

Subcontracting Policy – 2025/26

Apprenticeships and Adult Skills Funding

Policy Details			
Policy Owner	Director of Apprenticeships and Business Solutions		
CE Sponsor	Deputy Principal		
Date reviewed this year	7 July 2025		
Version:	Approved by:	Date approved:	To be reviewed:
2	College Executive	September 2025	July 2026

Version Control	
Version Number	Changes from previous 12 months policy
2	Changes made in line with updated funding rules (July 2025). In the main this includes the new £100,000 threshold that enables us to subcontract to providers that are not on the Apprenticeship Provider Assessment Register.
2	Updated the list of subcontractors.
2	Included links to the relevant funding rules and updated LSIP link.
Changes to policy in year	
2	Following the closure of the ESFA on 31 March 2025, all subcontracting references now refer to the Department for Education (DfE).
2	Only providers on the Apprenticeship Provider and Assessment Register (APAR) can subcontract if their delivery exceeds £100,000 annually.
2	Reflects the current academic year and latest guidance.

**Equality Impact Assessment Tool Name
of Policy: Subcontracting Policy**

		Yes/No	Comments
1	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race or ethnicity	No	
	Disability	No	
	Gender	No	
	Religion or belief	No	
	Sexual orientation	No	
	Age	No	
	Marriage and Civil Partnership	No	
	Maternity and Pregnancy	No	
	Gender Reassignment	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4	Is the impact of the policy/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	

1. Overview of Policy

This policy, which is renewed annually, details Colchester Institute's Subcontractor strategy and management.

2. Subcontracting Strategy

The College Strategic Plan 2024-2028 details **five key strategic priorities**:

Priority 1: An Outstanding Learner Experience

Colchester Institute is committed to delivering high-quality teaching and learning, personalised support, and exceptional progression outcomes. The goal is to ensure learners are equipped with the skills, knowledge and behaviours to succeed in work and life.

How subcontracting supports this:

Subcontractors enable the College to offer specialist provision and flexible delivery models that enhance learner access, experience, and achievement, particularly in niche or employer-specific areas.

Priority 2: A Fantastic Workplace

This priority focuses on creating an inclusive, empowered, and collaborative culture where staff are supported, trusted, and developed, making Colchester Institute a great place to work.

How subcontracting supports this:

Strategic partnerships reduce the pressure on direct delivery teams in high-demand sectors and allow internal staff to focus on continuous improvement and innovation, rather than covering broad programme scopes alone.

Priority 3: Financial Strength and Physical Resources

The College aims to ensure long-term financial sustainability, invest in modern facilities, and maximise the use of its estate and digital resources.

How subcontracting supports this:

Subcontracting allows the College to expand provision without incurring the upfront costs of specialist infrastructure or full-time staffing in low-volume or geographically dispersed areas.

Priority 4: A Responsive Curriculum

Colchester Institute's curriculum is shaped by employer need, labour market intelligence, and strategic priorities such as green skills, digital skills and health and care. It is regularly reviewed to remain relevant and future-facing.

How subcontracting supports this:

Subcontracting enables rapid responsiveness to emerging skills gaps, allowing the College to partner with providers who can deliver bespoke or innovative training at pace in line with the Local Skills Improvement Plan (LSIP).

Priority 5: Productive Partnerships

The College is committed to strong collaborations with employers, local authorities, training providers, and civic organisations to maximise community and economic impact.

How subcontracting supports this:

Engaging with subcontractors helps the College extend its reach, strengthen employer-facing solutions, and co-deliver training through trusted partnerships that reflect local and national skills strategies.

Overall Rationale for Subcontracting

Colchester Institute subcontracts to extend its capacity, meet employer demand, offer specialist or geographically targeted provision, and respond flexibly to the priorities of government, local skills plans, and learners. Subcontracting is not used to outsource core delivery but to add value, reach new learners, and meet unmet demand in ways that are high-quality, cost-effective, and aligned with the College's strategic plan.

In line with the College's Strategic goals, the College will consider a subcontractor arrangement where another organisation can provide:

- Training linked to specific employer demand – primarily throughout the Essex, Suffolk and Norfolk regions.
- A niche service, emerging market or expertise working with a specific learner group.
- The ability to support larger volumes of learners than the College can reach in skills shortage areas, such as Health and Care to meet increased demand.
- Specialist resources or expertise, not available at the college
- Opportunities to expand the College's offer into new markets.
- A flexible learning model for those who are unable or unwilling to attend College campuses.

