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POLICY & PROCEDURES

SUBCONTRACTING

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1. PURPOSE

Crosby Training is a directly funded organisation utilising the Adult Education Budget (AEB), devolved to the Liverpool City Region Combined Authority (LCRCA), to deliver high-quality education and training.

This policy sets out:

- Our approach to subcontracting delivery to third parties.
- How subcontractors are selected, monitored, and supported to ensure compliance, quality, and value for money.
- How we gather and act on learner and employer feedback.
- Procedures for managing contingencies, risk, and safeguarding.

This policy ensures all subcontracted provision meets Ofsted standards, AEB funding rules, and Crosby Training's internal quality requirements.

2. SCOPE

This policy applies to all AEB-funded subcontracted provision delivered by Crosby Training, on a rolling basis, including:

- New subcontractors joining in any contract year.
- Ongoing monitoring of existing subcontractors.
- Any third-party involvement in the learner journey.

The maximum subcontracted value shall not exceed 20% of allocated funding unless specifically approved by LCRCA.



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3. POLICY PRINCIPLES & RATIONALE

Crosby Training subcontracts to:

- Expand the reach of education and training across the Liverpool City Region.
- Offer a diverse and innovative curriculum aligned with regional skills priorities.
- Enhance opportunities for disadvantaged learners and those with protected characteristics.
- Ensure high-quality outcomes through experienced and qualified delivery partners.
- Deliver social value and support local communities.

All subcontracting arrangements must not compromise learner safeguarding, curriculum quality, or contractual compliance.

4. PROCUREMENT & DUE DILIGENCE

4.1 Procurement Process

- All subcontracting opportunities are advertised openly, including on Crosby Training's website and Government Contract Finder.
- Tender documentation includes: specification, requirements, evaluation criteria, scoring, and contract award process.
- Bids are evaluated transparently, moderated for fairness, and feedback is provided to all applicants.

4.2 Due Diligence

Prior to award, subcontractors must provide:

- Organisational and legal information (company registration, directors, staff contacts).



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- Latest audited accounts for financial viability checks.
- Insurance certificates.
- Policies and procedures covering: safeguarding, PREVENT, Equality & Diversity, Health & Safety, Information Security, Data Protection, Modern Slavery, Complaints, Fraud Prevention.
- Matrix accreditation or commitment to achieve it within six months.
- Evidence of compliance with Ofsted inspection standards.

Annual updates ensure continued compliance and risk assessment.

5. MANAGEMENT & QUALITY ASSURANCE

5.1 Responsibilities

Crosby Training retains full accountability as the prime provider for:

- Reporting, data, and performance management.
- Quality assurance, risk management, and learner safeguarding.
- Monitoring subcontractor compliance with AEB rules and contractual obligations.

5.2 Risk-Based Monitoring

- Each subcontractor is assigned a risk rating (Red/Amber/Green) based on delivery, quality, and financial indicators.
- Key performance measures include:
 - Delivery profile against contract value.
 - Learner success, retention, and progress.
 - Accuracy of data returns.
 - Quality of teaching, learning, and assessment.
 - Learner and employer feedback.
- Risk ratings are reviewed monthly, with interventions proportionate to the level of risk.



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5.3 Contingency Planning

Crosby Training ensures continuity for learners if:

- A subcontractor withdraws or fails to deliver.
- A subcontractor goes into liquidation or administration.

6. SUPPORT & DEVELOPMENT FOR SUBCONTRACTORS

Crosby Training provides subcontractors with ongoing support, including:

- Guidance on contractual compliance and AEB funding rules.
- Regular performance reviews, audits, and observations.
- Quality improvement support via Self-Assessment Reports and Improvement Plans.
- Access to CPD covering safeguarding, PREVENT, E&D, Mental Health, Information Security, OTLA, MI systems, and environmental sustainability.
- Networking events to encourage collaboration and sharing of good practice.

7. LEARNER & EMPLOYER FEEDBACK

- Feedback is collected from all learners and employers for every programme, using surveys and direct reporting.
- Data is collated quarterly and informs:
 - Subcontractor performance reviews.
 - Quality improvement interventions.
 - Self-Assessment Reports.
 - Strategic planning for future provision.



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8. PAYMENT & FUNDING ARRANGEMENTS

- Payments to subcontractors are monthly and conditional on accurate claims and evidence of quality delivery.
- Retained management fees fund administration, QA, performance monitoring, audits, and support.
- Non-compliance triggers proportionate deductions, and repeated breaches may lead to termination.

9. GOVERNANCE & ACCOUNTABILITY

- Policy Owner: Crosby Training Senior Management Team / Governance & Leadership Team.
- Monitoring: Social Value Lead and designated Senior Managers oversee subcontractor compliance, learner outcomes, and performance management.
- Reporting: Monthly internal reports, quarterly performance summaries, and annual consolidated reporting to LCRCA and Ofsted.

9. CONTINUOUS IMPROVEMENT & REVIEW

- Data from performance monitoring and feedback informs ongoing improvements.
- Annual review or sooner if legislative, contractual, or operational changes occur.
- Continuous improvement ensures alignment with:
 - Ofsted Education Inspection Framework.
 - AEB funding rules and guidance.
 - Crosby Training strategic objectives.



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11. REFERENCES & LINKED DOCUMENTS

- LCRCA AEB Funding and Performance Management Rules.
- Ofsted Education Inspection Framework.
- Crosby Training Safeguarding & PREVENT Policies.
- Crosby Training Quality Assurance Framework.
- Matrix Standard Accreditation Guidance.
- Social Value Policy.