Quality Procedures and Policies	CEN-007	**Issue Number**	3
		Issue Date	October 2026
Subcontracting		**Originator**	Julie Gough
		Amended by	Peter Hurlstone
		Approved by	Julie Gough

1. Purpose
This policy sets out the principles, controls, and procedures governing the subcontracting of education and training provision delivered on behalf of SETA Ltd. under Department for Work & Pensions (DWP) funded programmes.

The policy aims to:

- *Ensure that subcontracting arrangements add value to learners, employers, and stakeholders*
- *Maintain high standards of quality, compliance, and learner outcomes*
- *Ensure public funds are used appropriately and transparently*
- *Provide a framework for selecting, monitoring, and managing subcontractors*
- *Mitigate financial, operational, safeguarding, and reputational risks*

2. Scope
This policy applies to:

- *All DWP funded contracts and programmes where delivery is subcontracted*
- *All staff involved in procurement, contract management, quality assurance, compliance, safeguarding, and finance*
- *All subcontractors engaged to deliver learning, assessment, employer engagement, or learner support services*

3. Definition
The 2026/2027 UK Government Apprenticeship Funding Rules defines the term Subcontracting as:
'Subcontracting is now only related to the delivery of training'

4. Principles
SETA only engages in subcontract training where there is a clear and demonstrable benefit, including:

- *Access to specialist expertise or sector-specific knowledge*
- *Delivery in geographical areas not directly served by the organisation*
- *Improved access for disadvantaged or underrepresented groups*
- *Enhanced learner experience and outcomes*

Subcontracting is not used solely to generate income without providing effective management, oversight, and support.

SETA retains responsibility for curriculum planning, quality assurance, assessment decisions, internal quality assurance, learner progress monitoring and compliance with awarding organisation requirements.

SETA remains fully accountable for the quality, funding compliance, learner experience, safeguarding arrangements and outcomes of all subcontracted provision regardless of delivery undertaken by a subcontractor.

Subcontracting arrangements will be agreed with employers of Apprentices when training and/or assessment is delivered as part of an Apprenticeship Standard.

5. Due Diligence
Before entering any subcontracting arrangement, SETA undertakes a robust due diligence process, including:

Financial Assessment
- *Review of financial accounts and viability*
- *Credit checks where appropriate*
- *Assessment of financial business standing*

Quality Assessment
- *Review of Ofsted inspection reports and performance data where appropriate*
- *Achievement and retention rates where applicable*
- *Staff qualifications and capability*

Compliance Assessment
- *Data protection arrangements*
- *Safeguarding and PREVENT compliance*
- *Equality, Diversity and Inclusion (EDI) policies*
- *Health and safety arrangements*
- *Insurance cover*

Legal Assessment
- *Verification of company registration/UKPRN*
- *Right-to-work and employment status checks*
- *Confirmation of necessary Licences and registrations*

Each subcontractor will have a due diligence check via an 'Individual Subcontractor Due Diligence Checklist' **(Please See Annex A)**. This will be carried out by a member of the Management team and a copy kept with HR.

6. Selection and Approval
All subcontractors are approved through SETA's procurement and governance processes. Approval decisions considered are:
- *Capability and capacity to deliver*
- *Track record of quality performance*
- *Financial robustness*
- *Alignment with organisational values*
- *Ability to meet DWP funding requirements*
- *Safeguarding and PREVENT checks*
- *Employer consultation and approval*

Final approval is granted by the Chief Executive Officer or delegated authority, such as the Board of Trustees.

7. Contractual Arrangements
A legally binding written subcontract agreement is in place before delivery commences. Contracts shall include:
- *Reference to this policy*
- *Scope of delivery*
- *Funding arrangements and payment schedules*
- *Performance expectations and key performance indicators (KPIs)*
- *Compliance obligations*
- *Data protection requirements*
- *Safeguarding responsibilities*

- *Audit and monitoring rights*
- *Termination provisions*
- *Dispute resolution arrangements*

8. Management Fees
Fee's charged by SETA will be:
- *Transparent*
- *Evidence-based*
- *Proportionate to services provided*

Services can include:
- *Quality assurance*
- *Compliance monitoring*
- *Data management*
- *Staff development*
- *Contract management*
- *Audit activity*
- *Learner performance tracking*

The rationale for management fees will be documented and available upon request **(Please See Annex B)**.

