

Chichester College Group (CCG)

Subcontracting and Partnership Policy 2026/27

1. Introduction

Chichester College Group sub-contracts work to other organisations, such as training providers, to deliver training services. This is done for several reasons, for example: to enable charities to offer training to clients or volunteers; to offer specialist training that is not within the Group's areas of expertise; to provide training in areas outside the Group's typical geographical reach.

The Group has a long history of working with partners to deliver high quality teaching and learning. In recent years this work has mainly been focused on apprenticeship training.

2. Purpose

This policy sets out Chichester College Group's approach to subcontracting and partnership delivery funded by the Department for Education (DfE), including 16–19 study programmes, Adult Skills Fund (ASF) provision and apprenticeships.

The policy is designed to:

- Ensure all subcontracting demonstrably adds value for learners, employers and communities.
- Maintain full compliance with DfE subcontracting funding rules and the DfE Subcontracting Standard.
- Protect public funds through strong governance, transparency and value for money.
- Ensure high-quality teaching, learning, safeguarding and learner outcomes.
- Provide a clear framework for selecting, monitoring and managing subcontracting partners.

3. Scope

This policy:

- Applies to all CCG staff involved in subcontracting activity.
- Covers all subcontracted provision delivered on behalf of CCG.
- Applies to all relevant DfE-funded and fee-funded provision.
- Applies to all subcontractors and partnership organisations engaged by CCG.

4. Policy Statement

CCG will:

- Use subcontracting only where it delivers clear educational, economic or social benefit.
- Retain full accountability for all subcontracted provision.
- Ensure subcontracting is actively managed and not operated through a distant or passive model.
- Maintain a learner-first approach in all subcontracting decisions.
- Ensure subcontracting is never undertaken for financial gain alone, volume growth alone or where provision can be delivered effectively in-house.
- Operate a robust framework for due diligence, quality assurance, performance management and risk management.

5. Strategic Rationale for Subcontracting

CCG will enter into subcontracting arrangements only where one or more of the following applies:

- To widen participation and improve access for disadvantaged or under-represented learners.
- To support learners with protected characteristics or additional needs.
- To increase geographical access to education and training.
- To provide specialist or niche curriculum expertise unavailable within CCG.
- To respond to employer demand in priority sectors.
- To support local, regional and national skills priorities, including Local Skills Improvement Plan (LSIP) priorities where applicable.
- To engage new learner groups or employer markets where this benefits learners.
- To support employers operating across wider geographical areas.

All subcontracting proposals must evidence learner benefit, value for money and strategic alignment.

6. Governance and Oversight

Corporation

The Corporation, with delegated authority to the Finance and General Purposes Committee, will:

- Approve this policy annually.
- Review subcontracting activity, performance and risk.
- Monitor compliance with DfE requirements.
- Approve any subcontracting arrangements requiring Board approval under CCG governance arrangements.

Executive Team

The Executive Team will:

- Ensure compliance with DfE funding rules and the Subcontracting Standard.
- Monitor performance, risk and quality.
- Review annual subcontracting rationale and activity.

Contract Authorisation

All subcontracting agreements must be formally approved and signed by the Chief Executive or delegated authorised signatory.

Accountable Officers

The Chief Financial Officer will act as the senior executive lead with responsibility for ensuring that subcontracting arrangements represent value for money, comply with funding regulations and are subject to appropriate financial governance, risk management and assurance processes.

The Director of Information & Funding will act as the operational management lead with responsibility for the implementation and oversight of subcontracting arrangements, including funding compliance, due diligence, contract management, performance monitoring, data integrity, audit readiness and reporting to the Executive Team and Corporation as required.

7. Subcontracting Controls

CCG will:

- Ensure subcontracting remains a minority element of overall provision.
- Avoid high-volume subcontracting models.
- Review all arrangements annually.
- Ensure subcontracting activity remains strategically justified.
- Comply with any DfE restrictions, approvals or thresholds in force during the funding year.
- Prohibit further subcontracting by subcontractors.

8. Due Diligence and Selection

No organisation will be appointed until a comprehensive due diligence process has been completed.

Financial Due Diligence

- Minimum two years of financial information where applicable.
- Financial health assessment.
- Cashflow and solvency review.
- Review of any adverse financial indicators.

Quality Due Diligence

- Ofsted outcomes where relevant.
- Achievement and retention performance.
- Curriculum expertise.
- References and track record.

