

Subcontractor Contract Management Plan 2025-26

Policy Details			
Policy Owner	Director of Apprenticeships and Business Solutions		
CE Sponsor	Deputy Principal		
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Subcontractor Contract Management Plan

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SECTION 1

1.1 Purpose of the contract management plan

The purpose of this plan is to outline the expectations the College has when entering into a subcontract agreement for the whole life of the contract. Ensuring all partners meet the exact standards set out in this guide. Any subcontracted provision should ensure a high-quality learner experience, delivering outstanding teaching, learning and assessment, stretching and challenging learners to succeed and progress onto higher learning or employment.

Excellence through Learning

Colchester Institute is committed to driving forward educational success in further and higher education. We are extremely passionate about raising the aspirations, knowledge and skills of individuals, communities and businesses in Essex and beyond.

Excellence through learning is at the heart of what the College does. Excellence is what we do and is what we support others to attain. Colchester Institute will enable the highest levels of learner achievement and the highest levels of career and life fulfilment, through learning that will stretch and challenge.

Excellence is what customers, businesses and other organisations can expect to achieve themselves through working with the college.

Colchester Institute's mission is to support our local communities and to transform lives through the development of technical, professional and personal knowledge and skills.

Colchester Institute has a 4-year strategic plan with 5 goals that will help us achieve this mission. View this plan [here](#).

1.2 Contract Management - Roles & Responsibilities

Role / Contact	Area of responsibility	Specific responsibilities in relation to subcontracting
Governing Body	Responsibility for the overall College	Approval of Subcontractors Strategic relationships
Principal and Chief Executive	Overall responsibility for the College	Approval of Subcontractors Strategic relationships
Deputy Principal	Student Services, Additional Learning Support,	ALS, Safeguarding, Equality, Diversity and Inclusion
Director of Finance	Finance	Accounts, payments
Director of Apprenticeships and Business Solutions	Apprenticeships, Functional Skills and Commercial Business	Strategy, oversight of apprenticeships, employer engagement, Contracts
Head of Funding and Information	Apprenticeships, Adult and 16-19 provisions	Apprenticeship, ASF/NSF and 16-19 funding management, contracts, compliance, quality, data management and audit, due diligence
Quality Enhancement Officer	Quality in Apprenticeships	Observation of teaching, learning assessment and learner and employer experience, subcontract management
Data and Contracts Officer	Compliance and Funding, Apprenticeships	Enrolment / eligibility compliance checks, audit compliance, due diligence
Employer Account and Customer Service Manager	Business Development activities	Employer relationship management
Apprenticeship Admin Manager	Applications, App vacancies, Initial Assessment	Application and enrolment management including talent pool, initial assessment, eligibility and EPA management
Bids and Projects Manager	Procurement/Tenders	Procurement, Tender and Project applications
Curriculum Area Heads	Quality, oversight, curriculum development	Quality, oversight, curriculum design

Section 2 – Contract transition - Selecting and approving subcontracting

2.1 Selecting a Subcontractor

The College recognises that delivery Subcontractor provision can play an important role in providing a broad and flexible mix of provision for learners, employers and the wider community.

The key principles of selecting a new Subcontractor are whether they fit with the aims and goals of the College in relation to at least one or more of the following:

- Fill gaps in niche or expert provision or provide better access to training facilities.

In order to approve the selection of a new subcontractor, the College will review:

- The quality of provision from delivery Subcontractors and their ability to achieve outstanding success.
- Past performance of delivery Subcontractors and a track record of high success
- The sound financial health of delivery Subcontractors.
- Compliance to Government and funding agency targets, priorities, and regulations.

Currently Subcontractors may not further sub-contract provision. (This is referred to as **2nd Tier Subcontracting**, which the College will not enter into).

2.2 Process for Selecting a Subcontractor



2.3 Contract Due Diligence

To comply with the Department for Education funding rules, the College will need to be reassured that Subcontractors satisfy the following key elements of which are:

- The College is able to ensure that learners are enrolled (or rejected if applicable) on appropriate programmes in the name of the College not the Subcontractor(s)
- The College is satisfied (through a direct observation where possible) that the quality of provision is of the highest standard
- The College has measures in place to ensure it is not funding higher risk organisations or organisations involved in extremist activities. **See appendix 1**
- The provider has the capability and capacity to deliver to the tender specification
- There is a written learning agreement, entered into at the time of enrolment which is prepared and agreed with each learner and that reflects the outcome of the learner's initial guidance and assessment, and any learning support to be provided
- A learning programme and its means of delivery have been clearly specified by the College
- There are arrangements for assessing the progress of individual learners
- Adequate measures are in place to ensure the health and safety of learners
- Procedures exist for the College to regularly monitor the quality and delivery of programmes
- The subcontractor complies with the Modern Slavery Act 2015 and has in place throughout the Agreement Period policies and procedures to ensure full compliance

To ensure compliance with these elements the Pre-Qualification Questionnaire is a key source of information for new Subcontractors.

If 16-19 provision, ensure Whole Programme Subcontracting approval sought from the DfE in advance of contracting.

The College ensures it remains below the 25% 2025/6 threshold for subcontracting per ASF or 16 to 19 excluding apprenticeships

Other Independent sources of information about potential and existing providers include:

- Ofsted inspection reports (www.gov.uk/find-ofsted-inspection-report)
- Register of Apprenticeship provider and assessment register ([APAR](#))
- UKPRN (<https://www.ukrlp.co.uk/>)
- Companies House [Companies House - GOV.UK \(www.gov.uk\)](#)

Colchester Institute has an obligation to ensure value for money from its external expenditure therefore the decision to award contracts will usually be based upon the most economically advantageous tender which will take into account a number of factors including price, quality, sustainability, social value and running costs to establish the full life cycle costs. Tenders will usually advise what criteria will be used when selecting a supplier.

Colchester Institute will endeavour to advise all those who have quoted the outcome of a tender process. Prior to submitting a quote, it is important that you read all of the tender documentation to ensure that you fully understand our requirements, the specification for the goods or services and the timescales involved.

A cross-functional team comprising the CI Bid and Project Manager, a People and Culture representative, the Health and Safety Manager, and the Safeguarding Manager will collectively review the re-qualification questionnaire to support contract award decisions. This assessment will be informed not only by the questionnaire responses but also by the outcomes from the Request for Quotation (RFQ) and tender evaluations, ensuring a thorough and skills-aligned evaluation process

The criteria for tender approvals is:

- Price dependent on actual cost - 20%
- Maintain Quality of provision to ensure high quality and low risk to public funds - 65%
- Timescales for Completion - 15%

The engagement and management of delivery Subcontractors will be carried out by the Quality Enhancement Officer and Director of Apprenticeships and Business Solutions.

Section 3 – Contract Compliance

3.1 Audit & Data Compliance

A key element of the audit trail is the process undertaken to sub contract. To this end the following evidence is required:

- Details of sub-contract, which includes the:
 - What is the nature of the provision and the contractual relationship
 - Data sharing protocols
 - Ensuring the College, the appointed auditors and the Department for Education to have access to all information
- What is the rationale behind the College's decision to appoint a sub-contractor

The Department for Education have the right to audit all documentation in relation to the subcontracted provision. A satisfactory audit is essential to avoid loss of funding through claw back or termination of contracts. The College's audit principles include:

- All paperwork from Subcontractors must be originals
- PDSATS will be used to test integrity of data submitted by the Subcontractor

Controls to ensure no double funding include:

- Gaining information on other prime contractors at due diligence stage
- Personal Learner Record checks/Regular PDSATS testing

The Data and Contracts Officer and the Apprenticeships Administration Manager will ensure the relevant teams undertake the audit compliance and funding checks required throughout the life of the contract and at key ILR submission dates.

3.2 Contract Compliance

Apprenticeships:

In order to ensure we have up-to-date contracts each year we review our contract as part of the annual external audit carried out by Scrutton Bland. Contracts will be issued as follows which indicate the terms and conditions required.

16-19 Provision/Adult Skills Fund

Colchester Institute will provide an up-to-date subcontracting contract for our 16-19/Adult and Skills Funding. Originals of all subcontractor contracts will be held centrally in the Executive Support Office and will be signed by the Principal and Chief Executive.

All subcontracts will need to ensure that they:

- Meet the agreed educational needs
- Are achievable and affordable
- Address the desired outcome(s) of the subcontract, the possible alternatives, including existing contracts, the risks including the extent and where they may fall,
- Identify any contingent needs and ramifications of proceeding
- Meet the Data Protection Laws to maintain the security of processing and storing data and
- follow the requirements of the relevant funding rules. **See appendix 2** DfE Guidance on sub-contracting

The Quality Enhancement Officer will ensure all contracts are monitored regularly throughout the whole life of the contract.

3.3 Contract Fees & Payment

As part of the College's funding agreement with the Agency, the College is required to submit details of sub-contracting arrangements by submitting a returning the '**Subcontractor Declaration**' on the Skills Funding Service website.

All Subcontractors will have a standard profile of payments throughout the term of the contract, all invoices will be paid within 30 days. Payments are signed off by the Director of Finance.

3.4 Funding Rules Compliance

Apprenticeships: The college will continue to deliver a substantial proportion of the apprenticeship programme and will continue to always maintain the employer relationship

All funding models: We reserve the right to take appropriate action in line with the funding higher risk organisations policy, not only if we deem it is necessary, but also where DfE requires us to take appropriate action

Management fees will be determined based on the level of risk associated with each subcontractor. The Subcontracting Policy—available on the College website under Policies, Procedures and Reports, or directly via this link: [Subcontracting Policy - Colchester Institute](#) details all the services we provide along with their associated costs. This includes a breakdown of individually itemised costs for managing subcontractors, quality monitoring activities, and any other support services offered.

Management fees cover the costs of the below:

- The College provides a Contract Manager to manage the relationship with the subcontractor.
- The College provides a Quality Assurance and Teaching & Learning Lead to ensure that the quality of subcontractor's delivery meets its expectations and to support the continuous improvement of the subcontractor's provision.
- The College provides administration support to ensure the timely recording of learner information on the College's ILR.
- The College undertakes a regular and substantial programme of quality assurance checks

on the education and training provided by subcontractors, including visits at short or no notice and face-to-face interviews with staff and learners. These checks include whether the learners exist and are eligible, and involve direct observation of initial guidance, assessment and delivery of learning programmes. Where required arrangements are implemented to provide internal verification support to the subcontractor.

- The College ensures that all of the subcontractor's delivery meets the Department for Education Funding Rules.
- The College ensures that any Apprenticeship provision delivered by subcontractors meets all of the required standards and specific DfE funding rules.

Also included in the contract is a description of how each specific cost is reasonable and proportionate to the delivery of the subcontracted teaching or learning and how each cost contributes to delivering high quality learning.

The subcontracting fees and charges policy is available via the following link: [Policies Procedures and Reports](#)

3.3 Policies

Subcontractors will be asked to supply a copy of their policies as listed in the due diligence form. These will be checked by qualified staff within the organisation to ensure current and up-to-date. This will include but not limited to, Health and Safety, Safeguarding including prevent/extremism, Equality & Diversity, Complaints, Quality Assurance, GDPR, Business Continuity, Modern Slavery Act 2015.

Subcontracting partners need to ensure they are up-to-date with and have read Keeping Children Safe in Education where 16-19 learners are studying with them. As well as ensuring learners have information about and access to 16-19 Bursary and other student support funding, information, advice and guidance and access to learning support if required.

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

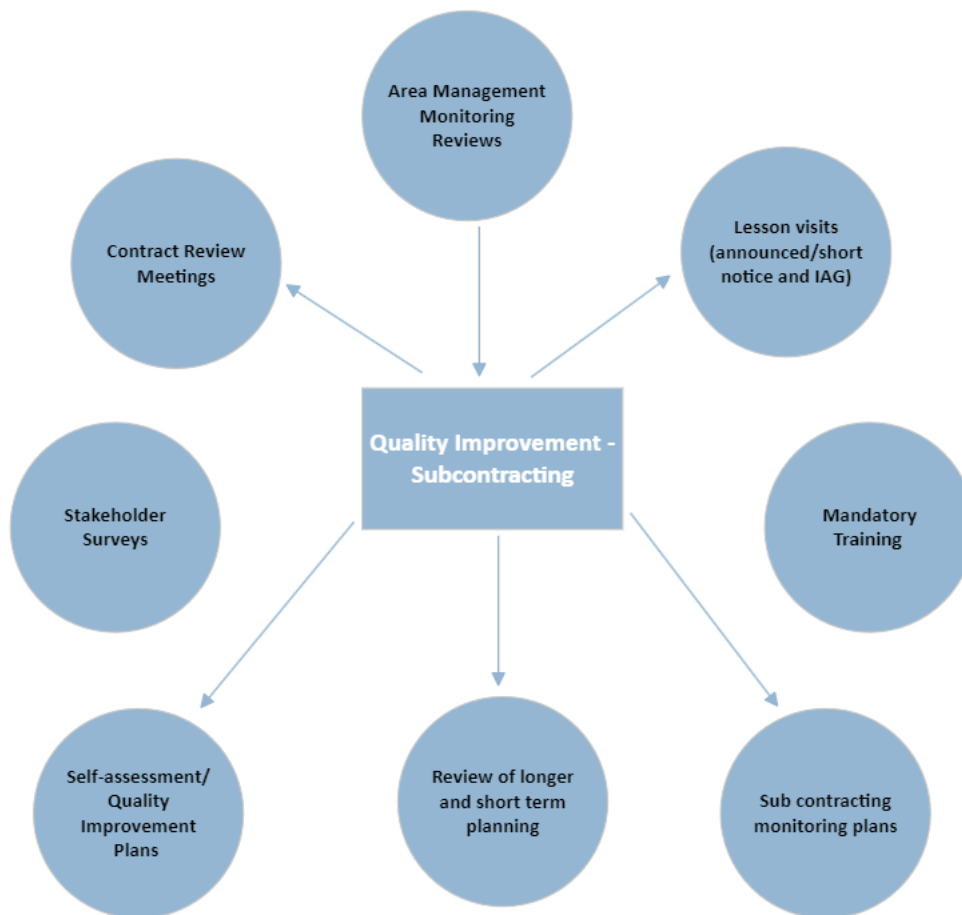
3.4 Communication Strategy

The main principles of communicating with Subcontractors are in line with Relationship Charter:

- ✦ Regular scheduled meetings set up
- ✦ Subcontractor provides a named contact to the College
- ✦ Notes / minutes of meetings kept on file and shared with Subcontractor
- ✦ Records of e-mails, correspondence etc. kept on file
- ✦ Data provided on request/or as and when required for audit monitoring/funding reporting purposes in regular meetings.

Section 4 – Contract management - Performance

4.1 Contract Quality Assurance Process



a) Performance Monitoring Framework

This cycle of performance monitoring scrutinises performance against contractual key performance indicators: attendance, achievement, retention benchmark statistics, learners at risk, quality around teaching, learning and assessment, CPD, safeguarding training, learner and employer satisfaction and financial health. **See Appendix 3**

Continuous monitoring will take place throughout the academic year. A central filing system is in place to record and evaluate the quality of delivery. Quality review meetings are held internally each term and will capture the action points from minutes of meetings and the external exam boards. Any actions required will be shared with the subcontractors including external body reports. See Our central system for quality assurance includes:

- Records of learners
- All correspondence internal/external
- Links to the relevant award boards covering quality assurance/specifications/forms
- Minutes of meetings internally and externally
- Standardisation meeting minutes
- Risk assessment/recommendations
- Action plans internal/external
- Organisational charts for verification purposes
- Development activities DfE standards
- Improvement action plans

b) Lesson visits and observations

As per our internal policy Learning and Teaching Observation, lesson observations will be carried out to observe teaching and assessment to ensure that all teaching, learning and assessment meets the requirements of OFSTED, awarding organisations, and professional standards. Scheduling of observations will be carried throughout the academic year. Two observations will be carried out for subcontractors, one announced which will be a paired observation between the Quality Enhancement Officer and Subcontractors and one short notice themed learning walk. The following criteria will be recorded on the subcontractors learning observation report form which will be shared with the staff member being observed. This provides constructive and supportive feedback with an action plan for improvement or actions for further training/CPD if required.

Please note that support meetings are available in addition to the observations when required. Any meetings held will be minuted and shared with the subcontractor providing actions if required and monitored internally to evaluate if further training for staff is required.

The observation criteria to include evidence to be observed and recorded:

- Impact of initial guidance to learners
- Impact of teaching, learning and assessment
- Use of an adaptive approach in designing the scheme of works and lesson plans
- Interviews with staff including feedback and training developments to support their delivery and development of the courses
- Interviews with learners which will provide feedback on their experience of the course delivery to support any further action required for improvements

c) Annual Quality Assurance Compliance Audit

The audit will seek to provide assurance regarding the subcontractor's quality processes and procedures, with a specific focus on minimizing risks. The audit findings will be categorized into key areas for example: Conflict of Interest, Financial Health and Insurance, Marketing, Disclosure and Barring, Human Resources, and General Data Protection Regulation (GDPR), Company Policies, Information Advice and Guidance, Apprentice Progress- Planning for Learning and Progress and Continuous Improvement.

Each category within the Annual Quality Assurance Compliance Audit will undergo a meticulous assessment, resulting in the assignment of risk ratings. The audit report will also identify specific actions or recommendations to address areas requiring improvement or to mitigate potential risks. The audit will be moderated by the Bid and Project Manager and reviewed by key stakeholders, including a representative from People and Culture, the Health and Safety Manager, and the Safeguarding Manager. The "Summary of Activity" section of the report will concisely present the audit's findings, highlighting significant developments and exemplary practices observed during the evaluation.

d) Development Activities

To enhance relationships with subcontractors, we will focus on improving performance and capability. This involves:

- Identify the specific skills, services, and capabilities required from subcontractors.
- Understanding the subcontractor's motivations and align development activities with both our goals and theirs.
- Engaging in joint activities such as process improvement and shared training for mutual benefit.

- Supporting operational performance improvements like Lean and 6-sigma initiatives.
- Contributing to wider government initiatives, including Social Values and Sustainability Development Goals.
- Developing initiatives to identify, manage, and mitigate potential risks that could negatively impact both parties.
- Participating in shared management activities to drive performance improvement.

e) Self-Assessment Report (SAR) and Quality Improvement Plan (QIP)

The Self-Assessment Reviews (SAR) and Quality Improvement Plans (QIP) will be aligned with the current Education Inspection Framework (EIF), ensuring a consistent focus on the quality of education, behaviour and attitudes, personal development, and leadership and management. These documents will draw upon a wide range of evidence sources, including Performance Improvement Reviews (PIRs), departmental self-reflection, and analysis of key performance indicators such as attendance, achievement, and retention data. In addition, learner feedback will be systematically captured through dedicated platforms across the duration of the contract.

By embedding these evaluative processes within the EIF’s expectations, the subcontractor demonstrates a robust commitment to self-improvement. This enables the early identification of areas requiring development and the implementation of targeted strategies to drive continuous improvement, ensuring high standards of subcontracted provision and a relentless focus on delivering outstanding educational outcomes.

f) Mandatory Training

As part of the subcontractor's requirements, it is mandatory for personnel to successfully complete a series of online training courses. These courses encompass vital topics such as Safeguarding, Preventing Radicalisation, Responding to sexual Violence, Inclusion Essentials, Information Security, GDPR Data Protection, and Health and Safety. The successful completion of these courses ensures that personnel possess the necessary knowledge and competence in the applicable practices and procedures. By adhering to these mandatory training requirements, the subcontractor aims to create a secure learning environment that prioritises the physical and emotional wellbeing of learners, while also addressing safeguarding concerns.

Section 5 – Contract Termination and dispute resolution

5.1 Termination of sub-contracting provision & managing disputes

5.1.1 Disputes and problem resolution

Provision for resolving disputes is contained within the contract. This sets out how disputes will be resolved and the escalation procedures followed.

In the event of a complaint by the subcontracting partner they can submit via the following link:

[Colchester Institute Complaints Form](#)

5.1.2 Termination:

Provision for termination of a contract is contained within the contract

5.1.3 Continuity of contract and delivery

The college will undertake all reasonable steps to ensure the viability and continuation of any contractual arrangements with sub-contractors' provision. Due diligence undertaken is robust enough to ensure the risk of failure of a sub-contractor's ability to deliver under its original contract terms is low and mitigated as far as possible through regular quality audits, annual financial review and regular contact with the Contracts Manager. In the unlikely event of a subcontractor failing to deliver the college will either pick up delivery through its own means or facilitate transfer to another provider.

5.1.4 Contractual changes

All contract variations during the whole lifespan of the contract will only be authorised by the principal or delegated authority following discussion and approval from the Vice Principal Director of Finance, Resources and Regional Affairs. Copies of signed contract variation agreements will be kept on file in the Executive Office.

5.1.5 Whole life oversight

The definition of whole life / whole programme oversight is deemed to include all aspects of a learners programme as detailed in their enrolment/learning agreement and/or Training Plan if an apprentice including End Point Assessment.

Subcontractors delivering apprenticeship provision are not permitted to deliver the entire programme and an agreement as to the elements that make up the subcontract will be agreed in advance and outlined in the contract schedule.

Appendices

Table 1: Data Submission Deadlines

1. Prevent Organisation Risk Assessment Form
2. DfE Guidance on sub-contracting
3. Performance Monitoring Framework
4. Contingency Plan for Continuity of Delivery

TABLE 1: Data Deadline Schedule 2025/2026

Each month data is sent to the DfE in order to provide up-to-date funding data, it is the requirement of the subcontractor to ensure they provide any updates to data in a timely manner and ensure their registers are kept up-to-date in order for us to monitor the learners effectively and to ensure funding is claimed accurately. When the final ILR is submitted this is the final opportunity to ensure the data is correct. It is essential the data remains up-to-date in order to ensure the DfE Declarations are accurate.

Schedule of Dates for Claims and Payments 2025/26

Collection	In Learning Census Date	Date claim to be submitted to DfE	Payment in Subcontractors banks*
R01	31/08/2025	04/09/2025	26/09/2025
R02	30/09/2025	06/10/2025	24/10/2025
R03	31/10/2025	06/11/2025	28/11/2025
R04	30/11/2025	04/12/2025	05/01/2026
R05	31/12/2025	07/01/2026	30/01/2026
R06	31/01/2026	05/02/2026	27/02/2026
R07	28/02/2026	06/03/2026	27/03/2026
R08	31/03/2026	08/04/2026	24/04/2026
R09	30/04/2026	07/05/2026	29/05/2026
R10	31/05/2026	04/06/2026	26/06/2026
R11	30/06/2026	06/07/2026	24/07/2026
R12	31/07/2026	06/08/2026	28/08/2026

*All payments reliant on funding being received from Department for Education by anticipated date, this has now been amended by the DfE to be 14th working days after ILR submission

APPENDIX 1

Prevent Organisation Risk Assessment Form

Subcontractor Name:

Date of Assessment (must be prior to the contract being issued, completed as part of the PQQ):

Assessment carried out by: Colchester Institute

Assessment Evidence

Details

OFSTED Report/External Reports

Policies – (Safeguarding & Prevent Policies)

Existing Relationship

Existing Reputation

Summary

1.1 The College is obliged to provide the Services to the DfE in accordance with the Funding Requirements. The Subcontractor shall therefore deliver the Services to the College as the College's Subcontractor and in accordance with the latest versions of the Funding Requirements:

1.1.1 The DfE's:

- (a) Subcontracting rules (2025-26)
<https://www.gov.uk/government/publications/subcontracting-funding-rules-for-esfa-funded-post-16-funding-excluding-apprenticeships/subcontracting-funding-rules-for-esfa-funded-post-16-funding-excluding-apprenticeships>
- (b) Apprenticeship funding and performance-management rules for training providers Aug 2025 – July 2026
[Apprenticeship funding rules - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/apprenticeship-funding-rules-for-training-providers-aug-2025-to-july-2026/apprenticeship-funding-rules-for-training-providers-aug-2025-to-july-2026)
- (c) Adult Skills Fund: Sets out the rules that apply to Department for education (DfE) funded adult skills fund (ASF) provision for the funding year [Adult Skills Fund: Funding and Performance Management Rules 2025 to 2026](https://www.gov.uk/government/publications/adult-skills-fund-funding-and-performance-management-rules-2025-to-2026/adult-skills-fund-funding-and-performance-management-rules-2025-to-2026)
- (d) DfE Subcontracting standard; [DfE subcontracting standard - GOV.UK](https://www.gov.uk/government/publications/dfe-subcontracting-standard/dfe-subcontracting-standard)

Financial guidance

[academies](#)

[college financial plans](#)

[college accounts directions](#)

[Subcontracting post-16 education and training for the first time - GOV.UK \(www.gov.uk\)](#)

[Funding higher risk organisations and subcontractors policy - GOV.UK \(www.gov.uk\)](#)



Subcontractor Performance Framework 2025 2026

Owner: Quality Enhancement Officer

Please Note: Every effort is made to keep to the planned dates in this quality calendar. However, on occasion, changes may be necessary due to factors beyond our control. Any adjustments will be communicated promptly.

Risk and Quality Assurance Compliance

Calendar Month	Type	Reason	How the process will be conducted
End of Oct 25	* Self-Assessment Report (SAR) and Quality Improvement Plan (QIP)	To help with evaluating or assessing overall risk. To self-assess performance against the EIF and to plan future improvements.	Subcontractor to update SAR and QIP for 24/25. Send documents to HD for moderation and feedback.
Every Month	Programme Management Review	Decision and solutions on tackling learner engagement and timescales on completion.	Attendees: SC, AH, & HFI
Every 6 weeks	Quality Monitoring Meetings (QMM)	Decision and solutions on tackling learner engagement, challenges/barriers	Six meetings per annum. Attendees: AH, QEO, DABS and DCO
Oct, Feb 26 & Jul 26 (3 per annum, themed)	*+ Contract Management Monitoring Review. Meetings to review actual & predicted success rate data.	Assess performance against contractual Key Performance Indicators: Financial health, Sustainability, predicted success rates, new starts, staff and learner well – being, learners at risk, progression teaching and learning delivery, safeguarding, CPD, learner and employer satisfaction etc.	Three meetings per annum. Attendees: SC, QEO/DABS and DCO Themed agenda sent in advance of each meeting.

