



Subcontracting Policy

Version: 6.00
Status: Final
Date: 09/10/2025

Subcontracting Policy

Approval History

Version	Date	Name
1.00	14/05/2018	Senior Leadership Team
2.00	28/04/2020	Advanced and Higher Apprenticeships Quality Monitoring Committee
3.00	7/11/2022	Senior Leadership Team
4.00	30/10/2023	Senior Leadership Team
5.00	29/10/2024	Senior Leadership Team
6.00	29/10/2025	Senior Leadership Team

Subcontracting Policy

Table of Contents

Contents

Subcontracting Policy	<i>i</i>
Approval History	<i>i</i>
Table of Contents	<i>ii</i>
1. Introduction	<i>1</i>
2. Purpose	<i>2</i>
3. Scope	<i>2</i>
4. Rationale for Subcontracting	<i>2</i>
5. DfE compliance	<i>3</i>
6. Risk management	<i>3</i>
7. Subcontractor Selection	<i>3</i>
8. Due Diligence	<i>4</i>
9. Subcontractor Appointment	<i>5</i>
10. Safeguarding and Prevent	<i>5</i>
11. Quality Assurance	<i>5</i>
12. Performance Management	<i>6</i>
13. Subcontractor support	<i>6</i>
14. Management Fee	<i>7</i>
15. Payment Terms	<i>7</i>
16. External Audit	<i>8</i>
17. Publication of subcontract activity and data	<i>8</i>
18. Policy Communication	<i>8</i>
19. Policy Review	<i>8</i>

Subcontracting Policy

1. Introduction

The University of the Built Environment is the leading specialist university for construction, real estate, planning, architecture, and sustainability, with over 105 years' experience of providing the highest quality learning opportunities to professionals.

We offer flexible, professionally focused online degrees, apprenticeships, and training, designed to fit around work and life. Our architecture master's is delivered through studio-based learning in London. As part of its apprenticeship offer, the University may seek to engage the services of subcontract training providers.

The University's approach to subcontracting is based on and derived from its strategic objectives, as everything the University does is influenced by its core values which are:

PASSION: We care

- We want each and every one of our students to succeed.
- We do the right thing by our students and customers. That means we do whatever we can to ensure that no student falls behind in their studies, and that no customer is unhappy with the service they receive.

SUPPORT: We support and respect each other

- At the University of the Built Environment, each member of staff does everything they can to help other staff and students to achieve their goals.
- We respect others and their opinions, we are open to ideas, we trust each other.
- We promote a supportive working environment across the University, that extends to our students.
- We value and reward each individual's skills, working towards common goals with shared objectives and through collaborative practice.

EXCELLENCE: We aim high

- High standards drive everything we do.

Subcontracting Policy

- We deliver excellence, strive for continuous improvement, and respond dynamically to change. Each one of us is personally responsible and accountable for the quality of whatever we do. We listen to our students and understand their expectations. We strive to exceed their expectations in quality and delivery.

INTEGRITY: Fairness First

- We model integrity in everything we do.
- We never compromise on honesty or trustworthiness. We adhere closely to all laws and compliance standards. We do what we say we will do and fulfil our promises to staff and students.

2. Purpose

As a holder of Department for Education (DfE) contracts for levy-funded and non-levy funded apprenticeship education and training, the University of the Built Environment is required to publish a supply chain fees and charges policy on its website.

The purpose of this document is to provide transparency for all stakeholders and/or interested parties regarding policy, process and support relating to subcontracted provision funded through the apprenticeship education and training contracts that the University holds with the DfE.

3. Scope

This policy applies to all subcontracted supply chain apprenticeship education and training activity that is funded via the DfE or any successor organisation.

4. Rationale for Subcontracting

The University of the Built Environment recognises that effective subcontracting in relation to its apprenticeship programmes can enhance its offer to learners and employers. In light of this, the University may from time to time, engage with subcontractors:

- to support the highest quality of delivery and learner experience for specialist aspects of apprenticeship education and training: for example, the delivery of functional skills qualifications or specialist technical skills
- to meet the needs of employers

5. DfE compliance

All subcontracting activity shall be in full compliance with DfE funding rules and policy intent.

