



# **Subcontracting Procedure 2025-26**

**(for the delivery of Teaching, Learning  
and Assessment)**

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## **Section 1 – Introduction**

### **1.1 Aim and Scope**

As part of the College Strategy to provide high quality learning experiences to students and to bridge identified skills and provision gaps, the College will seek to identify high quality training providers who are able to meet the needs of local, regional and national priorities across key priority groups. This procedure applies to all subcontracting arrangements for which Wirral Met College claims public funding for students whose provision is delivered by a partner organisation (known as the subcontractor) on behalf of the College.

This document sets out the College's procedures for the selection, appointment and management of subcontractors, and is informed by the Department of Education (DofE) and the Liverpool City Region combined authority.

### **1.2 List of declared Subcontractors.**

It is a funding requirement that all subcontractors in the DofE and LCRCA supply chain with an aggregate contract value of £100,000 or above are on the declared list of subcontractors, in accordance with DofE and LCRCA Funding Rules for Further Education and training providers.

## **Section 2 – Due Diligence**

### **2.1 Due Diligence checks**

The College will undertake a full Due Diligence check on potential subcontractors prior to awarding them a contract to deliver education and training services. This check meets DofE and LCRCA standards and will request information such as:

- Copies of annual financial accounts
- Credit checks for Training Providers
- Details of the teaching / delivery staff
- Details of awarding body accreditation
- Details of policies and procedures
- Details of Insurance Policies:
  - Employer Liability Insurance
  - Public Liability Insurance
  - Professional Indemnity Insurance
- Details of the Directors/Senior Managers and the ownership of the organisation
- Details of the organisations UK Provider Reference Number (UKPRN)
- Trade references
- DBS / Vetting and Barring Service approval for Delivery / Contact Staff
- Details of Ofsted Inspections either direct or indirectly
- Details of other Quality Standards held e.g. ISO / IIP
- Details of Registration with the Information Commissioners Office

- Details of Safeguarding policies and procedures
- Details of the Continuous Professional Development policies, procedures and processes

## **Section 3 – Ongoing Due Diligence**

### **3.1 Contract quality and delivery management**

Subcontractor performance will be monitored on a bi-monthly basis and feedback will be provided at periodic contract performance meetings. The frequency of these meetings will depend upon the performance of the subcontractor. To ensure that the subcontracted provision meets the standards set out in the Further Education & Skills Toolkit and the expectations of the student and the employer, Wirral Met College will undertake:

- Performance Reviews of provision by making announced and unannounced visits to the premises where delivery is taking place to continuously improve the quality of education
- Observation of teaching, learning and assessment (including scrutiny of student work) where delivery is taking place
- Monitoring of attendance evidence, IAG, reviews, accreditation and achievement
- Student Voice activity
- Verification of student authenticity
- Data analysis
- Health and Safety, audit and quality trail, including enrolment, progression and destination data and any safeguarding issues
- Internal verification (where agreed in the subcontract)
- Contract review meetings with relevant College Managers and Employer Services
- Annual Due Diligence review and updating of policies and procedures

### **3.2 Performance Improvement Plans**

Where performance falls below the standards required, subcontractors will be issued with a Performance Improvement Plan (PIP), which will detail the improvements to be made and the time scales required to achieve them. Support will be provided to help subcontractors to continuously improve and enhance the quality of education.

If a subcontractor fails to meet the necessary improvements within the agreed timescales, it may be necessary to implement contract termination procedures.

## **Section 4 - Requirements for enrolment training and checking accurate enrolments by subcontractors**

### **4.1 Enrolment training**

Each subcontractor will have an MIS link person, who will undertake enrolment training with the relevant subcontractor's staff, within 4 weeks of commencement of the subcontract.

### **4.2 Checking enrolments**

Periodic meetings will take place between the MIS link person and the subcontractor to check the accuracy of enrolments, and to address any enrolment issues. These meetings will also identify any CPD needs regarding enrolment training for the subcontractor's staff.

## **Section 5 - Requirements for monitoring student existence**

### **5.1 MIS checks**

MIS staff will conduct termly spot checks of registers against actual students to confirm existence and record and retain this information.

### **5.2 Quality of Education checks**

Quality of Education staff will check student existence against registers when conducting lesson observations or learning walks and record and retain this information. Student survey of a sample of subcontracted provision will be conducted by Quality of Education to check existence and this information will be recorded and retained by Quality of Education.

