are responsible for all the actions of their delivery subcontractors connected to, or arising out of, the delivery of services that are subcontracted. Providers must manage and monitor all delivery subcontractors to ensure that high-quality delivery is taking place according to GLA ASF funding rules. The GLA reserves the right to take steps following and Ofsted inspection of subcontracted delivery or undeclared subcontracting as outlined in the funding agreement with the prime provider.
- 36. The funding agreement also holds that providers must put in place the necessary internal control framework such as an internal audit function and that due diligence checks are performed multiple times across the duration of the subcontract.

Intervention process

37. This section defines the three stages of support and intervention measures that are available to the GLA and how they are applied. With a summary of the activation points for each measure and the steps providers can take to exit each measure.

Active support

- 38. The GLA is committed to ensuring the further education sector is supported to achieve continuous improvement and improved outcomes for learners. Active support is available to all grant funded providers not in intervention and involves an informal, supportive conversation with the GLA. This approach mirrors and complements similar support offered by the FE Commissioner and DfE/ ESFA.
- 39. Provider managers will work with providers to make sure provision aligns with the mayor's priorities; responds to the needs of learners, learning provision is of high quality and the financial stability of providers is confirmed to safeguard continued provision for learners. Providers may enter active support when they satisfy the criteria for active support and intervention outlined in the appendix.
- 40. Where one or more conditions apply to provision funded by the Mayor of London, providers will submit an improvement action plan to the GLA for approval. The action plan must outline actions to remedy or mitigate further consequences of a trigger being breached. Each action must be:
 - Specific how the action will realise a clear improvement in the financial resilience or quality of provision
 - Measurable a value or indicator that will be realised as a result of the action
 - Attributable assign responsibility to a named officer or officers to complete the action
 - Realistic how the action will gain the desired improvement with the available resources and
 - Timebound achievable within a realistic timeframe
- 41. Where a provider is also subject to an intervention by the DfE/ ESFA through the national oversight arrangements the GLA will work with these organisations to ensure that any agreed actions to improve performance complement arrangements contained in the single improvement plan. Provider managers will continue to engage with their provider and support them in addressing any areas that raised financial and/or quality concerns.

42. The GLA reserves the right to discuss concerns regarding provider performance and/or financial stability with the DfE, ESFA and Ofsted, and in line with provider funding agreements and the memorandum of understanding. Where the DfE/ ESFA makes its own assessment on financial health that triggers an active support or intervention response the GLA will work with the provider and the DfE/ ESFA to ensure that any improvement actions relating to GLA funded provision deliver rapid improvement.

Escalation

43. Where a provider fails to agree an improvement action, does not implement the improvement plan, or fails to meet agreed milestones the GLA may, at its discretion, implement further intervention measures as detailed in provider funding agreements. Measures include, but are not limited to, reducing a funding allocation or suspending payments. This course of action will apply where a provider has activated an intervention measure.

Intervention measures to improve performance

- 44. Where intervention is necessary the GLA will work with providers to explore a range of actions to address performance concerns. Providers must complete a SMART improvement action plan to submit to their provider manger. The plan must include a range of activities to work through the concerns and secure rapid improvement or mitigate the risk of other consequences because of the intervention.
- 45. The GLA will assess the proposed action plan and seek additional actions to bring performance in line with expected levels, where applicable. In addition to the actions available in the active support mitigation process, the GLA may implement supplemental intervention measures, including:
 - Suspension of payments against grant value
 - A reduction in the grant value
 - Referral to partner agencies such as the DfE/ ESFA and FE Commissioner
- 46. The GLA may at its absolute discretion terminate the funding agreement where a provider is unable to address the area of concern in line with agreed actions.

Exiting active support

47. Providers will remain in intervention until all performance concerns have been worked through. When a provider exits intervention the GLA reserves the right to implement additional measures to the usual monitoring process so that the risk of future declines in performance is monitored and promptly mitigated. Provider managers will support providers in achieving continuous improvement and stability.

Interventions table

48. The table summarises the GLA ASF intervention process including the triggers or criteria for each stage of the process and the thresholds to exit intervention processes.