In order to determine suitability for a subcontractor arrangement, due diligence processes will be carried out by the College. Colchester Institute will only subcontract up to £100,000 worth of funding if the training provider is not approved on the Apprenticeship Provider Assessment Register (APAR). These processes include a pre-contract questionnaire to ensure that the organisation can demonstrate its suitability to act as a subcontractor, followed by an in-person pre-contract compliance audit focused on quality assurance. Once an organisation has been approved, an annual compliance audit will be carried out, along with regular review meetings.

Rationale for Current Subcontracting Arrangements (2025/26)

Colchester Institute engages in subcontracting arrangements only where they add value, extend capacity, or provide specialist expertise that cannot be delivered internally to the same standard or reach. Each partnership is strategically aligned to curriculum need, employer demand, or

national skills priorities, with quality assurance retained in-house. The rationale for each current subcontractor is outlined below:

Essex Fire & Rescue Service – Operational Firefighter Level 3 Apprenticeship

Colchester Institute subcontracts with Essex County Fire and Rescue Service to deliver the Operational Firefighter Level 3 Apprenticeship, which serves as the sole entry route into the profession for new, inexperienced firefighters. Delivery must take place within an operational fire service environment by occupationally competent staff. Subcontracting ensures compliance with sector-specific training standards while enabling the College to retain quality oversight, assurance, and progress monitoring.

Blue Sky – HR Apprenticeships (CIPD Levels 3, 5 & 7)

Colchester Institute subcontracts with Blue Sky, a CIPD-approved centre, to deliver the knowledge components of the HR Support Level 3 (Norfolk only), HR Consultant/Partner Level 5, and Senior People Professional Level 7 apprenticeships. This enables the College to offer CIPD-aligned HR qualifications across Essex, Suffolk, and Norfolk, ensuring high-quality delivery while retaining responsibility for employer liaison, quality assurance, and full programme oversight.

ABA Procurement Ltd – Procurement Apprenticeships (Final Year)

In its final year of subcontracting with ABA Procurement Ltd, the College is supporting a small cohort of fewer than 7 apprentices completing CIPS-accredited Level 3 and Level 4 Procurement Apprenticeships. This interim arrangement was essential to meet employer needs while the College progressed toward becoming a CIPS-approved centre, with direct delivery planned for 2025-2026 and beyond.

Learning Curve Group – Free Courses for Jobs (FCFJ) Provision

Colchester Institute subcontracts with Learning Curve Group (LCG) to deliver Adult Skills Fund provision, primarily funded through Free Courses for Jobs (FCFJ). This partnership focuses on online and flexible learning programmes, targeting learners within a 30-mile radius of Colchester Institute to maintain a localised skills impact. LCG offers specialist Level 3 provision and digital delivery infrastructure that supports national skills priorities and increases accessibility for adult learners who may be unable to attend in-person provision.

Cambridge Fire & Rescue Service – Operational Firefighter Level 3 Apprenticeship

Colchester Institute subcontracts with Cambridge Fire and Rescue Service to deliver the Operational Firefighter Level 3 Apprenticeship, which serves as one of the entry routes into the profession for new, inexperienced firefighters. Delivery must take place within an operational fire service environment by occupationally competent staff. Subcontracting ensures compliance with sector-specific training standards while enabling the College to retain quality oversight, assurance, and progress monitoring.

Localisation

The College is actively engaged in responding to the emerging priorities of the Essex, Southend-on-Sea and Thurrock Area Local Skills Plan, last published in March 2025. This document can be found [LSIP | Essex Chambers of Commerce](#).

3. Subcontractor Policy

This policy applies to all subcontracted provision supported with the funds supplied by the DfE. The Subcontracting Policy is a mandatory requirement for subcontracting activity. The policy's content has been developed to comply with the [Subcontracting funding rules for post-16 education and training 2025 to 2026 - GOV.UK](#)

The College has robust partnership management processes in place to ensure that its processes meet the new Subcontracting Standard (introduced in August 2022). As part of the new Standard an external audit is required every 3 years to check that all elements of the Subcontracting Standard have been met. The Audit Report, along with the completed DfE Subcontracting Self-Assessment document, is submitted to the DfE by 31st July in the year in which the renewal is due. If approved Colchester Institute receives an assurance certificate from the external auditors that will cover the 3-year period. Colchester Institute will each year carry out an internal audit against the subcontracting standard and implement actions based on findings. Colchester Institutes next external audit is due in May 2026.