9. Quality Assurance
SETA maintains oversight of all subcontracted provisions through:
- *Regular performance reviews*
- *Learner feedback*
- *Observation of teaching, learning, and assessment*
- *Quality audits*
- *Achievement and progression monitoring*
- *Improvement planning where required*

Subcontractors participate fully in all quality assurance activities, and are subject to the following policies as required:
- *COM-009 - Teaching and Learning Audits*
- *COM-007 - EAL-Enginuity Qualification Assessment and Internal Quality Assurance*
- *COM-019 - City and Guilds Qualification Assessment and Internal Quality Assurance*
- *COM-020 - CompEx Qualifications Assessment and Internal Quality Assurance*
- *COM-002 - Pearson Qualifications Internal Quality Assurance*

10. Safeguarding and Learner Welfare
Subcontractors must:
- *Maintain effective safeguarding policies and procedures*
- *Comply with PREVENT duty requirements*
- *Report safeguarding concerns immediately*
- *Ensure staff receive appropriate safeguarding training*
- *Promote learner wellbeing and welfare*

Any significant safeguarding incident must be reported to SETA without delay.

Employers and learners will be informed where any aspect of their programme is delivered by a subcontractor and will be provided with details of the respective responsibilities of each organisation.

All subcontractor staff with learner contact must hold appropriate DBS clearance and complete safeguarding and Prevent training in accordance with SETA requirements.

11. Data Protection
All subcontractors must comply with the Data Protection Act 2018/UKGDPR legislation and organisational requirements. Subcontractors shall:

- *Process learner data lawfully*
- *Maintain secure systems*
- *Report data breaches immediately*
- *Cooperate with audits and information requests*

Appropriate data-sharing agreements are in place.

12. Monitoring and Audit
SETA reserves the right to undertake:

- *Scheduled audits*
- *Unannounced visits*
- *Financial checks*
- *Documentation reviews*
- *Learner file sampling*
- *Compliance checks*

Subcontractors must provide access to records, staff, learners, and systems as required.

13. Risk Management
SETA maintains a risk-based approach to subcontractor management. Risks monitored include:

- *Financial instability*
- *Poor learner outcomes*
- *Regulatory non-compliance*
- *Safeguarding and PREVENT concerns*
- *Data security breaches*
- *Reputational damage*

Higher risk subcontractors will be subject to increased oversight.

14. Conflict of Interest
All staff involved in subcontractor selection or management will declare actual, potential, or perceived conflicts of interest. This will be carried out by a member of the Management team, who in turn will complete a 'Subcontractor Declaration of Interests Checklist' **(Please See Annex C)**, which will be kept with HR.

Any identified conflicts are managed appropriately.

15. Termination
Subcontracting arrangements may be terminated where:

- *Contractual obligations are breached*
- *Quality standards are not achieved*
- *Funding rules are breached*
- *Safeguarding and/or PREVENT concerns arise*
- *Financial viability is compromised*

Appropriate learner protection arrangements are implemented where termination of subcontracting is necessary.

16. Responsibilities

Board of Trustees

- *Provide strategic oversight*
- *Approve subcontracting arrangements where required*
- *Monitor subcontracting risks*

Chief Executive Officer

- *Ensure policy implementation*
- *Approve subcontracting strategy*
- *Monitor organisational compliance*
- *Share Individualised Learner Record (ILR) data returns with the Subcontractor where required*
- *Produce, publish and maintain a:*
    - *Subcontracting Statement* ***(Please See Annex D)***
    - *Subcontracting Rationale Statement* ***(Please See Annex E)***
    - *Subcontracting Management Fee Schedule* ***(Please See Annex B)***

Managers involved in Subcontracting Arrangements

- *Manage subcontractor performance*
- *Conduct monitoring activities*
- *Escalate risks and concerns*

Subcontractors

- *Meet contractual obligations*
- *Comply with DWP funding rules*
- *Deliver high-quality learner outcomes*
- *Must maintain a business continuity and disaster recovery plan to ensure continuity of learner provision*

Where apprenticeship training is subcontracted, SETA will ensure that all subcontracted training complies with current Apprenticeship Funding Rules and that the subcontractor only delivers activity permitted under those rules.

