



Cranfield University

Apprenticeships Subcontracting Policy

2026/2027

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Introduction and Context

Cranfield University delivers a range of apprenticeship programmes to levy and non-levy employers across a variety of sectors and disciplines, this includes degree apprenticeship provision at Levels 4 to 6 delivered through [MK:U Apprenticeships - MK:U](#)

This policy sets out Cranfield University's approach to subcontracting within its apprenticeship provision, including the selection, management and oversight of subcontractors, quality assurance arrangements, and financial management processes. The University complies with all relevant Department for Education (DfE) apprenticeship funding rules and will only subcontract elements of delivery where there is a clear educational rationale, specialist expertise requirement, or capacity need [How to declare subcontracting arrangements for post-16 education and training - GOV.UK](#)

The policy applies to all subcontracted apprenticeship activity undertaken by Cranfield University, including the delivery of Functional Skills in English and Mathematics where required. Cranfield University retains full responsibility and accountability for the quality, compliance and outcomes of all subcontracted provision, and will ensure that all subcontracting arrangements deliver positive learner outcomes.

The content of this policy has been outlined against the funding rules for 2026/27 and associated documents, including [Using subcontractors in the delivery of apprenticeships](#)

Rationale for Subcontracting

The rationale for subcontracting within Cranfield's apprenticeship provision is for the following key reasons:

1. **Specialist Expertise:** It ensures learners are supported to develop their maths and English skills by procuring specialist expertise.
2. **Inclusion:** It offers opportunities for disadvantaged learners (those without maths and English, or those in need of extra support).

The main subcontracting provision is for Maths and English Functional skills to ensure that learners have the opportunity to complete these if they are required to do so (under 19 learners), or if their employer chooses to opt them in. This is especially the case if they have not achieved maths and/or English Level 2 prior to enrolment.

Responsibilities and Accountability

Cranfield University remains accountable for all apprenticeship provision delivered under its funding agreements. The key responsibilities below are indicative, and will be detailed in agreement between Cranfield and the subcontractor.

The University will:

- Ensure that the subcontractor's delivery is consistently meeting contractual, compliance and quality requirements.
- Remain responsible for the delivery and quality assurance of the substantive proportion of each apprenticeship programme.
- Ensure the subcontractor is approved in line with the procurement policy.
- Maintain the contractual relationship with employers and communicate with them about any subcontracted provision being used by their apprentices.
- Process Individualised Learner Record (ILR) returns for apprentices.

- Ensure compliance with apprenticeship funding rules.
- Ensure that each learner has an evidence pack outlining the subcontracting provision being received, as required by DfE.
- Monitor apprentice progression using action tracking, the collation of performance information and undertake timely reviews to fully assess and manage subcontractor performance.
- Act in support of learner and staff safety by reviewing mandatory training based on the subcontractor's processes and policies, including Prevent and Safeguarding.

The subcontractor will:

- Deliver the programme according to the agreed contract.
- Share information and data suitable for initial due diligence.
- Cooperate in ongoing quality assurance monitoring, including providing apprentice data on progression, achievement and any identified risks.
- Provide clear and auditable data to track and monitor learner progress required for ILR returns and current funding requirements.
- Inform Cranfield of any changes to the provision.
- Provide sufficient time for Cranfield to assess the subcontractor's performance against the Ofsted inspection framework (toolkit) and incorporate relevant evidence into the self - assessment report.
- Share timely information on apprentices whose progression puts them at risk of non-completion.
- Always have suitably qualified staff available to provide the education and training.

Cranfield University as the main provider of apprenticeships will adhere to the subcontracting funding rules and DfE requirements, including but not limited to the following:

- Agree the use of subcontractors with employers at the start of the apprenticeship.
- Undertake due diligence checks on the potential subcontractor, including taking account of any relevant Ofsted inspection reports.
- Ensure that the subcontractor can comply with current and relevant procurement regulations.
- Enter into a legally binding written agreement with the subcontractor.
- Manage and monitor the subcontractor to ensure that high-quality delivery is taking place that meets the requirements of the agreement they have entered into for the provision of apprenticeship funded delivery (which must comply with the apprenticeship funding rules).
- Take full responsibility for the quality assurance of the subcontractor and undertake regular reviews (including visits at short notice and face-to-face interviews with staff and apprentices).
- Clearly describe to each employer and potential subcontractor before each subcontracting relationship is agreed, outlining the reason for subcontracting, all services they will provide and the associated costs.
- Comply with relevant legislation and any statutory responsibilities, ensuring the safeguarding of all apprentices receiving provision under the subcontractor arrangement.
- Provide subcontractor declarations as required by DfE (twice during each funding year. The first declaration must be made by 31 October, and the second declaration must be made by 30 June) and manage updates if arrangements or circumstances change throughout the year.

Due Diligence

Before entering into any subcontracting arrangement, Cranfield University will undertake appropriate due diligence to ensure that the proposed subcontractor has the capacity, capability and resources to deliver high-quality provision.