Colchester Institute works with a minimal number of subcontractors to deliver high quality training and education against its key priorities. The following outlines the process followed:

- All subcontractors delivering greater than £100,000 of apprenticeship provision must be on the Apprenticeship Provider Assessment Register (APAR) as a main or supporting provider to access apprenticeship funding.
- All subcontractors will be expected to complete a tender application annually prior to a contract being awarded.
- All subcontractors will be subject to due diligence before being issued with a contract and, where relevant, are subject to the financial health checks as laid out in the funding rules.
- A contract management plan will be in place for each Subcontracting arrangement.
- All subcontractors must meet high quality standards.
- All subcontractors must provide evidence of financial viability.

The College has robust subcontractor management processes in place that have been subject to external and internal audit. All FCFJ enrolments are subject to rigorous eligibility checks including:

- Checking ID, residency and right of abode
- Prior attainment via the Personal Learning Record (PLR).
- Additionally, adult funded programmes, on a monthly basis, the College shares (ILR) data with the subcontractor for double funding checks and regularly checks the Funding Rules Monitoring Reports (FRM02) where the DfE reports on duplicate learning aims being funded at more than one provider.

Through the supply chain, the College is able to develop understanding and knowledge of different sectors and communities, learning through shared good practice.

Currently, Colchester Institute works with four subcontractors as part of the apprenticeship and adult funded programmes. For the apprenticeship provision these are niche areas that Colchester Institute does not currently have the specialist delivery knowledge to run and requires the expertise of subcontractors

The list of Subcontractors for 2025-26 are shown below:

Sub-contractor	Funding Type and Contract Value	Delivering
Learning Curve Group Ltd	FCFJ for 2025/26	A range of eligible FCFJ programmes delivered to eligible adults
ABA Procurement Ltd	Apprenticeships - Carry-in 2025-26	CIPS procurement qualifications mandatory to the L3 & L4 Procurement Standards
Blue Sky	Apprenticeships New Starts and carry-in 2025-26	CIPD mandatory qualification at levels 3 (Norwich only), 5 and level 7
Essex County Fire and Rescue	Apprenticeships - New Starts and carry-in funding 2025-26	Delivery of 15 week basic skills training
Cambridge Fire and Rescue	Apprenticeships - New Starts 2025-26	Delivery of 17 week basic skills training

4. Fees and Payments

For the provision of apprenticeships, Colchester Institute agrees to pay the subcontractor an agreed fee per apprentice. This charge is recorded in the contract and is set for the duration of the contract. Charges are reviewed annually and updated in line with any changes to the apprenticeship standard. Where the subcontractor requires services which exceed those outlined in the current agreement from Colchester Institute, an increased charge will be negotiated.

Subcontracted adult funding is capped at 20% of the maximum contract value and 80% of the subcontracted funding is passed to the subcontractor for the delivery of ASF or FCFJ funded courses. The 20% fee retained by Colchester Institute covers the provision of:

- administration
- quality assurance and compliance
- MIS function relating to the submission of funding claims to the DfE
- provision of management meetings
- provision of a dedicated account manager

Colchester Institutes overall aim is that learners engaged with the subcontractor achieve the maximum benefit from the provision. The subcontractor will be responsible for meeting the costs associated with the registration of candidates with awarding bodies and examination fees. Non-standard charges may be applied to other subcontracting agreements in the future where costs savings can be mutually identified and agreed between the subcontractor and Colchester Institute.

Payment Arrangements

Payments will be made monthly or as agreed with the subcontractor and will be reviewed quarterly.

- Following the validation of evidence in the ILR return the College will make the appropriate payment to the subcontractor and any adjustments for reconciliation.
- Specific payment profiles will be attached to each contract.
- Where non-delivery has been identified, clawback of funds will be reconciled the following month, unless occurring at the end of the contract year, where an invoice will be raised, and repayment requested.

5. College Support for Subcontractors

The exact mix and level of support for each subcontractor will be assessed initially as part of the due diligence process, prior to contracting, and thereafter on an annual basis. A contract renewal meeting will be held with any subcontracting organisation who is continuing an ongoing partnership.

For new subcontractors, monthly reviews will be conducted by the Director of Apprenticeships and the subcontractor to identify any day-to-day operation and administrative issues. All subcontractors will be subject to regular review.