6. Risk management

The management of University of the Built Environment subcontractors will be 'risk based'.

The University is committed to early identification and mitigation of risk within its supply chain, this is demonstrated by its processes which ensure that all subcontractors are:

- required to pass a robust initial due diligence process before a Contract for Service is issued;
- managed through a process of regular quality and performance monitoring reviews and audits together with annual due diligence checks;
- where applicable, required to prepare and implement underperformance recovery plans in an agreed time frame.

All subcontractors are risk assessed as a function of the initial and annual due diligence processes; existing subcontractor performance is routinely monitored against the performance standards set out and agreed in the Contract for Services and through quality assurance activities as laid out in this document.

The frequency and scope of the monitoring and audit activity undertaken by the University is determined by the risk rating given to a subcontractor through the due diligence process.

7. Subcontractor Selection

All procurement for goods/services and works across the University of the Built Environment shall be carried out in accordance with legal requirements, financial regulations, our regulators requirements and the University's Procurement Policy. In addition, all procurement must align with our commitment to responsible and ethical procurement as detailed in the [Sustainability Strategy](#).

The University of the Built Environment approach to subcontractor selection will be determined by the circumstances under which it has been identified that subcontracting is the preferred route. The procurement process will be compliant with our Procurement Policy and may include:

Subcontracting Policy

- identification of a potentially suitable subcontractor (or subcontractors) by the University;
- identification or nomination of a potentially suitable subcontractor by an employer; or
- open tender.

The selection process shall assess each potential subcontractor's suitability, capacity, and capability through the initial due diligence process and will follow the DfE funding rules related to the selection of a suitable subcontractor as well as the University's Procurement Policy.

8. Due Diligence

The University of the Built Environment will undertake due diligence as part of the selection of subcontractors and as part of annual monitoring processes.

Initial due diligence is focused upon compliance with the following:

- organisation legal status;
- financial and management checks;
- existing DfE contracts held;
- be on the Apprenticeship Provider and Assessment Register (APAR);
- capability and capacity to deliver required services;
- safeguarding and Prevent regulations;
- health and safety arrangements and records;
- equality and diversity regulations;
- quality assurance;
- learner guidance and support;
- data protection and information security regulations;
- environment and sustainability regulations;
- anti-bribery and corruption regulations;
- professional and business standing;
- references.

Subcontracting Policy

The above is reviewed as part of annual monitoring processes and each subcontractor is required to complete an annual due diligence update questionnaire.

9. Subcontractor Appointment

Appointment of a subcontractor shall only be made through a legally binding Contract for Services. The Contract for Services must be in place and signed by both parties before any subcontracted delivery takes place. The Contract for Services shall specify the terms and conditions (including DfE funding rule requirements) and shall include appendices setting out financial values, financial performance requirements and minimum standards of delivery requirements. The University of the Built Environment reserve the right to claw back funds from the subcontractor in the event of under delivery or any other eventuality resulting in the recovery of funds by the DfE.

10. Safeguarding and Prevent

The University of the Built Environment is committed to the safeguarding of learners and compliance with the Prevent agenda. As such, safeguarding of learners and the Prevent agenda are key features of its due diligence process, Contract for Services and quality and performance monitoring processes.

The University will work with and support its subcontractors to ensure that safeguarding and Prevent arrangements are robust across the range of provision/services being delivered.

11. Quality Assurance

The University of the Built Environment, as the main provider and DfE contract holder has full responsibility for the quality of all aspects of every apprenticeship. The University will carry out formal assessments of the delivery undertaken by each of its subcontractors through:

- desk based annual quality review which supports the annual due diligence process and examines the subcontractor's own quality assurance arrangements.
- quality review panel undertaken between two and four times a year as outlined in the Subcontracting quality assurance procedure.
- online and/or face to face observations of any delivery activity.

Subcontracting Policy

The University is committed to improving the quality of all provision funded through its DfE contracts and will work with and support its subcontractors to ensure continuous improvements are put in place across the range of provision/services being delivered.

12. Performance Management

The University of the Built Environment will manage the performance of its subcontractors through:

- contract value review – We will review the predetermined contract values with the subcontractor at regular contract review meetings. Volumes may be revised or withdrawn if the Subcontractor fails to meet key performance targets or if the DfE funding is reduced and/or if an overspend is anticipated.
- accuracy and timeliness of data – We will review the accuracy and timeliness of data in accordance with the data collections framework set out in the “Specification of the Individualised Learner Record” appropriate to the applicable funding year.
- minimum standards – the subcontractor must achieve the standards set out in the Contract for Services. Performance against minimum standards will be reviewed regularly at contract review meetings and interventions taken as appropriate.

The frequency of contract review meetings shall initially be determined by the risk rating given to the subcontractor at initial due diligence review. A low-risk subcontractor would require quarterly contract review meetings. As can be seen in the “Risk Statement & Process Guide”, the University works to a low appetite for risk model and therefore would not contract with a medium/high-risk rated subcontractor.

Should an existing subcontractor fail to meet minimum standards laid out in the Contract for Services and therefore fall into a medium/high-risk category, the University would follow its standard Risk Statement & Process Guidelines to manage the risk.

13. Subcontractor support

The University of the Built Environment acknowledges that it has a responsibility to support its supply chain to deliver high quality provision/services to all learners and employers. The support offered will typically include:

Subcontracting Policy

- designated contract manager;
- enrolment and learner file template documentation;
- safeguarding and Prevent training and support;
- technical support to ensure that programmes are set up correctly and data input is correct;
- regular performance updates against agreed measures of success;
- monthly live learner reviews;
- observation of teaching, learning and assessment;
- compliance audit (funding rules and contract).

The frequency of support provided may increase relevant to the risk level and the specific requirements of the contract.

14. Management Fee

The University of the Built Environment does not currently charge a management fee and instead passes on the full value of funding received to the subcontractor. This ensures the whole funding amount contributes to high quality educational provision by the subcontractor.

15. Payment Terms

Payments will be made by the University of the Built Environment to the subcontractor according to the schedule for payments identified in the Contract for Services. Such payments will be made in accordance with the DfE Apprenticeship Funding Rules, on condition that the subcontractor delivers the services in accordance with the terms and conditions of the contract for services.

All charges equate to the total funding value received from the DfE, per qualification. The subcontractor will invoice for the charges at the end of each month for services performed during that month. The University shall settle each valid invoice submitted within 30 days.

Where funding evidence requirements have not been fully met, delivery has not been undertaken and/or funding criteria or methodology has changed, the University may suspend, recover and/or offset future funding payments to the subcontractor to mitigate the risk to public funds.

16. External Audit

In accordance with DfE funding rule requirements, the University of the Built Environment will appoint an external auditor if the total of apprenticeship contracts with delivery subcontractors will exceed £100,000 in any one financial year. The auditor will be asked to determine if the University's arrangements to manage and control its delivery subcontractors are sufficiently robust.

The auditor will be asked to provide a written report, which will be presented to the audit committee, and where the audit report provides satisfactory assurance, the auditor will be asked to provide a signed certificate confirming this.

17. Publication of subcontract activity and data

For each funding year the University of the Built Environment will report subcontracted delivery to the DfE as required.

18. Policy Communication

The policy is published on the University of the Built Environment website.

The policy will be communicated to potential subcontractors as part of the procurement process and shall be subsequently discussed with appointed subcontractors as part of the contract review process.

19. Policy Review

The policy will be reviewed on an annual basis by the Director of Apprenticeships and the Academic Quality Unit (AQU). The University of the Built Environment reserves the right to undertake a review at any time in response to material changes in the funding and or business landscape, including but not limited to, changes in government policy and/or funding.