Structural changes – Independent Business Reviews (IBRs) and Structure and Prospect Appraisals (SPAs)

- 49. Where a provider is considering making structural changes as an institution or group they must inform their provider manager at the earliest opportunity. The provider manager, supported by colleagues with financial and legal expertise, must be invited to participate in any IBRs or SPAs, regardless of whether an IBR or SPA has been commissioned by the provider, the FE Commissioner or a third party, such as a creditor.
- 50. The GLA will not provide financial assistance for IBRs.
- 51. Providers should ensure that their provider manager is informed of the IBR and/ or SPA. The GLA may, at its discretion, implement further measures of intervention including, but not limited to, reducing the allocation value or suspending payments when a provider fails to notify the GLA where an IBR or SPA is initiated.

Insolvency and the Technical and Further Education Act 2017

- 52. The Technical and Further Education Act 2017 introduced the insolvency regime applicable to FE colleges, sixth form colleges, the Institutes for Adult Learning and specialist designated institutions. If a provider enters the FE insolvency regime, they must alert their provider manager and facilitate their participation in the process, including any IBR as set out above.
- 53. According to the memorandum of understanding, the GLA will alert partner agencies including the DfE and ESFA, in any cases where a provider manager believes that a provider is at risk of insolvency. This may be before formal notification of the insolvency regime from the provider, when their financial health measures indicate risk of insolvency.
- 54. Further information on the FE insolvency regime is available in the Technical and Further Education Act 2017 and the Dept for Education's College Oversight: Support and Intervention policy document.

Further queries

55. For further guidance on the policy please contact your provider manager or ASF@london.gov.uk

Appendix

Appendix 1 – Interventions and active support table

Intervention criteria/ trigger	Level of intervention	Additional actions available	Threshold for exiting intervention
Quality of provision			
A grading of insufficient progress awarded for overall effectiveness in an Ofsted monitoring report. Only colleges undertaking a merger are eligible for Ofsted monitoring visits under this policy. Two consecutive gradings of requires improvement awarded for overall effectiveness by Ofsted. Poor and/or a measurable decline in performance management data (as outlined in the "Quality Assurance and Raising Standards" section of the providers funding agreement). Escalation by the GLA Provider Manager due to local intelligence, such as	Active support	The GLA reserve the right to implement one or more of the following actions: Consultations with the Body's governors, principal, and, where required, local stakeholders and learners Require from the provider the Self-Assessment Reports, Single Improvement Plan (Quality Improvement Action Plans) and implementation updates Request additional data on a regular basis, such as ILR data returns, monthly management accounts and financial information, reports submitted to the provider's senior management team Impose additional performance monitoring points and	A grading of sufficient progress is awarded for overall effectiveness in the subsequent Ofsted monitoring report Ofsted reinspection has determined that the overall effectiveness of the provider is graded as good or above The provider's educational performance data evidence improvements, agreed in the provider's action plan Any actions required by the GLA have been addressed within specified timescales.

Intervention criteria/ trigger	Level of intervention	Additional actions available	Threshold for exiting intervention
Quality of provision			
complaints or poorquality data returns.		meetings with the GLA Provider Manager	
		 Request the provider's risk management plan 	
		 Request information on planned strategic developments, including but not limited to federation or merger arrangements 	
Poor and/or a measurable decline in performance management data (as outlined in the "Quality Assurance and Raising Standards" section of the providers funding agreement).			The provider's educational performance data evidence the improvements agreed within the provider's action plan
An Ofsted inspection determining that the overall effectiveness of a provider is inadequate.			Ofsted reinspection has determined that the overall effectiveness of the provider is graded as good or above
FE Commissioner diagnostic assessment determines that a provider requires urgent escalation to formal intervention.			The FE Commissioner is satisfied that the provision is of good quality; and/or

Intervention criteria/ trigger	Level of intervention	Additional actions available	Threshold for exiting intervention
Quality of provision			
A decline in the provider's educational performance data or low achievement rates			The provider's educational performance data evidence the improvements agreed within the provider's action plan Any other requirements being satisfactorily addressed

