

Subcontracting Policy

Purpose

This policy outlines how the ITP ensures compliance with Department for Education (DfE) Funding Regulations regarding subcontracted provision. We are committed to expanding our services to meet market demand and improve the learning experiences of our learners. To achieve this, we may subcontract certain aspects of delivery to ensure high standards are maintained. The ITP remains fully accountable for the delivery of all contracts involving subcontracted services, and all potential subcontractors must undergo a comprehensive due diligence process before any delivery begins.

In line with DfE funding rules, The ITP publishes annually on its website its rationale for subcontracting, the services delivered by The ITP and by subcontractors, and the typical proportion of funding paid to subcontractors and retained by The ITP.

This policy is reviewed prior to each funding year, signed off by the person with overall responsibility for governance, and published by 31 October each year.

Subcontractor Rationale

At The ITP, we are dedicated to building a workforce that reflects the diverse and dynamic world we serve. Through continuous professional development, high-quality learning experiences, and a strong support network, we aim to cultivate a sustainable, inclusive workforce equipped to meet the challenges of tomorrow. Our approach to subcontracting is rooted in this mission, ensuring diverse, innovative, and impactful training solutions that empower individuals and organisations to thrive in a global, ever-changing landscape.

When subcontracting, the ITP will adhere to DfE guidelines, by not intending to outsource large volumes of provision or subcontract to meet short term funding objectives.

Subcontractors may be engaged to:

- Improve the quality or scope of the services we offer.
- Fill gaps in niche or expert provision or provide better access to facilities.
- Deliver specialised training.
- Support better geographical access for learners.
- Support an entry point for disadvantaged groups.
- Improve cost effectiveness of provision.
- Support individuals who share protected characteristics, where there might otherwise be gaps.

We are committed to adhering to best practice within the education and skills sector by complying with Department for Education (DfE) funding rules, subcontracting requirements, and associated statutory guidance, as updated from time to time.

Services Delivered and Associated Costs

Services delivered by The ITP

The ITP retains overall accountability for learner recruitment, contractual compliance, quality assurance, safeguarding, data returns, financial management, and oversight of all subcontracted provision.

Services delivered by subcontractors

Approved subcontractors may be engaged to deliver defined elements of training, teaching, learning, and assessment, including specialist or niche provision, enhanced geographical access, or targeted support for specific learner groups, as set out in individual subcontracting agreements.

Associated costs and management fees

The ITP uses subcontracting primarily to secure specialist external training elements within programmes. In these cases, a defined proportion of the funding is paid to the subcontractor to deliver the agreed training component.

Typically, subcontracted delivery represents a minority proportion of the total funding band for a programme, with the majority of funding retained by The ITP to deliver core training, learner support, quality assurance, compliance and programme management.

The proportion paid to subcontractors will vary depending on the standard and the volume of training delivered but is generally in the region of up to approximately 15–20% of the total funding band where subcontractors deliver a discrete element of training.

In exceptional cases, where a subcontractor delivers a very limited or highly specific element of training, the proportion paid may fall outside this range. Any such arrangements are documented and justified within individual contracts.

The exact funding value and payment profile are agreed within individual subcontracting contracts and reflect the level of delivery and support required.

Funding retained by The ITP contributes to programme delivery, learner support, safeguarding oversight, quality assurance, data management, compliance monitoring and overall contract management in line with DfE funding rules.

Subcontractor Due Diligence and Compliance

The ITP conducts comprehensive due diligence to ensure that any subcontractor we engage with operates ethically, is financially stable, and adheres to trusted business practices and codes of conduct. This process mitigates risk, confirms the legitimacy of subcontractors, and ensures compliance with Department for Education (DfE) funding rules and subcontracting requirements, including guidance relating to higher-risk organisations, as updated from time to time.

All due diligence checks will be documented and made available for inspection as required. Prior to signing any subcontracting agreement, the subcontractor must provide relevant information, including:

- Companies House information including Company and Company Director(s).
- Details of other subcontracting agreements or contracts that fall under the provision of funded / regulated provision.
- Financial credit report assessment including latest audited accounts for a financial viability health check.
- Insurance Coverage (Employer, Public and Product Liability).
- All relevant policies including Safeguarding and Prevent, Health and Safety, Equality and Diversity etc.
- Delivery provision, capacity and capability
- Details of approved centres for training and examinations
- Previous three years performance data including success rates
- CV's including professional qualifications and DBS checks on relevant staff.
- Declaration from directors to confirm no criminal convictions in accordance with Department for Education (DfE) funding rules.

