

Subcontracting Policy

Document Owner: Quality and Funding Director		
Version No.	Date	Notes
1	October 2025	Creation of policy (Robyn Harley)

Our Commitment

Cambridge Spark is committed to ensuring that all provision funded through our direct Department for Education (DfE) apprenticeship contracts is high quality, fully compliant, and represents good use of public funds.

At present, we do not subcontract any apprenticeship delivery and have no current plans to do so. However, to retain the flexibility to subcontract should exceptional needs arise, we have published this policy in line with the government's apprenticeship funding rules and the deadline for public declaration (31 October 2025).

Objectives

This policy provides transparency to apprentices, employers, the DfE, Ofsted, and other stakeholders about our approach to subcontracting. It outlines the rationale, principles, and controls we would apply should we enter into subcontracting arrangements during the academic year.

1) Scope

This policy covers:

- Rationale for Subcontracting
- Procurement
- Due Diligence
- Contract Agreement
- Management Fee Policy
- Typical Management Rates/Calculations
- Support Provided to Subcontractors
- Contingency Planning
- Payment Terms
- Communication and Publication
- Policy Review and Amendments

2) Key Contacts

- **Robyn Harley** – Quality and Funding Director
- **Denham Holmes** – Group Financial Controller
- **Tom Phillips** - COO

3) Responsibilities

Name	Responsibility
Quality and Funding Director	Quality assurance of subcontracted provision, performance and relationship management. Compliance with DfE rules and learner data integrity
Group Financial Controller	Contract negotiation and financial due diligence
Audit and Risk Committee	Final oversight and sign-off of the Subcontracting Policy, including approval of any subcontracting arrangements

a) Rationale for Subcontracting

We do not currently subcontract any provision. If, during the year, subcontracting is deemed necessary, it will be to:

- Address a specific niche, specialist or geographical need;
- Enhance learner opportunities where internal capacity is insufficient;
- Access subject-matter expertise or specialist facilities not available in-house.

We will not accept unsolicited approaches to subcontract delivery. All subcontracting decisions will be internally initiated and based on strategic need.

In line with DfE rules, we will only subcontract to organisations listed on the Apprenticeship Provider and Assessment Register (APAR) unless an approved exemption applies. Cambridge Spark would lead the relationship with any relevant employer at all times.

b) Procurement

If required, subcontractors will be procured on an invitation-only basis, determined by strategic delivery needs and subject to any legislation that may apply.

We will assess prospective subcontractors based on:

- Organisational capacity and capability;
- Compliance and quality assurance track record;
- Financial health and risk profile;
- Alignment with our strategic objectives and learner needs.

c) Due Diligence

We will carry out a formal due diligence process before entering any subcontract. This includes, but is not limited to:

- Financial health checks and accounts review;
- Evidence of quality assurance capability;
- References and history of DfE-funded delivery;
- Analysis of Ofsted outcomes (if applicable);
- Risk scoring and Executive Team/Audit and Risk Committee approval.

d) Contract Agreement

Where subcontracting is agreed, we will use a sector approved subcontract and adapt it as necessary. All contracts will:

- Comply with the current apprenticeship, or any other funding rules relevant to the programme;
- Be signed at Director level on both sides;
- Be in place before any delivery commences;
- Be reviewed and re-signed annually.

e) Management Fee Policy

Should subcontracting occur, we will ensure that the maximum amount of funding reaches the point of delivery. Management fees will be used solely to cover the cost of:

- Contract management and performance oversight;
- Data processing, ILR maintenance, and funding claims;
- Quality assurance, including observations, audits and learner feedback.

f) Typical Management Rates

Our **management fee will not exceed 25%** of the contract value, and will be based on:

- Risk level of provision;
- Volume and complexity of support required;
- Data and compliance workload.

A detailed funding breakdown (eligible and ineligible costs) will be made available as required and published in line with DfE rules.

g) Support Provided to Subcontractors

Subcontractors will receive appropriate support at no additional cost, including:

- CPD and internal training opportunities;
- Updates on DfE, Ofsted and awarding body guidance;
- Quality assurance visits and feedback;
- Guidance on self-assessment and quality improvement planning.

h) Contingency Planning

In the event of a subcontractor withdrawal, insolvency, or termination:

- We will ensure continuity for all learners;
- Learners will remain our responsibility as the lead provider;
- A designated senior manager will coordinate the transition;
- All stakeholders (learners, employers, DfE, awarding bodies, EPAOs) will be informed promptly.

A formal Subcontractor Contingency Plan will be enacted to minimise disruption and uphold learner outcomes.

i) Payment Terms

Where subcontracting takes place, payments will be made monthly in accordance with DfE funding availability and subject to the subcontractor fulfilling their contractual obligations.

j) Communicating this Policy

This policy is published on our website and will be shared with all potential subcontractors prior to contract negotiation. It will be referred to during all relevant procurement or compliance

discussions.

k) Policy Review

This policy is reviewed annually in July and updated as required in response to changes in:

- DfE funding rules;
- Organisational delivery strategy;
- Quality assurance or audit findings.

l) Policy Amendments

We reserve the right to amend this policy without prior notice if required to ensure compliance with DfE or Ofsted expectations, or to respond to exceptional delivery changes.

Current Subcontracting Status

- **Number of subcontractors:** 0
- **Funding value subcontracted:** £0
- **Services delivered by subcontractors:** None
- **Declaration to DfE:** Submitted with “zero delivery” status

If subcontracting arrangements are introduced during the academic year, we will publish an updated policy and funding declaration within 30 calendar days, in accordance with the apprenticeship funding rules.

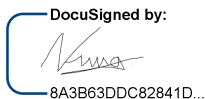
For further information, please contact:
Robyn Harley – Quality and Funding Director

Senior Management sign off

Name: Raoul-Gabriel Urma

Title: Group CEO

Date: 28 October 2025

Signed:  8A3B63DDC82841D...