

Document title:	Subcontracting Policy	Owner:	Beverley Ellis, Operations Director
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This policy has been reviewed and approved by the Operations Director:			

1. Policy Statement

TRS Training Limited is committed to meeting the training needs and expectations of our employer partners. To achieve this, we recognise that it may be necessary to engage the services of local HGV providers. Additionally, we acknowledge that certain specialist providers can deliver highly valuable training for our learners—for example, the Transport Manager CPC offered by the RHA. For these reasons, we will consider subcontracting where it enhances the quality and relevance of our training provision.

2. Scope of Policy

All subcontracting decisions will adhere to the following principles:

- Align with TRS Training Limited's strategic objectives.
- Ensure fit-for-purpose delivery that prioritises learner and employer interests.
- Expand our provision where internal capacity is insufficient.
- Enable comprehensive employer-led solutions.
- Promote cost-efficiencies and economies of scale.
- Confirm sufficient internal resources to support subcontractors.
- Award contracts per DfE Funding Rules, ESFA Subcontracting Standard, and the Public Procurement Regulations 2015.
- Subject all subcontractors to due diligence approval.
- Validate availability of funding.
- Require demonstrable delivery timeliness and quality.
- Ensure all subcontractors enter formal contractual agreements.

3. TRS Values

3.1. This policy underpins our commitment to our values, with particular reference to:

- SPECIALISE – Utilising our vast experience and expertise in logistics to benefit learners and employers
- RESPOND – Listening to our customers, partners and stakeholders and being equipped to meet their changing needs
- PARTNERS – Developing sustainable partnerships where everyone involved benefits from the relationship
- QUALITY – Providing outstanding teaching, learning and customer service for all
- ACHIEVEMENT – Recognising and celebrating success with learners and staff
- DEVELOPMENT – Supporting continuous professional development for all staff

4. Implementation Principles

- 4.1. TRS will undertake fair and transparent procurement activities, conducting robust due diligence procedures on potential subcontractors to ensure compliance.
- 4.2. The funding allocated to the partner will depend upon the programme being delivered, the services that TRS will provide, and the level of activity TRS Training Limited needs to undertake to monitor the quality of the provision.
- 4.3. The management of subcontractors will be based upon the application of the risk principle. All subcontractors will be risk assessed and be given a risk rating. This rating will determine the risk so we can judge how often the sub-contractor needs to be monitored and how much support we need to give them in return.
- 4.4. Fees are set out in the Contract for Services agreement. Management fees are not charged for single qualification services.
- 4.5. The management fee covers the support provided to the Sub-contractor, which includes:
 - Funding and delivery advice or support
 - Quality monitoring and observations
 - Internal Training and sharing of best practice (sub-contractors will be invited to attend development days and other training that supports delivery or addresses emerging needs)
 - Enrolment form templates
 - Eligibility checks & audit compliance
 - Internal administration and enrolment validation
 - ILR input, validation checks and data submissions
 - Finance/invoice requirements
 - Management support - where identified through checks or initial risk assessment the sub-contractor will be supported by enhanced visits and checks

A higher fee may also be charged for programmes that require increased support, monitoring, audits and/or shared delivery from TRS but this will be agreed during the pre-contract discussions.

TRS reserves the right to set the management fee based on the level of additional support required by the subcontractor over and above the normal management, administration and quality requirements.

- 4.6. The Quality Team conduct regular reviews of delivery against profile and discuss issues/risks/concerns for providers of long-term subcontracted provision
- 4.7. Annual quality assurance will take place of short course subcontracted provision.
- 4.8. All Subcontractors will be required to supply TRS with all relevant information as documented in our staged due diligence process. This process is designed to ensure that all required financial, quality, legislative and policy checks are completed to a satisfactory level before any contractual agreements are signed.

4.9. TRS expects the subcontractor to work towards our levels of learner and employer engagement, learner feedback and continual course evaluation to ensure they are meeting the needs of the learner, and enabling them to progress or gain employment. TRS will undertake our own internal learner and employer voice monitoring as part of our quality assurance process.

4.10. The subcontractor will be expected to have in place appropriate Safeguarding, Equality, Diversity and Inclusion and Sustainability policies that are reviewed and monitored on a regular basis. They are also expected to have policies and processes in place to support the Prevent Programme and the Government's counter-terrorism strategy.

4.11. TRS will immediately terminate all contracts with a subcontractor if they are found to be using funding to support any terrorist or radicalisation activities and authorities will be notified accordingly.

4.12. TRS may undertake funding audits and announced and unannounced visits to check delivery and processes and will ensure that each member of the sub-contractor's staff is observed by a TRS Observer against Ofsted Inspection Framework, feeding back results and supporting any action plans.