## **Section 6 - Management oversight and reporting arrangements**

### **6.1 Responsibilities**

6.1.1 The Principal & Chief Executive has the overall responsibility for all matters involving the Subcontracting Procedure. This responsibility includes ensuring that audit and quality compliance matters are seen as an important priority for the College, addressed through comprehensive policies and procedures that are effectively implemented and appropriately resourced within the overall financial position of the College.

6.1.2 The Vice Principal Finance & Resources and Director of Quality of Education are responsible for ensuring that the College's Subcontracting Procedure is implemented if delivery of provision is planned via a subcontractor. On programme responsibility includes:

6.1.2.1 validation of schemes of work and assessment

6.1.2.2 verification of evidence

6.1.2.3 formative and summative assessment internal verification

- 6.1.2.4 course performance reviews
- 6.1.2.5 observation of student activities on site
- 6.1.2.6 lesson observations of staff and scrutiny of student work
- 6.1.2.7 implementation and evaluation of student and employer feedback
- 6.1.2.8 ensure that any Safeguarding or Health & Safety issues are reported by exception in regular monthly meetings
- 6.1.2.9 ensure an assessment of ALS is in place where required
- 6.1.2.10 monitoring financial performance
- 6.1.3 The Vice Principal of Student Experience will ensure:

- 6.1.3.1 undertaking the initial Due Diligence process relating to new partners
- 6.1.3.2 drawing up and agreeing all contracts and amendments
- 6.1.3.3 agreeing line communication for each partner
- 6.1.3.5 conducting internal audits relating to document control
- 6.1.3.6 organising periodic contract review meetings
- 6.1.3.7 undertaking annual renewal of Due Diligence and updating of policies in year
- 6.1.3.8 ensure that any Safeguarding or Health & Safety issues are reported by exception in regular monthly meetings
- 6.1.3.9 ensure that ALS is put in place by the subcontractor when required

- 6.1.4 The Director of Information Services is responsible for:

- 6.1.4.1 enrolment training for subcontracted staff and the checking of accurate enrolments by subcontractors
- 6.1.4.2 making monthly claims to the relevant funding body for starts, on programme payments and completions
- 6.1.4.3 providing funding calculations relating to each partner
- 6.1.4.4 claiming all completions that are registered through the College centre
- 6.1.4.5 ensuring that copies of all student certificates are copied and retained
- 6.1.4.6 carrying out spot checks of registers and student existence
- 6.1.4.7 carrying out spot checks relating to tests or exams
- 6.1.4.8 ensuring that invigilation is carried out in accordance with awarding body requirements

- 6.1.5 The Director of Quality of Education is responsible for:

- 6.1.5.1 conducting teaching, learning and assessment inductions with partner staff
- 6.1.5.2 ensuring lesson observations of subcontracted staff are conducted by the College staff or approved and trained staff of the subcontractor
- 6.1.5.3 ensuring that partners complete a Self-Assessment Report and Quality Improvement Plan in line with the College process
- 6.1.5.4 including partner staff in any relevant training relating to delivery, pedagogy, assessment & feedback, progress monitoring, verification, inspection, EDI, safeguarding etc
- 6.1.5.5 monitoring in-year retention and

achievement rates of subcontracted provision, and taking necessary action where these fall below the required standard

6.1.5.6 overseeing quality visits which include lesson observations, work scrutiny and student voice activity

## **Section 7 – Fees and Charges**

Details of the procurement process, and the fees and charges to subcontractors, can be found in the Supply Chain Fees and Charges Policy (2025-26), which is published on the Wirral Met College website ([www.wmc.ac.uk](http://www.wmc.ac.uk)).

## **Section 8 – Contingency Plan in case of non-delivery**

The College will attempt to mitigate non-delivery by maintaining a level of due diligence over sub-contractors to identify early signs of organisational failure. Effective quality processes are in place to ensure rigorous performance management and support measures are provided to reduce the risk of subcontract failure.

In compliance with the DofE and LCRCA and other funding agency rules that apply, if a subcontractor withdraws from the arrangement, or if a subcontractor goes into liquidation or administration, the College undertakes to directly manage and deliver the remainder of the agreed provision already being delivered. This delivery will be either through its existing structure or by transferring to another provider. Any provision planned but not yet started will be cancelled and the project closed.

If the College needs to withdraw from a sub-contracting arrangement, sufficient notice will be provided to allow sub-contractors to complete delivery of immediate provision. The College will provide support to enable sub-contractors to identify other sources of funding if possible, or take appropriate action to complete the project, or close the project at the earliest opportunity, without prejudice to currently enrolled students or staff.