	+QIP update	To check funding risks, to ensure SC is adhering to DfE rules. Review progress against QIP targets. To promote continuous improvement against measures and improve efficiency and effectiveness in the service.	This is a desk-based activity for the SC. Each month the SC to review and update progress on the QIP/Business Plan. The SC will provide an update at the contract review meetings.
Bimonthly			
CI – Release Questionnaire: w/c 23rd Feb 26	* Annual Quality Assurance Compliance Audit	To provide assurance of the SC’s quality processes and procedures are low risk. To detect and correct problems.	This is a desk based or site visit. A checks list of audit evidence requirements to be sent to the SC in advance of the audit. Cross specialist panel to review the SC’s records and documents (paper documents or electronic files) and assess whether the SC meets all the necessary regulatory requirements. Moderation carried out by BPM
SC – Submit Evidence: 13th March 26 CI – Submit Report: by 20th March 26			
March - April 26	*+ Conduct paired teaching and learning observation	To ensure that all teaching, learning, and assessment meets the requirements of Ofsted, Awarding Organisations, and professional standards. To improve teaching practices and learner performance.	Place and date for the observation are agreed between CI and SC. Tutor’s teaching and learning resources to be shared with HD prior to the start of the session. The observations will last at least 40 minutes and no more than one hour. QEO and SC quality lead will form a fair judgment of the delivery. Outcome of the observation will be summarised in a short report followed by an action plan.
May 26 (Date TBC)	Subcontractor External Assurance audit carried out by Scrutton Bland	To ensure compliance with funding rules, quality standards, and contractual obligations.	Scrutton Bland will conduct a four-day assessment, which will be partly desk-based and will include interviews with CI staff involved in managing subcontractors. Each subcontractor may also be asked to submit evidence for the audit.
SC – Submit PQQ evidence: w/c 15th June 26 CI – Score PQQ: 22nd – 26th June 26	+* Pre contract process begins +* Pre contract	To help with due diligence assessment of potential subcontract delivery.	Tenderer/existing subcontractor to submit an acknowledgement of an acceptance of the process and invited to tender

22nd – 26th June 26	+* Pre contract outcome		
29th – 3rd July 26	Notification of contract award/offer		Tenderer/existing subcontractor to submit PQQ and declaration form to enter a new contract year The cross-specialist panel provides support for completing scoring assessments and financial checks Via New Contract Meeting.
6th July – 20th July 26	*+ Review of new contract	Parties to identify and request needed changes before signature. Examine everything is stated clearly and accurately, without errors or discrepancies. To reduce the legal and financial risk involved.	Attendees: SC, DABS, DCO, AH, QEO & HFI
As Required	*Conduct re-observations if required. This will be based on previous observation outcomes/ learners' voice/attendance data and other key performance indicators.		

Available all year round

<p>*Mandatory online training courses: Preventing Radicalisation, Safeguarding, GDPR, Inclusion Essentials, Health and Safety, Responding to Sexual Violence and Harassment, ILT Online Safety, Information Security</p>	<p>To ensure such practices, and procedures are used and understood. To provide a safe environment for learners to learn in. (Physical, emotional wellbeing and safeguarding)</p>	<p>CI to send login details for new SC staff to complete mandatory online training courses within 21 days of their start date. Copy of certificate or screen shot of completion to be sent to QEO. Persons who can provide evidence of current training (within the last 12 months) for any of the mandatory topics are exempt from completing CI courses.</p>
<p>Joint improvement activities and activities relating to wider Government Initiatives For example, 'Lean' and '6 sigma', sustainability, disability employment issues, use of SME Small and Medium Enterprises and BMEs (Black Minority and Ethnic suppliers)</p>	<p>To improve performance and capability</p>	
<p>* Subcontractor feedback</p>	<p>The focus is to make better decisions, identify risks, stop repeating problems and to increase satisfaction to build a healthy business relationship.</p>	<p>CI will gain feedback from SC at programme and contract review meetings. CI actions will be communicated as and when and monitored by DABS/QEO.</p>
<p>+ Conduct one short notice themed learning walk (Arise from SAR, QIP, learner, and employer feedback)</p>	<p>To find out about the normal experience of learners and delivery staff. To ensure that all teaching, learning, and assessment meets the requirements of Ofsted, Awarding Organisations, and professional standards. To improve teaching practices and learner performance.</p>	<p>Place and date for the learning walk is communicated to SC. Before a learning walk, QEO will identify a theme or question that the walk will address. Outcome of a learning walk will be summarised in a short report followed by an action plan.</p>

Key

- * Focus on risk management
- + Focus on contract management and compliance

Personnel involved in Contract Performance Management Plan

Director of Apprenticeships and Business Solutions, (DABS)

Quality Enhancement Officer (QEO)

Area Head Professional Apprenticeships and Skills (AH)

Data and Contracts Officer (DCO)

Head of Funding and Information (HFI)

Subcontractor (SC)

Bid and Projects Manager (BPM)



Colchester Institute Apprenticeship and Subcontracting Continuity Plan 2025-2026

Apprenticeship Continuity Plan

Policy Owner:	Director of Apprenticeships and Business Solutions	Date Created:	June 2024
Authorised by:	Deputy Principal	Date Authorised:	July 2025
Amendments by:	Director of Apprenticeships and Business Solutions	Date of review/amend:	19 July 2025
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Purpose

This plan has been developed to reflect the principles detailed in our Business Continuity Plan and the requirements of the Department for Education (DfE) Apprenticeship and Subcontracting Funding Rules. This plan also applies to adult learners funded through the Adult Skills Fund (ASF), including Free Courses for Jobs and Bootcamps, ensuring compliance with relevant continuity expectations in the DfE Adult Education Funding Rules 2025–26. The following documents have been used to review this Policy:

[Apprenticeship Funding Rules 2025-2026](#)

[Subcontracting Funding Rules for Post-16 Education and Training 2025-2026](#)

[Adult Skills Fund: Funding and Performance Management Rules 2025 to 2026](#)

This plan is designed to prepare Colchester Institute and provide assurance that we have considered a wide range of risks that could impact apprentices' or learners' ability to successfully undertake or complete their programmes and that we have contingency plans in place to eliminate, mitigate or manage these risks. The plan considers those incidents that will have a significant impact on the operation of our Apprenticeship or Subcontracting provision following a major crisis, disaster, or an event, and which creates the need for short-term closure or suspension of activity.

Policy Aim

The Apprenticeship and Subcontracting Continuity Plan applies to all apprenticeship and subcontracted programmes that are provided by Colchester Institute. All learning is delivered in the classroom at one of the Colchester Institute campuses, at the employer's or subcontractor's premises or virtually; however, all hard copies of learner records are held at our Colchester campus and are managed by the Funding & Information Team. Colchester Institute also uses Smart Assessor a secure e-portfolio system to store electronic records. The scope includes all stakeholders, directors, tutors, assessors, coaches, employers, and learners.

Continuity of learning is the continuation of education in the event of a prolonged establishment closure. It is a critical component of emergency management, as it promotes the continuation of teaching and learning despite circumstances that interrupt normal delivery patterns for one or more learners.

All Colchester Institute staff, apprentices and subcontractors are asked to ensure that they read and understand the contents of this plan and that they remain aware of its existence to act and respond accordingly.

Colchester Institute maintains a "register of issue" of College policies to all staff and acknowledgment by all staff, that the policy has been received including updates resulting from any policy review. College policies and procedures form a key part of all new staff inductions.

Programme Structure

Colchester Institute offers a range of approaches to the delivery of apprenticeship or subcontracted programmes, to best address the unique needs of each employer and their apprentices or adult learners on subcontracted provision. Some programmes have components that are delivered on campus, online, at employer's locations or at alternate premises. For this reason, these continuity plans consider a wide range of arrangements that may be drawn on to address the needs of individual employers and/or learners should

contingency arrangements need to be implemented.