Interventions criteria/ trigger	Level of intervention	Actions available	Threshold to exit intervention
Financial health and st	ability		
GLA or ESFA Financial Health assessment determines that the provider's financial health 'Requires Improvement', or risks declining to 'Requires Improvement' or 'Inadequate' in future and/or the provider's financial information shows that the provider may not be able to continue to operate in the future.	Active support	The GLA reserve the right to implement one or more of the following actions: Consultations with the Body's governors, principal, and, where required, local stakeholders and learners Require information which demonstrates how the provider is planning to tackle financial health decline. This may include undertaking a cost scrutiny exercise to identify how to reduce costs and/or bring them within sector standards	The GLA or ESFA Financial Health Assessment indicates that the provider's financial health is rated as 'Good' or above Any actions required by the GLA have been addressed within specified timescales
The GLA or ESFA Financial health assessment is 'Inadequate'. The provider is considering structural change, including via an Independent Business Review (IBR), or Structure and Prospects Appraisal (SPA). If a provider enters the FE insolvency regime, as defined by	Intervention	and/or an assessment of the impact of any funding claw back or reduction on planned income Request the provider's risk plan Request information on planned strategic developments, including but not limited to federation or merger arrangements	The GLA or ESFA Financial Health Assessment indicates that the provider's financial health is rated as 'Good' or above The FE Commissioner is satisfied that the provider has adequate financial stability; and/or The provider is no longer at risk of

Interventions criteria/ trigger	Level of intervention	Actions available	Threshold to exit intervention
Financial health and st	ability		
the Technical and Further Education Act 2017 ¹ .		Reports from provider's internal auditors on the management of the provider, including financial compliance and health	insolvency, as confirmed by the appointed education administrator Address any other requirements satisfactorily
Interventions criteria/ trigger	Level of intervention	Actions available	Threshold to exit intervention
Audit assurance fraud	and investigatio	ns	
The GLA or the Mayor's Office of Policing and Crime (MOPAC), acting on behalf of the GLA, determine there is enough information to investigate an allegation of fraud or financial irregularity, including: •A funded provider has claimed funding from the GLA through deception; •A funded provider	Active support (whilst investigation is ongoing)	The ESFA and other funding agencies will be informed of allegations that affect their funding streams. The GLA reserve the right to implement one or more of the following actions: • Consultations with the Body's governors, principal, and, where required, local stakeholders and learners	Satisfactory resolution to financial irregularity or fraud investigation
has broken the funding rules;		 Additional meetings with the GLA Provider 	

¹ Technical and Further Education Act 2017 (TEFA 2017) available at http://www.legislation.gov.uk/ukpga/2017/19/contents

Interventions criteria/ trigger	Level of intervention	Actions available	Threshold to exit intervention	
Audit assurance fraud and investigations				
•A funded provider has not delivered education/ training funded by GLA; •Corruption (the offering, promising, giving, requesting, receiving, or agreeing to accept an inducement or reward, which may influence a person to act against the interests of the GLA) and bribery – for example, in relation to sub-contracting. This section of the table also relates to subcontractors to GLA grant agreements or contracts		 Manager and MOPAC Auditor A review and/or retention of learner files Contact with learners and/or subcontractors to verify information contained in learner files Reports from provider's internal auditors on the management of the provider, including financial compliance and health 		
A qualified opinion resulting from a funding audit; A fraud or financial irregularity investigation produces evidence to support suspicion or allegations; and/or A provider fails to provide audit and			A satisfactory follow-up audit following receipt of a qualified opinion MOPAC Recommendations are implemented satisfactorily and any clawback decisions are complied with	

Interventions criteria/ trigger	Level of intervention	Actions available	Threshold to exit intervention	
Audit assurance fraud and investigations				
assurance documents required by the GLA (to be set out in an audit code of practice)			The provider complies with the GLA's audit and assurance requirements. Any other requirements addressed satisfactorily	
Other				
Failure to comply with active support measures. Serious breach of the GLA grant agreement.	Intervention		GLA requirements being satisfactorily addressed	

Other formats and languages

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