17. References

UK Government

Apprenticeship Funding Rules August 2026 to July 2027 Version 3
https://www.gov.uk/government/publications/apprenticeship-funding-rules-and-assessment-plan-guidance-2026-to-2027

Department for Work & Pension
https://www.gov.uk/government/organisations/department-for-work-pensions

Counter Terrorism Policing

PREVENT
https://www.counterterrorism.police.uk/what-we-do/counter-terrorism/prevent/

18. Review, Publishing and Transparency

This policy is:

- *Reviewed ahead of each funding year by the Chief Executive Officer*
- *Published by 31st October of the new academic year and a statement made available on SETA's website accordingly*
- *Made available to stakeholders upon request*
- *Discussed with the Board of Trustees*

Individual Subcontractor Due Diligence Checklist

This form is to be used to collate and assess information about potential subcontractors. This must be updated annually for those subcontractors with a continuing contract or whenever there is a material change in the contractors business. For an individual freelancer/sole trader, complete both the person-level and business-level checks.

Field	Details *(Please read and refer to the specification for this subcontract)*
Proposed subcontractor / individual	
Trading name / legal entity name	
Co. Number	
Registered Address	
APAR status / route	
Email	
Phone Number	
Proposed apprenticeship standard(s) and unit	
Expected delivery hours	
Expected annual contract value	£
Total value of the contractors DfE/DWP funded delivery contracts this funding year – this must include any commitments awaiting signature	Apprenticeships £ Other funded (specify) £
Total value of all commitments including SETAs	£ Days
Lead SETA manager	

Individual Subcontractor Due Diligence Checklist

Date of Check		Assessment Lead Name		
Area	**Check**	**Evidence**	**Outcome – has the evidence been provided**	**Assessment conclusion and comments (Please include any information required by the check. The assessment lead must describe HOW the check confirms the outcome**
Status and eligibility	Confirm the arrangement is subcontracting: a separate legal entity or individual (not an employee) is being paid to deliver apprenticeship training.	Evidence of contracting model / HR status review	☐ Yes ☐ No ☐ N/A	
Status and eligibility	Current UKPRN confirmed.	UKRLP search / screenshot	☐ Yes ☐ No ☐ N/A	
Status and eligibility	APAR status checked. If not on APAR, confirm the de-minimis route applies: aggregate apprenticeship subcontracted delivery across all providers is under £100,000 for the funding year, the subcontractor has a current UKPRN, has not engaged the higher-risk policy and will not deliver a full apprenticeship standard.	APAR / declarations / written confirmation	☐ Yes ☐ No ☐ N/A	
Status and eligibility	Check published list / declaration information to confirm and other subcontract relationships and aggregate exposure.	Search record / declaration	☐ Yes ☐ No ☐ N/A	
Higher-risk checks	Assess against the current Funding higher risk organisations and subcontractors policy.	Completed risk review	☐ Yes ☐ No ☐ N/A Notes:	
Financial / business standing	Identity and legal status verified (photo ID for individual; Companies House / sole-trader evidence as applicable).	ID / registry evidence	☐ Yes ☐ No ☐ N/A Notes:	
Ownership / governance	For an organisation, current ownership, ultimate parent and persons with significant control are verified; for an individual/sole trader, identity, trading status and ownership of the business are clear.	Companies House / PSC search / ID / declaration	☐ Yes ☐ No ☐ N/A Notes:	
Ownership / governance	Principal activities, past and present, professional/commercial affiliations and any other subcontracting relationships are understood.	CV / business profile / declarations / references	☐ Yes ☐ No ☐ N/A Notes:	