4.13. All long-term subcontracted provision must be designed to include the following (as appropriate):

- An appropriate induction to the course
- A formal initial assessment process and appropriate IAG that allows learners and staff to identify what they want to achieve from the course
- It must identify support needs, eligibility for the funded course and progression routes/outcomes
- A detailed Individual Learning Plan that is reviewed at appropriate points to check targets and goals are being achieved
- Appropriate schemes of work and lesson plans
- Progression routes and job outcomes
- A timetable of teaching and learning observations
- Direct claim status for qualifications and external verification reports with no serious action points

4.14. The subcontractor will be issued with a schedule of provisional monitoring visits to ensure quality is being monitored against their risk rating. These visits will include, but will not be limited to, the following areas:

- Review meetings with TRS to go through their contractual requirements. This will include monitoring reports, timeliness of data returns, achievements and success rates.
- Review of delivery against targets
- Additional support requirements
- Audit checks and sampling of records for eligibility assurance (such as learners' attendance and progress monitoring)
- Observations
- Monitoring of Safeguarding, Equality, Diversity and Inclusion issues

TRS reserves the right to adjust the monitoring schedule in year to reflect any change in requirements due to under or over performance, or issues/risks that have arisen.

- 4.15. An annual audit will be undertaken with the sub-contractor to ensure compliance against the contract and the current funding rules and subcontracting guidance. TRS reserves the right to give short notice requests to do additional audits as and when appropriate.
- 4.16. TRS will provide quality and observation support to the subcontractor in line with existing internal processes. The sub-contractor will be offered:
 - Training (where required)
 - Resources and on-line tools.
 - Sharing of good practice
- 4.17. TRS will ensure timely reports are provided to the subcontractor which will include confirmation of the data submitted on the ILR returns, financial breakdown and success rate information.
- 4.18. Should TRS not be assured that any element in the contract or the subcontracting policy is being adhered to we reserve the right to implement procedures to deal with performance or non-compliance issues. If it is deemed necessary, TRS will issue a formal development plan for any immediate actions required and any long term changes to the contract. This may include additional controls, higher levels of support or short term stops on recruitment as appropriate. If the non-compliance issues are not resolved satisfactorily then TRS may withdraw the contract and act accordingly to recover funding.
- 4.19. TRS pays invoices within 30 days of receipt of the submitted invoice. In agreement with both parties, variations to the contract may be issued during the contract period. The variation may relate to agreed changes to the programme offer, the volumes of learners and funding available.
- 4.20. Subcontractor has a responsibility to report any concerns or incidents that they become of aware of in relation to learners or employers immediately, including health and safety, safeguarding, radicalisation, equality and diversity, dissatisfaction or wellbeing.
- 4.21. TRS will take responsibility for the management of the apprenticeship contract with the employer and the raising of any additional cohorts and requests for training. Recruitment to programmes must not be undertaken by the subcontractor without prior agreement.

5. Roles and Responsibilities

- 5.1. Directors are responsible for the approving the use of sub-contractors.
- 5.2. The Driving School Manager is responsible for:
 - Maintaining appropriate subcontractor checks and ensuring the due diligence process is followed
 - Ensuring (where appropriate) that subcontractors are on The Apprenticeship Provider and Assessment Register (APAR)
 - Ensuring subcontractors are aware of their contractual requirements, quality requirements, monitoring timeline and support available
 - Ensuring no conflict in delivery and the programme meets TRS Training Limited Strategic Objectives and values.
 - Ensuring that the funding is not used to support any extremist organisations or activities
 - The management of sub-contractor processes and performing quality checks

5.3. The Administration Team is responsible for:

- Ensuring contract paperwork is completed satisfactorily and requirements are met
- Providing subcontractor reports to monitor delivery in year

5.4. The Quality Manager / Curriculum Manager is responsible for:

- Monitoring the quality of teaching and learning activities and the validation of Observations.
- Ensuring subcontractor observation paperwork mirrors any internal validation changes
- Setting out the timetables and frequency of observations of Teaching and Learning for all subcontractors in relation to risk.
- Checking schemes of work and delivery methods.

6. Policy Monitoring and reporting arrangements

6.1. The policy and due diligence is assessed by the Board on an annual basis for it's relevance and effectiveness.

6.2. This policy is published on our website – www.trstrainingltd.com and is subject to annual reviews in line with academic and funding years.

7. Summary of Revisions

Version	Date	Revision
26-1	13/01/2026	Update policy statement to reflect our current reasons for subcontracting
26-1	13/01/2026	Updated to reflect change of responsibility to Driving Schools Manager
26-1	13/01/2026	Removal of Appendix – Due Diligence. Now available as a separate document
24-1	14/12/2024	Reviewed content and updated around subcontracting requirements and APAR
23-1	30/9/2023	Changed responsibilities as a result of a new role created of Funding and Compliance Manager
22-1	27/09/2022	Updated content to ensure the policy reflects ESFA Subcontracting Standard 2022
22-1	27/09/2022	Included the clause that organisations may be considered as a subcontractor even if they are not approved on RoATP in response to the ESFA relaxation announcement in July 2022
22-1	22/03/2022	Approved for use by Operations Director