Subcontracting Policy	
Version no	3.0
Operational from	September 2026
Policy prepared by	Director of Quality, Compliance & Excellence
Policy approved by	Educationwise Board
Annual assurance date	September 2027
Next full review	September 2028

Policy statement

Educationwise will only use subcontracting where there is a clear educational, operational or strategic rationale and where the arrangement supports learners, employers and the effective delivery of education and training.

Where Educationwise acts as the lead provider, it remains accountable for the appropriate use of public funds, the quality of provision and compliance with relevant funding, contractual, safeguarding and regulatory requirements.

Subcontracting will not be used simply to transfer responsibility for delivery, address short-term funding pressures or avoid Educationwise's own responsibilities as lead provider.

Purpose

The purpose of this policy is to set out the principles governing Educationwise's use and oversight of subcontractors.

It aims to ensure that subcontracting arrangements:

- Provide clear educational or operational value
- Protect learners and public funds
- Are subject to appropriate due diligence
- Are supported by legally binding agreements
- Are monitored proportionately
- Provide value for money
- Meet relevant funding and contractual requirements
- Maintain appropriate quality and safeguarding standards
- Are subject to effective governance and oversight
- Can be ended or transferred safely where required

Detailed operational arrangements will be set out within the Subcontractor Management Cycle, contracts, schedules, quality assurance arrangements and supporting WOW workflows.

Scope

This policy applies where Educationwise subcontracts education or training delivery to another organisation and retains lead-provider, funding, contractual or Awarding Organisation responsibility.

It may apply to subcontracted provision across:

- Apprenticeships
- Other DfE-funded provision where subcontracting is permitted

- Commercial provision where Educationwise chooses to subcontract delivery
- Qualification delivery where Educationwise retains centre or Awarding Organisation responsibility

Advanced Learner Loan-funded provision must not be subcontracted where prohibited by current funding rules.

Funding-specific requirements will only apply where relevant to the particular funding stream.

Principles

Learner interest

Subcontracting arrangements must support the interests of learners and maintain appropriate standards of education, training, support and safeguarding.

Accountability

Educationwise retains accountability where it remains the lead provider, funding recipient, contracting organisation or approved centre.

A subcontract does not transfer Educationwise's responsibility to ensure that relevant requirements are met.

Transparency

Subcontracting arrangements, fees and responsibilities will be clearly documented.

Relevant information will be published or declared where required by funding rules or contractual requirements.

Value for money

Subcontracting arrangements must provide reasonable value for money.

Management fees and retained funding must reflect the services, oversight, assurance and support Educationwise provides.

Quality

Subcontracted provision will be subject to appropriate quality assurance and performance oversight.

Proportionality

Due diligence, monitoring and assurance will reflect:

- The value of the subcontract
- Nature of the provision
- Learner numbers

- Funding risk
- Delivery model
- Previous performance
- Safeguarding risk
- Financial risk
- Quality risk
- Any other relevant concerns

Integrity

Subcontracting decisions must be free from unmanaged conflicts of interest, fraud, bribery or inappropriate financial influence.

Rationale for subcontracting

Educationwise may use subcontracting where it provides a clear benefit, such as:

- Access to specialist expertise
- Access to specialist facilities or equipment
- Meeting a learner or employer need that Educationwise cannot reasonably meet directly
- Supporting delivery in a specialist occupational area
- Extending access to suitable provision where there is a clear strategic rationale
- Providing complementary expertise that strengthens learner outcomes
- Supporting contractual commitments where subcontracting is permitted

The rationale for each arrangement will be documented and reviewed.

Educationwise will not enter into a subcontracting arrangement solely:

- To fill a short-term funding gap
- To maximise funding without clear educational value
- To transfer responsibility for poorly performing provision
- Where Educationwise does not have sufficient capacity to oversee the arrangement properly
- Where the arrangement creates unacceptable financial, quality, safeguarding or reputational risk

Approval and governance

New subcontracting arrangements must be appropriately approved before delivery begins.

Approval will consider:

- Strategic rationale
- Learner benefit
- Financial implications
- Management fee
- Due diligence findings
- Quality
- Safeguarding
- Delivery capacity
- Funding compliance
- Conflicts of interest
- Contractual requirements
- Risks
- Educationwise's capacity to oversee the arrangement

The Board and senior responsible person will approve the subcontracting policy before the start of each funding year, or before publication where required.