Individual Subcontractor Due Diligence Checklist

Date of Check		Assessment Lead Name		
Area	**Check**	**Evidence**	**Outcome – has the evidence been provided**	**Assessment conclusion and comments (Please include any information required by the check. The assessment lead must describe HOW the check confirms the outcome**
Capability / systems	Capability to control quality, delivery, quantity, price, records and compliance is assessed, including quality-management arrangements.	Selection assessment / systems evidence / interview	☐ Yes ☐ No ☐ N/A Notes:	
Financial / business standing	Financial capacity and continuity risk assessed proportionately to contract size and dependency.	Accounts / bank reference / credit check / management accounts	☐ Yes ☐ No ☐ N/A Notes:	
Financial / business standing	Current/latest financial health and credit position reviewed; any adverse change has a documented mitigation.	Accounts / financial health assessment / credit report	☐ Yes ☐ No ☐ N/A Notes:	
Financial / business standing	No insolvency, winding-up, administration or overdue statutory filing concerns.	Companies House / declaration	☐ Yes ☐ No ☐ N/A Notes:	
Financial / business standing	Professional indemnity, public liability and employers liability insurance (where applicable) are adequate and in date.	Certificates	☐ Yes ☐ No ☐ N/A	
Financial / business standing	Tax / VAT status and invoicing details validated.	UTR/VAT/invoice details obtained as appropriate	☐ Yes ☐ No ☐ N/A	
Conflict / probity	Conflict-of-interest declaration completed, including common directors, family relationships, financial interests, gifts/hospitality and connected organisations.	Signed declaration	☐ Yes ☐ No ☐ N/A	
Conflict / probity	No member of provider staff with a direct or indirect financial interest will sign invoices/timesheets or carry out management control / monitoring.	Management allocation record	☐ Yes ☐ No ☐ N/A	
Conflict / probity	No brokerage arrangement; subcontractor will not subcontract training to a second level.	Signed declaration / contract clause	☐ Yes ☐ No ☐ N/A	

Individual Subcontractor Due Diligence Checklist

Date of Check		Assessment Lead Name		
Area	**Check**	**Evidence**	**Outcome – has the evidence been provided**	**Assessment conclusion and comments (Please include any information required by the check. The assessment lead must describe HOW the check confirms the outcome**
Reputation	Checks and declarations do not indicate any activity, affiliation, stated views which conflict with SETAs values or are in any way incompatible with SETAs legal duties or operating principles	Social media search /interview with subcontractor	☐ Yes ☐ No	
Extremism / Prevent	Checks and declarations support the provider's duty not to inadvertently fund extremist organisations.	Due diligence / Prevent declaration / contract	☐ Yes ☐ No	Describe social media search outcomes
Quality / capacity	Relevant Ofsted history considered where applicable; any themes are understood and mitigated.	Ofsted report / rationale	☐ Yes ☐ No ☐ N/A Notes:	
Quality / capacity	Evidence of recent high-quality teaching/training in the occupational area.	Observation, references, learner/employer feedback	☐ Yes ☐ No ☐ N/A Notes:	Include latest feedback obtained during the year in this file
Quality / capacity	Qualifications, occupational competence, industry currency and CPD are sufficient for the standard and delivery allocated.	CV, certificates, CPD	☐ Yes ☐ No ☐ N/A Notes:	Include CV, required certificates for technical and teaching skills
Quality / capacity	Capacity is sufficient: time, caseload, availability, equipment, premises, digital capability and contingency cover.	Capacity statement	☐ Yes ☐ No ☐ N/A Notes:	Include description of how the contractor is assuring SETA that their time is available
Business continuity	Business continuity/contingency arrangements are proportionate and support continuity if the individual is unavailable or the subcontractor fails.	Continuity plan / key-person contingency	☐ Yes ☐ No ☐ N/A Notes:	How will their delivery be covered in any emergency absence
Quality / capacity	Can provide evidence required for provider SAR / quality assurance and participate in observations, sampling, learner interviews and short-notice checks.	Signed confirmation	☐ Yes ☐ No ☐ N/A Notes:	
Safeguarding / people	Identity, right-to-work and references completed.	Evidence file	☐ Yes ☐ No ☐ N/A Notes:	