In turn, Colchester Institute acknowledges that individual apprentices and learners will be affected in different ways if any of the risks detailed in this plan materialise. For this reason, the delivery teams will communicate directly with learners, apprentices and their employers where additional support, advice or guidance is required and will work with any apprentices/learners who have approved reasonable adjustments or identified additional needs to ensure actions and options meet their individual requirements.

Continuity of Learning

Colchester Institute will ensure apprentices continue to engage in active learning every four weeks, in line with the 2025–26 Apprenticeship Funding Rules (para 58–67), even during periods of disruption.

Colchester Institute will take all reasonable steps to minimise disruptions to apprentices/learners' studies by:

- Re-scheduling any affected components of study in agreement with learners, apprentices and employers
- Delivering a modified version of learning or access to the same learning via a different mode of study if required and an appropriate solution to the disruption (e.g. distance learning)
- Supporting affected learners and apprentices to move to a new training location for sessions that would have been on a pre-arranged site or relocating sessions to employers' premises when appropriate
- Where learning sessions were scheduled to be onsite at the employer's premises, arranging to move delivery staff to alternate locations provided by the employer

Tools to support Continuity of Learning

Colchester Institute will continue to provide safeguarding support and pastoral care throughout any period of disruption, with learners able to access wellbeing services online or by telephone, and safeguarding concerns managed by the Designated Safeguarding Lead or deputy.

Our apprenticeship and subcontracted learning is delivered through a blended approach and this provides a level of flexibility and a number of options to ensure the relevant learning continues to be delivered to our apprentices. The methods of learning include face to face delivery (classroom and workshop), virtual, directed, and supervised learning activities, webinars, online-coaching, telephone coaching, set reading and feedback, work-based learning assignments and work-based assessments.

The following list also includes a range of tools and methods for facilitating distance learning, including those with no, some, or great levels of technological sophistication.

Instructional Packs. In the event of a prolonged closure absence, tutors and assessors can prepare hard copy instructional packs that apprentices/learners may use at home to continue their learning. Hard copy pack may include worksheets; calendars or schedules of work to be completed; directions for home study, projects, or written assignments; excerpts from textbooks or other reading materials; and sample assessments.

We may take two different approaches when developing packs:

Generic packs that can be used at any point that promote learning according to level and subject-specific standards, or
Unit-specific packs that are based on the planned curriculum and integrate with the apprentice/learners' current learning at their workplace or off the job training.

Tutor and assessor Check-ins and Tutorials: A variety of technologies (telephone, email, web conferencing, VLE) can be used to facilitate one-to-one, or teacher-and class interaction or lesson delivery between apprentices/learners and delivery teams.

Telephone and Video Calling. Delivery teams can hold group and individual discussions, or deliver sessions, with apprentices/learners in a secure and private setting.

Email. Use existing email service provider to send, receive, and track messages. In the event this service provider is not operating, response teams can use other online systems that all provide quick distribution of multimedia content to a mass audience. Colchester Institute currently uses Teams with limited Zoom licenses. We will also utilise Google Classrooms to deliver virtual learning. In the case of an emergency, additional licenses will be purchased.

Social Media. Many learners, apprentices, parents, employers, and staff use social media daily, but it can also serve as a vehicle to send announcements about learning sessions, staff absences, and other information related to continuity of learning. Social media can be useful during both short- and long-term closures, particularly because they are easy to access on different devices, including mobile phones, tablets, and computers. Colchester Institute also has its own app "CI Connect", which is used to communicate with apprentices.

Access to resources and portfolios. All our apprenticeship programmes and corresponding apprentice work and portfolios are accessible via Smart Assessor, Moodle and Google Classroom which remains available to apprentices via several media forms.

Ensuring Accessibility. Not all learners and apprentices may have access to the Internet, phone lines, TV or radio at the same time, or at all, during a prolonged closure or absence. Therefore, it is important to offer a variety of methods of distance learning. Colchester Institute will abide by the Disability Act and ensure materials will be provided in alternative formats, when necessary.

Travel

Learners and apprentices are required to make their own arrangements to attend their place of work and study location. Where a change of location of study is required for contingency reasons, Colchester Institute would seek to provide an alternative location that is as close as practicable to the original place of study or provide transport using college vehicles. Where alternate arrangements must be made that could not easily be accessed by the usual forms of transport, Colchester Institute will work with the learner, apprentice or employer to consider the nature and impact of alternate transport arrangements on individual apprentices and agree an appropriate solution.

Colchester Institute recognise the primary source of transportation for its remote delivery teams is via car. As such, expenses are paid to contribute towards the cost of fuel and general upkeep of the vehicle to enable delivery teams to maintain this source of transport. Delivery teams, apprentices, partners, and suppliers use the Colchester Institute parking facilities as necessary, however should this become unavailable; there is alternative public

parking facilities offsite opposite the East Gate entrance or 2 hours free parking within the retail park adjacent to the College. As an alternative, Colchester Institute recommends the use of public transport such as buses or trains, and private transport such as taxis or car sharing where appropriate.

All delivery teams are issued with portable IT equipment to enable them to work remotely, negating the need to travel in the event of an emergency. Remote visits can be completed using mobile phone, email, and software such as Teams or Google Classroom.

All delivery team staff are required to have appropriate insurance and breakdown cover, which is monitored annually, to ensure that in the event of an incident, suitable support is available.

Redundancy

In line with DfE Apprenticeship Funding rules 'Redundancy' 240.2, there may be circumstances where, if an apprentice is made redundant, Colchester Institute must make reasonable efforts to find the apprentice a new employer. In addition to our Apprenticeship's Administration team, we have a specialist employer engagement team and a Careers Advice Service that is at hand to assist apprentices with identifying career opportunities as well as preparing them to apply for positions.

Colchester Institute also has well established relationships with many levy employers working across varying sectors. Where appropriate, these relationships can be leveraged to identify opportunities for apprentices at risk of withdrawal due to redundancy. While assisting to secure alternate roles for apprentices who have been made redundant, our administration and recruitment teams can provide assistance in updating CVs, interview techniques and personal branding so that apprentices are well positioned to secure alternate roles when they become available.

Risks of Continuity of Learning

In the event of health-related disruptions such as a pandemic or local outbreak, Colchester Institute will revert to remote learning and digital engagement strategies as outlined in our Remote Learning Policy and this Continuity Plan.

In the event of a significant employer partner withdrawing from the programme, mitigation will include immediate engagement with learners, identification of alternate placements, and liaison with the DfE if applicable.

Colchester Institute will ensure apprentices continue to engage in active learning every four weeks, in line with the 2025–26 Apprenticeship Funding Rules (para 58–67), even during periods of disruption.

