Subcontracting and Partnership

Policy 2026-27

Deputy Principal and Chief Executive

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1. Rationale for Subcontracting and Partnerships

1.1. The College enters into subcontracting and partnership arrangements for the following reasons:

- To meet the skills and training needs of Wolverhampton and its region by providing training and education which complements the College's offer
- To support the College in meeting the needs of priority sectors, where specialist provision is required

1.2. Our purpose for commissioning subcontracting and partnership arrangements is to deliver the following outcomes for learners:

- To enhance the opportunities available to learners through local and accessible provision
- To fill gaps in niche or expert provision, or provide better access to training facilities which exceed facilities available through the College
- To support better geographical access for learners who have preferences for delivery sites that are more easily accessible to them
- To offer an entry point for disadvantaged groups and other learners who are constrained by work commitments or their socio-economic backgrounds

1.3. The College will not subcontract apprenticeship provision to partners who are also the sole employing organisation for the apprentices concerned unless the College also delivers a substantial element of the overall programme. This may include the College delivering functional skills qualifications and developing knowledge, skills, behaviours and also providing work-based assessment and review services.

2. Subcontracting and Partnership Agreements

2.1. Subcontracting and Partnership Agreements shall comply with current Department of Education (DfE) and West Midlands Combined Authority (WMCA) Funding Rules (as applicable).

2.2. All apprenticeship subcontractors must comply with DfE requirements. Under the Funding Rules, any partner must be:

- approved as a 'Supporting Provider' or a 'Main Provider' on the Apprenticeship Provider and Assessment Register (APAR),
- the apprentice's employer, or a connected company or charity as defined by HMRC, and are on the published APAR, having applied through the employer-provider application route; or
- will deliver less than £100,000 of apprenticeship training under contract cross all main providers and employer-providers between 1 August and 31 July each year.

2.3. All subcontractors must be listed on the UKRLP site (UK Register of Learning Providers), have a valid UKPRN and a valid entry on Companies House for accounting purposes. Subcontractors must not have engaged the DfE's 'Funding higher risk organisations and subcontractors' policy and cannot deliver full apprenticeship standards.

2.4. In accordance with DfE and WMCA Funding Rules, second-level subcontracting is not permitted under any circumstance.

3. Authorisation of Subcontracting Agreements

3.1. Subcontracting agreements and any subsequent variations are subject to formal approval from the Board of Governors for delegated authority for the Principal to enter into formal contracts.

4. Subcontracting Management Fees

4.1. The range of fees for managing subcontracted and partnership delivery is ordinarily between 15% and 20%.

4.2. A full annual risk-assessment is undertaken for each subcontracted partner which will also be used to determine the appropriate management fee, which includes:

- Previous track record of delivering Government funded programmes
- Financial stability including review of company reports and director evaluation (including reference to DfE guidance on High Risk subcontracted provision)
- Overall and timely success rates (where applicable)
- Outcomes of compliance monitoring audits and visits (where applicable)
- Outcomes of Learner and Employer surveys and monitoring (where applicable)
- CVs for delivery staff
- Quality assurance arrangements, including teaching, learning and assessment
- Qualification Assessment Centre Status
- Timely submission of records (where applicable)
- Insurance cover and all required legal kite marks
- DBS and safeguarding monitoring
- Prevent Duty

4.3. In the case of specific compliance concerns arising which necessitate external audit activity, these costs are chargeable as an additional cost to the subcontractor or partner.

4.4. In the event of a partner delivering from college sites, fees may rise up to 50%, where a partner benefits from associated additional services which may include some or all of the following:

- Premises hire
- Security
- Cleaning
- Reception
- Rates and utilities
- Use of College estate for teaching and training purposes
- Exam registration costs borne by the College
- Initial Advice and Guidance (IAG)
- Student support services (e.g. counselling and Safeguarding)
- Fees advice

- Enrolment services
- Marketing and promotional events
- Joint EQA activity
- Open days/evenings
- College enrichment activities

4.5. Subcontractor fees shall in all circumstance be set with due regard to assuring that provision is high-quality, sustainable and meets the needs of learners.

5. Subcontractor and Partner Management Activities

5.1. The Funding and Compliance Team, with support from the Quality team, are responsible for the day-to-day management of all subcontracted provision.

5.2. These College controls may be enhanced by utilising the services of external educational services consultancy support to provide recommendations and review of the College's controls and their effectiveness in compliance to the Subcontracting Standard.

5.3. The Teams provide the following services:

- Due diligence and risk assessment for existing and potential subcontractors
- Monitoring of quality and compliance, including planned audits together with unannounced visits throughout the year
- Access to a named monitoring officer for all data and ILR processing/queries
- Policy, funding, quality and compliance advice including new funding initiatives (DfE Bootcamps for example)
- Support for the development of teaching, learning and assessment through quality assurance activities such as learning walks etc.
- Opportunities to bid for joint projects where these meet College priorities
- Assistance with advertising, shortlisting and recruiting apprentices including guidance on using the Digital Apprenticeship Service (DAS)
- Administration of internal and external learner and employer surveys
- Awarding body registration
- Support for IQA and EQA activities where applicable
- Processing of apprenticeship employer incentive payments
- MIS data entry and enrolment procedures
- Learner eligibility checks in line with funding rules guidance
- Employer registration identification numbers
- Access to ALS specialists
- Access to support for improvements to teaching, learning and assessment such as CPD
- Access to Marketing and Employer Engagement specialists
- Inclusion in the annual quality cycle, including self-assessment reviews and quality improvement plans
- Learner identification badges to enable access to College facilities including virtual learning platforms

5.4. Formal monthly Performance Operational Meetings will be held to review the progress of quality, funding and compliance in relation contracts throughout the academic year.