Individual Subcontractor Due Diligence Checklist

Date of Check		Assessment Lead Name		
Area	**Check**	**Evidence**	**Outcome – has the evidence been provided**	**Assessment conclusion and comments (Please include any information required by the check. The assessment lead must describe HOW the check confirms the outcome**
Safeguarding / people	Appropriate DBS check completed where legally/contractually required; level and barred-list check match the activity.	DBS evidence / risk assessment	☐ Yes ☐ No ☐ N/A Notes:	
Safeguarding / people	Safeguarding training completed before unsupervised delivery; local safeguarding procedures and DSL route understood.	Certificate / induction record	☐ Yes ☐ No ☐ N/A Notes:	
Safeguarding / people	Prevent training completed and provider Prevent arrangements understood.	Certificate / induction record	☐ Yes ☐ No ☐ N/A Notes:	
Safeguarding / people	Equality, Diversity and Inclusion (EDI) policies in place and training completed	Certificate/Induction record Policies	☐ Yes ☐ No ☐ N/A Notes:	
Safeguarding / people	Health and Safety policies in place and training completed. Risk assessment's in place and training completed	Certificate/Induction record Policies/Risk assessments	☐ Yes ☐ No ☐ N/A Notes:	
Data / information	GDPR, confidentiality, cyber security, acceptable use and records-retention requirements understood.	Training / declaration	☐ Yes ☐ No ☐ N/A Notes:	
Data / information	Data-sharing / processor arrangements in place where personal data will be processed.	DPA / data map	☐ Yes ☐ No ☐ N/A Notes:	
Delivery controls	Employer has agreed use of subcontractor; provider remains relationship lead.	Employer agreement	☐ Yes ☐ No ☐ N/A Notes:	
Delivery controls	Training to be subcontracted is clearly defined; provider's own direct delivery has substance and is not tokenistic.	Delivery model / training plan	☐ Yes ☐ No ☐ N/A Notes:	
Delivery controls	Learners will know provider and subcontractor roles and how to raise concerns / complaints.	Induction materials	☐ Yes ☐ No ☐ N/A Notes:	

Individual Subcontractor Due Diligence Checklist

Date of Check		Assessment Lead Name		
Area	**Check**	**Evidence**	**Outcome – has the evidence been provided**	**Assessment conclusion and comments (Please include any information required by the check. The assessment lead must describe HOW the check confirms the outcome**
Commercial	Price and payment basis are reasonable, proportionate and linked to eligible training delivery; management/QA charges are itemised.	Cost model	☐ Yes ☐ No ☐ N/A Notes:	
Selection / procurement	A clear specification, documented selection/procurement route and scoring rationale demonstrate fair, transparent selection and value for money.	Specification / procurement record / scoring matrix / approval	☐ Yes ☐ No ☐ N/A Notes:	
Selection / procurement	Successful subcontractor is entered on the provider's approved subcontractor list/register with review and expiry dates.	Approved supplier/subcontractor register	☐ Yes ☐ No ☐ N/A Notes:	
Commercial	Contract value and total subcontracting position checked against the 25% exemption threshold and £100k subcontracting-standard threshold.	Funding / declaration analysis	☐ Yes ☐ No ☐ N/A Notes:	
Approval	Due diligence outcome approved by authorised manager / governance route before delivery starts.	Signed approval	☐ Yes ☐ No ☐ N/A Notes:	

Overall assessment	**Risk Profile**	**Approve / Approve with actions / Do not approve**
Key conditions / actions required to manage risk exposure through this contract :	☐ High ☐Medium ☐ Low	☐Approve ☐Approve with actions – see below ☐ Do not approve

Subcontracting Management Fee Schedule

Provider: SETA Ltd.
Reporting Year: 2026/27
Applicable Funding Streams: DWP Funded Programmes

1. Management Fees
Management fees are retained by SETA to cover the costs associated with managing, supporting, monitoring, and assuring the quality of subcontracted provision.

Management fees are calculated based on the level of support and oversight required and reflect actual services provided, and will be set within Schedule 2.2 of individual subcontracting agreements.

2. Typical Management Fee
The standard management fee is:

- *7% to 12% of funding received for subcontracted provision*

The actual fee applicable to each subcontractor may vary depending on:

- *Scale and complexity of delivery*
- *Risk profile of the subcontractor*
- *Funding stream requirements*
- *Quality and compliance history*
- *Volume of learners*

Management fees are assessed on a case-by-case basis. In certain circumstances, SETA may choose not to apply a management fee.

3. Services Provided
The fee contributes towards the following services:
Contract Management

- *Contract negotiation and administration*
- *Performance review meetings*
- *Monitoring of delivery targets*
- *Risk management*

Quality Assurance

- *Observation of teaching, learning, and assessment*
- *Internal quality assurance activities*
- *Learner surveys and feedback analysis*
- *Self-assessment and quality improvement planning*

Compliance Monitoring

- *Funding rule compliance checks*
- *Learner file audits*
- *Evidence sampling*
- *Preparation for external audits and inspections*

Data Management

- *Individual learner record monitoring*
- *Data validation*
- *Performance reporting*
- *Management information services*

Subcontracting Management Fee Schedule

Safeguarding and Prevent

- *Policy review and monitoring*
- *Incident reporting oversight*
- *Safeguarding audits*
- *Prevent compliance monitoring*

Staff Development

- *Access to training and continuing professional development*
- *Briefings on funding and compliance updates*
- *Quality improvement support*

Financial Administration

- *Processing payments*
- *Financial reconciliation*
- *Funding claim management*

Example Fee Allocation

Activity	Indicative Allocation
Contract management	1%
Quality assurance	3%
Compliance monitoring	2%
Data management	2%
Safeguarding and PREVENT	2%
Staff development and support	2%
Financial administration	0%
Total	**12%**

Percentages are indicative and may vary according to the nature and level of support provided.

4. Transparency

Prior to contract award, all subcontractors will receive:

- *Details of the fee applicable to their agreement*
- *A description of the services covered by the fee*
- *Information about monitoring and quality assurance arrangements*
- *A copy of the Subcontracting Policy and Subcontracting Rationale Statement*

5. Review

This fee schedule is reviewed annually by the Chief Executive Officer and approved by the Board of Trustees.

This Review Date: 01/09/2026
Last Reviewed: N/A
Next Review Date: 01/09/2027

Declaration of Interests – Subcontractor

Purpose

SETA requires all subcontractors to declare any actual, potential, or perceived conflicts of interest to ensure transparency and safeguard the integrity of our work. A conflict of interest may arise where personal, financial, or professional interests could compromise, or be seen to compromise judgement, independence, or ability to act in the best interests of SETA and its employers, apprentices, contractors, Trustees or staff.

By identifying and managing such conflicts, SETA protects its reputation, ensures compliance with legal and contractual obligations, and maintains the trust of clients, members, and stakeholders. Failure to declare and manage conflicts of interest could result in reputational damage, loss of stakeholder confidence, breaches of confidentiality or data protection, and potential legal or financial liabilities.

It is the Subcontractor's responsibility to ensure that SETA retains an up to date, signed and dated Declaration of Interests statement throughout the length of the contract. An updated Declaration must be submitted at any point where a new conflict of interest emerges. Blank Declaration of Interest forms can be obtained from the lead manager.

Definition of Relevant Interests

The definition of a relevant interest in the scope of this Subcontractor agreement with SETA includes (but is not limited to) current:

1. Current or past contractor or employment with SETA's employees, suppliers or contractors or other connected organisations.
2. Financial or business interests in organisations supplying goods or services to SETA or connected to SETA.
3. Governance, trustee, directors or senior executive or no executive position or advisory board position with organisations in the education, skills, or apprenticeship sectors.
4. Any personal relationships that may influence or be perceived to influence your work for SETA.
5. Any family relationships that would come within the scope of the points above list
6. Any gifts or hospitality received in the previous 12 months from any organisation within the scope of the above list

Declaration

☐I have no interests to declare ☐ I have interests to declare as set out in Table 1 overleaf

- I declare that the information given in this document is complete and correct to the best of my knowledge.
- I agree to notify SETA promptly and provide an updated Declaration of Interests form should a conflict of interest arise during my contract term.