In addition to working within the College's own quality assurance processes, subcontractors will be subject to additional quality checks and support from the College's Quality and Innovation Team. Other areas of College support include input and guidance on the following:

- Support with due diligence
- Establishing and maintaining quality management systems
- Certification and registration with awarding bodies
- Audit of management systems
- Support & audit of learner paperwork
- Curriculum, Observation of Teaching and Learning and Quality support.
- A training and development offer – including training related to organisational performance improvement.

6. Teaching, Learning & Assessment (T, L, & A)

The College is committed to improving the quality of teaching and learning within our supply chain and along with the partnership quarterly review meetings, the additional quality checks and training opportunities listed below are included within our fees and subcontractor charges:

- Initial Quality and Curriculum Visit: before a contract is given, a quality and curriculum representative will visit a partner provider and complete the initial quality assessment report.
- Partner Training Events on developing and embedding good consistent practice in T, L & A, safeguarding, reviewing apprentice progress, PREVENT and other mandatory learning and development as identified through the College's quality assurance processes.
- Any actions will be highlighted in the quarterly partner review meetings. If the

partner is classed as high risk, a member of the quality team will also attend until the risk is reduced.

- Annual unannounced visit: a quality/curriculum representative will undertake an unannounced visit.
- Self-Assessment: support with the completion of the annual SAR cycle.
- Review of tracking and predicted achievement rates.

The College is committed to maintaining high quality teaching and learning, and the proportion of the fees retained by the College are reasonable and reflect the College's own costs to deliver the services provided.

7. Policy review and communication

Colchester Institute will review this policy annually. Any changes to the policy will be communicated to existing subcontractors at the contract management meetings. The policy will be discussed with new subcontractors prior to their engagement. An up-to-date copy of this policy will be posted on Colchester Institutes website and paper copies will be made available upon request.

8. Duties within Colchester Institute

Nominated members of staff with strategic lead responsibility for subcontracting:

- Deputy Principal
- Director of Apprenticeships and Business Solutions

Nominated member of staff with responsibility for performance management of subcontractors:

- Quality Enhancement Officer

9. Publication of Policy

This policy is published on the College's Website and issued to all partner organisations.

10. Subcontracting Contingency Plan 2025-26

If a subcontractor fails to deliver against the contract or the contract is terminated, the College will take steps to ensure that provision is made to preserve the continuity of the provision and learners involved are able to complete their qualifications. The contingency process that will be followed is documented in Appendix 1.

Appendix 1

Subcontractor Contingency Plan

To be implemented when a subcontractor is no longer trading, fails to deliver against the contract or the contract is terminated.

Stage 1:

- Contact all learners, employers, and any other relevant stakeholders to make them aware of the situation and advise them that the College will be making alternative arrangements.
- Conduct an assessment of learners' current progress.
- Secure all evidence such as reviews, registers, and portfolios.
 - Notify the DfE if appropriate.

Stage 2:

- Complete the Contingency Plan (see attached)
- Create a bespoke action plan for each learner.
- Put in place appropriate alternative arrangements. For example, relevant College staff where the College is directly taking over provision or seek alternative providers if the College is unable to take over the provision directly.
- Secure appropriate awarding body approval where required.
- Liaise with all stakeholders including employers to minimise the impact on learners and to support the learners continued development (more intensive if needed).

Contingency Plan

This plan should be completed by the appropriate representative of the College in the event of any of the circumstances listed below:

- The College has taken the decision to withdraw from a subcontract arrangement and learners are still on programme.
- A Subcontractor has withdrawn from the arrangement and learners are still on programme.
- A Subcontractor goes into liquidation or administration and learners are still on programme.

Partner Name					
Date of Plan					
College Representative and title					
Partner Representative and title					
Summary of circumstances leading to the current position and completion of plan					
Actions	Timescales and Target Dates	Responsible Person	Resources	Progress Update	Review Date
Stakeholder engagement /notifications to relevant funding body*					
Recipient Partner engagement					
Communications Plan					
Learner / Participant Transition Plan, including safeguarding and health and safety					
Learner / Participant Files (including e-portfolio), Data Management and Finance					

*For DfE - confirm that the declaration of subcontractors has been updated by the relevant College

representative. I/we agree this information is accurate and agree to complete the actions noted on this document.

Signed..... on behalf of Subcontractor Date:

Signed..... on behalf of the College Date: