



**MORLEY COLLEGE**

**Double Funding Policy**

**POLICY OWNER: Head of Management Information Services**

**APPROVAL: Policy Committee**

**LAST APPROVAL: 1<sup>st</sup> February 2018**

**NEXT REVIEW: 1<sup>st</sup> February 2022**

## Equality Analysis Screening

Equality analysis is a way of considering the effects on different groups protected from discrimination by the equality act. Consider if there are any risks within this policy that will adversely affect a particular group or a variety of groups. Are there any changes that need to be made to the policy its self or additional actions that need to be made to mitigate the risks? The protected characteristics are:

- Race
- Gender
- Disability
- Age
- Sexual Orientation
- Gender reassignment
- Religion and Belief
- Maternity and Pregnancy
- Marriage and Civil Partnership

**Has this Policy been identified as requiring an Equality Analysis Screening [Y/N]?**

Y

Risks identified: No risks identified

Evidence used (data, consultation): Policy committee consultation

Does this policy need a further action before it can be approved? No  
(changes made to policy or further equality analysis needed)

## **1. Introduction and Purpose:**

Morley College London's courses are funded in part by the government, through the Education and Skills Funding Agency (ESFA) or the Office for Students (OfS). It is a fundamental principle underpinning the rules for public expenditure that no costs for the same activity can be funded twice through the use of public funds. This policy states Morley College's strategic position and approach to ensure double funding does not occur and hence it meets the conditions of its funding grant.

## **2. Policy Statement:**

- 2.1. The College will ensure systems and processes are in place to mitigate against the risk of funding inadvertently being claimed for the same activity from more than one source of funding, or of the same activity being claimed for from the same source more than once.
- 2.2. Where double funding is identified, this will be rectified and notified to the relevant funding organisation.

## **3. Statutory requirements:**

3.1. The Funding allocation by the ESFA is made subject to the conditions set out in the Conditions of Funding (Grant) Agreement.

3.2. This includes the clauses;

*11.1.3 where the Body or any of its sub-contractors has access to other funding streams, the Body or any of its sub-contractors will be required to demonstrate through accounting, management information systems and any other relevant evidence (at the sole discretion of the ESFA or any other body undertaking the audit or monitoring), to the ESFA and anybody acting on their behalf that no double funding has occurred in respect of the Provision delivered under the Agreement; and*

*11.1.4 where the ESFA identifies double funding in respect of the Provision, or any part thereof, the Body will be liable to repay to the ESFA any sums paid, or part thereof, by the ESFA in respect of the Provision for which the Body has received funding from another source and the ESFA reserves the right to deduct such sums from any monies owed to the Body under the Agreement or any subsequent agreement;*

#### **4. Policy Objectives:**

4.1. The policy outlines the College's approach to use of public funds to support the cost of delivering courses and support for students.

4.2. Double funding could occur in a range of scenarios, not limited to the following examples;

- More than one funding stream available for the same activity.
- Funding available to multiple providers for the same activity or duplicate activity.
- Funding available for activity previously funded at the provider or elsewhere.
- Funding available to reimburse the provider for remitted fees, when fee income has been received.

#### **5. Scope of the Policy:**

5.1. The policy applies to all of the College's activity which is funded or part-funded by Public funds.

5.2. Any staff involved in the development, planning, management, delivery or statutory returns of this activity are bound by this policy.

#### **6. Procedure:**

6.1. During the curriculum planning process, planned income from courses will be analysed by MIS to define the applicable public funding stream.

6.2. During the enrolment of learners on to a course, Student Services and Curriculum staff will make proportionate checks on a student's prior learning and where applicable, current learning at other providers.

6.3. During the enrolment of learners on to a course, Student Services and Curriculum staff will ensure students are enrolled with the correct fee band and fee reason so students are correctly identified as fully funded or co-funded.

6.4. Before returning activity data to the funding bodies via the Individualised Learner Record (ILR), MIS will utilise the Learner Records Service (LRS) to further check on student prior attainment and current learning activity at other providers.

6.5. Before returning activity data to the funding bodies via the ILR, MIS will regularly review Provider Data Self-Assessment Toolkit (PDSAT) reports (reports B-50 and B-60) to identify whether there appear to be duplicate or overlapping learning aims for individual learners in the ILR.

6.6. Where courses are sub-contracted to another provider, the College will ensure through contractual terms that the College's right to reclaim funding for learners that are subsequently found to be funded elsewhere is protected.

6.7. Where the College has been sub-contracted to deliver courses for another provider, MIS will ensure this activity is recorded in the College's ILR as non-funded.

## **7. Communication and training:**

7.1. This policy will be available to all staff to view on the College Intranet site.

7.2. Staff should contact a member of the MIS department if they require further advice on this policy.

## **8. Monitoring:**

8.1. This policy will be reviewed on a regular basis by the College's Policy Committee.

8.2. Consultation on it will be undertaken with any appropriate committees, to ensure the effectiveness of this policy.

## **9. Related References, Policies, Procedures, Forms and Appendices:**

9.1. This policy is related to the College's Fees and Refunds Policy, specifically Appendix A – funding and fee remission eligibility.  
(<https://emma.morleycollege.ac.uk/Policies%20and%20Procedures/Fees%20and%20Refunds%20Policy%20July%202017.pdf>)

9.2. This policy is related to the College's Financial Regulations.  
(<https://emma.morleycollege.ac.uk/Policies%20and%20Procedures/Morley%20College%20Financial%20Regulations%20March%202017.pdf>)