This will include considering the risk management and business continuity policies. Selection and procurement of the subcontractor will be undertaken in accordance with Cranfield's Procurement policy [Policies and guidance - procurement](#).

In line with the funding rules and DfE guidance, Cranfield will only procure the services of a subcontractor who satisfies one of the five following criteria as outlined in the current funding rules [Apprenticeship funding rules: 2026 to 2027](#)

- They are on the published Apprenticeship Provider and Assessment Register (APAR) and have applied by the main provider or supporting provider application route
- They are the apprentice's employer, or a connected company or charity as defined by HMRC, and are on the published APAR, having applied through the employer-provider application route
- They are not on the published APAR but will deliver less than £100,000 of apprenticeship training under contract across all main providers and employer-providers, between 1 August and 31 July each year.
- The subcontractor must have a current UKPRN, must not have engaged the 'Funding higher risk organisations and subcontractors' policy and cannot deliver full apprenticeship standards. They can work with any main provider or employer-provider, even those that have not achieved the subcontracting standard.
- They have been approved to be exempt from the requirement to be on this register and can produce written approval from the department confirming that this exception applies to them, including its duration.

If any actual or perceived conflict of interest is identified, Cranfield will inform the DfE in writing.

Quality Assurance and Monitoring of Subcontractor Delivery

Cranfield University is committed to ensuring high-quality teaching and learning for all apprentices. To support this, Cranfield will work closely with the subcontractor through an evidence-based quality assurance process that promotes continuous improvement. Quality and performance will be monitored through monthly review meetings, supported by monthly learner progress reports.

A rigorous Quality Assurance process will provide strategic oversight to ensure that the subcontracted provision aligns with the wider University aims and objectives, and includes the following activities:

1. Exam Boards
2. Module evaluations and feedback surveys
3. Internal and external programme surveys, e.g., the NSS (National Student Survey)
4. Marking and Moderation processes
5. Annual Monitoring Review
6. Student Representative Forums
7. Employer Advisory Boards

Monitoring activities of the subcontractor will also include:

- Review of learner progress and achievement.
- Analysis of learner and employer feedback.
- Observation of teaching, learning and assessment.
- Compliance and audit checks.
- Review of safeguarding and learner support arrangements.

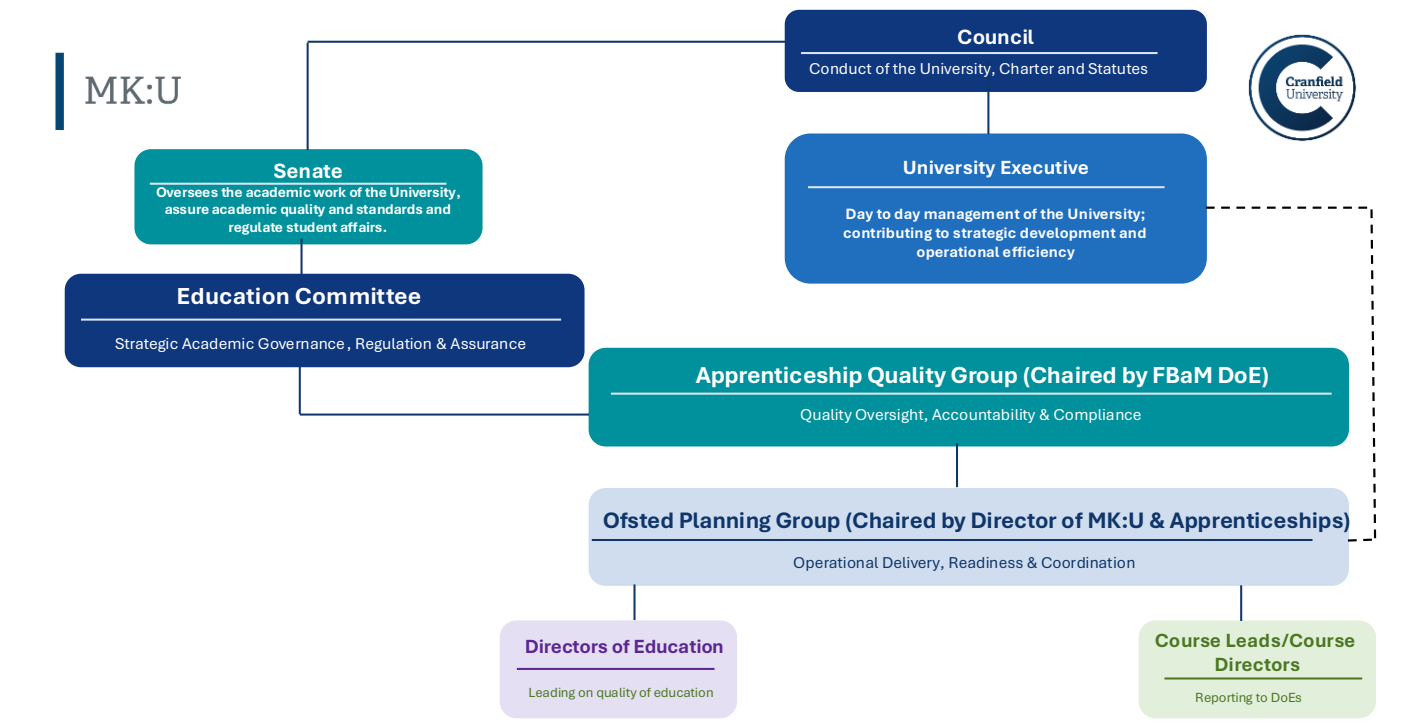
The subcontractor will be required to complete a Self-Assessment Report (SAR) and identify any quality improvement actions. Where performance concerns are identified, Cranfield University will take appropriate corrective action and may terminate the subcontracting arrangement where necessary.

