

**Apprenticeship Subcontracting**

**Policy**



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# POLICY

1. **Introduction and Purpose**

The purpose of this policy is to provide accurate and comprehensive information to external agencies on how the University procures its subcontracted services and the pricing framework used.

The University of Wolverhampton currently works with one subcontractor (see below) as part of the apprenticeship programme. This is an area of delivery the University is not currently delivering and requires the expertise of others to deliver.

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| **Subcontractor** | **Contract Value** | **Delivering** |
| Serco Ltd (trading as Serco Education) | Up to £100,000 | Functional Skills in English Level 2  Functional Skills in Math’s Level 2 |

This policy will publish contract values for all subcontractors.

1. **Principles**

The implementation of this policy is in accordance with the University’s core values which are to be:

* **Accountable;** we take pride in what we do and how we do it, take responsibility for our actions and operate with transparency and integrity.
* **Resilient;** we have a positive outlook; we are adaptable and recover from setbacks.
* **Inclusive;** we are welcoming, respectful, collegiate and supportive.
* **Ambitious;** we are imaginative, confident, innovative and deliver excellence.

1. **Scope and Context**

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 DfE subcontracting standard guidance and the policy document; Using Subcontractors in the delivery of apprenticeships, and to comply with any future updates to the funding rules to cover the period of this policy.

1. **Details of Policy**

**Fairness in Procurement**

The University will always undertake fair and transparent procurement activities. Should the need to increase the number of subcontractors be identified, future opportunities will be advertised and procured in accordance with the University's Procurement Policy andthe Procurement Act 2023, which came into force on 24th February 2025. Where appropriate, before appointing subcontractors the University may seek its own legal advice about the impact of the Procurement Act 2023 on the recruitment of delivery subcontractors. This would only occur where the expertise does not already exist within the Procurement team or University Legal department.

The University will inform the Chief Executive of the DFE in writing, about any circumstances which might lead to an actual or perceived conflict of interest.

**Due Diligence**

The University will undertake a robust process of due diligence when selecting potential subcontractors to ensure the highest quality of delivery is made available which demonstrates value for money and has a positive impact on the experience of both Employers and Learners. Initial information is gathered through the ‘Apprenticeship Subcontracting Due Diligence Form’ and then processed through relevant University departments for assessing. The full process is outlined in full under **Quality Processes: Subcontracting**.

The University will not procure the service of subcontractors who are not registered on the Apprenticeship Provider and Assessment Register (APAR) to deliver services to levy paying employers. It is a requirement for the subcontractor to provide up to date data for continued APAR accreditation.

## Contracting Arrangements

Successful partners will enter into a legally binding contract with the University which contains the right for the University and the DFE to request and be provided with any sub-contractor information required about the quality of training being provided, and to visit the sub-contractor at their premises, training sites or employer’s premises from which they operate as and when required.

The subcontractor will be required to comply in full with the DFE Apprenticeship Funding and Performance Management Rules for Training Providers 1st August 2025 to 31st July 2026 and will comply with any future updates to the funding rules to cover the period of this policy.

**Quality Processes: Subcontracting**

**University of Wolverhampton is committed to improving the quality of Teaching, Learning and Assessment throughout our Subcontracted provision**

The University is committed to a policy of continual improvement in the quality of Teaching, learning and assessment. This is demonstrated through the following quality processes by ensuring that all subcontractors:

* Are selected through a tender process that is aligned to the University’s strategic objectives for local delivery reflecting local community needs, high quality teaching and assessment, and priority sector provision.
* Are subject to a robust due diligence process that requires demonstrable evidence of the delivery of high-quality teaching and assessment.
* Attend regular performance monitoring and review meetings, tracking individual learner performance with the contract manager.
* Take part in lesson and assessor observations to ensure excellent teaching, learning and assessment is evidenced across the supply chain; this also includes dual observations.
* Comply with any administrative paperwork such as registers, learning agreements, etc. To ensure compliance with funding and audit regulations.
* Conduct comprehensive Initial Advice and Guidance sessions and Initial Assessments processes to demonstrate learners are on the right courses and any prior attainment is recorded correctly.
* Provide good quality outcomes and destinations for students on completion of any learning.

All subcontractors are required to undertake a self-assessment process in accordance with the Education Inspection Framework and produce a Self-Assessment Report (SAR). The University of Wolverhampton will support partners in this process and in the setting of clear targets for improvement.

**Educational Rationale**

The University of Wolverhampton currently subcontracts the teaching and delivery of English and Maths functional skills as this is an area of delivery the University is not currently delivering and requires the expertise of others to deliver. By offering the subcontracting delivery for functional skills we are ensuring that we are providing learners the maximum opportunity to complete their apprenticeship where English and/or Math’s Level 2 has not been achieved prior to joining the programme. The University works closely with its subcontractor to monitor performance and progression of learners and to ensure adequate support is in place for the attainment of these qualifications.

**Internal Policies**

Subcontractors are required to have robust internal policies to ensure compliance with legislative undertakings and general good practice and make certain that policies are regularly updated and effectively implemented, the requirements of which are identified in the contract.

**Fees and Charges**

The University makes a charge of 2% of the full contracted value as a management fee for its standard sub-contracted provision for English and Maths. The costs cover 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

The costs to the University in relation to the above provision would total more than the 2% charge; however, the University has taken the decision not to charge above 2% on the basis that it does not wish to make a profit from the sub-contracting provision. The University’s overall aim is that learners engaged with the sub-contractor achieve the maximum benefit from the provision.

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 the University.

**Payment**

Payment to subcontractors will be made within 30 days of the invoice been received, subject to all necessary paperwork and records having been submitted within the required time scale. A checklist of key dates and deadlines for the paperwork to be received for inclusion in the return to the Education Skills Funding Agency will be provided. Payment detail is included in the contract between the provider and sub-contractor.

**Reporting the Use of Delivery Subcontractors**

The University will provide a fully completed delivery subcontractor declaration by the dates given by the DFE. This will be submitted on at least two occasions between 1st April to 31st March each year. The University will update the subcontractor declaration if subcontracting arrangements change during the year.

1. **Policy Review and Communication**

The University 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 the University's website and paper copies will be made available upon request.

1. **Duties with the University of Wolverhampton**

Nominated members of staff with strategic lead responsibility for subcontracting:

* Dean of Academic Development and Success
* Director of Registry Services.

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

* Head of Apprenticeship Operations
* Apprenticeship Compliance Manager

Policy Approval:

* The University’s Academic Board

1. **Exceptions**

There are no exceptions to this policy.

1. **Amendments**

This Policy was approved by the University’s Academic Board on 11 June 2025. The University may change this Policy at any time, and where appropriate. Where a policy is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

1. **Contact**

For any queries, guidance and support relating to this policy please contact Head of Apprenticeship Operations.  
Email: [debbie.collymore@wlv.ac.uk](mailto:debbie.collymore@wlv.ac.uk)

For general queries, please contact the Corporate Compliance Team via email: [compliance@wlv.ac.uk](mailto:compliance@wlv.ac.uk).

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| **VERSION** | 2.0 | **AUTHOR/OWNER** | Dean of Academic Development and Success |
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