Compliance Due Diligence

- UKRLP registration.
- Legal entity status.
- Safeguarding arrangements.
- Prevent Duty compliance.
- Equality, Diversity and Inclusion arrangements.
- Health and Safety compliance.
- Data protection compliance.
- DBS arrangements.

Governance and Capacity Assessment

- Leadership and management capability.
- Staffing capacity.
- Quality systems.
- Learner support arrangements.

Due diligence will be refreshed periodically throughout the contract period.

9. Contractual Requirements

All subcontractors must operate under a legally binding written contract.

Contracts will include:

- Funding values and delivery profile.
- Performance expectations and KPIs.
- DfE funding rule compliance requirements.
- Data submission and ILR requirements.
- Audit and inspection access rights.
- Safeguarding requirements.
- Quality assurance obligations.
- Continuity of learning requirements.
- Recovery of funds where appropriate.

- Termination and exit arrangements.

No delivery may commence until the contract is fully executed.

10. Management Fees and Transparency

Management Fee Principles

CCG will apply a transparent and justifiable management fee.

Management fees will normally be between 15% and 20%, although individual arrangements may vary according to:

- Risk profile.
- Nature of provision.
- Required support and oversight.
- Quality improvement requirements.

Services Provided

Management fees support:

- Due diligence and due diligence refresh activity.
- Contract management.
- Data validation and ILR support.
- Funding compliance monitoring.
- Quality assurance activities.
- Teaching, learning and assessment reviews.
- Learning walks and observations.
- Learner voice activities.
- Safeguarding oversight.
- Audit support.
- Staff development and CPD.
- Access to relevant CCG systems, policies and training resources.
- Monthly performance monitoring and financial forecasting.

Publication

CCG will publish annually, in line with DfE requirements:

- Subcontractor names.
- Contract values.
- Subcontracting rationale.
- Management fees retained.
- Actual end-of-year fees retained.

11. Quality Assurance and Improvement

CCG will operate a single quality framework across directly delivered and subcontracted provision.

Monitoring Activities

- Lesson observations.
- Learning walks.
- Deep dives.
- Work scrutiny.
- Assessment reviews.
- Learner and employer surveys.
- Compliance audits.
- Scheduled and unannounced monitoring visits.

Performance Expectations

Subcontractors are expected to:

- Meet or exceed national performance benchmarks.
- Meet CCG performance targets.
- Participate fully in quality improvement activity.
- Demonstrate continuous improvement.

Integration into CCG Quality Processes

Subcontractors must contribute to:

- Self-Assessment Reports (SAR).
- Quality Improvement Plans (QIP).
- Staff development activities.
- Ofsted preparation activity.

12. Performance Management

Performance will be reviewed through:

- Monthly performance meetings.
- Monthly data reviews.
- Quarterly contract reviews.
- Annual strategic review.

Key measures will include:

- Recruitment.
- Retention.
- Achievement.
- Timely achievement.
- Attendance.
- Learner satisfaction.
- Employer satisfaction.
- Compliance performance.
- Safeguarding effectiveness.

Where performance falls below expectations, CCG may:

- Issue an improvement notice.
- Require a formal action plan.
- Increase monitoring.
- Reduce allocations.
- Suspend recruitment.
- Terminate the contract.

13. Safeguarding, Prevent and Learner Welfare

CCG retains ultimate responsibility for safeguarding learners.

Subcontractors must:

- Comply with CCG safeguarding policies.
- Maintain effective safeguarding arrangements.
- Ensure mandatory training is up to date.
- Implement Prevent Duty requirements.
- Report safeguarding concerns immediately.
- Participate in safeguarding audits and reviews.

14. Data Management and Funding Compliance

Subcontractors must:

- Submit accurate and timely data.
- Maintain complete learner records.
- Ensure funding evidence is available.
- Cooperate with all audits and reviews.

CCG will:

- Validate data before submission.
- Monitor compliance regularly.
- Undertake funding audits.
- Ensure adherence to DfE funding rules.

15. Audit and Assurance

CCG will operate a risk-based assurance programme including:

- Funding compliance reviews.
- Planned audits.
- Unannounced visits.
- Learner file sampling.
- Data quality reviews.

Non-compliance may result in funding recovery, suspension or contract termination.

16. Risk Management

A Subcontractor Risk Register will be maintained and reviewed regularly.

Risk assessments will consider:

- Financial health.
- Quality performance.
- Compliance performance.
- Safeguarding risks.
- Capacity and delivery risks.
- Reputational risk.

Mitigations may include enhanced monitoring, restricted growth, reduced allocations or exit planning.

17. Continuity, Termination and Exit Planning

CCG will maintain contingency arrangements to protect learners. Contracts may be terminated where:

- Quality standards are not achieved.
- Significant compliance breaches occur.
- Safeguarding concerns arise.
- Financial risk becomes unacceptable.
- The subcontractor ceases trading or withdraws.

Where termination is required, CCG will:

- Prioritise continuity of learning.
- Seek direct delivery where possible.
- Transfer learners safely where necessary.
- Maintain communication and support for learners and employers.

18. Conflict of Interest

All employees involved in subcontracting decisions must declare actual, potential or perceived conflicts of interest.

CCG will ensure procurement and selection processes remain fair, transparent and objective.

19. Review

This policy will be reviewed at least annually and updated immediately following any substantive changes to DfE subcontracting requirements.

20. Core Principles

CCG is committed to:

- Learner-first decision-making.
- High-quality, low-risk partnerships.
- Full transparency and accountability.
- Robust governance and oversight.
- Strong safeguarding and learner protection.
- Continuous quality improvement.

- Compliance with DfE funding rules and the DfE Subcontracting Standard.

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Appendix 1 – Annual Subcontracting Rationale Statement

For each subcontracting arrangement, CCG will prepare and retain a documented rationale which demonstrates why subcontracting is necessary and how it delivers clear benefits to learners.

The rationale will include:

- Name of subcontractor.
- Funding stream and curriculum area.
- Planned learner numbers and contract value.
- Strategic objective being supported.
- Learner benefits to be achieved.
- Employer benefits to be achieved.
- Geographic need being addressed.
- Contribution to LSIP, local authority or regional skills priorities.
- Evidence that the provision cannot be delivered as effectively by CCG directly.
- Value-for-money assessment.
- Risk assessment summary.
- Approval by the appropriate CCG governance body.

Annual review questions:

- Does the arrangement continue to meet an identified learner need?
- Does the arrangement support widening participation or specialist provision?
- Has the subcontractor delivered expected outcomes?
- Has the arrangement remained compliant with DfE funding rules?
- Should the arrangement continue, be modified or cease?

Appendix 2 – Due Diligence Framework

Prior to contract award and during annual refresh activities, CCG will assess subcontractors against the following criteria.

Financial Health

- Audited accounts.
- Management accounts where required.
- Cashflow forecasts.
- Credit and solvency checks.
- Insurance arrangements.

Quality and Performance

- Ofsted outcomes where applicable.
- Achievement and retention rates.
- Learner satisfaction.
- Employer satisfaction where applicable.
- Previous subcontracting performance.

Compliance

- UKRLP registration.
- Legal entity verification.
- Data protection compliance.
- Health and safety compliance.
- Equality, Diversity and Inclusion compliance.
- Prevent Duty compliance.
- Safeguarding arrangements.

Governance and Capacity

- Leadership capability.
- Curriculum expertise.
- Staffing structure and capacity.
- Quality assurance arrangements.
- Learner support arrangements.

Risk Rating

Each subcontractor will receive a risk rating of:

- Low Risk
- Medium Risk
- High Risk

Risk ratings will determine the level of monitoring, audit activity and management oversight applied throughout the contract period.

Appendix 3 – Management Fee Schedule

CCG will apply a transparent management fee, normally between 15% and 20%, which reflects the support, oversight and assurance activity provided.

The management fee may include the following services:

Contract and Relationship Management

- Partnership management.
- Contract reviews.
- Performance monitoring meetings.
- Financial forecasting and allocation management.

Compliance and Funding Assurance

- Funding compliance monitoring.
- Data validation.
- ILR support and checking.
- Audit preparation and support.
- Learner file reviews.

Quality Assurance

- Lesson observations.
- Learning walks.
- Deep dives.
- Learner voice activities.
- Employer feedback activity.
- Support for SAR and QIP processes.

Safeguarding and Learner Protection

- Safeguarding oversight.
- Prevent monitoring.
- Policy updates and guidance.
- Compliance reviews.

Staff Development and Support

- CPD opportunities.
- Access to CCG training resources.
- Networking and best-practice events.
- Quality improvement support.

Any variation from the standard management fee range must be documented and supported by a clear business rationale, demonstrating proportionality, transparency and value for money.