5.5. The purpose of the meetings is to have an operational review mid-way through an ILR return to deliver the agreed profile of learner starts and wider data requirements by the next ILR Return. This meeting will also review teaching, learning and assessments and feedback. Lack of progress on actions from either the College or the subcontractor can be escalated to the Quality of Education and Funding Board meeting. The agenda for each meeting includes:

- Learner starts
- Evidence pack compliance
- Job Outcomes & Destinations
- Teaching and Learning Assessments
- Progress Reviews
- Learner voice and learner work and assessment

5.6. The Performance Operational Meetings will be chaired by the College's Assistant Manager - Partnership Quality Performance and HE Data and Quality. Subcontractors shall be invited to table agenda items as needed. Formal minutes and actions shall be noted and followed up accordingly.

6. Quality of Education and Funding Board meetings

6.1. All partners are required to attend monthly Quality of Education and Funding Board meetings. A new layer of Performance Operational Meetings (as described above) will escalate to the Quality of Education and Funding Board meetings where insufficient progress, disagreement or high-level risks are identified.

6.2. The purpose of the meetings is to review progress against agreed contracts and to strategically improve the quality of the provision and to ensure compliance measures are in place. The agenda for each meeting includes:

- Data reconciliation, funding and payments
- Learner achievement, progressions and destinations
- Compliance
- Quality assurance
- Quality improvement (including Self-Assessment Reports and Quality Improvement Plans)
- Curriculum development
- Staffing updates (including DBS compliance)
- Safeguarding
- Marketing
- Facilities
- Health and Safety

6.3. Quality of Education and Funding Board meetings shall be Chaired by a member of the College's Executive Management Team and subcontractors shall be invited to table agenda items as needed. Formal minutes and actions shall be noted and followed up accordingly.

7. Timescales for Payment of Invoices

7.1. All subcontractor and partner arrangements will be paid based on an agreed proportion of funding, relating to valid funding claims, within 30 days of the invoices being authorised by the College.

8. Publishing of Data

8.1. An annual statement of key data will be published. This data will include for each subcontractor:

- The name of the subcontractor
- The UKPRN number
- Their Agreement start and end date
- The type of provision: programme; age range
- The amount of funding received from the DfE and/or WMCA
- The amount of funding paid to the subcontractor during the academic year
- The amount of funding retained by the College

9. Contribution to improving Subcontractors' and Partners' quality of teaching, learning and assessment

9.1. The College offers teaching, learning and assessment delivery qualifications, which are accessible for partner providers. The College's teaching, learning and assessment standards are shared with partners to be used as a minimum standard.

9.2. Subcontractors shall produce an annual Self-Assessment Report that contributes to the College's overall report and an agreed Quality Improvement Plan shall be developed and implemented.

10. Communication of the Subcontractor and Partnership Policy

10.1. The Subcontractor and Partnership Policy is reviewed on an annual basis and amended to reflect changes to funding guidance and College policy for the next contract year.

10.2. The Policy is reported to the Board for approval, discussed with partners during review meetings and is published on the College's website.

11. Contingency Planning

11.1. In compliance with DfE and WMCA Skills funding rules that apply, if a subcontractor or partner withdraws from the arrangement, or if a subcontractor or partner goes into liquidation or administration, the College undertakes to directly manage and deliver the remainder of the agreed provision already being delivered. This delivery will be either through its existing structure or by retaining tutor expertise and/or specialist equipment, whichever is more cost-effective. Any provision planned not yet started will be cancelled and the project closed unless the College has the means to continue provision either directly or through an alternative partner to an appropriate quality standard.

11.2. For apprenticeship delivery, failure by a subcontractor to successfully join the Apprenticeship Provider and Assessment Register will automatically result in termination of contracts with the College.

11.3. If the College needs to withdraw from a subcontracting or partner arrangement, sufficient notice will be provided to allow subcontractors to complete delivery of immediate provision, in line with formal contracts. The College will provide support to enable subcontractors or partner to identify other sources of funding, if possible, take appropriate action to complete the project; or close the project at the earliest opportunity, without prejudice to currently enrolled learners or staff. Contracts will clearly state conditions for termination and recovery of DfE and/or WMCA funding grants in case of non-delivery.

11.4. Where material levels of partnership activity are planned, the College will seek to minimise risks through:

- Regular dialogue with partners, both formally through Quality of Education and Funding Boards and Performance Operational Meetings, and informally as appropriate
- Embedding partners in and alongside the College's direct activities, including through partner occupation of College premises
- Agreeing long term partnership agreements alongside annual funding contracts
- Routine and ongoing due diligence including, but not limited to, review of financial records evidencing ongoing solvency
- Maintaining records of structure charts for both partners and internal College teams which includes named delegates.

12. Commitment to Government Policy

12.1. The College fully recognises and responds to the DfE and WMCA policy direction to significantly reduce the volume of subcontracted provision, particularly delivery that is geographically distant from the College's core operating base.

12.2. In line with DfE/WMCA funding rules and accountability requirements, the College publishes a clear rationale and strategic approach to subcontracting. This document forms part of that transparency and demonstrates compliance with national and devolved policy expectations.

12.3. The College is committed to a planned reduction in subcontracted delivery of generic provision, subcontracting will only be used where it is demonstrably in the best interests of learners, supports employer need, or provides access to specialist provision that cannot be delivered directly.

12.4. Future subcontracting arrangements will prioritise high-quality, locally aligned partnerships characterised by shared delivery, co-investment in facilities, and access to specialist, industry-standard equipment and expertise that would not be viable for the College to sustain independently.