Declared Interests

Subject of Declaration of Interest (Organisation or Individual)	Description of Subcontractor Interest	In relation to this declared Interest a description of any possible conflict OR a 'no conflict' statement with a rationale	Steps proposed by Subcontractor to manage any identified conflict (where identified)

FOR SETA COMPLETION - ensure that any action required by the subcontractor is included in their contract terms

☐ No conflict position agreed - compatible with engagement
☐ Conflict identified – not compatible with engagement
☐ Conflict identified – management plan agreed below:

Declaration of Interest Subject of Declaration of Interest	Description of Subcontractor Interest	Possible conflict	Steps required by SETA to manage any identified conflict where identified

Signed for and on behalf of SETA:

Name:

Signature:

Date:

Signed by the Subcontractor:

Name:

Signature:

Date:

Subcontracting Statement

Subcontracting of Training Provision
At SETA, our primary aim is to deliver high-quality education and training that meets the needs of learners, employers, and communities.

We will only subcontract training provision where it provides a clear benefit to learners and supports our strategic objectives. Subcontracting arrangements may be used to:

- *Provide specialist expertise or sector-specific knowledge*
- *Extend access to training in geographical areas where we do not directly operate*
- *Support disadvantaged, underrepresented, or hard-to-reach learners*
- *Enhance learner choice, experience, and outcomes*

We retain overall responsibility for the quality of all provision delivered on our behalf and ensure that all subcontractors are subject to robust due diligence, contract management, quality assurance, safeguarding, and compliance monitoring processes. Before appointing a subcontractor, we assess:

- *Financial stability and organisational capacity*
- *Quality and performance history*
- *Compliance with safeguarding, Prevent, data protection, equality and health and safety requirements*
- *Ability to meet funding and contractual obligations*

All subcontractors are monitored regularly through performance reviews, audits, learner feedback, and quality assurance activities to ensure that learners receive a consistently high standard of education and support.

Any fees charged reflect the actual costs incurred by SETA in the management, quality assurance, compliance monitoring, and support of subcontracted provision.

We are committed to transparency and ensuring that public funds are used effectively to maximise learner success and deliver value for money.

For further information regarding our subcontracting arrangements, please contact:

SETA Ltd.
First Avenue
Millbrook
Southampton
Hampshire
SO15 0LJ
Email: info@seta-training.co.uk
Telephone: (023) 8077 1908

Subcontracting Rationale Statement

Subcontracting Rationale
SETA is committed to providing high-quality education and training that delivers positive outcomes for learners, employers, and communities.

Our preferred approach is to deliver training directly wherever possible. However, we may subcontract provision where doing so provides a demonstrable benefit to learners and supports our strategic objectives.

Subcontracting may be used for one or more of the following reasons:

- *To access specialist sector expertise, knowledge, or facilities that are not available within our organisation*
- *To increase learner access in geographical areas where direct delivery is not practical*
- *To support employers requiring specialist training provision*
- *To engage learners from underrepresented, disadvantaged, or hard-to-reach groups*
- *To enhance learner experience, achievement, progression, and employment outcomes*
- *To respond flexibly to emerging local, regional, and national skills priorities*

When subcontracting provision, SETA remains fully accountable for:

- *The quality of education and training delivered*
- *Learner achievement and progress*
- *Compliance with funding requirements*
- *Safeguarding and learner welfare*
- *Data protection and information security*
- *Financial management and oversight*

All subcontractors are subject to a robust due diligence process before appointment and are monitored throughout the duration of any contract through quality assurance activities, performance reviews, compliance audits, learner feedback, and risk assessment processes.

Subcontracting is not used solely as a mechanism for generating income. All subcontracting arrangements must clearly demonstrate added value and tangible benefits for learners and employers.

Review
This statement is reviewed annually by the Chief Executive Officer and approved by the Board of Trustees.

This Review Date: 01/09/2026
Last Reviewed: N/A
Next Review Date: 01/09/2027