- Latest OFSTED report, if applicable.
- Any other relevant and required information.

Decisions are made based on an in-depth assessment of the financial stability, compliance standards, and quality of teaching, learning, and assessment offered by potential partners. Key considerations will include:

- Alignment with The ITP's mission, objectives, and values.
- The ITP's ability to effectively oversee and quality assure the provision.
- Sufficient resources for administrative and operational support.
- Contingency plans to ensure the continuation of provision in the event of subcontractor failure.
- Approval by ITP Senior Leadership after thorough risk and compliance assessments.
- There is appropriate funding within our contractual limits to support the subcontractor's planned delivery.

Once due diligence is completed, The ITP will review the evidence and make an informed decision about the subcontracting arrangement. If successful, a contract will be issued, outlining clear expectations for performance, compliance, and strategic alignment. All agreements will include a breakdown of fees, support services, and measurable performance indicators.

Risk Management, Fees and Charges

The ITP will not appoint any delivery subcontractor with a contract value of £100,000 or greater for each funding year unless the subcontractor is first listed on the relevant Department for Education register, where required.

Fees will be agreed based on the amount of training or number of sessions delivered to learners, any consumables and administrative costs, required management and review meetings and the level of support needed from the ITP.

Subcontractors will be paid under the following terms:

- Attendance reports confirming sessions have been completed against the agreed plan.
- In-learning evidence for apprentices under subcontracted delivery.
- Invoices submitted at the end of each month with payment terms of 30 days.

The ITP retains a proportion of subcontracting funds to cover services such as quality assurance, performance monitoring, and compliance checks. Retained fees are calculated based on risk assessments and the support provided.

Subcontractors are classified into risk tiers:

- **Low Risk:** Strong track record, minimal compliance issues, and financial stability.
- **Medium Risk:** Moderate compliance or performance concerns requiring additional oversight.
- **High Risk:** Significant compliance risks, poor performance history, or financial instability.

Management fees will reflect these risk levels, with higher-risk subcontractors receiving more resources for monitoring and support.

Subcontractors are not permitted to subcontract further. This ensures accountability and direct quality management of all learning provision.

Financial Health Assessment

To mitigate financial risk, The ITP will conduct annual financial health assessments of all subcontractors. If any changes occur in the subcontractor's financial status, such as a downturn or a negative audit report, The ITP must be notified immediately to reassess the risk and compliance. We also ensure that the total value of subcontracted provision does not exceed 25% of the total funding from any single subcontracting partner, in accordance with Department for Education (DfE) funding rules.

Quality Assurance, Monitoring and Reporting

The ITP conducts rigorous quality assurance activities to ensure that subcontracted provision meets our high standards and the expectations of funding and awarding bodies. These activities include:

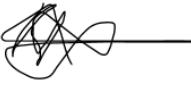
- ▶ Scheduled and unannounced monitoring and review visits.
- ▶ Observations of teaching, learning, and assessment practices.
- ▶ Learner feedback surveys to assess the quality of the learning experience.
- ▶ Data reviews on learner progress, completion rates, and progression.

We will periodically review the subcontractor's use of funding and may adjust contracts based on performance, capacity, and demand.

Subcontractors Responsibilities

Subcontractors engaged by the ITP must:

- ▶ Provide timely and accurate data reports in accordance with DfE requirements.
- ▶ Deliver training to the highest standards, in line with The ITP's policies and quality expectations.
- ▶ Comply with all safeguarding, equality, and health and safety policies to protect learners.
- ▶ Meet the expectations outlined in the subcontracting agreement and work collaboratively with The ITP to address any issues or improvements.
- ▶ Notify The ITP of any changes to their operational status, financial standing, or compliance position.

Signed By	Charlotte Goodwill
Job Title	Chief Executive Officer
Signature	
Date Signed	22/01/2026

Document Management

Owners: Charlotte Goodwill and Hanna Bland

Last Review Date: 22/01/2026

Next Review Date: 22/01/2027

Version Control

Version	Date	Change
Version 01	10/12/2024	New document
Version 02	22/01/2026	Annual review and alignment with DfE subcontracting funding rules. Removal of all ESFA relations.