Significant subcontracting arrangements will be reported through appropriate Senior Leadership Team and Board governance arrangements.

The Board will retain appropriate oversight of subcontracting strategy, significant risks and the overall use of subcontracted delivery.

DfE subcontracting requirements

Where Educationwise subcontracts publicly funded provision, it will comply with the funding rules, contractual requirements and subcontracting guidance applying to the relevant funding stream.

Educationwise will review each year whether the value of subcontracted DfE-funded provision brings it within scope of the DfE Subcontracting Standard.

Where the aggregate value of subcontracted DfE-funded delivery reaches the threshold at which the DfE Subcontracting Standard applies, Educationwise will comply with the Standard and associated assurance requirements.

The applicable threshold, assurance requirements and submission deadlines will be determined from the current DfE requirements rather than fixed permanently within this policy.

Educationwise will complete required subcontracting declarations and provide information to DfE or other relevant funding bodies where required.

Selection of subcontractors

Subcontractors will only be appointed following proportionate due diligence.

Selection will consider whether the organisation has the:

- Legal standing
- Financial capacity
- Operational capacity
- Relevant expertise
- Appropriate staff
- Suitable systems
- Appropriate safeguarding arrangements
- Appropriate quality arrangements
- Relevant registrations or approvals
- Capacity to meet contractual requirements
- Ability to protect learner and organisational information
- Ability to comply with funding requirements

Educationwise will not appoint a subcontractor solely because they offer the lowest cost.

Due diligence

Due diligence will be proportionate to the nature and risk of the proposed arrangement.

Checks may include:

- Legal identity and company status
- Ownership and control
- Financial health
- Credit information
- Insurance
- Relevant funding or provider registration
- Awarding Organisation approval where applicable
- Previous performance
- Quality assurance

- Learner outcomes
- Safeguarding arrangements
- Safer recruitment arrangements
- Prevent arrangements
- Data protection and information security
- Health and safety
- Equality and inclusion
- Policies and procedures
- Staff competence
- Delivery capacity
- Complaints or regulatory concerns
- Conflicts of interest
- Fraud or financial irregularity risks

Educationwise may seek additional evidence where risk is identified.

Due diligence will be refreshed **at least annually and sooner where there is a significant change in circumstances, performance, ownership, staffing, financial position, safeguarding risk or delivery model.**

Conflicts of interest

Any actual, potential or perceived conflict of interest connected to a subcontracting decision must be declared and managed in accordance with Educationwise's Conflict of Interest Policy.

Individuals with an unmanaged conflict must not make or influence decisions relating to the relevant subcontracting arrangement.

Contractual requirements

Every subcontracting arrangement must be supported by an appropriate legally binding written agreement before delivery begins.

The agreement will set out relevant matters including:

- Scope of provision
- Responsibilities of each party
- Funding arrangements
- Management fees

- Payment arrangements
- Learner eligibility and evidence requirements
- Data and reporting requirements
- Quality requirements
- Safeguarding
- Prevent
- Health and safety
- Data protection and information security
- Audit and access rights
- Performance expectations
- Monitoring arrangements
- Confidentiality
- Intellectual property where relevant
- Complaints
- Fraud and error
- Suspension and termination
- Learner continuity arrangements
- Requirements to cooperate with Educationwise and relevant external bodies

Contracts will reflect current funding and contractual requirements where publicly funded provision is involved.

Management fees

Any management fee retained by Educationwise will reflect the services and oversight provided.

These may include:

- Contract management
- Quality assurance
- Compliance assurance
- MIS and data support
- Funding assurance
- Staff support

- Safeguarding oversight
- Learner support
- Reporting
- Governance
- Administrative support
- Risk management

The retained fee must be reasonable and proportionate to the services, oversight, assurance and support provided by Educationwise.

Management fee arrangements will be transparent and set out within the relevant contract and Subcontractor Management Fee Policy.

Where publication of management fee information is required, Educationwise will meet the applicable requirement.

Onboarding

Approved subcontractors will complete an appropriate onboarding process before or at the start of delivery.

This may include:

- Introduction to key Educationwise contacts
- Contract and responsibility briefing
- Funding and compliance requirements
- Safeguarding and Prevent expectations
- Quality assurance arrangements
- MIS and reporting arrangements
- Learner support expectations
- Data protection and security
- Escalation routes
- Performance expectations
- Relevant handbooks and guidance

Learners must be made aware that Educationwise is the lead provider, the role played by the subcontractor and how they can contact Educationwise directly for support, safeguarding, complaints or concerns.