Governance and Quality Assurance Roles and Responsibilities at Cranfield University

Governance structure / Position of responsibility	Delegate(s)	Role
Council	Chief Executive & Vice Chancellor	Strategic oversight, challenge and assurance of quality and compliance
Chief Executive & Vice Chancellor	Pro Vice Chancellors and Chief Operating Officer	Institutional strategic fit of apprenticeships provision; deliver high quality and safe provision, ensure compliance with funding rules and regulatory requirements; understand strengths and weaknesses of apprenticeships provision and take effective action to address underperformance
Pro Vice Chancellor – Education & Research	Deputy Pro Vice Chancellor - Education	Education Strategy and the role of apprenticeships within it; drive the culture, practice and outcomes of academic excellence; oversight and direction of academic policy
Pro Vice Chancellors (faculties) and the Director of MK:U	Directors of Theme	Strategic development and delivery of their apprenticeship portfolios
Chief Operating Officer	Directors of Professional Services	Delivery of services in support of the delivery apprenticeship provision and in support of apprentices and employers
Chief Strategy Officer & University Secretary	Deputy Safeguarding Leads	Safeguarding policy and its operation and effectiveness
Senate	Education Committee	Regulation of all of the academic work of the University; assurance of compliance with Office for Students conditions of registration, Ofsted expectations and any other academic regulatory requirements which may be in force from time to time
Education Committee	Apprenticeships Quality Group	Upkeep and development of academic policies and rules; validate apprenticeship courses; oversight and continuous improvement of teaching quality; oversight of apprentice progression, achievement, and experience
Directors of Education	Course Directors	Design, quality assurance and continuous improvement of their apprenticeship portfolios

Course Directors	Module leaders	Design, delivery and continuous improvement of their apprenticeship course
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The diagram below outlines the governance structure and reporting lines for apprenticeship provision at Cranfield University, and will also be used to quality assure the subcontracted provision.



Internal Subcontractor Policies

Subcontractors at a minimum must be required to have the following policies in place:

- Data protection (GDPR compliant)
- Health and safety
- Equal opportunity/Equality and Diversity
- Learner Health, Safety & Welfare
- Quality Assurance
- Safeguarding and Prevent
- Risk management and business continuity policies
- Employment law and appeals
- Confirmation that the subcontractor has not engaged the '[Funding higher risk organisations and subcontractors policy](#)'

Funding and Fees

Cranfield University will pay the subcontractor for the agreed delivery of its training and assessment services. Fees and charges will be agreed prior to any provision commencing, and Functional Skills funding will be claimed via the ILR and is not paid from employers' levy accounts.

2026/2027 Subcontracting Fees:

Apprentices	Estimated Volume (variable depending on programme starts)	Unit Price	Total
Delivery of Functional Skills English	10	£724.00	£7240
Delivery of Functional Skills Maths	10	£724.00	£7240
		Total Value	£14,480

The estimated volume of learners receiving functional skills training will vary depending on each new programme intake.

Policy Review

This policy will be reviewed annually and updated as required to reflect changes in funding regulations, guidance and University practice.

Appendix A

Subcontracting Arrangements Register

Cranfield University will maintain a register of all apprenticeship subcontracting arrangements.

The register will include:

Section	Information Required	Details / Response
Provider Information	Organisation name	
	UKPRN (where applicable)	
	Contract period	
	Cranfield contract owner	

Apprenticeship Provision	Apprenticeship programme(s) supported	
	Description of subcontracted activity	
	Number of apprentices supported	
Rationale for Subcontracting	Reason for subcontracting	
	Evidence of specialist expertise/capability	
Quality Assurance and Overs	Due diligence completion date	
	Monitoring arrangements	
	Key performance indicators (KPIs)	
	Review dates and schedule	
	Identified risks and mitigations	
Compliance Confirmation	Safeguarding arrangements in place	☐ Yes ☐ No
	Prevent arrangements in place	☐ Yes ☐ No

	Appropriate insurance held	☐ Yes ☐ No
	Data protection compliance confirmed	☐ Yes ☐ No
	Equality, Diversity and Inclusion policy in place	☐ Yes ☐ No
	Business continuity arrangements in place	☐ Yes ☐ No
Financial Information	Total contract value (£)	
	Funding retained by Cranfield University (£ / %)	
	Funding paid to subcontractor (£ / %)	
	Rationale for retained funding	
Approvals	Completed by	
	Date completed	

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