

Subcontracting Policy for Apprenticeship Training

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Policy & Privacy Statement

Darke & Taylor recognises its statutory and contractual responsibility for the quality, compliance and outcomes of all education and training it delivers, including any provision delivered through subcontracting arrangements.

The Company adopts a risk-based, learner-focused approach to subcontracting, ensuring that any subcontracted provision enhances learner outcomes, represents value for money and meets all requirements set out by the Department for Education (DfE) and Ofsted.

Darke & Taylor retains full accountability for all subcontracted provision and will ensure that robust governance, oversight and quality assurance arrangements are always in place.

This policy applies to all learners, staff, directors, subcontractors and other stakeholders involved in subcontracted delivery.

Privacy Statement:

Darke & Taylor recognises the importance of appropriate information sharing in order to manage subcontracting arrangements effectively and protect learners.

In implementing this policy and associated procedures, the company will ensure that all personal data is obtained, processed and retained in accordance with GDPR and the Data Protection Act 2018.

Further information regarding data protection can be found in the company's Data Protection Policy.

1. Policy Aims

- 1.1 This policy provides a clear and consistent framework for managing subcontracting arrangements in line with DfE subcontracting funding rules and regulatory expectations.
- 1.2 The policy aims to ensure that subcontracting:
 - Improves learner experience, achievement and progression
 - Provides access to specialist expertise where required
 - Delivers high-quality education and training
 - Represents value for money
 - It is transparent, controlled and proportionate

2. Policy Principles

- 2.1 Darke & Taylor is committed to ensuring that:
 - Subcontracting is used only where it benefits learners
 - Delivery, financial and compliance risk is not transferred to subcontractors
 - Subcontracted provision meets the same quality and safeguarding standards as directly delivered provision
 - Governance and oversight arrangements are robust and effective

- 2.2 Subcontracting will not be used:
- As a mechanism to generate income
 - To circumvent funding, quality or compliance responsibilities
 - To expand provision beyond capability

2.3 The policy is approved by the directors and reviewed annually.

3. Scope

3.1 This policy applies to all current and future subcontracting arrangements relating to DfE-funded post-16 education and training delivered by Darke & Taylor.

3.2 Subcontracted provision may include, but is not limited to:

- Functional Skills Delivery
- Specialist technical or vocational training
- Additional learning support
- Specialist or niche provision

3.3 This policy applies to all staff involved in subcontractor approval, contracting, monitoring and governance.

4. Governance and Accountability

4.1 Darke & Taylor retains full accountability for:

- Funding compliance
- Quality of provision
- Learner outcomes
- Safeguarding and Prevent Duties

4.2 All subcontracting arrangements must:

- Be approved by the Governance committee/Directors
- Be declared to the Department for Education where required
- Be recorded on the Company's subcontracting register

4.3 Subcontracting activity will be reviewed at the governance committee meetings to ensure accurate oversight and risk review.

5. Subcontractor Selection and Eligibility

5.1 Darke & Taylor will only subcontract with organisations that:

- Are legally constituted and financially viable
- Demonstrate appropriate quality assurance arrangements
- Are listed on the UKPRN register
- Have effective safeguarding and Prevent procedures
- Have the capacity, capability and expertise to deliver the provision

- 5.2 The Company will not subcontract with organisations that:
- Meet the criteria of a high-risk provider under DfE policy
 - Are subject to insolvency or enforcement action
 - Fail to meet due diligence or financial health requirements

6. Due Diligence

- 6.1 Darke & Taylor will **undertake** full due diligence before entering into any subcontracting arrangement. This due diligence will be proportionate to the nature and scale of the subcontracted provision and will assess, as a minimum:
- Financial health and sustainability
 - Quality of provision and performance history
 - Safeguarding and Prevent arrangements
- 6.2 Due diligence will be reviewed on an annual basis and be subject to ongoing review throughout the duration of the subcontract to ensure continued compliance with DfE and contractual requirements.
- 6.3 Where due diligence identifies concerns relating to quality, financial health, safeguarding or compliance, Darke & Taylor may:
- Suspend any current or planned delivery
 - Increase the level of monitoring and oversight
 - Require remedial actions within defined timescales
 - Terminate the subcontracting arrangement where risks cannot be mitigated

7. Contractual Arrangements

- 7.1 All subcontracting arrangements will be governed by a formal written agreement.
- 7.2 Contracts will include, as a minimum:
- Roles and responsibilities
 - Data sharing and reporting requirements
 - Audit and inspection access
 - Safeguarding and Prevent requirements
 - Intervention and termination clauses
 - Contingency arrangements

8. Fees, Payments and Value for Money

- 8.1 All management fees retained by Darke & Taylor will be:
- Reasonable and proportionate
 - Transparent and evidenced
 - Reflective of the oversight and support provided
- 8.2 Subcontracting arrangements will be reviewed regularly to ensure value for money for the learners.

9. Monitoring, Quality Assurance and Performance Management

- 9.1 Darke & Taylor will implement robust monitoring and quality assurance arrangements for all subcontracted provision to ensure that delivery meets Department for Education funding requirements, contractual obligations and the Company's quality standards.
- 9.2 Monitoring activity could include:
- Learner attendance, progress achievement and retention
 - Quality of teaching, learning and assessment
 - Safeguarding and Prevent compliance
 - Accuracy and timelines of data, reporting and audit evidence
- 9.3 Monitoring will be conducted on a regular and risk-based approach, including routine performance reviews and formal review points, to enable early identification of underperformance or emerging risk.
- 9.4 Where monitoring identifies concerns relating to quality, safeguarding, financial performance, or compliance, Darke & Taylor may:
- Increase the frequency or intensity of monitoring
 - Require the subcontractor to implement improvement actions within agreed timescales
 - Suspend any current or planned delivery or reduce delivery volume
 - Escalate concerns in line with contractual arrangements, including termination where required
- 9.5 Darke & Taylor will maintain appropriate records of all monitoring and quality assurance activity to demonstrate effective oversight and compliance with DfE requirements.

10. Safeguarding and Prevent

- 10.1 All subcontractors must comply with the statutory safeguarding and Prevent duties and maintain appropriate policies, procedures and trained staff.
- 10.2 All safeguarding and Prevent concerns must be reported immediately to Darke & Taylor's Designated Safeguarding Lead.
- 10.3 Darke & Taylor retains overall responsibility for learner welfare and safeguarding outcomes.

11. Financial Oversight and Risk Management

- 11.1 Darke & Taylor will monitor financial exposure and delivery volumes.
- 11.2 Contingency and teach-out arrangements will be maintained to protect learners.

12. Intervention and Termination

12.1 The Company may intervene where concerns arise, including:

- Suspending learner delivery
- Reducing delivery volumes
- Issuing improvement actions
- Terminating subcontract agreements

12.2 Intervention may occur where quality, safeguarding, financial or compliance risks are identified, or when directed by the DfE.

13. Policy Review

13.1 This policy will be reviewed annually or following changes to DfE funding rules.

POLICY REVIEWS AND AMENDMENTS

Date	Description	Amendments/Comments

Signed: 

Name: Matthew Hyde
Apprentice & Training Manager

Date: 01 January 2026

Signed: 

Name: Simon Newton
Managing Director

Date: 01 January 2026