The level of onboarding will reflect the nature and risk of the arrangement.

Responsibilities of subcontractors

Subcontractors are responsible for meeting the requirements set out within their contract.

They are expected to:

- Deliver agreed provision appropriately
- Maintain suitable staff and resources
- Meet relevant funding and qualification requirements
- Maintain accurate learner records
- Cooperate with quality and compliance activity
- Protect learners
- Follow safeguarding and Prevent requirements
- Report significant concerns promptly
- Protect personal and confidential information
- Maintain appropriate financial and operational controls
- Respond to identified actions
- Cooperate with audits and external assurance where required
- Notify Educationwise of significant changes that could affect delivery

Subcontractors must not further subcontract Educationwise-funded delivery unless this has been expressly permitted and is compliant with applicable requirements.

Educationwise accountability

Subcontractors remain responsible for the quality and compliance of the services they deliver.

This does not remove Educationwise's accountability where Educationwise retains:

- Funding responsibility
- Contractual responsibility
- Awarding Organisation responsibility
- Lead-provider responsibility
- Regulatory responsibility

Educationwise will therefore maintain sufficient oversight to satisfy itself that subcontracted provision is being delivered appropriately.

Performance management

Subcontractors will be subject to appropriate performance management.

Performance may be considered through areas including:

- Learner participation
- Learner progress
- Achievement
- Retention
- Quality of teaching, learning and assessment
- Assessment practice
- Employer feedback
- Learner feedback
- Safeguarding
- Compliance
- Data accuracy
- Funding evidence
- Timeliness
- Complaints
- Actions arising from previous reviews

Detailed measures, thresholds, review frequency and evidence requirements will be set out through contracts, service level arrangements, scorecards, the Subcontractor Management Cycle and supporting documentation.

They will not be fixed within this policy.

Quality assurance

Subcontracted provision will fall within Educationwise's Internal Quality Assurance arrangements.

Quality assurance will be proportionate and risk-based and may include:

- Sampling
- Observations
- Learner discussions
- Employer feedback
- Staff discussions

- Programme reviews
- Compliance assurance
- Data review
- Thematic assurance
- Review of learner support
- Review of assessment
- Review of safeguarding practice

The detailed methodology will be contained within the IQA Strategy and supporting workflows.

A subcontractor's own quality assurance arrangements do not replace Educationwise's responsibility to obtain appropriate independent assurance.

Safeguarding and Prevent

Subcontractors must maintain appropriate safeguarding and Prevent arrangements relevant to their provision and learners.

They must:

- Follow applicable legislation and guidance
- Maintain suitable safeguarding procedures
- Ensure relevant staff understand their responsibilities
- Report safeguarding concerns appropriately
- Cooperate with Educationwise safeguarding oversight
- Notify Educationwise promptly of significant safeguarding incidents affecting Educationwise learners

Educationwise may undertake additional safeguarding assurance where risk indicates this is required.

Significant safeguarding concerns may result in immediate protective action, suspension of activity or termination where necessary.

Funding and data compliance

Subcontractors delivering publicly funded provision must comply with the funding requirements relevant to the provision they deliver.

They must provide complete, accurate and timely evidence required to support:

- Learner eligibility
- Enrolment

- Participation
- Learning activity
- Progress
- Achievement
- Funding claims
- Other contractual requirements

Educationwise retains responsibility for ensuring that funding claims made under its contract are appropriately supported.

Where evidence is insufficient or inaccurate, funding may be withheld, adjusted or recovered in accordance with contractual arrangements.

Fraud and error

Educationwise will apply its Counter Fraud and Error arrangements to subcontracted provision.

Subcontractors must report suspected:

- Fraud
- Financial irregularity
- Falsification of learner evidence
- False funding claims
- Bribery
- Corruption
- Serious conflicts of interest
- Other significant wrongdoing

promptly.

Educationwise may investigate, suspend payments, recover funding, terminate arrangements or report matters externally where appropriate.

Monitoring and assurance

Educationwise will maintain proportionate oversight of each subcontracting arrangement.

Monitoring will reflect the level of risk and may include:

- Contract reviews
- Quality assurance
- Funding assurance

- Learner file review
- Data review
- Financial review
- Learner and employer feedback
- Safeguarding assurance
- Action-plan monitoring
- Thematic review
- Visits where appropriate
- Other relevant assurance activity

The frequency and type of activity will be defined within the Subcontractor Management Cycle and supporting arrangements.