Colchester Institute ceases to operate:

Where viable, Colchester Institute will implement contingency plans which will allow existing learners and apprentices to continue and complete their learning and assessment (for apprentices – completion of the apprenticeship standard to enable them to enter Gateway and complete their End Point Assessment (EPA)). The measures Colchester Institute has in place to manage this risk means the likelihood of an imminent closure of Colchester Institute is low. Colchester Institute manages this risk by having in place:

Financial reserves that would allow us to continue to operate for a suitable duration.
Business plans that are reviewed by our Governors, College Executive (CE), Senior Leadership Team (SLT) and College Leadership and Management Group (CLMG).
Annual external auditing of finances and risks that provides independent assurance of our college's performance and forecasts.
Engagement of legal and financial advisors.

Failure to secure or maintain Registered Training Provider status
In the event of termination of agreement with the DfE as a result of Colchester Institute being removed from the Apprenticeship Provider and Assessment Register (APAR) and therefore becoming unable to continue the delivery of apprenticeship programme, Colchester Institute will engage with the DfE to make arrangements for effective exit to minimise the disruption to both apprentices and employers.

The detail of all apprentices, their apprenticeship programme, progress made, registration with awarding organisations including the End Point Assessment Organisation (EPAO) and evidence that is required to contribute towards entering into Gateway and successful completion of their End Point Assessment would be made readily available.

The primary goal of Colchester Institute is to see every apprentice through to successful completion of their apprenticeship standard and every effort would be made under such circumstances to enable this to happen.

Withdrawal of Apprenticeship Standards

Colchester Institute might make a strategic decision to withdraw learning on a particular apprenticeship standard if it has been superseded by a new apprenticeship standard, if it cannot be resourced, if the content is no longer fit for purpose or current, or if insufficient numbers can be achieved.

The ongoing viability of Colchester Institutes apprenticeship offer is monitored via the annual monitoring and quality assurance processes of Colchester Institute. Withdrawal of an apprenticeship standard is a strategic, planned event with the process defined in operational policies; the risk is considered low.

Colchester Institute manages this risk by having in place:

- Course Closure process where every effort must be made to ensure that stakeholders are consulted, not disadvantaged in any way, have every opportunity to complete learning or modules they have been registered for or that suitable arrangements are made where the withdrawal of the apprenticeship standard is required;
- A process of consultation with those affected including employers and apprentices and with delivery teams on the potential impact of withdrawal of the apprenticeship standard;
- A tested ability to successfully manage an apprenticeship phased-out process.

The withdrawal of apprenticeship standards is managed via Colchester Institutes Course Closure process that ensures the impact of any proposal is assessed and managed, and that key stakeholders are consulted as a core part of the process.

Where viable, a phased-out process will be proposed where current apprentices would be given the opportunity to complete their apprenticeship standard. The timing of the

implementation of any proposed withdrawal would also consider prospective apprentices and where in the recruitment cycle, they were.

All proposals would be considered by Colchester Institutes Deputy Principal and could not be implemented without CE oversight and approval of the phase-out and impact management proposal.

Subcontracting

All subcontract arrangements are considered carefully so that in the event of a subcontractor being unable to fulfil their full obligations under the terms of the contract:

The learning arrangements can be modified to encompass delivery directly in- company, initially on a short-term basis and then possibly into the future. Colchester Institute already has a range of Professional Coaches (associates) on board which could be utilised or the base broadened quickly;

Alternative organisations that may be approached that have already been through the initial desk-based quality checks, for example through OFSTED report analysis and local reputation checks.

An analysis would be conducted with an on-boarding quality assurance process that will ensure a non-stop process flow, so not to disadvantage the learner, apprentice or employer.

Unable to recruit or retain suitably qualified delivery staff

The impact of an inability to recruit suitably qualified staff is low given our programme specialties are not niche and that Colchester Institute has both an employed delivery team and network of experienced associate staff to draw on for temporary cover while permanent replacement staff are secured.

Colchester Institute manages this risk by having in place:

- A Remuneration and Search Committee who regularly reviews pay and benefit packages to ensure that Colchester Institute is positioned well to recruit and retain suitably skilled staff;
- Regular systems of appraisal and career development opportunities;
- Colchester Institute will seek to fill gaps in staffing as quickly as possible by initially drawing on suitably skilled and experienced temporary staff;
- Where necessary, Colchester Institute will draw on the network of associates and employers who have worked with Colchester Institute in recent years to undertake contract roles until permanent members of staff can be recruited.

IT infrastructure

Colchester Institute has an Information and Learning Technology (ILT) department to maintain our IT infrastructure and has in place processes and protocols for the ongoing monitoring and management of risks to our systems such as malicious attacks or hacking and remains as vulnerable to these and new threats as other organisations.

Colchester Institute manages these risks to business-critical systems and the back-up and restoration of data by having in place:

- Full database and system replication including student virtual learning environments (VLE);
- Firewall protection and a skilled and up-to-date team of IT specialists who monitor system risks and maintenance;

- Regular Business Continuity testing to ensure business systems can be supported from one or another site;
- Colchester Institute will implement its business continuity plans to reinstate IT services as soon as possible. Remote classes or workshops that were scheduled during a system outage will be rescheduled and recordings and/or additional support material provided for apprentices who were unable to attend sessions due to a Colchester Institute IT system issue.
- System enabled contingencies daily back-up of our business-critical systems ensures restoration of data can be achieved. We use Smart Assessor (e-portfolio), EBS (MIS system), Strata (achievement data) and EBIS (financial) for organisational collaboration and storing of relevant programme data which is also backed up every 24-hour.

Communication

Colchester Institute hold both the work and personal contact details of learners and apprentices on our secure information systems and have learner or apprentice's communication contingencies. In addition, we hold contact details for an apprentice's employer organisation including the teams responsible for overseeing apprenticeship programmes and the line managers of apprentices who can enact their internal emergency contact procedures.

Through staff development and available communication channels we have the following options to communicate with Colchester Institute delivery teams and our apprentices:

Smart Assessor (e-portfolio);

Email;

Telephone;

TEAMS video call

By our designated social media groups.

CI Connect App

We use Smart Assessor and EBS for internal, organisational collaboration and storing of relevant programme data which is also backed up every 24-hours and can be accessed remotely as well as on-site.

Roles and Responsibilities

Key emergency contacts and functional responsibilities (these include staff responsible for managing any crisis between Colchester Institute, the learner, and the employer.

The DfE will be informed of any programme break in learning.

