Subcontracting Policy

1. Purpose

This policy outlines the arrangements for the management, oversight and quality assurance of any subcontracted training and assessment delivered on behalf of **Straight A Training Limited**.

The purpose of subcontracting is to:

- Enhance the quality and range of training provision.
- Meet specific employer and learner needs.
- Access specialist expertise not available within the organisation.
- Support delivery in geographical areas where direct provision is not practical.

Subcontracting will not be used to avoid accountability for the quality of training delivery.

2. Scope

This policy applies to all subcontracted delivery funded through:

- Apprenticeship programmes
- Commercial training contracts
- Any other government-funded training provision

3. Principles

Straight A Training will:

- Retain overall responsibility for all funded provision.
- Ensure subcontracting arrangements comply with Department for Education (DfE) funding rules and contractual requirements.
- Deliver a meaningful proportion of all programmes directly where required.
- Conduct due diligence before entering into subcontracting arrangements.
- Monitor subcontractor performance on an ongoing basis.
- Ensure value for money and high-quality learner outcomes.

4. Selection of Subcontractors

Prior to appointing a subcontractor, Straight A Training will undertake:

Due Diligence Checks

- Financial health review.
- Review of Ofsted grades and inspection findings.
- Quality assurance arrangements.

- Policies relating to safeguarding, Prevent, equality and diversity, data protection and health and safety.
- Staff qualifications and occupational competence.
- Insurance and legal compliance checks.

The results of the due diligence process will be formally documented.

5. Contractual Arrangements

A written subcontracting agreement will be in place before delivery commences. The

agreement will specify:

- Roles and responsibilities.
- Funding arrangements.
- Quality expectations.
- Data-sharing requirements.
- Reporting arrangements.
- Compliance obligations.
- Termination clauses.
- Learner protection measures.

6. Quality Assurance and Monitoring

Straight A Training will monitor subcontractors through:

- Scheduled review meetings.
- Performance dashboards.
- Learner progress reviews.
- Lesson observations and learning walks.
- Internal audits.
- Sampling of learner files.
- Employer feedback.
- Learner satisfaction surveys.

Where concerns are identified, an improvement action plan will be implemented.

7. Safeguarding and Prevent

All subcontractors must:

- Comply with safeguarding legislation.
- Implement Prevent Duty requirements.
- Ensure all relevant staff receive appropriate training.
- Report safeguarding concerns immediately to the Training Provider.

8. Data Protection

Subcontractors must:

- Comply with UK GDPR and Data Protection legislation.
- Maintain secure learner records.
- Share information only where authorised and necessary.
- Report data breaches immediately.

9. Funding and Payment

Straight A Training will:

- Maintain transparent payment arrangements.
- Retain management fees only where these reflect genuine costs incurred.
- Ensure funding is used solely for eligible training delivery.

Payments will be linked to agreed delivery and compliance requirements.

10. Risk Management

Potential risks include:

- Poor learner outcomes.
- Funding non-compliance.
- Safeguarding failures.
- Financial instability.
- Reputational damage.

Risks will be reviewed regularly and recorded within the organisation's risk register.

11. Learner Protection

Where subcontracted delivery ceases unexpectedly, Straight A Training will:

- Ensure continuity of learning wherever possible.
- Communicate promptly with employers and learners.
- Arrange alternative delivery arrangements where required.

12. Review of Policy

This policy will be reviewed annually or sooner where changes to DfE/ESFA funding rules, legislation or organisational requirements occur.

Approval

Organisation: Straight A Training
Policy Owner: Jayne Raftery
Approved By: Senior Leadership Team
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