Assurance activity may increase where concerns are identified.

Improvement actions

Where concerns are identified, the subcontractor may be required to complete agreed improvement actions.

Actions will include appropriate:

- Ownership
- Timescales
- Evidence requirements
- Follow-up
- Escalation arrangements

Completion of an action does not automatically demonstrate that improvement has been achieved.

Where appropriate, Educationwise will recheck the relevant area before confirming that the concern has been effectively resolved.

Escalation

Where subcontractor performance or compliance falls below the required standard, Educationwise may take proportionate action.

This may include:

- Additional support
- Increased monitoring

- Targeted quality assurance
- Formal improvement actions
- Increased reporting
- Restrictions on new starts
- Withholding or recovery of payment where contractually permitted
- Suspension
- Termination

Any subcontractor action linked to funding compliance, learner progress, off-the-job evidence, active learning or Gateway readiness that remains incomplete after one review cycle will be escalated to the CEO and Quality and Compliance Committee Chair within five working days.

Safeguarding and Prevent concerns will be escalated immediately through the relevant safeguarding arrangements.

Serious concerns may be escalated immediately.

Learner protection and continuity

Educationwise will maintain appropriate arrangements to protect learners if a subcontractor:

- Is unable to continue delivery
- Ceases trading
- Has its contract suspended or terminated
- Experiences significant financial difficulty
- Fails to meet required standards
- Creates an unacceptable safeguarding, compliance or quality risk

Where practicable, Educationwise will seek to minimise disruption to learners and maintain continuity of learning.

Detailed arrangements will be contained within the relevant contingency plan and contract.

Termination

Subcontracting arrangements may be terminated where:

- Contractual requirements are breached
- Quality concerns remain unresolved
- Funding compliance cannot be demonstrated
- Learners are placed at risk

- Financial risk becomes unacceptable
- Fraud or serious misconduct is identified
- External approval or eligibility is lost
- Educationwise no longer considers the arrangement to provide appropriate value or learner benefit

Termination will be managed in accordance with the contract and relevant funding requirements.

Learner interests will be considered throughout.

Declarations and external assurance

Educationwise will complete subcontracting declarations and other submissions required by relevant funding bodies.

Where Educationwise falls within the scope of the DfE Subcontracting Standard, it will arrange the required independent assurance activity and submit required documentation within the applicable deadlines.

Current DfE requirements will be followed rather than fixed declaration dates being written permanently into this policy.

Records

Educationwise will maintain appropriate records relating to subcontracting.

These may include:

- Business rationale
- Approvals
- Due diligence
- Conflict declarations
- Contracts
- Management fee arrangements
- Performance reviews
- Quality assurance
- Funding assurance
- Improvement actions
- Safeguarding assurance
- Declarations

- External assurance
- Contingency arrangements
- Termination activity

Records will be stored securely and retained in line with applicable funding, contractual and Educationwise retention requirements.

Publication

Educationwise will publish subcontracting information where required by current funding or contractual requirements.

This may include:

- Subcontracting policy
- Management fee information
- Other information required by DfE

Where required, the updated subcontracting policy and management fee information will be published by 31 October each year.

Published information will be reviewed and updated where required.

Related policies and documentation

This policy should be read alongside:

- Subcontractor Management Fee Policy
- Subcontractor Management Cycle
- Subcontract Contingency Plan
- Internal Quality Assurance Policy
- IQA Strategy
- Counter Fraud and Error Policy
- Conflict of Interest Policy
- Safeguarding and Prevent Policy
- Data Protection Policy
- Security Policy
- Learner Appeals and Complaints Policy and Procedures
- Malpractice and Maladministration Policy
- Relevant contracts and service level arrangements

- Current funding rules
- Current DfE subcontracting requirements
- Relevant Awarding Organisation requirements

Monitoring and review

The Senior Leadership Team will maintain oversight of subcontracting arrangements.

The Board will receive appropriate assurance regarding significant subcontracting activity, risks and performance.

The subcontracting policy and rationale will be reviewed ahead of each funding year and approved through Educationwise's governance arrangements.

This policy will be reviewed annually or sooner where there is:

- A significant change to funding rules
- A change to DfE subcontracting requirements
- A significant subcontractor failure
- A major quality or safeguarding concern
- A change in Educationwise's subcontracting model
- A significant external assurance finding
- A regulatory or contractual change