Principal and Chief Executive

- Overall responsibility for the continuity of apprenticeship training
- Incident Officer
- Chair Crisis Team meetings
- Co-ordination of the response
- Liaise with Prime Funding organisations (where appropriate)
- Liaise with employers, partner providers, Awarding Bodies (where appropriate)
- Allocate resources
- Responsible for external liaison

- Be prepared to answer questions from the media

Deputy Chief Executive

- Responsibility for managing disruption in the provision of administrative services, assessment arrangements and physical premises
- Meet and greet emergency services as they arrive, with a floor plan of the building if necessary.
- Ensure all significant occurrences and decisions are recorded, together with reasons for decisions made.
- Follow up communication

Deputy Principal

- Provides strategic leadership for teaching, learning and assessment across the college
- Ensures business continuity plans are embedded across curriculum and quality processes
- Deputises for the Principal in all matters relating to continuity and crisis management

Vice Principal: Curriculum Innovation & Business Transformation

- Responsibility for implementing digital solutions and learning continuity innovations across curriculum areas
- Supports transition to virtual learning and blended approaches during disruption
- Provides oversight on curriculum innovation to ensure uninterrupted learning

Assistant Principal: Adults, Braintree STEM Innovation

- Responsibility for continuity of adult education programmes, including Adult Skills Fund provision
- Leads contingency planning for Braintree STEM and adult learners affected by disruption
- Liaises with curriculum and employer partners to maintain programme viability

Director of Apprenticeships and Business Solutions

- Responsibility for dealing with issues relating to subcontracted learners’ delivery
- Responsibility for dealing with issues relating to apprentices’ work placement and the ongoing checks of insurance and health and safety
- Responsibility for dealing with issues associated with apprentices’ apprenticeship training and timely progression
- Responsibility for dealing with issues relating to personal and pastoral support
- Agree key information to be given by delivery teams

In case of a significant incident emergency, contact details of key responsible staff. These include:

Contact Role	Contact Number(s)	Contact Email
Colchester Institute (Reception)	01206 712000	reception@colchester.ac.uk
Director of Apprenticeships and Business Solutions	01206 712340	apprenticeships@colchester.ac.uk
Education and Skills Funding Agency (Service Desk)	03702 670001	DfE Contact Form

Apprenticeship and Subcontracting Continuity Plan			
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Subcontractor Exit and Continuity Planning

The Director of Apprenticeships and Business Solutions is the nominated Subcontracting Lead. All new subcontracting proposals are reviewed and approved by the Executive Board and submitted to the Board of Governors annually.

Where subcontracting exceeds £100,000 annually, Colchester Institute has clearly documented and published the rationale, including reference to unique geographical delivery, sector specialism, or learner accessibility, in line with the Subcontracting Funding Rules.

In line with the DfE's subcontracting funding rules, Colchester Institute ensures all subcontractors have their own continuity arrangements in place to protect apprentices and prevent interruption to learning.

These continuity plans are reviewed annually as part of our subcontractor quality assurance processes, including due diligence checks, site visits, and performance reviews.

Where a subcontractor is unable to fulfil their obligations or the subcontracting arrangement ceases, Colchester Institute will ensure apprentices are supported to complete their training. This may include transferring them to an equivalent internal programme or an alternative registered provider, subject to DfE approval.

The DfE will be notified immediately if subcontractor failure presents a risk to continued apprentice delivery, and mitigation actions will be enacted in line with the continuity strategy.

Annual Review and Governance

This continuity plan is reviewed annually by the Director of Apprenticeships and Business Solutions and authorised by a member of the College Executive Team. Any amendments are recorded, and version control is maintained in line with DfE audit requirements.

The plan forms part of the College's wider Business Continuity and Subcontracting Strategy and is aligned to statutory and regulatory guidance from the DfE, Ofsted and awarding bodies.

The next formal review will take place in June 2026, with updates reported to the Executive Board.

DfE Subcontracting Funding Rules Compliance (2025/26)

This section outlines how Colchester Institute complies with the Department for Education (DfE) Subcontracting Funding Rules for the 2025/26 academic year.

Subcontracted delivery for all post-16 provision, including apprenticeships, is monitored to ensure total subcontracting does not exceed the £100,000 annual threshold without full compliance with the DfE Subcontracting Standard.

All subcontractors undergo robust due diligence checks, including financial health reviews, quality assurance, and risk assessments. Annual checks are carried out as part of contract renewal.

Where the £100,000 threshold is met or exceeded, Colchester Institute commissions an independent external auditor report. This is submitted via the DfE Document Exchange by 31 July annually.

The Board of Governors receives and reviews an annual subcontracting report that includes delivery performance, contract value, quality assurance outcomes, and learner impact.

All subcontracting agreements meet DfE contractual standards, and all subcontractors are required to confirm they have continuity and disaster recovery plans in place.

Colchester Institute maintains a publicly available Subcontracting Register, updated annually, and published in accordance with DfE requirements.

Continuity Plan Summary for Employers and Subcontractors

- ✓ This continuity plan ensures the safeguarding and progression of all apprentices and adult learners during any disruption.
- ✓ Apprentices will continue active learning every 4 weeks, in line with the 2025–26 DfE funding rules.
- ✓ Learning can continue remotely using Smart Assessor, Google Classroom, CI Connect App, email, video calls and hard copy packs.
- ✓ All subcontractors must have a continuity plan in place. If a subcontractor cannot deliver, Colchester Institute will transfer learners or deliver directly.
- ✓ If an employer is affected (e.g. by redundancy or operational changes), we will support apprentices with alternative placements or exit options.
- ✓ Adult learners (including those on Bootcamps and Free Courses for Jobs) are fully covered by this continuity plan.
- ✓ Safeguarding and wellbeing support will continue during any period of disruption via our Designated Safeguarding Lead.
- ✓ Subcontracting rationale is documented and governed by our Executive Board. We maintain full DfE compliance, including audit and publishing our register.
- ✓ Contact Director of Apprenticeships & Business Solutions, for any queries related to this plan.

DfE Audit Checklist – Apprenticeships and Subcontracting (2025–26)

1. Enrolment & Eligibility:

- ✓ Learner eligibility documented (residency, right to work, no duplicate funding)
- ✓ Apprentice employment status verified via Apprenticeship Service

2. Training Plan & Prior Learning:

- ✓ Signed training plan before start date
- ✓ Prior learning assessment documented; funding adjusted appropriately

3. Off-the-Job (OTJ) Training:

- ✓ Planned hours in ILR match training plan
- ✓ Evidence shows new, relevant learning within working hours

4. Active Learning:

- ✓ Apprentice engagement every 4 weeks during practical period (active learning tracked)

5. Completion & EPA:

- ✓ Gateway evidence documented
- ✓ Accurate ILR coding for withdrawals, breaks, and completions

6. Subcontracting:

- ✓ ILR records all subcontracted delivery
- ✓ Written agreements in place with dispute resolution
- ✓ Subcontracting >£100k includes audit & Board-approved rationale

7. Adult Provision (ASF):

- ✓ Continuity covers adult learners incl. Free Courses for Jobs
- ✓ Alternative provision or RPL offered where needed

8. Continuity & Safeguarding:

- ✓ Safeguarding and learner support maintained during disruption
- ✓ Subcontractors have verified continuity & safeguarding plans

9. Evidence & Record Keeping:

- ✓ Up-to-date ILR, training plans, OTJ tracking
- ✓ Logs of incidents, decisions, and updates kept

10. Governance & Review:

- ✓ Named Subcontracting Lead (Director of Apprenticeships)
- ✓ Policy reviewed annually; version control in place

11. Audit Preparation:

- ✓ Mock audits conducted
- ✓ Governors and SLT briefed on audit readiness

Completed by: Director of Apprenticeships and Business Solutions

Date of Completion: 05/08/2025